



Nature's place in National Planning Framework 4

Summary

- Nature recovery is key to reaching net-zero and coping with the consequences of climate change.
- NPF4 will have a significant impact on Scotland's ability to meet its climate and biodiversity ambitions.
- The nature crisis must be given equal weight to the climate crisis.
- Much of the policy direction in NPF4 is welcome, although some key aspects fall short of the transformational approach required.
- Scottish Environment LINK has proposed a range of ways in which the draft Framework can be strengthened in order to meet the Scottish Government's stated ambitions.

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Scottish Environment LINK members welcome the draft NPF4's recognition of the role planning has to play in tackling the climate and nature crises. This is a vital signal to planners, communities and sectors across the economy that reaching net zero emissions and restoring nature is a central ambition of this government. LINK's full response to the NPF4 consultation is available [here](#).

Local Government, Housing and Planning Committee report

LINK members support the Committee's request for adequate time to consider any revised draft after consultation comments have been taken into account, particularly if there are significant changes.

We support the Committee's recommendation that more clarity is provided as to which policy areas should be prioritised in decision making. In particular, we support the Committee's recommendation that greater clarity is provided as to how the prominence given to the climate emergency in the NPF4 will be delivered against competing priorities. However, nature must be given the same weight to climate in decision making. **In particular we would like to see a clear delivery mechanism for nature networks and biodiversity enhancement.** NPF4 must ensure that other government priorities, including reaching net zero, do not unwittingly cause nature loss or undermine future biodiversity targets.

The Committee's call for better funding and resourcing of local authority planning departments echoes the concerns of our members, particularly around the capacity of planning departments to deliver on NPF4's ambitions to improve biodiversity. Capacity concerns in ecological and planning staff have been highlighted in a recent survey of Scottish Local Planning Authorities. Lack of enforcement staff to ensure compliance was also a big concern with two-thirds of respondents rating it as a high or very high risk to their LPA's ability to implement NPF4 and Positive Effects for Biodiversity.

Full cost recovery implies that funding for planning may be reliant on fee increases. We would urge that some funding is provided through other, public funding means, to ensure delivery of services is focused on public interest planning.



POLICY 2: CLIMATE EMERGENCY

LINK members strongly agree that addressing climate change and nature recovery should be at the heart of the planning system and decision making. We welcome that all planning decisions will be required to give significant weight to the climate emergency and to consider emissions across the whole lifecycle of developments.

This commitment could be strengthened by ensuring that Local Development Plans are explicitly required to give significant weight and priority to the climate emergency.

The draft NPF4 includes a presumption against development proposals that will generate significant emissions unless “this level of emissions is the minimum that can be achieved for the development” and the “proposed development is in the long-term public interest.” LINK members believe that more detail is required as to the definitions of both “significant emissions” and “public interest” in this exemption.

POLICY 3: NATURE CRISIS

It is welcome that the draft NPF4 acknowledges that we face a nature crisis. With 1 in 9 species at risk of extinction in Scotland, the planning system must shift to actively contribute to nature restoration and recovery as a matter of urgency.

Policy 32 Natural Places also relates to nature, and amalgamating part of this policy with Policy 3 would be clearer and ensure nature protection and enhancement were covered under this universal policy. NPF4 must ensure that habitats and species are protected before enhancement is achieved and the policy wording needs to be strengthened to ensure commitments on nature recovery can be met.

The development of nature networks would help connect areas of good quality habitat and allow species to move across the landscape. They could be integral to meeting the ambition of improving biodiversity. Although they are mentioned in NPF4, it is not clear how they would be delivered.

We are pleased that some of these ideas have been incorporated into the proposal to expand the Central Scotland Green Network (CSGN) as a national development. However, LINK members believe that this approach could go further and reach beyond the central belt.

Policy 3 states that development plans should “facilitate biodiversity enhancement” including by “facilitating the creation of nature networks”. While we welcome the policy intention, **LINK members strongly believe this should be strengthened to establish an explicit requirement that all local authorities should deliver projects that would contribute towards the creation and protection of a strategic national Nature Network.** This should be delivered within a defined timeframe and include a requirement to report to NatureScot.

Other measures that could be taken in the NPF4 to respond to the nature crisis include:

- Requiring all development proposals to contribute to biodiversity enhancement, with larger developments expected to make greater contributions.
- Requiring robust, long-term management plans for National Scenic Areas and SSSIs to protect and restore the natural environment. Currently only 3 of Scotland’s 40 National Scenic Areas have active management plans in place.
- Resourcing planning authorities to have a sufficient level of in-house ecological expertise.
- Ensure that the Nature Network approach delivers a range of habitats that aid carbon sequestration and restore biodiversity (such as restoring grasslands and protecting carbon-rich marine sediments).



