National Planning Framework 4
Call for Ideas

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Summary

We welcome the holistic and ambitious approach to the National Planning Framework 4 (NPF4) and that it will 'provide a spatial planning response to the Global climate emergency'. The nature and climate emergencies are inextricably linked, and NPF4 must ensure that ambitious actions for inclusive, place-based nature restoration are included.

The current biodiversity ambition for NPF4, 'securing positive effects for biodiversity', is inadequate and not reflective of the First Ministers statement that:

> "*The challenges facing biodiversity are as important as the challenge of climate change, and I want Scotland to be leading the way in our response."*[1]

For a 30-year vision, NPF4 must be part of a wider system change and range of solutions that achieve net-zero emissions by decarbonising across every sector whilst restoring nature, our relationship and equitable access to it. These points are even more important when considered in the light of the Covid 19 pandemic.

We respond to the *Call for Idea*s by outlining, in broad terms, a vision for a strategic connected, resilient, and inclusive framework for nature, green and blue spaces and infrastructure, and just climate action.

The Trust would like to see the NPF4 becoming the spatial expression of the National Performance Framework rather than the Economic Strategy and bring more coherent and joined up policy across the whole framework. In doing so it would help form the framework for a wellbeing economy that includes environmental and biodiversity priorities and address the quantity, quality, distribution, and importance of nature in our everyday lives.

The Trust sees a central role of the NPF 4 being the Scottish Nature Network, which would strategically tackle ecological problems and provide nature based solutions to some of the biggest issues facing society such as climate change and health inequality.

Key to delivery of a Scottish Nature Network in NPF4 would be coordination of green and blue infrastructure in the Infrastructure Investment and Climate Change plans. NPF4 would also need to ensure there is coherence between the Land Use Strategy, Regional Land Use Plans and the spatial management of a rigorously designed Biodiversity Net Gain (BNG) approach.

This submission is in addition to Scottish Environment LINK's submission which the Trust has also contributed to.

Background

The NPF4 is intended to go far beyond the scope of previous NPFs with a much-expanded timeline. This means it must address the interrelated crises of climate disruption and ecological breakdown to be a viable strategy in keeping with Scottish Government ambition and statements. Scotland needs a step change in the governance of land-use and planning in a period of climate breakdown and biodiversity loss. IPBES and other scientists have recently highlighted that:

> Only immediate transformation of global business-as-usual economies and operations will sustain nature as we know it, and us, into the future.[i]

The assessment by the experts is clear:

> Our comprehensive assessment of status, trends, and possible futures for nature and people suggests that action at the level of direct drivers of nature decline, although necessary, is not sufficient to prevent further deterioration of the fabric of life on Earth. Reversal of recent declines—and a sustainable global future—are only possible with urgent transformative change that tackles the root causes: the interconnected economic, sociocultural, demographic, political, institutional, and technological indirect drivers behind the direct drivers.

The Scottish Wildlife Trust believes such an assessment requires a coordinated, ambitious, and rapid transition in which nature's decline and climate breakdown are tackled and reversed. This requires an emergency response across those sectors outlined above, with nature-based solutions providing significant contributions to a broader just transition. Whilst ambitious, the approach is people-centred and evidence-based. For instance, scientists and conservationists have shown that:

> As more and more carbon dioxide is emitted into the atmosphere, humans and the natural world are beset by the damaging consequences of a rapidly changing climate. **Natural and seminatural ecosystems are likely to be the best starting place for immediate adaptation and mitigation solutions.** First, though, many natural environments need restoration to maximize their own resilience to climate change.[ii]

Elsewhere, it has been estimated[iii] that 37% of near-term climate mitigation can be achieved 'through protection, improved management, and restoration of ecosystems, as we increase overall ambition'. Crucially, it is necessary to *both* eliminate fossil fuel dependence in the economy *and* initiate large-scale restoration of nature. The paper concludes that 'both can and must be done in the coming decades to avoid greater costs to society posed by climate change'.

Scotland will have to have reduced 75% of its emissions by 2030. This means the current and next Scottish Governments will have to implement workable, scalable, implementable actions capable of solving three-quarters of the emissions pollution.

Role of planning in restoring nature

The Trust's primary planning policy can be found in our policy on the Planning system.

A primary function of the planning system should be to 'further the conservation of biodiversity' as stated in section 1 of the Nature Conservation (Scotland) Act 2004. In order to achieve this, Scottish Government planning policy should actively seek to create space for nature, make ecological

connections and provide clear advice for planning authorities who have to implement national policy.

NPF4 must take the opportunity to carry across and strengthen relevant sections in Scottish Planning Policy (SPP) in relation to biodiversity and greenspace. Currently too much of this policy is optional and is rarely carried through by developers or enforced by planning authorities. This is resulted in the Scottish Governments "place standard" polygon tool[iv] scoring remarkably poorly for most new developments.

