

## LINK Consultation Response

Call for evidence on the electricity transmission, gas transmission and gas distribution business plans for RIIO-3  
February 2025



Scottish  
Environment  
LINK

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### Introduction to Scottish Environment LINK

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.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits.

Our response concerns the commitments made by Scottish Hydro-Electric Transmission (SHE-T) and Scottish Power Transmission (SPT) to deliver at least 10% Biodiversity Net Gain (BNG) on transmission grid upgrades, and the need for these to continue to be funded. This response is not confidential.

### NPF4 requirement

We consider the commitment to deliver at least 10% BNG to be a minimum to ensure compliance with the policy requirements of Scotland's National Planning Framework 4 (NPF4), and in particular policies 1 and 3.

NPF4 is a national policy document approved by parliament. It is part of Scotland's statutory development plan; therefore, its policies are a significant material consideration for proposals for all energy consents applications, including major, national and EIA developments.

The Framework rebalances the planning system so that the climate and nature crises are at the heart of plans and decisions. Securing positive effects for biodiversity is one of six statutory outcomes of National Planning Framework 4.

Policy 1 states that when considering all development proposals, significant weight will be given to the global climate and nature crises. Policy 3 rebalanced the system in favour of conserving, restoring and enhancing biodiversity and promoting investment in nature-based solutions, benefiting people and nature. It states that development proposals will contribute to the enhancement of biodiversity; and development proposals for national or major development, or for development that requires an Environmental Impact Assessment, will only be supported where significant biodiversity enhancements are provided.



NPF4 identifies Strategic Renewable Electricity Generation and Transmission Infrastructure as a national development and gives policy support to developments coming under this classification, including new and replacement high voltage transmission lines. This policy support must be considered alongside other policy requirements.

When deciding whether to grant consent under the Electricity Act (1989), the ability of the proposal to deliver significant biodiversity enhancement is and will be a significant material consideration. If consent is granted, then a corresponding condition on the consent (or other mechanism) will be required to ensure appropriate enhancement is delivered.

### **Threat to nature restoration targets**

In the context of the climate crisis, Scottish Environment LINK members support the development of appropriately sited and designed renewable energy infrastructure, but this cannot come at the expense of the nature crisis. Indeed we are well aware of the climate imperative for the proposed transmission network upgrades in these business plans. However, the sheer scale and location of these upgrades means that even with significantly increased efforts to route these upgrades in the least environmentally damaging way, the cumulative biodiversity impacts of the T3 transmission upgrades constitute a threat to Scotland's wider biodiversity policy aims, and the UK's 30 by 30 international commitment unless they are carried out in an appropriate way which not only mitigates and compensates for predicted impacts but delivers enhancement for nature.

The Scottish Biodiversity Strategy to 2045 sets out the clear ambition for Scotland to be Nature Positive by 2030, and to have restored and regenerated biodiversity across the country by 2045. The only way to balance the dual imperatives of the nature and climate crises by securing nature restoration alongside the T3 transmission upgrades is through adequately funded and strategic use of biodiversity enhancements at the national scale.

Relevant supporting documents:

- [Part 2 – National Planning Policy - National Planning Framework 4 - gov.scot](#)
- [Scottish Biodiversity Strategy to 2045: Tackling the Nature Emergency in Scotland](#)
- [scottish-biodiversity-delivery-plan-20242030.pdf](#)

### **For further information contact:**

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