

Thirteenth Annual Report on the Operation of Section 72 of the Climate Change (Scotland) Act 2009

Laid before the Scottish Parliament by the Scottish Ministers
under Section 73 of the Climate Change (Scotland) Act 2009

31 March 2023

SG/2023/40

March 2023

1. Summary

- 1.1. This report on the operation of Section 3F of the Town and Country Planning (Scotland) Act 1997 is a requirement of Section 73 of the Climate Change (Scotland) Act 2009.
- 1.2. As per previous annual reports it is concluded that the legislation remains operationally effective at this time and is therefore required.
- 1.3. This report highlights that future reports should take into account changes to building regulations and heat standards in order to establish whether Section 3F continues to be needed.

2. Legislation

- 2.1. Section 72 of the Climate Change (Scotland) Act 2009¹ ('the 2009 Act'), which came into force on 1 April 2010, introduced Section 3F into the Town and Country Planning (Scotland) Act 1997² ('the 1997 Act'). This report will refer to Section 3F. Section 3F requires that:

'A planning authority, in any local development plan prepared by them, must include policies requiring all developments in the local development plan area to be designed so as to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, calculated on the basis of the approved design and plans for the specific development, through the installation and operation of low and zero-carbon generating technologies.'

- 2.2. Scottish Ministers are required by Section 73(1) and (2) of the 2009 Act to report annually to the Scottish Parliament on:
 - The operation of the requirement on relevant planning authorities to include policies within development plans;
 - An assessment of whether the Section 3F requirements have contributed effectively to the reduction of greenhouse gas emissions from developments; and
 - Whether Section 3F continues to be needed.
- 2.3. If Section 3F is considered no longer needed, Section 73(2) enables Scottish Ministers to repeal it and Section 73, by order.

¹ The Climate Change (Scotland) Act 2009: <https://www.legislation.gov.uk/asp/2009/12/contents>

² The Town and Country Planning (Scotland) Act 1997: <https://www.legislation.gov.uk/ukpga/1997/8/contents>

3. Understanding the Legislation and Guidance on it

Responsibility for implementation

3.1. The legislation is a requirement for policy in local development plans and therefore a responsibility of planning authorities.

Operational emissions

3.2. The legislation aims to save emissions otherwise created from the operation and use of new buildings. This excludes construction and demolition of the building and transport to and from it. Therefore, emissions savings relate to emissions otherwise created through space and water heating, and the electricity used for operation of the services within a building. Such services powered by electricity include those that are fixed like lighting and mechanical ventilation. In practice moveable electronic appliances in homes and other plugged-in devices such as for industrial and commercial processes, among other things, do not form part of building level operational emissions calculation methodology.

Low and zero-carbon generating technologies

3.3. Section 3F operates on the basis that there are emissions from the energy source for the operation and use of the building that can be saved (or avoided), by using low and-zero carbon generating technologies at the building to provide energy instead. The legislation seeks emissions savings only using generating technologies, and not energy efficiency measures such as improved glazing or additional insulation.

3.4. The legislation operates on the basis that the low and zero-carbon generating technologies will save a proportion of the emissions to be created by the operation and use of the building. It does not require that the technologies will avoid all emissions otherwise created by the operation and use of the building.

Guidance

3.5. We continue to suggest that local development plan policies implementing the legislation contain three elements:

- A proportion of emissions to be saved;
- At least one increase in the proportion of emissions to be saved; and
- A requirement that savings should be achieved using generating technology (rather than energy efficiency measures).

3.6. The Annex to this report identifies the policies in adopted local development plans considered to respond to Section 3F and a web link to where the full text of them can be found. This is offered as a resource for those preparing a policy in response to Section 3F. Previous annual reports have provided full text or extracts of the individual planning authority policies, this is replaced this year with a web link to where the relevant local development plan can be read.

