

# LINK Consultation Response

## National Planning Framework 4 – Call for Ideas

30 April 2020



Scottish  
Environment  
LINK

### Introduction

Scottish Environment LINK is the forum for Scotland’s voluntary environment community, with 39 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. The LINK network exists to support our members in making change happen on the ground for a healthier environment, healthier societies and a healthier planet. The National Planning Framework 4 (NPF4) Call for Ideas is an opportunity for LINK to highlight what our members consider are the most important outcomes that should be delivered by the Framework and recommendations for actions that can be implemented to achieve them. Primarily for NPF4, our focus is to contribute toward the development of policy measures that can help address the twin challenges of climate change and biodiversity loss in Scotland and help contribute toward the achievement of a more resilient and sustainable society.

During the past year, the First Minister has echoed the importance of addressing these twin challenges: in April 2019, she announced a climate emergency, and confirmed in a letter to LINK that the **climate emergency and biodiversity crisis were of equal importance** in shaping the Scottish Government’s way forward. Indeed, a fundamental element of addressing climate change includes the restoration of biodiversity and making the most of nature-based solutions on land and at sea.

The current public health emergency of the COVID-19 pandemic is and will continue to have lasting effects on our health, environment and economy. The huge and sudden societal changes brought in to help address the pandemic are far reaching and unprecedented. Whilst uncertainty remains as to when and how Scotland and other nations will overcome this immediate crisis, we can be certain of our ambitions. Ambitions that remain the same now as they were before the pandemic, which are positive, and which seek to realise a low carbon society and thriving nature and communities.

**These ambitions work toward achieving the vision set out in the Scottish Government’s Environment Strategy that:**

**“By 2045: By restoring nature and ending Scotland’s contribution to climate change, our country is transformed for the better - helping to secure the wellbeing of our people and planet for generations to come.”<sup>1</sup>**

Scotland’s 2019 Planning Act sets a new direction for planning in Scotland. For the first time planning has a defined purpose: to manage the development and use of land in the long term public interest. In turn, “long term public interest” is defined as contributing to sustainable development, and to achieving the national outcomes, which integrate economic, social and environmental ambitions.

The NPF4 must set out how we are going to live within our planetary boundaries in the decades ahead in order to achieve this vision. It should be the foundation of a transformative planning system that addresses the question of ‘what do we need so that we can live well within planetary boundaries?’ This is a planning system that plays a part in delivering public benefit and enables a smooth transition to a net-zero carbon economy, not a technocratic planning system that limits itself to deciding what

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<sup>1</sup> Scottish Government, 2020. *The Environment Strategy for Scotland: vision and outcomes*. p.3. Available at:

<https://www.gov.scot/publications/environment-strategy-scotland-vision-outcomes/>

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developments to approve without reference to broader strategic aims. We need a culture of planning that values the health and wellbeing of our environment on land and at sea; rights-based planning that embraces equality and a level playing field for communities; and effective, well-enforced environmental policy and regulation.

The NPF4 is an opportunity to introduce bold policies to enable intelligent development for the next three decades. As such we need strong, decisive action that enables a climate-friendly and resilient Scotland to be built.

Our response to the Call for Ideas contains two overarching recommendations: (1) to establish a Nature Network for Scotland and (2) for NPF4 to align with the Land Use Strategy. The remainder of the response is structured around the questions asked in the [‘Have Your Say’](#) consultation paper. In response to each question LINK members have highlighted key areas and recommended policies to include in NPF4. **The structure is as follows:**

**Key recommendation 1: Scotland’s Nature Network**

**Key recommendation 2: Aligning with the Land Use Strategy**

1. What development will we need to address climate change?

i. **Peatland Restoration**

**Recommendations:**

- Cease licensing peat extraction for horticultural use.
- Repeal existing extraction licences by 2023.
- Restore extraction sites.

ii. **Woodlands and Forestry**

**Recommendations:**

- Strengthened policies to protect against loss of ancient woodland and veteran trees.
- Integration of forestry and woodland strategies with Regional Land Use Frameworks.

iii. **Positive effects for biodiversity**

**Recommendation:**

- Develop a set of principles for delivering positive effects for biodiversity.

iv. **Energy developments (fossil fuel developments, renewables, fracking)**

**Recommendations:**

- Ban on new fossil fuel developments.
- Ensure the full deployment of renewable energy.
- Renewable energy generation in appropriate locations as a national priority.
- Favourable planning regime for renewable heating and heat networks.
- Favourable conditions for community energy generation.
- No approval for large biomass plants.
- Manage the impact of renewable generation and electricity transmission on our natural and cultural heritage.
- Include and clarify the position of no support for unconventional oil and gas.
- Include a presumption against conventional onshore oil and gas extraction.

