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Ivan McKee MSP
Minister for Public Finance
Scottish Government

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Dear Minister,

Thank you very much for taking the time to meet with representatives of LINK's Planning Group on 25th September and for the discussion on matters including NPF4 and how the planning system can support wider aims for people, climate and nature.

Fourth National Planning Framework (NPF4)

The adoption of NPF4 last year presents real opportunities for planning to support a nature positive and net zero Scotland. The recognition of the climate and nature crises as a key theme throughout the document and the introduction of the Policy 3 requirement for development to deliver biodiversity enhancement are particularly welcomed. The ongoing implementation of NPF4 policy, through guidance, development of tools and through decision making, will be crucial in determining how effective the planning system is in translating the positive aims and objectives of NPF4 into practice.

We expressed some concern that the [work programme update letter](#), dated 20 September 2024, did not include a reference to nature or biodiversity and the hope that this did not reflect a change in the importance of this issue in planning. We welcome your confirmation of the recognition of the nature and climate crises and request that this is reflected in any future correspondence with planners. It is crucial for nature to be prioritised and the message is clear that greater weight needs to be given to nature in decision making.

The ongoing work, such as the Scottish Government draft biodiversity planning guidance and NatureScot's commissioned work on a metric was also noted.

The differing circumstances and pressure that planning authorities face was discussed, in addition to the need to address other challenges, such as the housing crisis. LINK's experience has been that there is not a push back or opposition from developers to the NPF4 policy requiring biodiversity enhancement, and large developers are often used to the general principle through similar requirements in England. However, certainty and clarity is something that developers and community value.

LINK noted that the planning system also needs to protect the best places for nature and support the Scottish Government's commitment to protecting 30% of land and seas by 2030. Although the policies in

NPF4 do provide for this, positive effects for biodiversity cannot be realised unless the mitigation hierarchy is followed, as set out in policy and guidance. Although not discussed at the meeting, the Scottish Government's commitment¹ to review the policy on Ramsar Sites is strongly welcomed and we will look out for the consultation due to take place in October 2024.

Resourcing of the Planning System

We discussed how the planning system, including planning authorities, statutory agencies and decision makers, need to be properly resourced to support delivery of 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.

It was noted that CIEEM had carried out a [survey](#) in 2022 with local authorities that had emphasised the challenges faced by planning departments. This had found that 22% of planning authorities did not have access to ecological advice and expertise. The lack of enforcement staff was also noted as a problem in ensuring compliance and ensuring what has been given permission is actually delivered as intended.

The Scottish Government work that has been done to encourage people into the planning profession was raised and welcomed, in addition to work on resourcing the planning system, including the recent consultation. We strongly support the promotion of planning as a positive and interesting area of work.

LINK noted the cuts to the Nature Restoration Fund for local authorities and that the fund has, in some instances, been useful in enabling local authorities to plan nature, including 30x30 and nature networks.

The establishment of the Planning Hub was raised and we note its intended use to make the most of limited funding. We agreed that it is in no one's interests to take too long to make decisions, this is difficult for communities as well as applicants. However, LINK notes that timeous decisions cannot be at the expense of proper assessments of impacts on the environment. It was also discussed that the process can be delayed due to the lack of information submitted by applicants.

Biodiversity Enhancement

As noted above, the Policy 3 requirements for development to deliver biodiversity enhancement is very welcome and there are great opportunities for such measures to support the Scottish Government's wider commitments to nature restoration. At the meeting we discussed that LINK does have concerns over the way that the requirement for biodiversity enhancement is being implemented in some development decisions. This includes inconsistencies in how it is applied, accepting very limited and not significant measures, considering enhancement very late in the process and pushing the burden onto others, such as local communities.

¹ [Parliamentary Question Reference S6W-29859](#)

It was agreed that it was much easier and effective to design in biodiversity enhancement from the outset, rather than trying to retrofit it or try to address it late in the decision making process. Clear guidance is needed to ensure that the expectations for developers and decision makers are clear. Early stage advice from planning authorities is also helpful in avoiding delays later in the process but this is often difficult with very limited resources.

Please also find a link to Planning Democracy's research on the implementation of NPF4 biodiversity policies [here](#). The work is being followed up with more focus on major developments. We will keep you updated about this work.

Thank you

Once again, thank you for your time. If you require further information on any of the issues we have raised, we would be delighted to supply that.

The LINK Planning Group is keen to work closely with yourself and Scottish Government colleagues to deliver for our natural environment. We would like to invite you to a quarterly meeting where we can bring key topics of importance to your attention.

Yours sincerely,

Esmé Clelland, Senior Conservation Planner at RSPB Scotland & Convener of LINK Planning Group
Clare Symonds, Chair of Planning Democracy & Vice-Convener of LINK Planning Group
Annie Robinson, Senior Policy Officer at CIEEM
Juliet Caldwell, Advocacy Officer at Scottish Environment LINK



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