



Part 1 – Consultation and development of the draft NPF4

Please provide your views on the consultation and development of NPF4 and how this has contributed to the draft.

Scottish Environment LINK has engaged in the early stages of development of the draft NPF4, responding to the government’s [Call for Views](#) in April 2020 and its consultation on the [Interim Position Statement](#) in February 2021.

While this proactive engagement with stakeholders is very welcome, LINK members have concerns about the current process for consultation on the draft NPF4 documents. With both the committees’ Call for Views and the Scottish Government’s own consultation running concurrently, the volume of questions and policy issues to respond to is very high. This dual consultation process means that for organisations such as LINK (where a range of member views are discussed to establish shared policy positions) there is very little time to gather views and build consensus. Additionally, capacity is lower in the run up to the festive season and setting a consultation deadline early in the new year places extra challenge on finalising a response that reflects the full range of views in the environment sector.

Furthermore, LINK members also share concerns that the dual consultation by parliament and government currently taking place on the draft NPF4 could result in a lack of meaningful parliamentary scrutiny of NPF4. We feel that running both processes concurrently does not provide the relevant committees with opportunity for a thorough examination of a document that has been revised following public consultation.

We would like the Committees to consider how parliament can make meaningful comments on the revised NPF4 later in the spring ahead of its final approval by parliament.

Please provide your views on the incorporation of the Scottish Planning Policy and coherence of the NPF4 document overall as a roadmap.

Summary of LINK members’ key points:

- The final NPF4 document must strengthen the language in each policy to demand, rather than encourage, action to mitigate and adapt to climate change and reverse biodiversity loss. The final NPF4 must provide a roadmap for addressing the interlinked nature and climate emergency.
- A national Nature Network is a key mechanism for addressing the nature crisis and reversing biodiversity loss (see comments on Central Scotland Green Network national development and those for Policy 3 Nature Crisis for more detail).



- Policy needs to be stronger to encourage more public led planning, where local authorities are enabled to deliver more housing themselves through land assembly mechanisms that allow public/ community or public/ private partnerships

The Scottish Government has stated on several occasions that NPF4 will deliver a ‘transformation’ in Scotland’s planning policy and deliver real progress on meeting climate change goals and addressing biodiversity declines. Disappointingly, we feel the proposals set out do not match that level of ambition and believe the approach lacks a truly transformative agenda — despite awareness of the urgent need to radically scale up action to tackle the climate and nature emergency and create fairer communities.

We welcome the government’s mention of the climate emergency and biodiversity crisis throughout the draft NPF4. This is vital for signalling to planners, communities and sectors across the economy that reaching net zero emissions and restoring nature is a central ambition of this government. We applaud the increased attention given to the natural environment in this updated Framework, for example the draft states:

“To achieve a net zero, nature-positive Scotland, we must rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and decisions.” (Draft NPF4, p.68)

However, the draft currently lacks a clear delivery mechanism for achieving this and putting in place the policies it sets out – timescales remain vague and detail of how these will be implemented is lacking. We note that the government intends to publish a ‘draft delivery programme’ (p.114) alongside the final NPF4 - this should set out clear timelines and regular reporting on progress to deliver the programme. While we welcome the sentiment, we are unclear what is meant by ‘guiding principles’ in this context - for example, will there be a link drawn with the environmental principles adopted by the UK Withdrawal from the European Union (Continuity) (Scotland) Act 2021, also [currently out for public consultation](#)?

Most worryingly for LINK members is that the current draft needs to go further to support decision-makers to avoid ‘business as usual’ by providing policy that secures action on climate and nature in new developments/proposals. Despite the welcome rhetoric on climate and nature, there is little in the draft that actively supports the inclusion of nature and climate goals in new developments.

In the context of the nature and climate emergency we need to move beyond a planning system that encourages actions to one that demands action. With less than 10 years to achieve Scotland’s ambitious 2030 climate target of 75% emissions reduction, a robust NPF4 must require planners to take a new approach to assessing developments to bring about a true transformation in planning throughout Scotland’s towns, cities and rural areas. We urge the committees to consider the role the planning system can play as a regulator, requiring high environmental standards to attain climate and nature targets and thus making the changes that support the long-term public interest.

For further comments from LINK members, please see the answer provided to Part 7 of this consultation.



