

NPF4 Policy 3

Julie Dewar

Planning Manager -Specialists Team

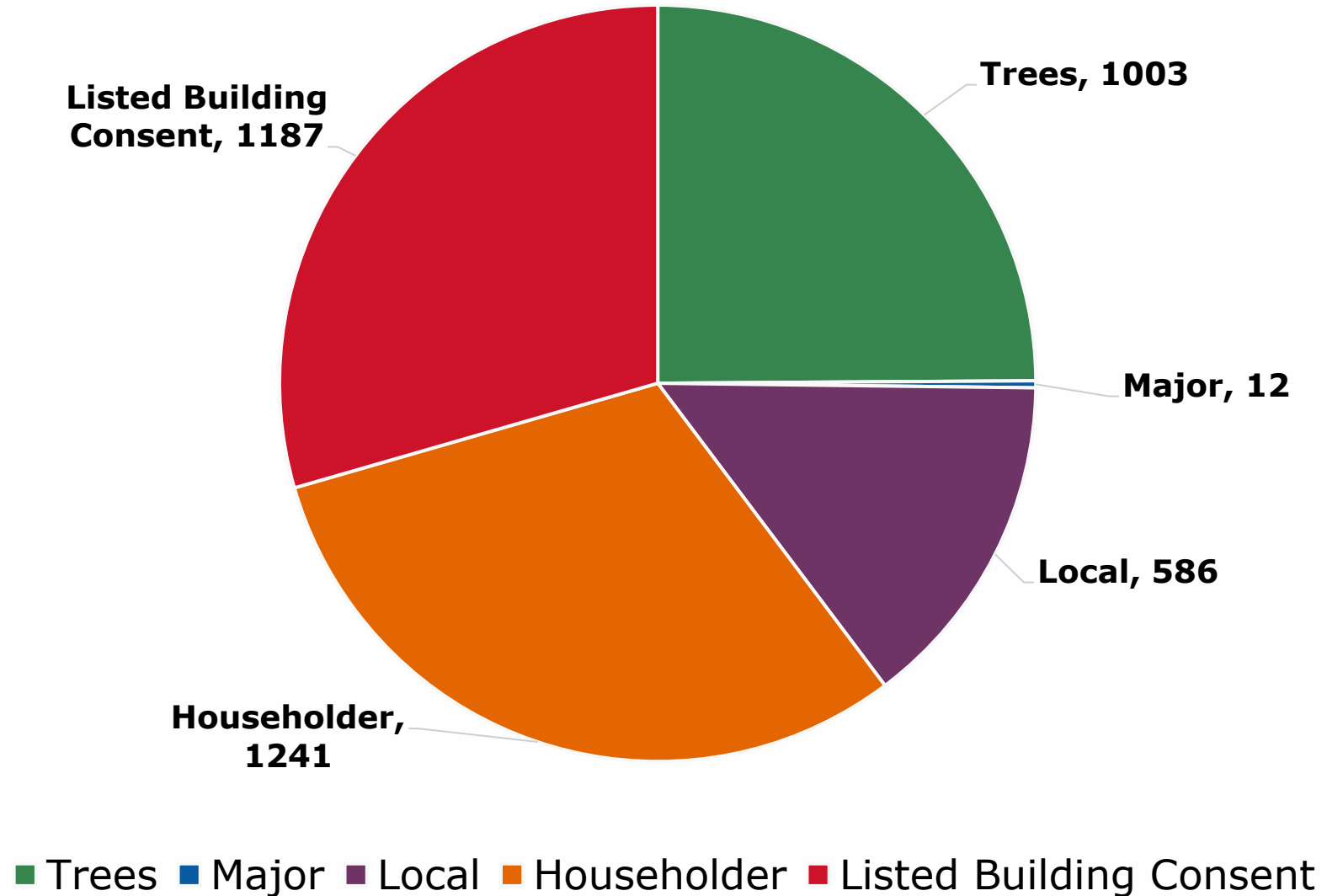
City of Edinburgh Council

NPF4 Policy 3 - Edinburgh

- **Successes** - some examples
- **Challenges of implementation** - urban context
- **Future aspirations** - joining it all up