4. Operation and Effectiveness

Operation

- 4.1. While Section 3F is in force, the Scottish Government will continue to make representations on proposed local development plans that do not contain policies including the three elements identified in Section 3.
- 4.2. The new planning regime for local development planning, triggered by the adoption of National Planning Framework 4³ (NPF4) will be in force later this year (2023). Regulations and guidance for local development plans flowing from the Planning (Scotland) Act 2019 will be put in place, having already been consulted upon during 2022.
- 4.3. The new requirements will streamline the local development planning system, removing the previous Main Issues Report stage (as such this report does not include analysis of numbers of local development plans at Main Issues Report stage, unlike previous reports). The new Evidence Report stage is unlikely to need to reflect on Section 3F, as the monitoring requirements for the legislation fall to the Scottish Government and Section 3F is mandatory for the development plan, rather than a matter which requires evidence to inform spatial options.
- 4.4. The Planning (Scotland) Act 2019⁴ makes the National Planning Framework (NPF) part of the statutory development plan, meaning that it can be used to inform decision making on planning applications. This has the potential to streamline planning policy across the country. However, the provisions of Section 3F and Section 15 (about form and content of local development plans) of the 1997 Act still need to be applied by planning authorities in the preparation of local development plans.
- 4.5. Planning authorities may wish to consider the policy approach identified in research⁵ commissioned by the Scottish Government and published in 2021. The research proposes that the approach closest to the requirements of Section 3F, does not specify on the face of the policy an increase in the proportion of greenhouse gas emissions to be saved. The Scottish Government routinely makes representations on proposed local development plans where the Section 3F policy does not include one or more of the three elements considered necessary to comply with Section 3F. Ultimately it is for the planning authority to be confident that its proposed local development plan is legally compliant.

³ Scottish Government: National Planning Framework 4; 2023:

<https://www.gov.scot/publications/national-planning-framework-4/>

⁴ Planning (Scotland) Act; 2019: <https://www.legislation.gov.uk/asp/2019/13/contents>

⁵ Scottish Government: Developing a Scotland Wide Section 3F Planning Policy; 2021:

<https://www.gov.scot/publications/developing-scotland-wide-section-3f-planning-policy/pages/4/>

- 4.6. Many planning authorities paused progress on the first stage of the development planning process (publication and consultation of the Main Issues Report) because of the review of NPF. A small number of planning authorities that were further through the local development plan review process continued to progress towards adoption. Given this and the changes to the development planning system soon to be in force, the reporting on implementation of Section 3F has been slimmed down compared to that of previous annual reports.
- 4.7. Paragraphs 4.8 and 4.10 as well as Table 1 identify the number of adopted (in force) local development plans and the number of forthcoming plans (proposed local development plans) that appear to contain a policy which responds to Section 3F. As with previous annual reporting, this remains the majority of local development plans.
- 4.8. Number of adopted local development plans with a Section 3F type policy as of 15 February 2023:
- Section 3F policy – 32
 - No Section 3F policy – 2
- 4.9. Notes on paragraph 4.8: There are 32 planning authorities plus two National Park Authorities with planning functions. There are more development plans than there are planning authorities because some local authorities have more than one local development plan. The East Ayrshire Minerals Local Development Plan is within the scope of Section 3F but is not counted here as it relates only to minerals. One local development plan was adopted in March 2010 so predates the coming into force of Section 3F but is counted as an adopted plan. The Highland Council has the Highland-wide Local Development Plan (counted) which is supplemented by three adopted Area Local Development Plans which are not counted as they are used in conjunction with the Highland-wide Local Development Plan.
- 4.10. Number of proposed local development plans in progress and including a Section 3F policy but not yet adopted as of 15 February 2023:
- Section 3F policy – 6
 - No clear Section 3F policy – 1
- 4.11. Notes: West Dunbartonshire Council has two proposed local development plans, one will not be adopted but the Council's website is clear that it may be used as a material consideration for decision making. A more recent proposed local development plan is progressing. It is this later plan that is counted in paragraph 4.10. The second Highland Council Inner Moray Firth Area Local Development Plan is progressing but is not counted as it would be read alongside the Highland-Wide Local Development Plan once adopted.