Additional Comments:

Members of LINK's Freshwater Group would like to express concern about the ambition "to address the impact of climate change on communities while also generating renewable heat and facilitating urban cooling from our rivers" (p.36). In the absence of further detail, we assume this refers to some kind of heat pump system. If so, there is a risk of changes to the temperatures of rivers, possibly by removing heat from rivers in winter and returning heat to the rivers in summer months, similar to the system illustrated in [this diagram](#). This could exacerbate the already high temperatures that we see in some rivers and jeopardise a range of cold-loving freshwater species, such as salmon.

Part 2 - National Developments

Please provide your views on each of the National Developments in the text boxes provided below.

(a) Central Scotland Green Network

For several years, Scottish Environment LINK has called for the government to establish a [Scottish Nature Network](#), also known as a national ecological network (see [here](#) and [here](#)). In [response](#) to the government's Call for Views in 2020, LINK called for a Scottish Nature Network to be set as a national development to deliver bigger and better sites for nature and to 'enable delivery of green and blue infrastructure, restoration of nature and the ecosystem services that underpin societal wellbeing.'

We are pleased that some of these ideas have been incorporated into the proposal to expand the Central Scotland Green Network (CSGN), and that nature networks are mentioned throughout the draft document. Such projects are needed if Scotland is to make headway in reversing biodiversity declines and delivering vital nature-based solutions to climate change. This national development will bring additional benefits of giving communities in the central belt greater access to nature, which has proved to be an important source of wellbeing and physical health during recent months of Covid-19 restrictions.

However, we think the current proposal could go a little further by taking control of the opportunity and recognise the part it can play in supporting and responding to the nature crisis. LINK members ask the committees to consider the following changes to this proposal:

- Set out a clear requirement for all local authorities to deliver projects that would create a strategic national Nature Network, extending beyond the central belt.
- Commit to providing additional financial resource to planning authorities to allow for the recruitment of more biodiversity officers within local authorities to work on the roll out of a national Nature Network.



- Give a clear indication of the timescale for delivering a Nature Network in central Scotland and beyond.
- Adopt the IUCN definition of nature-based solutions and be clear that the Nature Network is to deliver a range of habitats that aid carbon sequestration (such as restoring grasslands and protecting carbon-rich marine sediments).

Additional Comment: New National Parks

Scottish Environment LINK would like to see the creation of new National Parks included in the list of National Developments. The concept was previously assessed and deemed to be “Broad strategy rather than specific project or development proposals” and not suitable for this status (Annex D, Report of Assessment for the Draft National Developments).

However, given the Scottish Government’s recent commitment to designate at least one new National Park in the current parliamentary session, this decision should be reconsidered. New National Parks will be place-based; of national status; have implications for the planning regime of any area selected, and, most importantly, the aims of National Park status will help address the nature and climate emergency which is a key ambition of NPF4. The [Scottish Government and Scottish Green Party - Shared Policy Programme](#) recognised that National Parks can benefit the economy and the environment, “support progressive development, address the climate emergency in the way we use our land, and improve public and community wellbeing” (p.40) and committed to funding this.

Part 3 - National Planning Policy

Please provide your views on each of the National Planning Policies in the text boxes provided below.

Policy 1: Plan-led approach to sustainable development

A plan-led approach to sustainable development is commendable but more is needed from NPF4 to make this achievable in practice. The policy places an emphasis on the importance of Local Development Plans guiding long-term land use in the interests of nature recovery and climate resilience. However, to achieve this all the policies in NPF4 need to be in the interests of nature recovery and climate resilience, or at the very least, not undermining long-term land use in the interests of nature recovery and climate resilience.

This seems a somewhat unnecessary ‘policy’ as the requirement to determine applications in accordance with the development plan unless material considerations indicate otherwise and the purpose of planning is set out in the Planning Act 2019 (Section and (Section 3ZA and Section 25 respectively). The policy does not seem to offer any additional guidance or emphasis other than that set out in legislation. LINK members believe that a presumption against development not in accordance with local development plans should be emphasised here.



Policy 2: Climate emergency

LINK members agree that significant weight should be given to the climate emergency when assessing development proposals and with taking account of emissions over a development's entire lifecycle.