Number of applications 2024 - 2025

- 4029 applications received
- Approx. 3.8% applications subject to pre-application advice
- Majors make up a small proportion of our casework



NPF4 Policy 3b - Majors

**Scottish Government Planning
Guidance: Biodiversity**

December 2025

- Must demonstrate significant gain
- Enhancements informed by ecological survey
- Use of existing tools or metrics:
 - [Defra Biodiversity Metric](#)
 - [Urban Greening Factor](#)
 - [Malmo Green Points](#)
 - [Building with Nature Standards Framework](#)

Core Principles

- Apply the mitigation hierarchy
- Consider biodiversity from the outset
- Provide synergies and connectivity for nature
- Integrate nature to deliver multiple benefits
- Prioritise on-site enhancement before off-site delivery
- Take a place-based and inclusive approach
- Ensure long term enhancement is secured
- Additionality

Case-by-case judgement will continue to be required by the decision maker on what is appropriate based on the circumstances of the individual case

City Plan 2030

Policy Context

- Env 21 - Protection of Biodiversity
- Env 37 - Designing in Positive Effects for Biodiversity

Edinburgh Design Guidance



Pages 31-34

- Mirrors Scottish Government guidance
- Major developments should use an existing metric to demonstrate significant enhancement, aiming for 10% or equivalent
- Planning applications should be accompanied by:
 - Ecological survey
 - Full metric calculations, including habitat condition assessments
 - Site plans with existing biodiversity features and location of proposed enhancements
 - Habitat management plan

[Edinburgh Design Guidance](#)

Defra Metric

- Developed by Natural England and now maintained by Defra
- Calculates before and after biodiversity value of a development as biodiversity units
- Maintains mitigation hierarchy
- Minimum 10% gain required using the metric and approval of a net gain plan

SAICA Development



Edinburgh Gateway

Headline Results

Scroll down for final results

[Return to results menu](#)

On-site baseline	Habitat units	24.08	
	Hedgerow units	3.59	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	28.05	
	Hedgerow units	8.81	
	Watercourse units	0.00	
On-site net change (units & percentage)	Habitat units	3.97	16.49%
	Hedgerow units	5.22	145.50%
	Watercourse units	0.00	0.00%

Building with Nature



- UK Green Infrastructure benchmark
- Voluntary accreditation scheme that enables developers to create places that deliver for people and wildlife
- Divided into 4 themes:
 - **Core standards** – distinguishes green infrastructure from a more conventional approach to open and green space provision
 - **Wellbeing standards** – securing health and wellbeing benefits by delivering green infrastructure close to where people live
 - **Water Standards** – managing water quantity and quality, whilst maximising opportunities for amenity and biodiversity
 - **Wildlife Standards** – creating places where nature can flourish, both within the site boundary and at a landscape scale



Meadowbank Masterplan

Metrics - Pros and Cons

Pros

- Consistent, transparent approach for assessing policy compliance
- Clear outputs that are simple to understand
- Highlights presence of valuable habitats informing site to avoid/minimise impacts
- Provides confidence that proposed enhancement is ecologically beneficial and contributes to policy aims
- Indicates whether proposals are sufficient to offset biodiversity loss and provide enhancement

