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Shirley-Anne Somerville
Cabinet Secretary for Social Justice and Housing
Scottish Government

20 May 2026

Dear Cabinet Secretary,

I am writing on behalf of Scottish Environment LINK to warmly congratulate you on your appointment as Cabinet Secretary for Social Justice Housing. We look forward to working with you on the important challenge of delivering more homes in Scotland in a way that also supports climate and nature goals.

Scottish Environment LINK brings together over 50 environmental organisations, collectively representing the support of over half a million people across Scotland. Our members are keen to ensure that housing delivery is aligned with Scotland's commitments to restore nature and halt biodiversity loss.

The ambition to increase housebuilding through More Homes Scotland can, and must, be delivered in a way that is aligned with the Scottish Government's environmental ambitions and Scotland's legally binding climate and nature targets.

There are, however, challenges caused by a lack of ecological capacity within the planning system. Planning authorities are already under pressure, particularly in relation to ecological expertise, and there is a risk that this limits the consistent application of National Planning Framework 4 requirements, including biodiversity enhancement. Research undertaken by LINK has found that ecological capacity within the planning system is worryingly low:

- 14 out of 34 planning authorities have no in-house ecological expertise
- 13 planning authorities have only a single FTE (or 0.8FTE) post to offer ecological expertise
- 5 planning authorities have neither in-house ecological expertise nor have accessed external expertise over the previous 12 months

This low level of capacity threatens to undermine the effectiveness of the planning system and of wider policy objectives, notably the requirement under NPF4 for planning authorities to produce a Nature Network, which should be a key policy tool to deliver Scotland's nature targets.

Good housing development can and should contribute to nature recovery, for example through green infrastructure, habitat creation and better-designed places. Achieving this depends on adequate capacity within planning authorities and clear, consistent expectations on environmental outcomes.

We would welcome early engagement with you and your officials on how ecological capacity is being considered within More Homes Scotland, and how housing delivery can better support Scotland's nature and climate objectives.

We would be pleased to meet early in your role to discuss this further.

Once again, congratulations on your appointment. We look forward to working with you.

Yours sincerely,
Deborah Long

Chief Executive
Scottish Environment LINK



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