In part (c) of this policy, we would ask the committees to seek more detail from the government on what is meant by allowing planning authorities to grant exemptions to applicants who '[provide] evidence that this level of emissions is the minimum that can be achieved for the development to be viable and it is demonstrated that the proposed development is in the long-term public interest.' (Draft NPF4, p.69) How is 'the public interest' to be defined in this context and could there be an upper cap for emissions created by a single development? We feel additional detail is required in the final NPF4 so it is clear how the planning system will transform in response to the climate emergency.

Furthermore, in part c), as 'significant emissions' is not defined it is not clear which types of development will be covered by this policy. In addition, only housing developments of 50 or more dwellings or those on a site over 2ha are included in 'major' developments regardless of type of housing and likely greenhouse gas emissions (i.e. 49 large luxury homes may have much larger emissions footprint than other developments of 50+ smaller dwellings). Please could the Committee consider how this policy applies to housing development in general?

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 efforts. We agree with the thrust of this policy however we urge that the language be strengthened. For example, there should be a requirement that development plans contribute meaningfully to biodiversity enhancement, rather than just 'facilitate' it.

LINK members strongly encourage greater recognition of the role of robust, long-term management plans in protecting and restoring our natural environment. Improving management and regulation of land use is essential for nature recovery and delivering positive effects for biodiversity. Policy 3 could be strengthened by promoting the use of management plans for National Scenic Areas and SSSIs. For example, only 3 of Scotland's 40 National Scenic Areas currently have active management plans in place.

If Nature Networks are to be integral to facilitating biodiversity enhancement, they must deliver diverse habitat types, including grasslands and wetlands. We also need them to be mapped and safeguarded in Local Development Plans. Policy 3a could, for example, instruct Local Development Plans to map, identify and safeguard Nature Networks. Furthermore, to aid interpretation of what Nature Networks may include, it would be helpful to expand the list as drafted in Policy 3a. The definition of Nature Networks in the glossary is really helpful and suggests that Nature Networks are intended to connect wild places - this definition should be reflected back in policy 3a by



referencing nationally important landscape types, including Wild Land Areas, which while not protected by statute remain valued landscapes and important places for wild plants and animals.

Policy 3b could be bolder and require more from developers given the guiding principles of NPF4 - *all* development proposals should contribute to biodiversity enhancement but the greater the scale of the development, the greater the expected contribution that development makes to biodiversity enhancement. The greater material footprint of a development, the greater the expected land use change and where land is being converted from a more natural state to built environment, so the requirement for biodiversity improvement should be high and if not discharged (e.g. through a land management and design approach for nature recovery) then the presumption should be to refuse that development.

As mentioned previously, in order for this policy to be effective local planning authorities must be given extra resources to hire planners with experience in biodiversity and ecological science. Evidence from [RTPI](#) shows that planning departments within local authorities have seen a 25% reduction in staff since 2009. An assessment by the [Association of Local Government Ecologists](#) in 2016 found that there is huge variation across different UK planning authorities in the quality of ecological reports they use to assess development applications. Indeed, LINK members report that many ecology posts have been cut across local authorities creating enormous difficulties and discrepancies in in-house expertise and experience across Scotland.

LINK members suggest every local authority should have, as a minimum, ecologists and environmental planners who are adequately resourced and trained. Without in-house ecological expertise in local authorities, positive effects for biodiversity cannot be assessed and delivered. To implement transformation in Scottish planning there is an urgent need for increased capacity and expertise at local levels.

The concept of developments delivering ‘positive effects for biodiversity’ is mentioned only very briefly at the end of this policy, though it is mentioned elsewhere in the text. We ask the committees to question the government about how developments’ contributions to ‘positive effects for biodiversity’ will be assessed in a tangible, measurable and consistent way. We also encourage committees to ask whether long term monitoring and evaluation should be a policy requirement of every national, major and EIA development.

Policy 9: Quality homes

Our members welcome the introduction to the Quality Homes policy which states the need for our housing stock to contribute less to Scotland’s climate emissions and highlights the wider benefits of better energy efficiency and greener buildings. However, the draft NPF4 has not sufficiently recognised that building housing *per se* contributes to carbon emissions and has significant impact on biodiversity through loss of wildlife corridors, loss of mature trees and woodland and concreting over soil, including peatland.