At a high-level policy in Scotland regarding green infrastructure is very good, however, this is unfortunately not delivering the developments we need to see on the ground. Ultimately between high level policy and implementation something is being lost in translation and so often we see developments that are ecologically incoherent and negatively impacting nature.

The Cumbernauld Living Landscape, a partnership between Scottish Wildlife Trust, North Lanarkshire Council, Sanctuary Scotland and the James Hutton Institute, has done an excellent job of translating high level on green networks into a local situation in this guidance note. Unfortunately, as in other areas of Scotland we do not see this guidance delivering nature, people and climate friendly development. This must be rectified with NPF4 to meet Government ambition. Without developers being compelled to integrate biodiversity into decision making we will not see it happening.

Biodiversity Net Gain

Given the mixed experience with biodiversity offsetting and the challenges with its practical implementation, the Trust supports the principle of Biodiversity Net Gain but only where it is consistent with the following principles:

- That all projects have rigorously applied all steps in the mitigation hierarchy (avoid, minimise, restore before offset).
- A full set of alternatives have been considered.
- The approach has demonstrated it can address concerns around measuring biodiversity, displacement, additionality, timescales, uncertainty, monitoring/evaluation and governance.
- That the margin of net gain is sufficient to reduce some of the risks of the approach.
- In certain circumstances, biodiversity offsets are not appropriate because residual impacts on biodiversity cannot be offset or where there is a high risk of failure. Protected areas such as SSSIs and habitats such as ancient woodlands and peatlands should never be considered for development. There are some biodiversity impacts that can never have an appropriate offset.
- Regional Land Use Partnerships should be engaged fully and early in the net gain process to ensure local values are properly accounted for.

Connecting policies and reconnecting nature

Ecosystem health and carbon benefits are maximised with greater spatial connectivity. At the national level, therefore, the emphasis should be on ensuring policy and planning is coordinated, consistent, and coherent across sectors. National Planning Framework 4, the Regional Land Use

Frameworks, the Land Use Strategy, and the Forestry Strategy need to be better integrated to ensure this. Habitat fragmentation should receive far greater attention in environmental policy broadly.

The inclusion of green and blue infrastructure, if deployed according to the principles of a wellbeing economy, the Place Principle, and National Performance Framework, could be instrumental in meeting the scale of nature restoration required for both people and planet. This should extend to the design of new building and housing estates, learning from practices where safe and inclusive access to greenspace has been factored into the design.

Sustainable and inclusive prosperity is a central objective of Scotland's National Performance Framework which all policies should work towards. New policies need to be able to take account of wellbeing derived from access to nature, with communities actively engaged.

National Planning Framework 4, the Regional Land Use Frameworks, the Land Use Strategy, and sector-specific policies such as the Forestry Strategy need to be better integrated to ensure the necessary coherence.

There is also a need for NPF4, the LUS, and the RLUPs to provide coherence for and delivery of green and blue infrastructure investment, in line with the Infrastructure Investment Plan (consistent with the advice from the Infrastructure Commission). Otherwise there is a risk of this being ad hoc and not providing as much benefit as it might without strategic delivery.

This framework, including the RLUPs, should be informed by the needs for greater habitat connectivity and more sustainable transport routes for people and goods. Whereas grey infrastructure, such as roads and railway lines, fragment habitats and lead to significant impacts on nature, green and blue infrastructure deploy natural and naturalistic principles to minimise impacts, mimic natural processes, and maximise connectivity of green spaces, in both urban and rural contexts. NPF4 must recognise and reinforce the role RLUPs have in regionalising this strategy of green corridors for people and nature, and in engaging communities of place and communities of practice/interest[v] in identifying needs and solutions.

In order to combat the twin biodiversity and climate emergencies Regional Land Use Partnerships (RLUPs) need to identify and work with stakeholders to provide Nature Based Solutions to these issues and others (such as health inequality). NPF3 included provisions for a *national ecological network*, but in practice this has not been applied and suffered from being poorly embedded in implementation strategies, being poorly communicated politically and to stakeholders and having next to no resource given to it. The RLUPs and NPF4 need to increase this ambition to help reverse the declines of species and habitats on which all activity ultimately relies. One key means for doing this will be through opportunity mapping. RLUPs should be equipped to help highlight and include invaluable stakeholder expertise to inform this.

We urge that both RLUPs and NPF4 accommodate each another and adopt nature connectivity as a basic principle of nature restoration. Large efforts, such as Coigach & Assynt Living Landscape, are of substantial importance, but connectivity, and restoration in general, cannot be limited to protected areas. Infrastructure has a key role to play in ensuring this, both in terms of sensitivity to the

environment and in the incorporation of natural and naturalistic features into the design of buildings, materials, provision and waste utilities, and places.