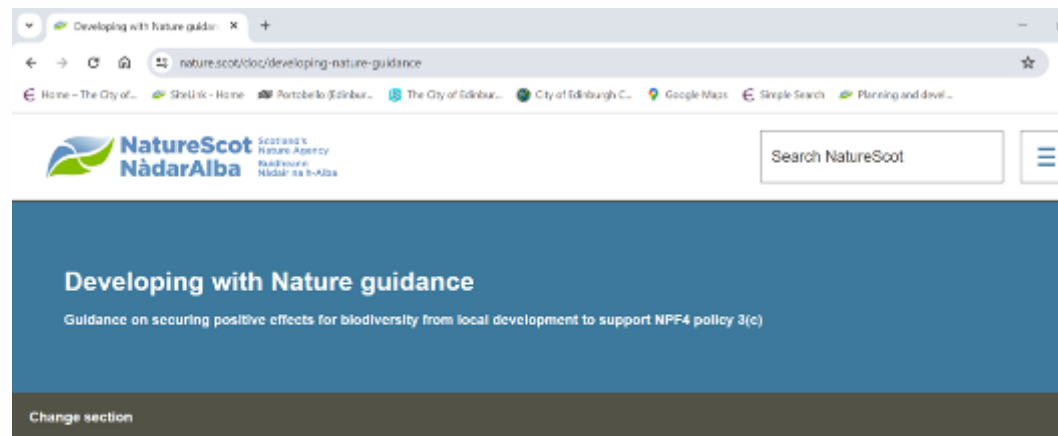
Cons

- Oversimplification of complex ecosystems
- Habitat as a proxy, may not protect species
- Requires ecological expertise
- Focus on numerical gains rather than nature conservation
- Long term management and monitoring required
- Capacity to review metric outputs

NPF4 Policy 3c - Locals

- Proportionate to scale of development
- Developing with Nature Guidance
- Biodiversity Enhancement Plan

[NatureScot- Developing Nature Guidance](#)



The following Guidance has been published in support of policy 3(c) of National Planning Framework 4. An illustrated version of this guidance is currently in preparation, and will be published on this page when finalised.

Lanark Road



Figure 6 Elevations showing locations of biodiversity enhancements, including integrated swift nesting blocks on Eastern and Northern elevations

ACTIONS CONSIDERED	MITIGATION/ COMPENSATION Measures included to minimise or compensate impacts	ENHANCEMENT Measures included to enhance biodiversity (or explanation for not applying these)
Protection and enhancement of existing habitats on or adjacent to the site	1. TRANSPLANTING OR PLANTING OF HONEYSUCKLE AND PROTECTION OF EXISTING SAPLINGS WITHIN SITE At TN8 there is an <i>established honeysuckle growing on an arch over steps descending into the grassland area in the south of the site. This should be transplanted</i> or replanted in one of the areas recommended for native shrubs (see Action 4 below).	2. PROTECTING REGENERATION OF HOLLY, WYCH ELM & WILD CHERRY SAPLINGS There are multiple self-seeded <i>holly and wych elm saplings at TN11 which can and should be protected and allowed to mature</i> at the southern tip of the development site. Along the west of the site there are <i>self-seeded wild cherry saplings at TN15. These too should be protected and allowed to mature.</i>
Creation of new habitat on the site	3. ONLY NON-NATIVE TREES TO BE REMOVED No established native trees or shrubs shall be removed to accommodate the development; in fact there is a paucity of any native tree or shrub species within the site. There are multiple locations within the development site where non-native tree and shrub species shall be removed (specifically three <i>Acers</i> at TN3, a non-native <i>Prunus cerasus</i> at TN6, arch and dome structures constructed from basketry varieties of <i>Salix viminalis</i> at TNs 7 and 9, a <i>Buddleia</i> at TN13, 4 tall <i>Leyland cypresses</i> at TN4, and a section of <i>Leyland cypress hedge</i> along the access road at TN21). While there are proposals to	4. PLANTING OF NEW NATIVE TREES, SHRUBS AND WILDFLOWERS Suitable locations for the <i>planting of new native broadleaved trees and shrubs, as recommended by NatureScot (2023) as biodiversity enhancement measure 4, are iden</i> native tree species in birch (<i>Betula pendula</i> hawthorn (<i>Crataegus petraea</i>), grey willow (<i>Salix caprea</i>), rowan (<i>Sorbus cordata</i>), wych elm (<i>Ulmus glabra</i>) seeds, and/or nectar (<i>Ilex aquifolium</i>), black cherry (<i>Prunus avium</i>