We would like to see Policy 9 recognise and encourage a significant contribution to housing targets to be made by existing empty homes, or buildings not currently used for residential purposes, being returned or converted to use as homes.

This approach would be far more in keeping with other policies on circular economy and 20 minute neighbourhoods, with the benefits of reducing carbon emissions through embodied energy and reducing construction waste. It will also protect other land uses such as agricultural land.

LINK members believe that the policies that try to deliver affordable housing by allocating generous amounts of land for all-tenure housing are flawed. NPF4 policies focus on local authorities allocating enough land for housing and using the Minimum All Tenure Housing Land Requirement (MATHLR) as the basis for establishing a deliverable pipeline of land for housing.

Our concerns are:

- That this continues to rely on the delivery of the majority of affordable and more diverse housing through the private sector, which does not deliver the proportion or variety of affordable housing desired.
- It is a very inefficient means of delivering housing in terms of land, because it relies on larger amounts of land to be allocated for housing, assuming that not all sites will be viable or deliverable. This makes it harder to deliver an ‘infrastructure first’ approach to housing, because it is not clear which land is going to be used, so upfront infrastructure cannot always be provided ahead of time.
- It is an inefficient means of delivering the level of affordable housing needed because it requires large amounts of housing land only a proportion of which will be used for affordable housing through section 75 agreements.
- It focuses on new-build to deliver housing rather than looking to reuse existing buildings.
- Overgenerous allocations will result in greenfield sites being used disproportionately as they are often more profitable to deliver than the more complex brownfield sites.

In order to achieve the wider goals of Housing to 2040 and NPF4, including community wealth building, meeting targets for diverse housing needs and meeting climate and biodiversity ambitions, planning policy needs to find the most effective means of delivering housing efficiently in terms of land use and resource use. Policy hierarchy needs to be clear about the primacy of universal policies and particularly the significant weight given to the climate emergency with respect to housing developments.

The market delivery of affordable housing is recognised as inefficient and policy should look forward to how changes in land assembly practice and more public-led planning will improve all of the NPF4 outcomes required by the 2019 planning legislation.

The current Minimum All Tenure Housing Land Requirement policy or MATHLR in Annex B may fulfil the housing land target requirement included in the 2019 Planning Act but it appears to have been developed in a ‘climate-free’ space without consideration of the most sustainable, low emission means of delivering better and appropriate housing for all who need it. Given this, it must be ensured that the climate policies in NPF4 are applicable to proposed housing developments.



Our members are aware that the current 2014 wording of Scottish Planning Policy has been interpreted in such a way that some speculative housing developments, which would otherwise have been considered unsustainable have been approved on the basis of the so-called tilted balance. We welcome the fact that the policy proposed has moved away from this mechanism and hope that some of the terminology in the draft is further clarified to ensure the primacy of the development plan and that local authorities are able to direct new housing to the most sustainable locations making the most of existing infrastructure.

The statement of community benefit proposed at 9e) should be expanded to address positive and negative environmental changes that will impact the local community. It is not clear how a community will be involved in the assessment of these statements or be able to highlight any oversights. If the relevant development is then approved will the statements be used as a basis for some of the conditions of approving development and how would they be enforced?

Policy 12: Blue and green infrastructure, play and sport

LINK members support the direction of this policy to increase the number of green spaces, green roofs and sustainable urban drainage systems set out in the draft document. We agree that blue and green infrastructure can provide a range of associated benefits to peoples' health and wellbeing and provide important shared community spaces. They can also offer benefits to biodiversity and climate mitigation and adaptation.

Blue and green infrastructure can play a part in establishing a Nature Network. For example, semi-natural habitats can contribute toward such a Network, with protected sites at the core, connecting outward to high biodiversity sites in between with semi-natural and other natural infrastructure on the fringes.

As with other policies set out in the draft, it is not clear how decisions to promote more green and blue spaces will be made in practice as the language is very high level. NPF4 should require Local Development Plans to support land uses that help to restore and recover nature at the identified and safeguarded green and blue infrastructure sites and areas.