Table 1 – Number of Adopted Local Development Plans Responding to Section 3F Over Time

| Year | 2012 / 13 | 2013 / 14 | 2014 / 15 | 2015 / 16 | 2016 / 17 | 2017 / 18 | 2018 / 19 | 2019 / 20 | 2020 / 21 | 2021 / 22 | 2022 / 23 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Plans | 4 | 6 | 14 | 20 | 24 | 29 | 32 | 32 | 32 | 32 | 32 |
| Notes on Table 3. This table is created from information contained in Table 3 of the 2022 Twelfth Annual Report ⁶ plus data from this year reported earlier in this report. | | | | | | | | | | | |

Effectiveness

4.12. Paragraph 4.13 shows the number of adopted Section 3F policies that use low and zero-carbon generating technologies as a means to: achieve building regulations emissions standards; go beyond them; to support proposals that meet and also that go beyond building regulations; and those policies where it is not clear how the policies relate to building regulations emissions standards.

4.13. Typology of adopted local development plan Section 3F policies:

- Type 1 - 26
- Type 2 – 0
- Type 3 – 2
- Type 4 – 4

4.14. Notes on paragraph 4.13. Type 1 policies use Section 3F as a way of achieving emissions standards set by building regulations. Type 2 policies use Section 3F as a way of exceeding emissions standards set by building regulations. Type 3 policies are a blend / hybrid of Types 1 and 2. Type 4 policies do not fall clearly within types 1, 2 or 3.

4.15. The policies in development plans inform the design approaches to the buildings proposed in planning applications. This is because decisions on planning applications in the planning system are based on the development plan in the first instance, in addition to material considerations relevant to the application. This means that building designers consider how their proposals help achieve the policy aims of the development plan. Designers will also need to consider how their proposals will achieve the requirements of building regulations to avoid needing to amend designs that have already secured planning permission.

4.16. It is for the relevant planning authority as the decision maker to reach a decision as to whether the proposed development accords with the development plan and the effect of material considerations they identify on the decision.

⁶ Scottish Government; Twelfth Annual Report on the Operation of Section 72 of the Climate Change (Scotland) Act 2009; 2022: <https://www.gov.scot/publications/twelfth-annual-report-operation-section-72-climate-change-scotland-act-2009/>

4.17. As reported in previous annual reports, research⁷ published in 2016 (commissioned by the Scottish Government) in relation to Section 3F, found that for reducing emissions, building regulations were the driving force, rather than Section 3F policies. This annual report does not present evidence to alter that research finding, although Section 5 identifies the progressive approach to emissions reduction set out in NPF4.

4.18. In line with previous annual reports on Section 3F, **take up of the legislation within local development plans remains high as demonstrated in paragraph 4.8 and Table 1, and the approach is therefore considered to be effective.**

5. Scottish Government Action on Emissions from Buildings

5.1. The Climate Change Plan Update 2020⁸ identifies that 20% of Scotland's greenhouse gas emissions come from heat in buildings, both domestic and non-domestic. It also identifies that because of the level of renewable electricity generation contributing to the national electricity grid in Scotland, that emissions of the electricity grid have fallen by around 90% from 2000-2018.

5.2. While work continues to ensure that more renewable electricity supplies the electricity grid, the Climate Change Plan Update also has a focus on resolving the heat in buildings related emissions.

5.3. Section 3F policies within local development plans only apply when there are planning applications for new buildings, so is not targeted at emissions from existing buildings. The policy will, however, help to reduce future retrofit requirements over the longer term.

5.4. NPF4 was adopted in February 2023 and the climate emergency including emissions reduction is core to it. For all development the policy is clear that when considering development proposals the climate emergency will be given significant weight (Policy 1). The policy also requires development proposals to be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible (Policy 2). Lifecycle emissions can encompass in-use emissions and construction related emissions. These key policies which are supported by all the other policies in NPF4 (for example Policy 12 includes re-using building materials and using materials with the lowest forms of embodied emissions) highlight the commitment to emissions reduction by decision making on development proposals within the planning system. They work with parallel consenting regimes in not seeking to duplicate approaches, more to facilitate designers to work across regimes to deliver buildings with the lowest possible emissions both in-use and relating to their construction.

