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Dr Fiona Simpson
Director of Planning, Planning Directorate
Scottish Government

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Dear Dr Fiona Simpson,

Scottish Environment LINK was interested to note the Scottish Government's decision to bring the Energy Consents Unit (ECU) into the Planning Directorate.

We hope that making ECU a division of the Directorate will provide an opportunity to improve links between energy consent and the wider planning system, helping to ensure greater consistency and stronger alignment with National Planning Framework 4. We have previously highlighted concerns over the interpretation of policies, particularly around biodiversity, nature recovery and protection of important habitats by the ECU.

Closer integration should strengthen the application of planning policy across energy decisions, without creating undue pressure to prioritise the speed of energy and infrastructure delivery at the expense of wider planning and environmental objectives. The right development in the right places should benefit nature and people, helping to deliver the Government's wider aims.

We are particularly interested in how the Scottish Government intends to ensure that:

- NPF4 policies, including Policy 3 Biodiversity Enhancement and Policy 6 , Forestry, Woodland and trees, continue to be effectively applied
- Energy consenting and planning decisions support nature recovery and climate objectives
- Environmental considerations are properly integrated into decision-making from the outset

We would welcome further information on how the new Planning Directorate will operate, including how the ECU Division will work alongside Planning Policy & Practice and Planning Systems, and how the Scottish Government will ensure that this change strengthens the aspirations set out in NPF4.

We would welcome the opportunity to discuss this further.

Yours sincerely,

Esmé Clelland
Head of Planning and Development, RSPB Scotland
Co-Convener of LINK Planning Group

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