2. How can planning best support our quality of life, health and wellbeing in the future?

i. **Housing**



**Recommendations:**

- Presumption against the renewal of planning permissions.
- A national housing audit to assess climate and biodiversity outcomes.
- Continue to support policies and research on land value capture to help deliver well-planned sustainable communities.

**ii. Farming and Rural Communities**

**Recommendations:**

- Soils of high agricultural value to be taken into account.
- A priority for locating multiple businesses and public services within rural communities.

3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?

**i. Circular Economy**

**Recommendations:**

- A presumption in favour of enhancing, repurposing or maintaining existing infrastructure.
- A priority for infrastructure that delivers a transformative circular system for key materials.

4. What policies are needed to improve, protect and strengthen the special character of our places?

**i. Green belts**

**Recommendations:**

- Stronger protection for green belts and encouragement to extend or designate new ones.
- A clear statement of the many positive benefits of green belts.
- More effective management by planning authorities for the long-term benefit of local communities and the climate.
- Forbid planning permission for building developments on green belt land where there are nearby existing brownfield sites with low biodiversity.

**ii. Landscapes**

**Recommendations:**

- Recognise the role of wild and man-made landscapes in enhancing quality of life, health and wellbeing.
- Continued recognition of the importance of wild land and use of Wild Land Areas map to inform planning decisions.
- Strengthen duty on local authorities to safeguard wild land in local development plans.
- National Park development plans should emphasise their first statutory objective.

**iii. Local Place Plans**

**Recommendations:**

- Set a policy direction for Local Place Plans to have status within relevant Local Development Plans and in subsequent decision-making.
- Recommend developers respond to the ambitions expressed in Local Place Plans.
- Greater resources to be made available to help communities develop their plans.



## Key recommendation 1: Nature Network

Scottish Environment LINK are calling for a stronger commitment to deliver Scotland's Nature Network by adopting it as a national development in NPF4. NPF3 included a commitment to develop and deliver a National Ecological Network for Scotland. In light of the climate and nature crises, it has become increasingly important to take a strategic approach to how we manage our natural environment, not just within planning but through other land uses and land use sectors.

Adopting 'Scotland's Nature Network' as a national development will enable delivery of green and blue infrastructure, restoration of nature and the ecosystem services that underpin societal wellbeing. A Nature Network means having bigger, better, more and joined up sites for nature; the need for this functional ecological connectivity is identified in Scotland's Biodiversity Routemap. Whilst directly beneficial to building resilient ecosystems, this approach can also assist delivery of shared ambitions that exist across Scottish Government programmes, not just those that exist for planning and the built environment. For instance, a Nature Network can directly support rural development priorities, not just by outlining the space required for nature but it can also identify, help spatially prioritise and direct investment toward land uses that are sustainable and needed to help address the effects of climate change. This would include the identification of suitable areas for nature-based solutions such as tree planting, peatland restoration, flood risk management, coastal management and natural flood management measures. Outcomes that both the Land Use Strategy and NPF4 and planning are focused on achieving and benefitting from.

Since publication of NPF3, government agencies and NGOs have been developing the Scotland's Nature Network concept and our understanding of the potential benefits that such a network could bring. Last year, the Landscape Scale Working Group of the Scottish Biodiversity Strategy (with membership from agencies, NGOs and local authorities) produced a paper to set out their shared thinking on a Nature Network, [\*Nature for the Nation: Scotland's National Ecological Network\*](#) which should be considered as part of this response.

## Key recommendation 2: Align planning with the Land Use Strategy

Scotland's Land Use Strategy, first published in 2011 and revised in 2016, sets out 10 Principles for Sustainable Land Use, recognising the role of land in underpinning Scotland's social and economic prosperity, supporting climate mitigation and adaptation and promoting sustainable development. These Principles are as relevant in urban environments as in rural settings and NPF4 must outline how the Principles influence planning decisions on the ground.