⁷ ClimateXChange; The Effectiveness of Greenhouse Gas Emission Policies in Scottish Local Development Plans; 2016: <https://www.climatexchange.org.uk/research/projects/effectiveness-of-greenhouse-gas-emission-policies-in-local-development-plans/>

⁸ Scottish Government; Update to the Climate Change Plan 2018-2032; Securing a Green Recovery on a Path to Net Zero; 2020: <https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/documents/>

5.5. These policies for individual decision making are a clear part of delivering the broader spatial strategy set out in NPF4, which sets six spatial principles aimed at delivering places that avoid, reduce, and minimise emissions, and deliver the benefits from net zero for communities:

- Just transition;
- Conserving and recycling assets;
- Local living;
- Compact urban growth;
- Rebalanced development; and
- Rural revitalisation.

5.6. The New Build Heat Standard⁹ (NBHS) will require zero direct emissions heating systems for new domestic and non-domestic buildings requiring a building warrant and some conversions of buildings. It will be implemented through new building regulations and is about in-building / in-curtilage heating systems so heat networks are not included. We are currently considering whether any limited exceptions to the standard would be appropriate. The NBHS regulations are intended to be laid in Parliament in Spring 2023, coming into force 1 April 2024.

5.7. As already reported the electricity grid is significantly decarbonised. As a consequence, once the NBHS is in place, new buildings consented for construction in accordance with building regulations from 2024 onwards will only have in-use emissions related to the electricity used for fixed services that are not space heating or for hot water, unless exempted from the Standard. It is acknowledged that where new homes are connected to a heat network there may be indirect emissions depending on how the heat is produced. Current emissions calculation methodologies used for building regulations consider fixed services like space and water heating, space cooling, ventilation, lighting and auxiliary systems. The methodologies exclude emissions arising from operations taking place within the building but that may vary over time such as machinery for industrial or commercial processes.

5.8. A further action relates to Passivhaus standards. Passivhaus is an approach to designing buildings to require minimal energy demand for the operation of the building. In December 2022 Ministers committed to introducing legislation within two years, and by Mid-December 2024, for new minimum environmental design standards for all new-build housing to meet a Scottish equivalent of the Passivhaus standard to improve energy efficiency and thermal performance. Work is progressing on a Passivhaus equivalent in Scotland.

6. Need for the Legislation

6.1. The Twelfth Annual Report reflected on the 2017 'Places, People and Planning Position Statement'. The Position Statement concluded that section 3F should not be withdrawn through the then Planning Bill because every policy area is required to contribute to reducing emissions as part of our commitment to

⁹ Scottish Government; New Build Heat Standard: Consultation Part Two; 2022: <https://www.gov.scot/publications/new-build-heat-standard-consultation-part-ii/>

addressing climate change. The Twelfth Annual Report concluded ‘that the changes planned in building and heat standards may at some point mean that Section 3F may not be required, but at this time does not suggest that Section 3F should be withdrawn.’ It then set out some of the planning policy changes included in the 2021 Draft NPF4 (the final policy position is indicated in Section 5 of this report).

- 6.2. From 2024 and the introduction of the NBHS, while operational emissions will remain for new buildings at the building (rather than energy source) they will have been minimised through a combination of:
- Energy demand reduction through more energy efficient building fabric as a result of enhanced building regulations, and further enhancements that may flow from future review of building regulations (so the need for energy input and therefore greenhouse gas emissions is avoided);
 - Zero direct emissions heating systems, which will become commonplace for buildings receiving a building warrant after April 2024; and
 - Continued decarbonisation of the electricity grid through ongoing delivery of renewable sources of electricity generation.
- 6.3. In the meantime, NPF4 reflects our commitment to addressing climate change with its policies and strategy which have been designed to maximise the contribution of planning to meeting net zero.
- 6.4. NBHS will support zero direct emissions heating and that may be achieved through on-site heating sources. Where zero direct emissions heating systems are provided on-site for individual buildings, this mirrors the generating technology based approach supported by Section 3F.
- 6.5. In the meantime, for 2023, local development plan policy encouraging designers from the outset to take a generating technology approach to reducing emissions will help to keep this consideration in view. It also reinforces the role of generating technology in advance of the 2024 standards, as well as the application of current building standards which are commonly met through the application of generating technologies.
- 6.6. From 1 April 2024, for all new buildings receiving a building warrant, the NBHS will require zero direct emissions heating technology. This builds on already existing higher energy efficiency requirements for new buildings. Given that Section 3F seeks to save only a portion of emissions from the use of the building, it will be important to reconsider its role and continuing contribution in light of this changing context.
- 6.7. Energy Performance Certificates (EPCs) are required to be produced when buildings are completed, sold, or let to a new tenant. The Scottish Government is due to consult on EPC reform in 2023, however we anticipate that EPCs will continue to report emissions for buildings in accordance with the respective domestic and non-domestic methodologies.

