

MSP Briefing: NPF4 Revised Draft

Summary

The *National Planning Framework 4: Revised Draft* is a vastly improved document and does place significant weight on the climate and nature crises. Policy 6 on forestry, woodland and trees has been clarified since the last draft and provides an advantageous place to start securing protection for ancient woodlands and ancient and veteran trees from inappropriate development. Now strong policies are in place, it is essential that the skill, resources and data required to implement the NPF4 are drawn into all planning departments across Scotland.

Policy 6 forestry, woodland and trees

The new proposed policy provides watertight protection for ancient woodland and ancient and veteran trees, stating "b) Development proposals will not be supported where they will result in: i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition;." The policy wording is an improvement on the previous draft having strengthened the language used from "should not be supported" to "will not be supported." This is in line with the Scottish Government's intention to give significant weight to climate and nature in the planning system.

The improvements to the policy come not only to ancient woodland and ancient and veteran trees but also to individual trees. Within the previous draft published last year individual trees, except for veteran trees, were not mentioned. This omission could have led to a lack of consideration for trees outside of woods within the planning system. The revised draft requires planning authorities' spatial strategies to set out proposals for individual trees within their local authority.

There are new requirements for development land with existing woodland or land that has been identified as suitable for woodland creation. To be supported developments on land described above will have to enhance and improve the woodlands and plant new trees on the site.

We still have some concern around compensatory planting. However, this is more of an issue with the Scottish Government policy on the control of woodland removal being out of date, and the need to update it to reflect the climate and nature crises.

National Developments

The National Developments have not changed, as such we still have the same concerns as with the last iteration of the document. National Developments such as *High Speed Rail* and *Strategic Renewable Electricity Generation and Transmission Infrastructure* are large infrastructure projects with linear elements. Linear infrastructure has historically had a significant impact on ancient woodland, we have seen this demonstrated in England with HS2. The Woodland Trust will continue to communicate with Transport Scotland to minimise the impact of *High Speed Rail* in Scotland and will seek ways to influence *Strategic Renewable Electricity Generation and Transmission Infrastructure* in order to minimise impacts as far as possible.

Delivery

The NPF4 Delivery Programme highlights a concern shared by the Woodland Trust, Scotland needs well-resourced planning departments to support the delivery of the NPF4, which we currently lack. Scottish government seek to address this through a range of activities including:

- Mandatory training for planning committee members
- Working with Partners in Planning to develop a skills strategy to identify the specialist skills required to address the requirements of NPF4.

The Woodland Trust proposes local authorities require the following to deliver the NPF4:

- Elected members on planning committees who have received relevant environmental training, that could be delivered through the mandatory training mentioned above.
- **Resourced tree officers within planning departments**, skilled to provide the expert advice required on planning applications. We hope this will be highlighted through the proposed skills strategy.
- Better data on location, extent, condition of ancient woodland. Data plays a huge role in planning as is evident through Scottish Government's digital transformation of planning. In light of the improved policies for ancient woodland protection, better planning data available for ancient woodland location, extent and condition through the delivery of Scottish Government's commitment for an Ancient Woodland Register will be essential to the delivery of the NPF4.

Suzie Saunders, Policy Advocate – Planning and Local Authorities, Woodland Trust Scotland suziesaunders@woodlandtrust.org.uk