Our members also suggest that the government clearly sets this policy within the wider context of statutory access rights under the Land Reform (Scotland) Act 2003. While it's important that as many people as possible have access to high quality green and blue spaces close to where they live and work, the planning system also has a role in protecting access rights and future-proofing land for potential access provision. For example, a new planning application for a development on a greenfield or brownfield site may have a negative impact on informal routes across this ground which have been established over time and are much valued by the local community. Similarly, there may be wilder areas of rough grassland or woodland on the site which are important for public enjoyment as well as for biodiversity. These routes are likely to be useful for local leisure or active travel purposes and should be protected, and at the same time, the planning system needs



to be alert to opportunities to preserve land for potential future active travel or leisure corridors (or for biodiversity enhancement) on such sites.

Policy 13: Sustainable flood risk and water management

LINK members agree with the broad direction of Policy 13, however the success of its implementation will be dependent on the quality of the assessment and the infrastructure built. For example, in part 13e looking at the risk of surface water flooding, to what extent will changing climate and heavier short term rainfall events across the lifetime of the development be taken account of?

Members also raise concerns about the use of the qualifier 'wherever practicable' in part 13f, bullet point 2. The use of SUDS should be a mandatory absolute and this qualifier deleted. We note that the value of green and blue infrastructure referred to will be dependent not only on the design but how this infrastructure is planted and maintained (e.g. vegetation cutting and removal) over several decades. We ask the committees to explore how SUDS will be maintained to maximise positive effects for biodiversity, for example by identifying the best species and long term management for each site.

There are a number of areas where we feel more detail and explanation is required in the final document, to avoid any loopholes. This includes clarity on what will qualify as 'essential infrastructure' and how 'essential' is to be defined. In part 13b, we are unclear what 'water compatible uses' refers to. Also in 13b, does 'redevelopment of an existing building or site' also include substantial alterations to existing buildings i.e. converting a smaller building into a block of flats? If such a redeveloped site has an existing flood protection scheme in place, how will it be established that the existing scheme is sufficiently effective or if it requires modification/upgrading?

LINK members also suggest that the final NPF4 incorporates green roofs as a drainage solution. For example, by following the lead of Switzerland and mandating green roofs for developments of a certain size. Green roofs not only slow the flow of water to the sewerage system, but they also insulate buildings, reducing the heating and cooling required throughout the year. In addition, if designed correctly they can provide biodiversity benefits. If we combine this with the French approach of 30% of new commercial and industrial buildings to have solar panels, then it could make a huge difference to water management, energy use, and biodiversity.

Policy 19: Green energy

Renewable energy developments, and their associated transmission networks, inevitably have an impact on our landscapes, and on our natural and cultural heritage. The planning system should recognise the potential for conflict and play a proactive role in siting and in mitigation to reduce or remove these. This includes assessing potentially damaging environmental impacts to protect our most sensitive landscapes and ecosystems from inappropriate development.



A national priority to significantly increase renewable energy generation in Scotland and contain measures that reduce the time taken to deploy a mix of renewables across Scotland. An updated process would need to balance expediency with democratic engagement processes, environmental protection legislation and opportunity for public scrutiny while considering all new developments against the need to reduce our overall energy demand.

Additionally, LINK members believe large biomass plants should not be considered or included as renewable generation.

Policy 21: Aquaculture

LINK members consider that any future growth of the salmon farming industry in Scotland must be guided by effective spatial planning and consider the cumulative and in-combination impacts of multiple activities on the marine environment. It is essential that the Local Development Plans, the National Marine Plan and Regional Marine Plans all align to ensure the future growth of the salmon farming industry is environmentally sustainable.

With regard to Policy 21, Section A, we consider the Local Development Plans should guide future fish farm developments based on the environmental capacity of the marine environment, including the cumulative impact of other fish farms and other marine activities in the region. We consider conservation objectives should be prioritised over industry needs, reflecting the urgent need to address the decline in marine biodiversity.

With regard to Section B, we consider it essential that, to safeguard migratory fish, important migratory routes on the west coast of Scotland should also be free of fish farm developments. Guidance for fish farm development should be updated as more information becomes available on migration routes, particularly for Atlantic salmon.

Policy 29: Urban edges and the green belt

LINK members agree with the direction of this policy. Given the synergy between Policy 29 and other policies (including 20 minute neighbourhoods, town centres, nature networks and the universal climate and biodiversity policies) its wording could be more positive, i.e. consider using green belts in the more accessible or pressured rural or peri-urban areas.