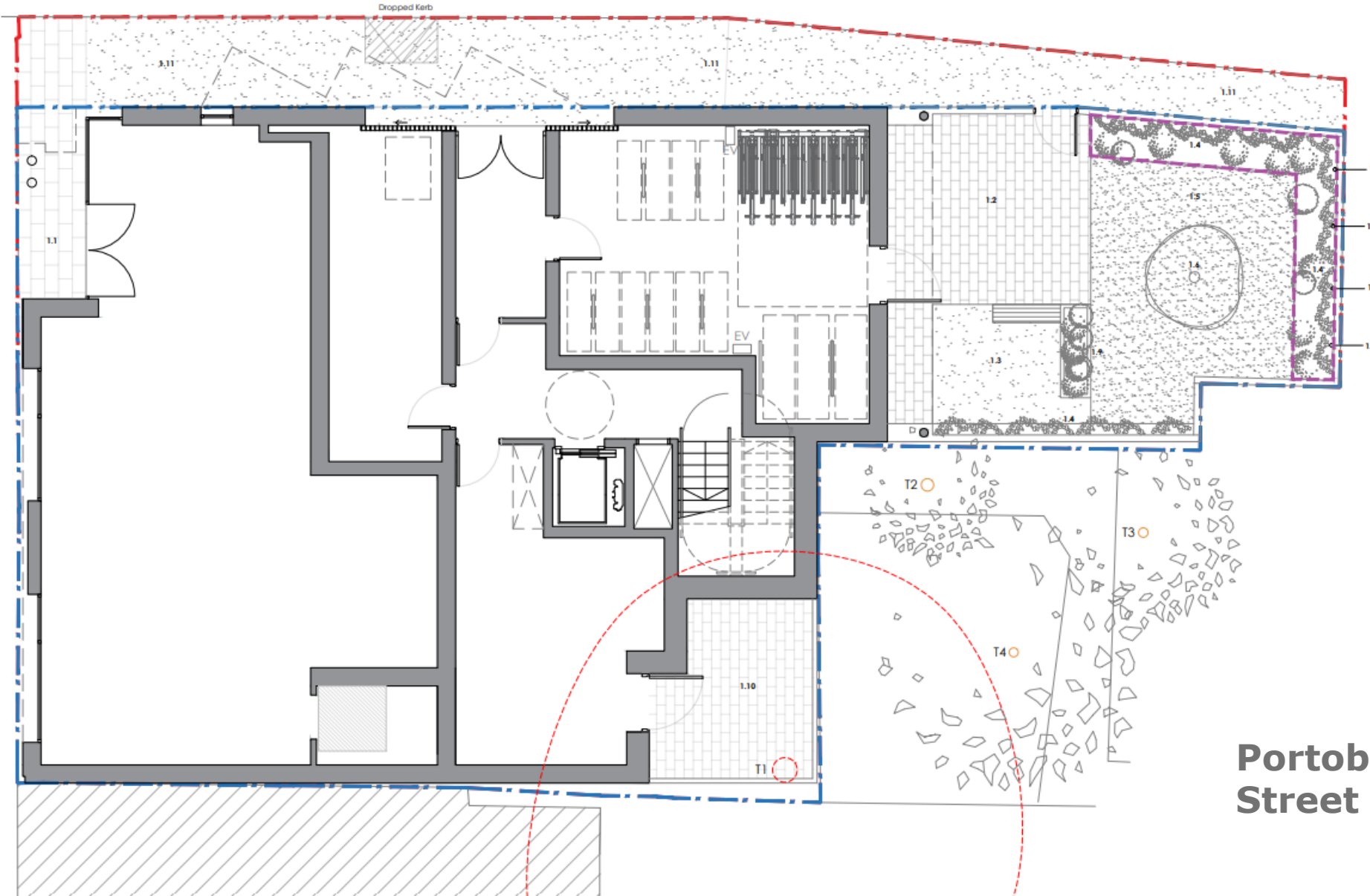
	other mammals around the perimeter will not be substantially diminished by the development.	habitats to the habitats within the site because the perimeter cypress hedge will need to be retained.
Protection and enhancement of existing species on or adjacent to the site	7. BREEDING BIRDS Bird species recorded singing or calling (on 05/07/2024) within or adjacent to the site included chaffinch, goldfinch, bullfinch, great tit, coal tit, robin, blackbird, magpie and woodpigeon. Several of these could be breeding within the short sections of <i>Leyland cypress</i> to be felled (at TNs 4 and 21) and/or the <i>Acer</i> and <i>Prunus</i> trees to be removed from TNs 3 and 6). Felling of these trees should only be undertaken outside the bird breeding season (i.e. September to February). The cypress hedge should also be recut only outside the bird breeding season.	8. HEDGEHOG HIGHWAYS There are recent historical records of hedgehog nearby, although none were detected during the site visit. It is possible that hedgehogs already use the site and this will be encouraged. The passage of hedgehogs into the site from the gardens to the east, south and west will be facilitated by providing hedgehog-sized holes (13cm x 13cm) in the fences along these boundaries, to create "hedgehog highways", as recommended by NatureScot (2023) as biodiversity enhancement measure 12.
Enhancement for new species	9. N/A	10. SWIFTS Specialist nesting blocks, as advised by the CEC Biodiversity Officer and recommended by NatureScot (2023) as biodiversity enhancement measure 13, shall be installed for swifts, a severely declining bird species that has been recorded nearby in Kingsknowe to the north and downstream along the Water of Leith to the west and southeast. As part of the architectural design and construction of the building, fourteen internal integrated swift nest box blocks (see Figure 7 below) will be located beneath the gable roof eaves away from windows and high enough to provide unimpeded flightlines in, on the north and east elevations to reduce glare and solar heating of the nest blocks. These will