6.8. Notwithstanding the questions related to implementation of Section 3F in relation to NBHS, largely the same conclusion is made here as for the Twelfth Annual Report, **that changes planned in building and heat standards may mean that Section 3F may not be required in the future. However, in advance of those changes it is not suggested that Section 3F should be withdrawn.**

7. Matters for Future Reports

7.1. Future reports will consider:

- How the reporting requirements of the Climate Change (Scotland) Act 2009 can be met proportionately in relation to the new system of local development planning arising from the Planning (Scotland) Act 2019;
- How annual reporting should continue to be used as a means of providing guidance to planning authorities and developers; and
- Whether the changes to building and heat standards outwith the planning system mean that Section 3F is no longer required.

ANNEX – Section 3F Policies of Adopted Local Development Plans

This list provides the local development plan title and relevant web link. The year indicated is either part of the plan title or is included as the year of adoption. The relevant policy reference within the plan is also provided.

Aberdeen City Local Development Plan 2017

(<https://www.aberdeencity.gov.uk/services/planning-and-building-standards/local-development-plan/aberdeen-local-development-plan>) Policy R7 - Low and Zero Carbon Buildings, and Water Efficiency; Low and Zero Carbon Buildings

Aberdeenshire Local Development Plan 2023

(<https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2023/>) Policy C1 Using Resources in Buildings

Angus Local Development Plan 2016

(https://www.angus.gov.uk/localdevelopmentplan/development_plan?page_id=1147#item-details) Policy PV11 Energy Efficiency - Low and Zero Carbon Buildings

Cairngorms National Park Local Development Plan 2021

(<https://cairngorms.co.uk/planning-development/ldp-2021/>) Policy 3: Design and Placemaking

Clackmannanshire Local Development Plan 2015

(<https://www.clacks.gov.uk/property/>) Policy SC7 - Energy Efficiency and Low Carbon Development

Dundee Local Development Plan 2019 (<http://www.dundee.gov.uk/service-area/city-development/local-development-plan>) Policy 48: Low and Zero Carbon Technology in New Development

Dumfries and Galloway Council Local Development Plan 2 2019

(<https://www.dumgal.gov.uk/ldp2>) Policy OP1: Development Considerations

East Ayrshire Local Development Plan 2017 ([https://www.east-](https://www.east-ayrshire.gov.uk/PlanningAndTheEnvironment/development-plans-and-policies/adopted-local-development-plans/ldp.aspx)

[ayrshire.gov.uk/PlanningAndTheEnvironment/development-plans-and-policies/adopted-local-development-plans/ldp.aspx](https://www.east-ayrshire.gov.uk/PlanningAndTheEnvironment/development-plans-and-policies/adopted-local-development-plans/ldp.aspx)) Policy ENV 14 Low and Zero Carbon Buildings

East Dunbartonshire Local Development Plan 2 2022

(<https://www.eastdunbarton.gov.uk/residents/planning-and-building-standards/planning-policy/local-development-plan-2>) Policy 9. Climate Change, Sustainability and Energy Infrastructure

East Lothian Council Local Development Plan 2018

(https://www.eastlothian.gov.uk/info/210547/planning_and_building_standards/12242/local_development_plan) Policy SEH2: Low and Zero Carbon Generating Technologies

East Renfrewshire Council Local Development Plan 2 2022
(<https://www.eastrenfrewshire.gov.uk/ldp2>) Policy E1: Sustainable Design