The Land Use Strategy 2016-2021 made clear that fully embedding these Principles within the planning system can deliver considerable benefits for planning decisions within towns and cities, but that much more progress is needed to encourage and realise these benefits. In particular, more work is required to fully integrate an ecosystem approach into Sustainable Environmental Assessment; to communicate and realise the benefits to communities of sustainable land use; to facilitate stronger connections between people and the land; and to help communities engage with and build resilience to climate change.

Whilst NPF3 and Scottish Planning Policy had *regard* to the Land Use Strategy and its Principles, the high-level Strategy has proved difficult to translate into a change on the ground and it is unclear what influence it has had on planning decisions in practice. We believe there is now an opportunity emerging to better integrate these processes through NPF4, as Local Authorities develop Regional



Spatial Strategies. There could be strong parallels between these and the Regional Land Use Frameworks, due in 2023. Local Authorities will likely have a key role in emerging Regional Land Use Partnerships and we suggest that Regional Land Use Frameworks and Regional Spatial Strategies must be produced in a strategic, holistic and coordinated way.

Similarly, adoption of Scotland's Nature Network complements this work, offering a guide to the priorities and opportunities for delivering nature-based solutions and focusing investment toward projects that deliver the greatest results in terms of tackling the climate and nature crises. For instance, offering clarity on the type and location of woodland creation and protection, the opportunities for peatland restoration and the areas that would offer the greatest flood risk alleviation outcomes.

Better aligning the efforts of planning and land use will serve to more readily achieve these outcomes and maximise the role that land plays and will continue to play in underpinning Scotland's social and economic prosperity, supporting climate mitigation and adaptation and promoting sustainable development.

**To facilitate this, LINK members recommend that:**

- A timetable for review is built into NPF4, perhaps at a 5-year point, to allow for Regional Spatial Strategies and Regional Land Use Frameworks to be integrated into and better inform wider planning policy and decisions.
- Advice, examples and case studies are developed, communicating the interdependencies between land use decisions in rural and urban areas, with a particular focus on the peri-urban interface, the influence that rural land use decisions can have on urban areas and vice versa.
- Regional Spatial Strategies and Local Development Plans are required to support ongoing delivery and strengthening of the Nature Network; and require direct reference to the shared objectives of both planning and the Land Use Strategy and forthcoming Regional Land Use Frameworks, due in 2023.

## **1. What development will we need to address climate change?**

It is right that addressing the climate crisis is a central focus of NPF4 but it is equally as important that actions to address it incorporate nature-based solutions on land and at sea which take steps to reverse biodiversity decline. As acknowledged by the First Minister and Cabinet Secretary for the Environment, Climate Change and Land Reform, these two crises are interlinked. Measures in NPF4 to assist Scotland in meeting ambitious net zero targets must also take account of opportunities to enhance biodiversity and aid nature recovery in both our inland and coastal environments.

Furthermore, to meet climate targets NPF4 must enable the transition to a fully renewable energy system and align with Scotland's Energy Strategy. It must also incorporate the principles of the circular economy to make best use of existing resources and lower our carbon emissions (this is discussed further in Section 3).

**LINK members provide the following readily deliverable recommendations that NPF4 could implement to help address the climate and nature crises:**

### **(i) Peatland Restoration**

The UK Committee on Climate Change (UKCCC) was clear and unequivocal about the critical role of peatland restoration in meeting Scotland's ambitious target of net zero greenhouse gas emissions by



2045. The Scottish Government has also been clear in its commitment to restore peatlands, committing £250m over the next 10 years.

Despite the importance of peatlands, peat extraction continues to be sanctioned within the planning system. ClimateXChange estimates that peat extraction volumes in Scotland for horticulture are around 0.5 million m<sup>3</sup> per year, accounting for 60% of UK production and with estimated carbon emissions of 100kt CO<sub>2</sub>e per year.<sup>2</sup> The continued extraction of peat for horticulture and other uses, facilitated through the planning system, could both significantly undermine the Scottish Government's peatland restoration ambitions and its ability to meet its legally binding climate targets.

**In order to maximise the benefits that can be realised through restoring peatlands, LINK members recommend NPF4 includes policy to:**

- Cease granting any new mineral extraction licences for peat extraction for horticultural use.
- Support the repeal of all existing licences by 2023.
- Support the restoration of existing extraction sites, where bare peat is re-vegetated and water tables are raised to protect the remaining carbon store. Where possible, peat forming function should be restored to facilitate future carbon sequestration.