Lanark Road

Portobello High Street



■ Swift bricks on the rear elevation (NE). Five swift bricks.



KEY

- 1.1 Stone paviors to newly proposed footpath to High Street to match existing paviors
- 1.2 Stone paved area for clothes drying
- 1.3 Sealing Area
- 1.4 Multiple bushes and planting to perimeter of amenity space to ensure good and even coverage. Bushes to be Buxus Sempervirens 500mm (20 no.) topiary balls and clipped with shears on an overcast day. Low level planting to be Vinca Minor (20 no.) and maintained when outgrow boundaries with light pruning and weeding while plants become established. Wall planting to be Clematis Montana (20 no.), 1.8m high and pruned every 3 years.
- 1.5 Grassed Area (Urban Pollinator Grass Seed Mix. Sowing rate 4g /m2 and to be sown in Spring. Spread subsoil to a depth of 150mm over lawn areas.
- 1.6 1 No. new Feature Rowan Tree (Sorbus aucuparia). Allow to grow to 3m in height. Tree should be pruned every 2 years in Spring.
- 1.7 Wall mounted Bat Box
- 1.8 Wall mounted Bird Box
- 1.9 Raised Planter of Wild Flowers. Planter to be seeded every Spring and cleared at the end of every season.
- 1.10 Concrete paviors to newly proposed external yard off Plant Room
- 1.11 Asphalt footway to match opposing side of Beach Lane

Soil Conditions

Topsoil: Imported topsoil must be BS 3882:2015 compliant and existing topsoil must be cultivated in accordance with BS 3882:2015. No cultivation should take place in wet / waterlogged conditions. All shrubs to be planted in groups of 3, 5, 7 or 9 of the same species, each species evenly distributed throughout the planting bed. Each plant is to be planted in pits of 300mm diameter and depth, backfilled with imported topsoil to BS3882, incorporating 5 litres of peat free compost into each pit. Filter medium to be 750mm to 1000mm to ensure adequate depth for development of tree root ball.

Grassed Areas

Urban Pollinator Grass Preparation: Remove existing vegetation and grasses with an approved weed killer. Spread subsoil to a depth of 150mm over lawn areas. If required import additional subsoil from an approved local source. Prepare areas for flowering lawn seeding by preparing a fine fluff by cultivation / raking.

Flowering lawn to be sown on graded subsoil. Seeds to be sown at a rate of 4 g/m2 for level areas. Ensure seeds are mixed well mixed before sowing. Sow in Spring (March-April) or September. Sow on a calm, wind free day. Sow mechanically - broadcast by seed spreader covering the site twice. Firstly in one direction with half the seed then at 90 degrees to ensure even coverage. Roll the ground to ensure the seeds are well pressed into the soil surface so they have good contact with the soil. Seeds should not be buried.