NATIONAL PARKS

The Scottish Government is committed to establishing at least one new National Park during this parliamentary session. This has not been included in NPF4, primarily because the location or locations are not yet decided.

LINK members suggest that **the creation of one or more new National Parks is highlighted** at the start of the Spatial Strategy under Distinctive Places, as the stated aspirations there very much align with the aims of National Parks in the 2000 Act. The new Park or Parks will be designated within the timeframe of NPF4 and will have significant implications for the planning system in those area(s), and will be a further tool in moving to being a more “nature-positive and resource efficient” country.

POLICY 9: QUALITY HOMES

Planning must consider the most sustainable, low emission means of delivering better and appropriate housing for all who need it. Our concern is that housing policy perpetuates a business as usual approach, inefficiently allocating extensive amounts of land for new build housing. Greater focus and priority needs to be given to delivering housing through existing buildings.

POLICY 13: SUSTAINABLE FLOOD RISK AND WATER MANAGEMENT

We welcome the promotion of natural flood risk management as it can provide social, economic, and environmental benefits. The policy should state that when designing natural flood management systems, early consideration should be given to how they can contribute to wider aims including Local Biodiversity Plan priorities and helping the delivery of positive effects for biodiversity, by highlighting the part that flood management should play in enhancing nature networks, creating new habitats, combating climate change and mitigating the effects of climate change.

POLICY 19: GREEN ENERGY

LINK members support the protection of designated landscapes and the recognition that there are sensitive landscapes outside Scotland’s National Parks and National Scenic Areas and that impacts on these remain a key consideration in planning decisions. We support the full list of considerations in Policy 19k and the inclusion of wild land impacts in this list. We believe developments should be required to align with circular economy principles by considering the lifecycle impact of materials used. The development of green energy should not cause the loss of biodiversity.

We recommend a planning presumption against new medium-sized and large-scale wood burning plants. Any increase in support or demand for biomass has significant potential to exacerbate deforestation and biodiversity loss, as well as causing significant carbon emissions.

POLICY 20: ZERO WASTE

We welcome the inclusion of Zero waste as a specific policy and, importantly, that the planning system should support development which reflects the waste hierarchy, prioritising the reduction and reuse of materials, and facilitate the delivery of new infrastructure to achieve this. We strongly urge stronger wording in this policy, changing ‘should’ to ‘needs to’ or similar.

POLICY 21: AQUACULTURE

We welcome the reference to minimising “impacts on the environment” but are concerned that the overall direction of the policy emphasises an expansion of the industry rather than protection of the natural environment.

The continued assumption against development on the north and east coasts to safeguard migratory fish species is welcome, however account should also be taken of key migratory routes on the west coast, as highlighted by the recent Salmon Interactions Working Group report.



Overall, there is a lack of reference to other strands of policy and regulation that should be used to inform planning decisions, such as the development of the Scottish Government's Aquaculture Vision, or the role of Scotland's Marine Protected Areas network. Of particular concern should be developments within MPAs that have designated features that are at risk from salmon farming.

POLICY 33: PEAT AND CARBON RICH SOILS

Peat and carbon rich soils have a critical role to play in addressing the climate emergency and reversing biodiversity loss. Scotland's peatlands cover more than 25% of the land and form a very rare habitat, capable of storing carbon while giving a home to many wildlife species.

We welcome the presumption against development on peatland and carbon rich soils, although are concerned that the policy as drafted leaves a concerning amount of leeway over what development would be acceptable. We are concerned that the exemption for commercial peat extraction to support an industry "of national importance" is vague and requires further detail as to how this level of importance would be determined. Clearer policy wording is needed.

POLICY 34: TREES, WOODLAND AND FORESTRY

Woodlands and trees are a huge asset in helping address the twin nature and climate crises. Protecting these natural assets is key, especially irreplaceable ancient woodlands and ancient and veteran trees. The draft NPF4 presents landmark policy changes that could halt further loss of ancient woodland and trees. We must ensure these policy changes are retained in the final version.

The new protections this policy will give to ancient woodlands and ancient and veteran trees is hugely welcome but correct implementation is highly dependent on local authorities being resourced with skilled people and ancient woodland data.

Whilst the inclusion of ancient and veteran trees in policy 34b is a positive step forward, the **reference in Scottish Planning Policy to Tree Preservation Orders (TPOs) hasn't been taken forward to the Draft NPF4. Being one of the only protections for individual trees and groups of trees in Scotland this removal could prove highly damaging without anything in its place.**

A stronger stance could be taken against woodland habitat fragmentation. Developers must be required to provide compensatory tree planting and/or woodland expansion which could include natural regeneration.

This response represents the collective view of LINK's Planning Group. Members may also respond individually in order to raise more detailed issues that are important to their particular organisation.

For more information contact:

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