## **(ii) Woodlands and Forestry**

NPF4 must take the opportunity to strengthen the provisions from the NPF3 and Scottish Planning Policy in relation to woodlands and trees. Woodlands and trees contribute to the outcomes which the NPF4 is set out to deliver, specifically: improve health and wellbeing, improve equality, meeting targets related to emissions reduction and positive effects for biodiversity.

The integration of nature, including mature trees, into built environments can contribute to making places more resilient to the long-term impacts of climate change. Urban forestry – which includes trees on streets, parks, cemeteries, private gardens and generally all trees in the urban realm – delivers a significant number of benefits such as: flood and rainwater management, shade and shelter, and space for wildlife. A Nature Network would help to identify the areas that would see the greatest benefit from tree planting.

Climate-friendly places are places where mature trees are part of the canopy cover and native and ancient woodlands are protected and in good condition. Homes are built with timber which is locally sourced and processed and is from sustainably managed forests.

In addition, the inclusion of existing and creation of new green spaces in urban areas, which include trees, can contribute to 'green health.' There is now a growing body of Scottish research on 'green health'<sup>3 4</sup> investigating the ways in which access to good quality urban greenspace mediates health

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<sup>2</sup> ClimateXChange, 2020. *Alternatives to Horticultural Peat in Scotland*. Available at: <https://www.climateexchange.org.uk/research/projects/alternatives-to-horticultural-peat-in-scotland/>

<sup>3</sup> CRESH: Centre for Research on Environment, Society and Health (2019). *Green Spaces and Health*. Available at: <https://cresh.org.uk/cresh-themes/green-spaces-and-health/>.

<sup>4</sup> James Hutton Institute, OPENSpace Edinburgh University, University of Glasgow, Heriot-Watt University, Biomathematics and Statistics Scotland (2014). *GreenHealth. Contribution of green and open space to public health and wellbeing. Final Report*. Available: <https://www.hutton.ac.uk/research/projects/green-health>.



and wellbeing outcomes by promoting physical activity, mental and social health, and reducing health inequalities.<sup>5 6</sup> Recent studies also suggest that the health gap between richer and poorer people may be smaller in neighbourhoods with more greenspace.<sup>7</sup>

**To maximise the benefits that can be realised through protection and restoration of native and ancient woodlands alongside sustainably managed forests, LINK members recommend:**

- Strengthened policies to protect against the irreparable loss of ancient woodland and veteran trees. This should follow the example of the policy and definition of ancient woodland and veteran trees given in England’s National Planning Policy Framework.
- Planning authorities integrate statutory forest and woodland strategies with regional land use frameworks developed across Scotland as per the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, with the aim of better integrating forestry with other land uses.

### **(iii) Positive Effects for Biodiversity**

Securing positive effects for biodiversity is one of the NPF4’s high-level outcomes. This reflects the UN Sustainable Development Goal target 15.9 of integrating ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts. In order to achieve such outcomes through planning there is a need to make transformational changes from the current approach of simply limiting or mitigating damage to nature toward one that actively seeks positive outcomes for nature from development. Such a transformational shift will require clear and direct policy support within NPF4.

Biodiversity net gain is one particular concept being implemented voluntarily by a handful of businesses and is gaining traction as a means to deliver positive outcomes for biodiversity from development in England. However, positive effects for biodiversity from development can be delivered in a variety of ways. Scottish Environment LINK do not ascribe to any individual approach or concept of net gain, but do emphasise the need for such a policy requirement to be applied consistently in order to provide clarity to stakeholders engaging with the planning system.

Scottish Environment LINK support the inclusion of policy within NPF4 directing all development to deliver ‘positive effects for biodiversity’ through a mechanism that is yet to be specified. LINK and its members offer support in the development of such a mechanism.

**To realise positive effects for biodiversity through NPF4, LINK members recommend that:**

- Any new requirement to deliver positive effects for biodiversity must be guided by a set of principles to ensure intended outcomes. Some LINK members are working up detailed principles and are keen to offer their input into the development of any new policy requirement.

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<sup>5</sup> Pearce, J., Shortt, N., Rind, E. & Mitchell, R. (2016). Life Course, Green Space and Health: Incorporating Place into Life Course Epidemiology. *International Journal of Environmental Research and Public Health* 13:1-11.

<sup>6</sup> Ward Thompson, C., Roe, J. & Aspinall, P. (2013). Woodland Improvements in Deprived Urban Communities: What Impact Do They Have on People’s Activities and Quality of Life? *Landscape and Urban Planning* 118:79-89.

