



Scottish  
Environment  
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**Joe FitzPatrick MSP**  
**Minister for Local Government Empowerment and Planning**  
**Scottish Government**

**18 May 2023**

Dear Minister,

On behalf of Scottish Environment LINK, we would like to extend our congratulations to you on your appointment as Minister for Local Government Empowerment and Planning.

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.

Scotland faces twin environmental crises of nature loss and climate change. The latest Intergovernmental Panel on Climate Change (IPCC) [report](#), issued this month, made clear that humanity requires urgent action to protect our environment, and underlined the importance of restoring nature as part of this effort. A healthy environment with rich and diverse nature is fundamentally important to the health, wellbeing and prosperity of Scotland's people. However, Scotland has suffered a high level of historic nature loss and this is accelerating further, with 1 in 9 species at risk of national extinction.

The commitment to put the twin global climate and nature crises at the heart of the Scottish Government's vision for a future Scotland is strongly welcomed by LINK. We also fully support that nature recovery must be at the heart of future places, if we are to respond to the biodiversity crisis. The wording of NPF4 policy 1, that when considering all development proposals significant weight will be given to the global climate and nature crises, recognises the importance and interrelated nature of these issues. This is not to say that there will not be challenges in the implementation of policies and much will depend on future guidance and decision-making. Although the planning system cannot address the biodiversity crisis in isolation, it must play a significant role to deliver meaningful change and contribute to the goal of a net-zero, nature positive Scotland.

We have highlighted LINK's Planning Group and Hilltrack sub-Group's current priorities:

#### **Implementation of NPF4**

Ensuring planning authorities, statutory agencies and decision makers are properly resourced to support delivery of the Fourth National Planning Framework (NPF4) as intended, with climate and nature at the centre of decision-making, securing biodiversity protection and enhancement, safeguarding our important natural assets and creating nature networks.

Engaging with consultations on guidance on the delivery of NPF4 policy, especially the implementation of policy 3 Biodiversity, for national, major and EIA development to ensure that planning delivers for nature.

### **Developing with Nature Guidance**

Monitoring the implementation of the Developing with Nature guidance, produced by NatureScot and providing feedback to improve the guidance and its use in applications and decision making.

### **Nature Networks**

Although nature networks are mentioned numerous times in NPF4, it is not clear how these will be implemented. Nature Networks represent the best tool to strategically plan out blue and green infrastructure at landscape scale and can help deliver positive effects for biodiversity through the planning system.

### **Hilltracks**

LINK's Hilltracks group works as a subgroup of the Planning Group and for over a decade has been campaigning for stronger public oversight of the construction of private ways in upland areas (commonly known as Hilltracks).

There was a commitment to review permitted development rights (PDRs) for such tracks in 2020 as part of Phase 1 of the government's wider review of PDRs. However, their inclusion was postponed to phase 3 and we now understand that they will not be included as part of Phase 3. In a meeting with the Chief Planner and her team on 4 May, it was confirmed that the review is still due to happen, but there is no firm date for this.

LINK urges the Minister to ensure that a review of PDRs for hilltracks takes place as soon as possible.

### **Future working**

LINK and our members are keen to work closely with the Scottish Government to deliver for our natural environment. We would like to invite you to a meeting where we can bring key topics of importance to your attention.

We look forward to hearing from you.

Yours sincerely,

**Esmé Clelland, Senior Conservation Planner at RSPB Scotland & Convener of LINK Planning Group**

**Helen Todd, Campaigns and Policy Manager at Ramblers Scotland & Co-Convener of LINK Hilltracks Group**

**Beryl Leatherland, Scottish Wild Land Group Committee Member & Co-Convener of LINK Hilltracks Group**



Scottish Environment LINK the voice for Scotland's environment

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