We support the description of Green Belts in this section but given the extended list of exceptions to the presumption against development outlined on p.102 and the reference to 'not undermining the purpose of the green belt at that location' (policy 29c, first bullet point) we would urge that more detail is provided in order to understand how decisions to protect and make use of green belts will be taken in practice. In particular, in landscape terms the aim of retaining a predominantly open landscape nature in green belt should be promoted.

Additionally, we suggest that the term 'green belt' is added to the glossary so that all stakeholders have a clear definition to refer to.



Policy 30: Vacant and derelict land

LINK members believe that the main focus of our planning system should not be on new development, but on revamping existing housing stock and other existing buildings, bringing empty homes back into use, using vacant and derelict sites and brownfield sites of low ecological value.

We support the proposal for local development plans to seek to reuse vacant and derelict land as a priority, on the condition that a full assessment is made of the contribution existing brownfield sites make to biodiversity. Plans must recognise the important role of our existing stock of buildings – which will continue to comprise the majority of our built environment – and which often underpin our sense of place and identity. Our existing buildings are an important store of carbon, and sensitive and creative reuse reduces our environmental footprint, and maintains our local environments, reducing the need for greenfield developments.

However, we urge that the biodiversity contribution of existing brownfield sites are assessed very carefully as part of the application process. Brownfield sites can have a high biodiversity value and provide an important refuge for plants and wildlife, on some occasions holding more rare and threatened species than ancient woodland (see examples in pp.4-5 of this [briefing](#)). While we agree with the proposal to locate developments on brownfield sites over greenfield sites, the final NPF4 must contain reference to assessing the biodiversity contribution of brownfield sites. We suggest the same qualification as used in Policy 31 for vacant and derelict land is adopted here: vacant and derelict land to be reused “where a return to a natural state is not likely” (p.105). Reusing existing, vacant buildings would make an important contribution to building a circular economy in Scotland, where construction currently accounts for [around half of Scotland’s waste](#).

Policy 31: Rural places

This policy could be improved by making explicit the role rural places can play in addressing the climate and nature emergencies, which is stated earlier in the draft as being central to NPF4. In December 2021, the [UK Climate Change Committee](#) reported that Scotland’s annual targets for the next decade will be “very difficult to meet” and require changes to agricultural policy that are “sufficiently ambitious.” The proposed policy lacks a clear link with work currently underway on post-CAP low carbon agriculture which will impact Scotland’s rural places over the next decade and beyond.

We agree with the proposals on encouraging the prosperity and sustainability of rural communities and economies, reusing existing buildings and providing affordable housing. However, this policy makes no mention of the vital role rural places can make to the transition to a net zero, nature positive society and economy.

It is disappointing that the policy makes no mention of other work being taken forward in this area by other branches of government, namely the Land Use Strategy, development of Regional Land Use Partnerships and Frameworks, Good Food Nation legislation and Just Transition plans for the rural economy. The current discussions on agricultural transition and wider land-use policy must be



taken account of in the final NPF4, including consideration of the role that planning can play in supporting the transition of land use toward a nature-positive and net-zero future.

Policy 32: Natural places

LINK members greatly welcome the acknowledgement in this proposed policy that “the natural environment underpins our economy, health and wellbeing, biodiversity and climate resilience” (p.107). The focus on restoring and enhancing our natural places is also very encouraging as is the restated commitment to nature-based solutions and nature networks.

However, this rhetoric must feed in to clear requirements and objectives for restoring nature that planning authorities and developers must meet.

It is good to see reference made to the precautionary principle (p.108) and we recommend that the final NPF4 makes explicit mention of the government’s guidance on environmental principles in the Continuity (Scotland) Act 2021 (currently under consultation).

LINK members strongly support the presumption against development in Scotland’s wild land stated in Policy 32i) and commend the Scottish Government for having the foresight to protect Scotland’s wild land for future generations. This policy fits with the infrastructure first approach required by policy 8 as wild land areas, by definition and their nature, do not have any infrastructure in them that could support large scale development.