<sup>7</sup> Mitchell, R., Richardson, E., Shortt, N. & Pearce, J. (2015). Neighbourhood Environments and Socioeconomic Inequalities in Mental Wellbeing. *American Journal of Preventative Medicine* 49:80-84.



#### **(iv) Energy Developments**

Current policy states that “the planning system should recognise the national benefit of indigenous coal, oil and gas production in maintaining a diverse energy mix and improving energy security.” This statement is out-dated and planning policy must now be amended to reflect not only the Paris Agreement (following the Court of Appeal’s recent judgment in the Heathrow third runway case), but also the First Minister’s declaration of a climate emergency and which the Scottish Government has committed to tackling.

We note that the Scottish Government will be reviewing Scotland’s Energy Strategy in light of the new climate targets and has indicated that the current target for 50% of Scotland’s total energy consumption across electricity, heat and transport to be met by renewables, will have to be strengthened. This places an ever greater emphasis on the role of planning policy in enabling the transition to a fully renewable energy system, and will require greater alignment of NPF4 and Scotland’s Energy Strategy.

Any fossil fuel energy generation developments granted during the period of NPF4 would still be operating by 2045, the date by which Scotland must reach net-zero emissions, thereby locking us into a high carbon future and compromising our ability to meet the targets. In order to transition away from burning fossil fuels in heat and transport, there will be greater reliance on electrification in these sectors in the future. The UKCCC has suggested that renewable electricity generation must quadruple in order to meet the new climate targets. NPF4 must enable a rapid scaling up of renewable electricity generation in Scotland over the next decade.

#### **For the planning system to support the national objective of delivering net-zero greenhouse gas emissions by 2045, LINK members recommend NPF4 includes:**

- A focus on reducing energy use, while safeguarding social, economic and environmental outcomes.
- A ban on all new fossil fuel developments, extending to all new coal, oil or gas energy developments, including projects below 50MW for which approval is currently granted by local planning authorities. This should extend to developments proposing to manufacture fossil hydrogen and to fossil fuel generation with Carbon Capture and Storage (CCS).
- 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 upholding democratic processes, environmental protection legislation and opportunity for public scrutiny while considering all new developments against the need to reduce our overall energy demand.
- 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.
- NPF4 must create a favourable planning regime for the roll out of renewable heating and heat networks at scale across Scotland, which should be considered a national development.
- NPF4 must also create conditions favourable to community energy projects, in order to meet the Scottish Government’s target of achieving 2GW of community and locally owned



energy by 2030. This must be accompanied by resources and guidance for local planning authorities.

- Large biomass plants should not be considered or included as renewable generation.
- NPF4 should include and clarify the Scottish Government's position of no support for onshore unconventional oil and gas (fracking), having committed to doing so in Parliament. Additionally, the present moratorium is limited to *unconventional* oil and gas extraction – NPF4 should go further and include a presumption against *conventional* onshore oil and gas extraction as well.

## 2. How can planning best support our quality of life, health and wellbeing in future?

Planning has a fundamental role to play in shaping how we will live in the future. LINK members have particular recommendations to make for how planning can meet the need for more affordable and social housing and how the system can support the best use of agricultural land and Scotland's rural communities.

### (i) Housing

There is a clear need for new social and affordable homes across Scotland. In planning and building these new homes the focus must be on the quality of the homes and their setting so that we build communities that people really want to live in, and which are resilient now and into the future. We need homes and new settlements that make a coherent contribution to place, rather than large volumes of housing being imposed on places with little or no regard to outcomes for NPF4.

These homes and settlements need to be audited against net-zero and interim targets and the principles of a circular economy, and the government needs to set higher environmental standards for housing construction. We must move away from the poor state of volume-housing design. Fulfilling housing needs should no longer be seen as an opportunity for volume house builders to make a profit from private housing. Future analyses of housing needs must be sophisticated enough to include the type and tenure of the properties. The main focus 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 should also 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 also 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.

Scottish Planning Policy should support new housing developments where it can be clearly demonstrated that they fulfil the purpose of meeting the demand for affordable and social housing. New housing should also be sited on suitable brownfield sites, in preference to greenfield sites or brownfield sites of high environmental value as identified by a Nature Network. Similarly, new developments should protect and enhance irreplaceable habitats to provide positive effects for biodiversity. Any housing development and associated infrastructure should not be sited in formally designated areas, have negative consequences on irreplaceable habitats, nor cause an increased flood risk in the immediate area or other catchments. Any new settlements should be self-sustaining with



good provision of supporting jobs, workspaces and community facilities, with high density housing to ensure less land is required.