The Planning (Scotland) Bill defines "green infrastructure" as "features *of the natural and built environments that provide a range of ecosystem and social benefits*" and "green networks" as "*connected areas of green infrastructure and open space*"

The Infrastructure Commission for Scotland has already been tasked with providing independent advice for a 30-year infrastructure strategy and have concluded that natural infrastructure should have a full needs assessment and be part of the Infrastructure Investment Plan.

The RLUPs should help coordinate the needs of local communities, facilitate the knowledge and values exchanges among communities of place and communities of practice/interest, and feed this information into the broader system to help in the allocation of resources and contribute to the co-production of national planning and land use management.

Wellbeing

We note and welcome comments recently by the First Minister that transitioning to a wellbeing economy is at the heart of economic thinking. This can and should include the environment. As NPF4 builds on and contributes to new ways of judging the success of an economy, it must include the quantity, quality, distribution, and importance of nature in our everyday lives. We propose that, as wellbeing has a deserved and central place in the focus of NPF4, it must be realised with concrete actions, clear and accountable indicators, and a compelling vision for a sustainable, just transition.

Indicators must go further than existing economic metrics. As the First Minister has also outlined,:

> *"The goal and objective of all economic policy should be collective wellbeing. This broader approach is at the very heart of our economic strategy which gives equal importance to tackling inequality as economic competitiveness."*

We believe that NPF4 should aim to be the spatial expression of the National Performance Framework rather than the Economic Strategy.

Placemaking

We welcome the inclusion of placemaking as an approach to appropriate planning. Planning needs must be based on the needs of local communities while adhering to our duty to reversing nature degradation and taking just climate action. The emphasis on *placemaking* in proposals for NPF4 are encouraging. It is imperative that this reflects a substantial approach embedded at multiple levels, and a central principle of deliberation in the planning system.

Place-based approaches have become more common throughout Scotland, with the Communities Empowerment (Scotland) Act 2015 being the key legislation, and the Christie Commission on the future of public services providing key recommendations in this area. The Act helps form the basis of place-based approaches to policy. The approach "offers a holistic or 'whole place' approach that crosses policy sectors and silos. Its added attraction for policymakers is that it sounds tangible, immediate and local. It's something an individual can identify with – a place to live, a place of work, and a place to care about and protect."[vi]

Whilst particularly urban solution will benefit from a place-based approach, ecosystem and carbon benefits are maximised with greater spatial connectivity. At the national level, therefore, the emphasis should be on ensuring policy and planning is coordinated, consistent, and coherent across sectors. National Planning Framework 4, the Regional Land Use Frameworks, the Land Use Strategy, and the Forestry Strategy need to be better integrated to ensure this. Habitat fragmentation should receive far greater attention environmental policy broadly.

Sustainable and inclusive prosperity is a central objective of Scotland's National Performance Framework which all policies should work towards. New policies need to be able to take account of wellbeing derived from access to nature, with communities actively engaged. This should include recognising and mitigating social inequalities in access to green spaces.

Nature-based solutions and climate action

The Scottish Wildlife Trust has outlined elsewhere its approach to place-based natural solutions that offer wide benefits, including just climate action.

A fundamental function of NPF4 must be tackling the worsening declines in nature and the climate emergency. Whilst we welcome the prominence of climate action in the Discussion Paper, leaving out nature declines and other environmental issues risks reducing planetary sustainability to a question of greenhouse gas emissions. The Trust has been clear that radical decarbonisation of the economy, in every sector, is essential. Moreover, this effort cannot be substituted by natural climate solutions: both actions are necessary and desirable in their own right.

There is a risk that NPF4, in aiming to tackle climate breakdown, worsens both long-term GHG emissions and biodiversity, if the right information is not available. For example, much of commercial forestry in Scotland is harvested to produce short-lived timber products, such as pulp and fence posts, the majority of the carbon stored is released back into the atmosphere within 15 years, while carbon dioxide has an atmospheric lifespan of centuries or millennia. It is crucial that NPF4 and other land use planning frameworks, particularly the RLUPs, do not become a facilitator of compromised carbon markets based on non-native commercial forestry: this would undermine both biodiversity and climate action by presenting a false solution to both.