Edinburgh Local Development Plan 2016 (<https://www.edinburgh.gov.uk/local-development-plan-guidance-1/edinburgh-local-development-plan>) Policy Des 6 Sustainable Buildings

Falkirk Local Development Plan 2 2020
(<https://www.falkirk.gov.uk/services/planning-building/planning-policy/local-development-plan/>) IR13 Low and Zero Carbon Development

FIFEplan 2017 (<https://www.fife.gov.uk/kb/docs/articles/planning-and-building2/planning/development-plan-and-planning-guidance/local-development-plan-fifeplan>) Policy 11: Low Carbon

Glasgow City Development Plan 2017
(<https://www.glasgow.gov.uk/index.aspx?articleid=16186>) CDP 5; Resource Management; Low and Zero-Carbon Generating Technologies

Highland-wide Local Development Plan 2012
(https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/199/highland-wide_local_development_plan) Policy 28 Sustainable Design

Inverclyde Council Local Development Plan 2019
(<https://www.inverclyde.gov.uk/planning-and-the-environment/planning-policy/development-planning/ldp>) Policy 6 – Low and Zero Carbon Generating Technology

Loch Lomond & the Trossachs National Park Local Development Plan 2017-2021
(<https://www.lochlomond-trossachs.org/planning/planning-guidance/local-development-plan/>) Overarching Policy 2

Midlothian Local Development Plan 2017
(https://www.midlothian.gov.uk/info/205/planning_policy/286/development_plans_and_policies) Policy NRG 3; Energy Use and Low & Zero-Carbon Generating Technology, and Policy NRG 4; Interpretation of Policy NRG3

Moray Local Development Plan 2020
(http://www.moray.gov.uk/moray_standard/page_133431.html) DP1 Development Principles

North Ayrshire Council Adopted Local Development Plan 2019 (<https://www.north-ayrshire.gov.uk/planning-and-building-standards/ldp/local-development-plan.aspx>) Policy 29 Energy Infrastructure Development; Buildings: Low and Zero Carbon Generating Technology

North Lanarkshire Local Development Plan 2022
(<https://www.northlanarkshire.gov.uk/planning-and-building/development-plans/north-lanarkshire-local-development-plan>) Policy EDQ 1; Site Appraisal

Orkney Local Development Plan 2017 (<https://www.orkney.gov.uk/Service-Directory/O/Orkney-Local-Development-Plan.htm>) Policy 1; Criteria for All Development

Outer Hebrides Local Development Plan 2018 (<https://www.cne-siar.gov.uk/planning-and-building/planning-service/development-planning/development-plan/>) Policy PD4: Zero and Low Carbon Buildings

Perth & Kinross Local Development Plan 2019 (<https://www.pkc.gov.uk/developmentplan>) Policy 32: Embedding Low and Zero Carbon Generating Technology in New Development

Renfrewshire Local Development Plan 2021 (<https://www.renfrewshire.gov.uk/article/3070/Local-Development-Plan-2>) Policy 17; Zero and Low Carbon Buildings

Scottish Borders Local Development Plan 2016 (https://www.scotborders.gov.uk/info/20051/plans_and_guidance/121/local_development_plan) Policy PMD2: Quality Standards; Sustainability

Shetland Local Development Plan 2014 (<https://www.shetland.gov.uk/development-plans-policy/development-plans/1>) Policy GP2 General Requirements for All Development

South Ayrshire Local Development Plan 2 2022 (<https://www.south-ayrshire.gov.uk/article/28782/Local-development-plan-2>) LDP policy: low- and zero-carbon buildings

South Lanarkshire Local Development Plan 2 2021 (https://www.southlanarkshire.gov.uk/info/200145/planning_and_building_standards/39/development_plans/2) Policy 2 Climate Change

Stirling Local Development Plan 2018 (<https://www.stirling.gov.uk/planning-and-building/planning/development-planning/the-statutory-development-plan/>) Policy 4.1: Low and Zero Carbon Buildings

West Lothian Local Development Plan 2018 Adopted Plan (<https://www.westlothian.gov.uk/LDP>) Policy NRG 1a; Low and Zero Carbon Generating Technology



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