The uplift in land values accruing from the grant of planning permission (or betterment) should be captured for the public good. Benefits that could accrue from more fully capturing betterment include a change to the incentive structures governing private development. By removing the potential for speculative profit and loss on land, the planning system could effectively de-risk development whilst leaving developers free to compete based on the quality of what they build, rather than underlying (and unproductive) land values.

New developments must be designed with high placemaking standards, with sustainable transport links and access to green and blue spaces planned for early in the design phase.

**To maximise the benefits of housing to best support the quality of life, health and wellbeing of all, LINK members recommend NPF4 considers:**

- Consider introducing a presumption against the renewal of planning permissions for housing developments, or, in the case of larger sites, a requirement for a phasing agreement whereby planning permission would be revoked if the permitted housing is not delivered. Alternatively, a mechanism could be introduced whereby a developer or landowner would face a financial penalty in cases of non or under-delivery unless there are proven economic or technical reasons why development has not gone ahead.
- Consider introducing a regular national housing audit, to determine the quality of the housing stock and new housing settlements in terms of climate, biodiversity and other outcomes.
- Continue to support policies and research on land value capture to help deliver well-planned sustainable communities in places people want to live and at prices they can afford to pay.

## **(ii) Farming and Rural Communities**

It is vital that NPF4 takes a holistic approach, planning for liveable communities where education, culture and care are easily accessible. It is also vital that the Framework sets out proposals for providing good nutrition to all of Scotland's communities and plays a role in delivering the ambitions of making Scotland a good food nation. This requires the planning system to take account of the importance of agriculture not only in terms of rural economic development but also in boosting Scotland's health and underpinning sustainable local food systems.

Soil is an integral part of our natural and cultural heritage, indeed it is the backbone of Scotland's rural economy and underpins nationally and internationally important biodiversity and a wide variety of landscapes. It requires constant management to maintain soil health and productivity. However, the importance of soil has been undervalued in recent decades. The growing recognition of peatlands as vital carbon stores is welcome, but the planning system must begin to account for the importance of high value soils for food growing and developing local, sustainable supply chains.

Scotland's rural communities are central to our agricultural sector but they are frequently underserved by local public services, driving a fall in rural population. Planning must support local rural places by encouraging multiple businesses and services to locate nearby so that our rural communities are diverse and multi-functional.

**To maximise the benefits of an environmentally sustainable agricultural system, LINK members recommend NPF4:**



- Takes into account land of high agricultural value. A soils framework would help to identify the areas of land that can contribute the most to developing sustainable, local food chains and ensure the planning system recognises their value.
- Includes a priority for locating multiple businesses and public services within rural communities.
- In the light of COVID-19, consideration is given to planning for local food production. This could include establishing food belts in peri-urban areas as a national priority, with processing and distribution designed to connect communities with fresh and lightly processed food from their region, along with public storage of some commodities for emergency supply.

### 3. What does planning need to do to enable development and investment in our economy so that it benefits everyone?

Planning has a role to play in the transition to a sustainable economy. Our climate and nature emergencies are closely linked to the quantity of products that we use and consume, how they are made and how they are disposed of. Linear economics is the driving force for this, which is why LINK members urge the transition to a circular economy where products are re-used and waste reduced.

#### (i) Circular Economy

We need to re-programme our economy to extract less from the planet, re-use what we've already taken and reduce our waste.

The construction sector is the largest users of resources in Scotland and generates the most waste. In 2016 it generated approximately 5m tonnes of waste, about half of all waste generated. Although Scotland is a producer of aggregates and timber, both are also imported in significant quantities. At the UK level, the trade deficit in construction materials and components has continued to widen in recent years. The planning system has an important role to play in smoothing the adoption of more circular practices to make the construction sector more efficient and resilient while making progress toward net-zero climate targets and reducing our impact on the natural world.

In doing that, it will be critical that Scotland develops the infrastructure to support a circular economy. Most existing infrastructure has been designed for and continues to perpetuate a linear economy, for example the past focus on landfill, energy from waste and, more recently, recycling infrastructure continues a manufacture, waste, discard trajectory for raw materials. We need infrastructure to support and enable a circular economy where products are easily brought back into use or repurposed for other means.