Undertake grass cutting to approximately 50mm each month during the first growing season to foster root establishment. For the first year, cut the grass to 50mm, approximately 6-8 weeks after the first plant seedlings appear and repeat every 2 months through the first Summer. Following the first two years establishment, the grass areas should be cut during April, August and October. Following the October cut, the grass should be cut on a regular 2 week cycle.

General Notes & Maintenance

Species have been selected which are native, have seasonal interest, which promote biodiversity and suitable within the bioretention area where applicable. Developer to ensure all hard and soft landscaping is maintained regularly. Within the first 5 years any trees which fail will be replaced. Landscaping to be inspected regularly in the first 5 years and pruned, weeded etc. as necessary to ensure a high standard of landscaping becomes established and thrives.

D	3001/24 Drawing Amendments	MD	SA
C	2901/24 Drawing Amendments	MD	SA
B	1100/24 Drawing Amendments	EC	SA
A	1001/24 Pre-Work Updates	MD	SA

Rev: Date: Issue No: Date

Portobello High Street

BLOCK NINE ARCHITECTS

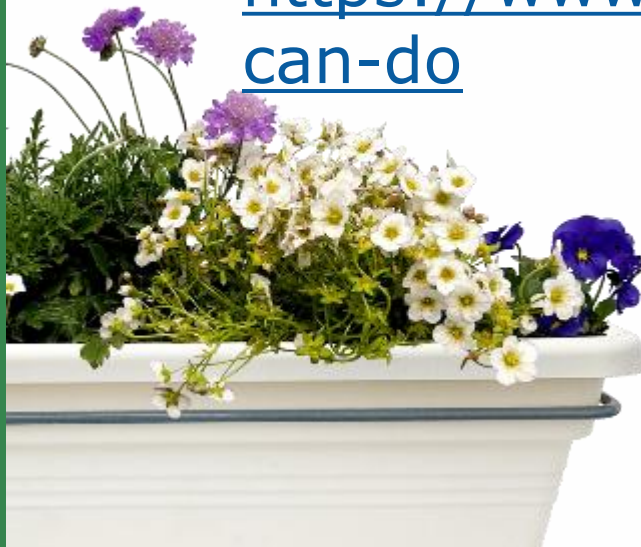
21 Castle Street
Edinburgh
EH1 2DH
0131 425 4930
info@blockninearchitects.com
www.blockninearchitects.com

Scale: **PLANNING**

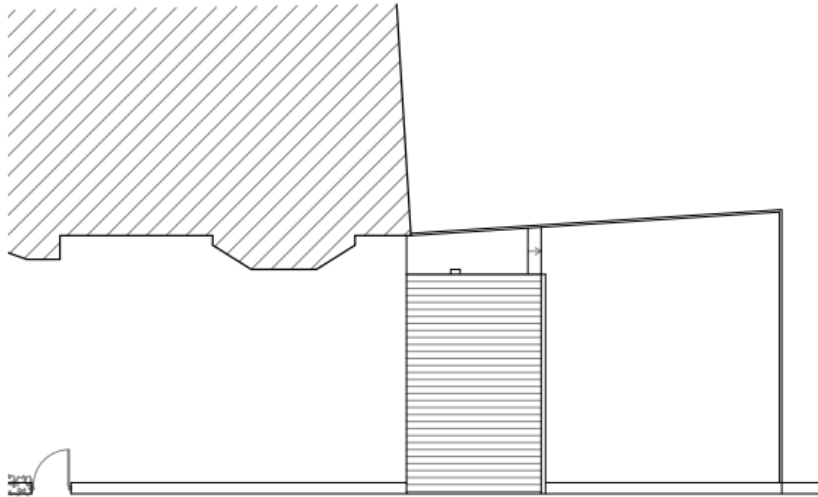
Project: 120-124 Portobello High Street
Edinburgh
EH15 1JB