To inform this approach the Trust advocates three core principles that should lie at the heart of any natural solutions, including natural climate solutions. Place-based natural solutions are:

- **Additional –** Nature restoration must occur *in addition to* radical decarbonisation across every sector and confronting the systemic conditions that worsen socio-environmental conditions. No amount of natural solutions can replace the urgent need for decarbonisation, and other systemic changes, of, and across, the economy. Similarly, greenhouse gas sequestration and storage cannot be the sole indicator for determining value or success – nature is far larger than its ability or inability to store carbon. Nature restoration and decarbonisation are not exchangeable.
- **Place-appropriate –** *Place* is the co-production of social context and a physical location, or how we apply meaning socially to particular spaces, such as a public garden or a site of memorial. This process is ongoing, intersecting narrative, representation, history, and physical environment. Place-appropriate projects are led by residents, communities of place

and communities of practice/interest, maximising knowledge and values sharing and participative governance. Ecologically, place appropriateness includes an analysis of the suitability of species and habitats to a particular area, taking account of both naturalness and relevant physical geography, such as hydrology.

- **Just –** Environmental justice takes account of the distribution of environmental benefits and burdens in society, such as access to nature, as well the potential for environmental policy to alleviate or reproduce social inequalities. For example, access to nature is impacted by the availability of leisure time, closeness to greenspace, and gendered impacts such as safety of access routes. Policymaking in Scotland should contribute to realising a Just Transition and reversing inequalities. This should be factored into all stages of place-based natural solutions, including financing, design, and implementation. Place-based natural solutions must also be sensitive to the potential for green urban development to displace and/or marginalise residents and take steps to combat this.

NPF4 should provide the national-level spatial planning for certain nature-based solutions.

Nature and the environment

Rather than seen as a set of 'issues' pertaining to a particular set of stakeholders, the importance of nature and the environment to our everyday lives and livelihoods should be seen holistically and embedded throughout NPF4. It is not enough to give a chapter of the strategy to climate disruption, or to biodiversity – these must be seen in the context of the wider functions and malfunctions of the socio-economic system.

In addition to protecting and restoring nature in Scotland, the NPF4 must be equipped to tackle biodiversity impacts throughout the world that occur as a result of demand in Scotland – in effect the ecological footprint of infrastructure projects.

Secondly, to help address the ecological footprint of infrastructure projects when imported materials are necessary, the NPF4 needs to be able to insist on fully traceable imported materials, excluding those which contribute to significant ecological impacts.

What development is needed to address climate change?

Development of a Scottish Nature Network

This is as per Scottish Environment LINKs submission and our submission mirrors theirs, the following text is additional. The Trust submitted the original proposal for a National Ecological Network in 2013 for NPF3. This received priority status within the text and was also included within the Scottish Biodiversity Strategy. Unfortunately, this has made almost no progress despite willingness to progress from all LINK member organisations and SNH. It is essential that the Scottish Government take this opportunity to do something meaningful for biodiversity and climate.

The Scottish Nature Network (SNN) would be about providing national coordination and strategic planning to our green and blue infrastructure, it would provide coordination to the myriad of schemes that are working to deliver better outcomes for the environment. This would not be limited to but would include:

- Green and blue infrastructure investment in the Infrastructure Investment Plan
- Replacement rural development/agriculture funding
- NGO effort
- Philanthropic spend
- Major charitable investors such as the lottery
- Biodiversity net gain projects
- Conservation finance investment

Without the coordination and opportunity mapping an SNN would provide we would lose out on many multiple benefits. We would never dream of implementing any other nationally important infrastructure without strategic planning. The same approach should be applied to green and blue infrastructure, which is vitally important to biodiversity, climate and – as sharply highlighted by the Covid 19 crisis – health and wellbeing.

NPF4 should include SNN as a National Development. This should actively seek opportunities to improve nature connectivity to maximise delivery of nature-based solutions and benefits for people and wildlife.

The advice of the Infrastructure Commission should be followed and the Infrastructure Investment Plan should contain a suite of national green and blue infrastructure projects that would contribute to delivery of the SNN.

The NPF4 should target local delivery of the NEN through the forthcoming Regional Land Use Frameworks to achieve strategic coordination at a national level.

The Central Scotland Green Network

The CSGN and the recent blueprint work has demonstrated how an opportunity mapping approach can deliver for the environment and communities. The CSGN should be retained and the learning used to roll out a national network.

[i] https://science.sciencemag.org/content/366/6471/eaax3100
[ii] https://science.sciencemag.org/content/366/6471/eaaw9256
[iii] https://onlinelibrary.wiley.com/doi/10.1111/gcb.14612
[iv] https://www.placestandard.scot/
[v] A community of place is taken to mean the immediate local community by geography, a community of practice is a group of people who engage in collective learning in a common area of interest and a community of interest is a group of people who share a common interest or passion. Land management issues often involve all three.
[vi] What Works Scotland (a joint initiative between Glasgow and Edinburgh Universities, Scottish Government, and the ESRC) http://whatworksscotland.ac.uk/topics/place-based-approaches/