As far as we are aware, very little has been said about the capacity of Scottish infrastructure for the activities needed to reduce resource use and support a circular economy beyond recycling, including reuse and refurbishment. We would like to draw your attention to the Green Alliance report, [\*Building a Circular Economy: How a new approach to infrastructure can put an end to waste\*](#), which describes the infrastructure required under three scenarios (business as usual, high recycling, and transformation to a circular economy) for three common, high impact material streams from household waste: plastic, textiles and electrical equipment in England.



Scottish Planning Policy should include the adoption of a ‘whole life approach’ to developments where any new developments are designed for full and proper maintenance so that their life is extended and components can be reused.

**To begin delivering the benefits of a circular economy LINK members recommend NPF4 includes:**

- A presumption in favour of enhancing, repurposing or maintaining existing infrastructure to make continued use of existing assets. This will also contribute to meeting climate change targets.
- A priority for infrastructure that delivers a transformative circular system for key materials. We need to carry out an infrastructure stocktake combined with an analysis of material flows to inform decisions about what infrastructure is required.

#### **4. What policies are needed to improve, protect and strengthen the special character of our places?**

NPF4 can make a contribution to protecting and enhancing the places we visit everyday close to our homes as well as Scotland’s natural environment and wild places. Planning needs to ensure that our most sensitive landscapes and ecosystems are protected from inappropriate and damaging development, are valued for their importance in underpinning our societal needs and wellbeing, and that greenspaces are easily accessible from our towns and cities.

##### **(i) Green Belts**

Scotland’s eleven green belts are a precious resource of national importance. They protect and enhance the landscape setting of the towns and cities they surround, and help to direct growth into appropriate locations within settlements. Green belts provide many important benefits to the quality of life and well-being of society in addition to their planning purposes. They often include important designations for the protection of landscape, nature conservation, informal outdoor recreation and cultural heritage. They would have an important contribution to make in the development of a Nature Network.

Green belts already contribute to climate mitigation through carbon storage in soils and woodlands. However, they also have great potential to do much more to address the climate emergency and biodiversity crisis and to promote physical and mental well-being through healthy outdoor exercise. They contain significant areas of prime agricultural land, important for home-grown food production, and of semi-natural woodland, valuable for carbon storage. All Scotland’s rural landscapes provide benefits to people’s mental and physical health, but green belts are particularly significant in this regard, as many of them provide access to the countryside for Scotland’s most deprived urban communities with otherwise poor access to open space, helping to mitigate day-to-day environmental injustice. Green belts can also provide havens for wildlife, so can help to tackle the biodiversity crisis.

However, the integrity of our green belts is under constant threat, primarily for housing development which should mostly take place on brownfield land of low environmental value as recommended in section 3.

Existing green belt policy aims to guide development to the most appropriate locations, however local community groups report serious concerns about significant green belt losses and the need for their stronger protection through the planning system. Substantial developments are currently proposed



in green belts around for example Aberdeen, Edinburgh, Glasgow, Perth, St Andrews and Stirling. Environmental justice demands that green belt policy be strengthened in NPF4.

**To maximise the benefits of green belts, LINK members recommend that NPF4 should:**

- Grant stronger protection to green belts, promoting their positive management for landscape and recreation and to encourage local authorities to extend existing green belts and designate new ones.
- Clearly set out the many positive benefits of green belts.
- Require local planning authorities to use Regional Spatial Strategies, Local Development Plans and the Nature Network to manage green belts more effectively for the long-term benefit of local communities and the climate.
- Forbid local planning authorities from granting planning permission for building developments on green belt land while undeveloped brownfield land remains in their area, with unmet housing targets no longer considered a valid reason for development on green belt land.

## **(ii) Landscapes**

Scotland's finest landscapes support human vitality and health; inspire awe, wonder and a sense of peace; and provide space for challenge, reflection and adventure beyond the day-to-day. They are an important part of our heritage and a source of inspiration for our creative and cultural industries. The livelihoods of people – from tourism, heritage, food, farming and cultural sectors – are interwoven with the health of surrounding landscapes.

Scotland is unique within the United Kingdom in that it still has extensive wild land areas that, although modified over the centuries by human activity have the potential for landscape-scale ecological restoration. These areas have been mapped by SNH in the form of a Wild Land Areas map<sup>8</sup>, providing a spatial framework that identifies those parts of our landscape that can make a major contribution to addressing climate change, for example, through nature-based solutions such as woodland and peatland restoration on an extensive scale.