However, a note of caution on policy 32i). As drafted, the policy would require a degree of interpretation of what ‘cannot be reasonably located outside of the wild land area’. To prevent a piecemeal and disjointed approach to interpreting what this means, we suggest adjusting the wording slightly to direct its interpretation in Local Development Plans. Some of the draft policies in NPF4 clearly instruct what development plans should do e.g. policy 5a) states ‘Development plans should address community wealth building priorities’ and policy 3a) states ‘Development plans should facilitate biodiversity enhancement, nature recovery and nature restoration across the development plan area’. Policy 32 would benefit from being explicit in stating Local Development Plans should protect wild land areas.

Another way in which Policy 32 could aid certainty and consistency amongst planning decisions is to define or expand on what is understood by ‘nationally and internationally valued natural assets’. Clarity of meaning could be provided by expanding the text in Policy 32a) – we suggest with reference to wild land areas – or by including a definition in the glossary.

In regards to protected landscapes, including and beyond Wild Land Areas, LINK members are disappointed that the opportunity has not been taken to strengthen these protections. While we welcome that there is no downgrading of existing protections, we would highlight that Policy 32 contains little that improves upon the protections in NPF3 and existing Scottish Planning Policy. The draft document, rightly highlights the importance of delivering for climate and nature throughout, but this is another area where the delivery does not match this welcome rhetoric.



Policy 33: Peat and carbon rich soils

LINK members agree that peat and carbon rich soils have a critical role to play in addressing the climate emergency and reversing biodiversity loss. We agree that local development plans should protect valued soils.

We urge that the language in part (c) of this policy is strengthened. 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. The UK Committee on Climate Change has been unequivocal about the [critical role of peatland restoration](#) in meeting Scotland's net zero target. They are one of our country's most important natural habitats. The policy as drafted leaves a concerning amount of leeway over what development would be acceptable on peatland and carbon rich soils.

It is also deeply disappointing that a number of exemptions have been given to the ban on commercial peat extraction. Specifically, the exemption on peat extraction that is to 'support an industry of national importance to Scotland' (p.109) is vague. We urge the committees to question the Scottish Government about this exemption and demand more detail of how 'national importance' would be determined to avoid this acting as a future loophole to the restrictions.

Policy 34: Trees, woodland and forestry

The acknowledgement of the importance of trees and woodland to meeting climate targets and reversing biodiversity loss is very welcome. We strongly agree that local development plans should identify and protect existing woodlands and identify potential for woodland expansion - this would be important for delivering Nature Networks, where expansion is sensitive to other habitats that have a high biodiversity value (i.e. grasslands).

The new protections the policy will give to ancient woodlands and veteran trees is hugely welcome. This is a considerable improvement on the ambiguity of current Scottish Planning Policy and does have the potential to eliminate inappropriate development as a threat to ancient woodlands, and ancient and veteran trees. However, to allow planners and developers to comply with these policy changes the following will need to happen:

- Scottish Government must see through the SNP manifesto and Programme for Government ancient woodland register commitment so that the current Ancient Woodland Inventory (AWI) is updated and made fit for purpose.
- Local authorities must be resourced with biodiversity and tree officers associated with their planning departments.
- As is the case for ancient woodlands, there needs to be an ancient and veteran tree inventory such as the Woodland Trust's Ancient Tree Inventory, to ensure planners and developers can comply with the requirements of policy 34.
- We also encourage a definition of ancient woodland to be added to the Glossary.



Policy 35: Coasts

LINK members are disappointed that Policy 35 on coasts focuses solely on adaptation to climate change and economic regeneration without recognising the importance of coastal planning policy in protecting the marine environment and its contribution to delivering ocean recovery. All development proposals should be consistent with a revised and updated National Marine Plan, that prioritises the protection and restoration of marine species, habitats and ecosystem services throughout Scotland's seas.

The protection and recovery of the marine environment is vital to providing long-term sustainable development of coastal communities. The National Marine Plan should act as the primary guidance for all coastal development. In addition, development proposals should take account of a Blue Economy Strategy/vision that is based on principles of sustainability and recognises environmental limits, and on the aims of the Future Fisheries Management strategy to deliver sustainable fisheries.