Householder

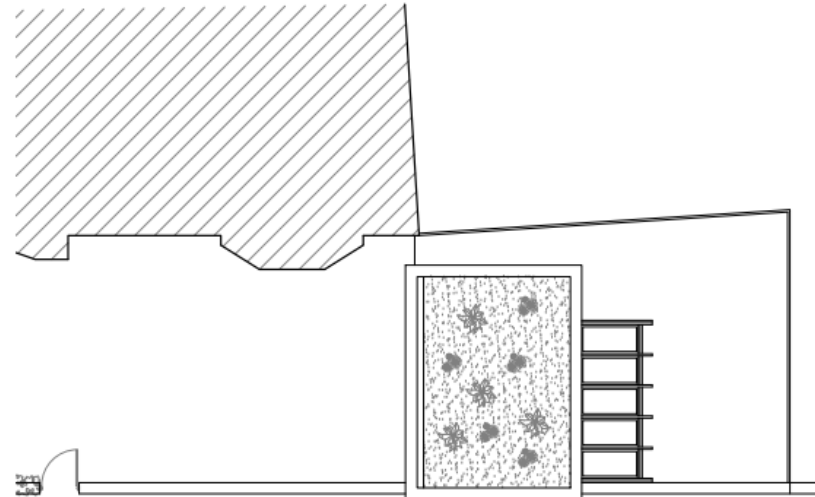
- [Guidance for Householders p18-19](#)
- <https://www.nature.scot/doc/developing-nature-guidance>
- <https://www.wildlifetrusts.org/gardening>
- <https://www.rspb.org.uk/helping-nature/what-you-can-do>



Mount Lodge Place



Existing Roof Plan
Scale 1:100



Proposed Roof Plan
Scale 1:100



Garage Conversion
2 Mount Lodge Place,
Edinburgh, EH15 2AB

SCALE
1:100



Rev: -
Date: October 2024
Scale: 1:100@A3
Title: PLANS

Drawn by:
DP
Checked by:
DR

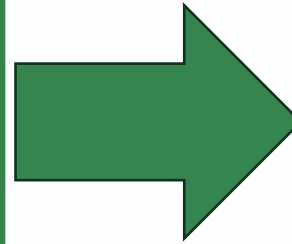
PL02

RIZZO
ARCHITECTURE

Challenges and Opportunities in an urban environment

Challenges

- Constrained sites
- Competing land use priorities
- Brownfield land
- Contamination
- Habitat fragmentation
- Structural vs biotic diversity
- High population



Opportunities

- Integrating biodiversity into plans
- Adopting nature-based solutions
- Using local partnerships
- Innovative design solutions
- Nature Network to strengthen connectivity

Joining it all up

Key Challenges

Climate Change

Biodiversity loss

Access to nature
Inequalities

Legislation/ Policy Background

Biodiversity
Duty

National Planning Framework 4

Climate
Change Duty

Scottish
Biodiversity
Strategy

Applying relevant Tools

EBAP

Biodiversity
metrics

Species
conservation and
Protected Sites

Agri-environment
schemes

Climate Adaptation
measures

Natural Capital
tools

Delivery

Strategic
solutions
preventing
adverse impacts
on European
Sites

Development
and projects
contributing to
nature recovery

Sustainable
Land
management
practices

Embedding nature in placemaking

Nature rich
spaces
contribute to
the Edinburgh
Nature Network
and provide
ecosystem
services

Climate resilient
places with
green and blue
spaces

More people
engage with and
nurture nature

EVIDENCE

Case Study: Urban Pollinator Mix



- Collaboration with University of Edinburgh and the Urban Pollinators project as part of the Edinburgh Living Landscape initiative
- Key aim to improve urban space for pollinators, and reverse negative effects of urbanisation
- Urban Pollinator mix is a native Scottish seed mix specifically created for urban environments. Created with Scotia Seeds
- Provides nectar and pollen for as long as possible
- Positive impacts for human health and wellbeing

<https://impact.ed.ac.uk/research/climate-environmental-crisis/protecting-our-pollinators/>

In Conclusion

- **Need good guidance in place.**
- **Early consideration of biodiversity** is essential to prevent delays.
- Biodiversity Enhancement should be **ecologically meaningful** and **proportionate** to the **scale of development**.
- **Expertise** within or available **to support planning officers** will ensure good outcomes.

Thank you