NPF4 offers an opportunity to recognise the role of Scotland's Wild Land Areas as part of a national Nature Network, playing an integral part in sustaining and revitalising rural and remote rural communities in Scotland. In addition, this should extend to the spectacular nature found along Scotland's coasts and waters that help to define our national landscape in addition to wild inland areas. Future Scottish Planning Policy should continue to assert the importance of Scotland's wild coastlines.

For landscapes that already receive statutory protection, such as our National Parks and National Scenic Areas, NPF4 should recognise their national importance and special characteristics and protect the potential of these areas to respond to and help address climate change. For National Parks, it can do so by continuing to emphasise their first statutory objective with planning decisions taken consistently with the priority weighting of the first objective. Within development plans for National Parks, there should be a development category for ecological restoration as in this respect planning can help National Parks to fulfil their primary objective.

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<sup>8</sup> LINK members recognise that there is not universal acceptance of the Wild Land Areas map, and we respect the views of those who disagree with the concept. Terminology to one side, we believe that there are extensive areas of our Wild Land Areas which could play a major role in addressing the climate and biodiversity crises, while significantly boosting rural economies through the investment that would be needed in people, partnerships, expertise and skills.



In addition, for National Scenic Areas, NPF4 can protect these areas of outstanding scenic value by reflecting the amendments made to the Town and Country Planning (Scotland) Act 1997 by the Planning (Scotland) Act 2019. In summary, these amendments require: when planning powers are used, special attention is to be paid to safeguarding or enhancing the character or appearance of National Scenic Areas; Scottish Ministers, before issuing a direction designating a National Scenic Area, consult with Scottish Natural Heritage and such other persons as are prescribed, including residents in and adjacent to the proposed area, and any community body with an interest in the area; Scottish Ministers must produce a report on the consultation undertaken, in any year they have designated a new National Scenic Area, and that Scottish Ministers must have regard to any such report when preparing the National Planning Framework.

**To realise the benefits of protecting and restoring Scotland’s most scenic landscapes, both wild and shaped by human activity, LINK members recommend that:**

- NPF4 continues to recognise the national importance of wild land and Wild Land Areas, with the Wild Land Areas map retained as a spatial framework complementing a national Nature Network.
- NPF4 strengthens the existing provision within Scottish Planning Policy which expects Local Authorities to ‘identify and safeguard’ areas of wild land in their local development plans.
- NPF4 continues to recognise the role of all landscapes, including our wildest landscapes, and wild land, as well as battlefields, gardens and designed landscapes, National Scenic Areas, Conservation Areas, and Special Landscape Areas, in contributing to the quality of life, health and wellbeing of present and future generations.
- Development plans for National Parks should emphasise the first statutory objective of National Parks, and planning decisions should be consistent with the priority weighting of the first objective. Within development plans for National Parks, there should be a development category for ecological restoration as in this respect planning can help National Parks to fulfil their primary objective.

### **(iii) Local Place Plans**

Research has found that the majority of the public think they have no influence on the planning system, and that less than half of Scots thought the planning system had protected or enhanced their local natural or historic environment.

The NPF4 is an opportunity to turnaround these perceptions, and more fully engage citizens with how Scotland’s physical environment is changing. The Local Place Plan provisions in the Planning (Scotland) Act 2019 can form the foundation of better community engagement.

**To achieve this, LINK members recommend that:**

- NPF4 references the Local Place Plan provisions of the 2019 Act and sets a policy direction for giving them status within relevant Local Development Plans, and in subsequent decision-making.
- NPF4 recommends developers respond to the ambitions expressed in local place plans.
- NPF4 recommends greater resources be made available to help communities develop their plans.



## Conclusion

The NPF4 has a responsibility to set out how we are going to live within our planetary boundaries in the decades ahead as part of our response to the climate and nature emergencies. The Framework should form the foundation of a transformation in Scotland's planning system to deliver public benefits, meet net-zero goals and contribute to the recovery of biodiversity. LINK members have suggested a range of bold policies to allow intelligent decisions to be made by planning authorities across Scotland, enabling Scotland's communities to take actions which together will put us on the path to a resilient, socially just, climate-friendly and nature-rich Scotland.

**This response represents the collective view of LINK's [Planning Group](#), with substantial input from across the wider LINK network. Members may also respond individually in order to raise more detailed issues that are important to their particular organisation.**

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