Greater emphasis should be placed on protecting and restoring Scotland's blue carbon habitats as a nature-based solution. Our coasts have a significant potential for restoration of key habitats, such as seagrass, saltmarsh, native oysters, seaweeds and sediment communities, that can help meet net-zero targets and also offer opportunities for community engagement, improved health and well-being and socio-economic regeneration. For example, Scotland's sea lochs are globally significant "hotspots" for [blue carbon](#),* burying terrestrial carbon with important implications for national carbon accounting, and Scotland's Firths, estuaries and sea lochs provide excellent opportunities for increasing carbon sequestration through restoring important habitats such as seagrass beds and native oyster beds.

Communities around Scotland are already leading the way with several restoration projects. The planning policy should support delivery of the revised National Marine Plan and drive increased protection and restoration of blue carbon habitats around the Scottish coastline.¹

Part 7 - Any other comments

Do you have anything else to add in relation to the draft of the NPF4?

The approach we take to planning, designing and building places has a direct effect on Scotland's nature, climate emissions and people's wellbeing. With 1 in 9 species in Scotland at risk of extinction and with concern that Scotland risks missing its annual emissions reduction targets into

¹ *Significant new stores of sedimentary carbon (295.6 ± 52 Mt OC) have recently been quantified within the post-glacial sedimentary sequences of Scottish sea lochs (fjords) (Smeaton *et al.*, 2017); it is estimated that a further 4.16 ± 0.5 Mt OC is stored in the surficial sediment (top 10 cm) of Scotland's sea lochs (Smeaton & Austin, 2019). These organic rich sea loch sediments cover a significantly smaller area ($2,052$ km²) than their continental shelf counterparts, yet their carbon density (20.27 ± 3.67 tonnes OC ha⁻¹) far exceeds that found on Scotland's continental shelf (area < 200 m water depth) (4.2 ± 1.8 tonnes OC ha⁻¹). These results highlight that fjords are globally significant "hot spots" for carbon burial (Smith *et al.*, 2015) and recent work by Smeaton & Austin (2017) highlights that Scottish sea lochs provide effective traps for terrestrial carbon within coastal seas, with important implications for national carbon accounting.



the 2020s (see CCC report to Parliament), this National Planning Framework must deliver a robust response to the nature and climate emergency, while clearing the way for truly transformational changes across Scotland's urban, rural and wild areas.

LINK members welcome the language embedded throughout the document which frames the importance of addressing the nature and climate emergency as the central mission of NPF4. However, we are disappointed and unconvinced at this stage that this good rhetoric will be put in place in practice in the many and increasingly complex national planning decisions. We want to reiterate a number of comments we have made throughout our response, starting with our principal concern that the current draft lacks the detail of how this transformation change will be *required* by planning authorities and, consequently, those bringing forward development proposals. We believe that NPF4 will be successful if it sets out *minimum requirements* for developments to contribute to nature restoration, emissions reduction and the transition to a circular economy.

Many of the draft policies intended to address the climate and nature emergencies include exemptions, often described in vague terms. We would like to see more clarity and precise language (or additional guidance) on how assessments will be made where developments seek an exemption from policies designed to reduce emissions and restore nature.

As noted earlier in our response, nature-based solutions are critical to bringing about the transformation we need to see in Scotland's land use between now and 2045. We urge the Scottish Government to adopt the [IUCN's definition](#) of nature-based solutions.

A final key issue we want to highlight is the omission of the Scottish Government's commitment to establish at least one new national park within this parliamentary session. We urge committee members to ask that NPF4 reiterates this commitment and contributes to the smooth delivery of a vital protection for Scotland's wildlife and important contribution to people's health and wellbeing.

To conclude, overall we welcome the high-level rhetoric embedded throughout the draft NPF4 but we need to see more in the final document and accompanying delivery plan to assure us that NPF4 will deliver a true transformation in planning over the next decade, in line with climate and nature goals. This is the time for delivery and the NPF4 needs to be a key part of the government's delivery of net zero and nature positive policies.

This response is supported by the following LINK member organisations:

Association for the Protection of Rural Scotland
Badenoch & Strathspey Conservation Group
Cairngorms Campaign
Chartered Institute of Ecology and Environmental Management
Environmental Rights Centre for Scotland
Froglife
John Muir Trust



Marine Conservation Society
National Trust for Scotland
Planning Democracy
Ramblers Scotland
RSPB Scotland
Woodland Trust Scotland
WWF Scotland

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.

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