

# CONSULTATION

## Response Document



### **Local Living and 20-minute neighbourhoods - planning guidance**

**(Scottish Government - Local Government and Housing  
Directorate)**

20 July 2023

# Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 7,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Wildlife and Countryside Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 740 members in Scotland who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

**This response was coordinated by Members of our [Scotland Policy Group](#).**

We welcome the opportunity to participate in this consultation and we would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy) at [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net) with any queries.

# Introduction

## [Guidance Document Link](#)

The fourth National Planning Framework (NPF4) sets out a clear commitment to think differently about our places, putting climate and nature at the forefront, tackling long-standing challenges and inequalities, and leading the transition to stronger, greener, fairer and healthier communities across Scotland.

A key element of this agenda is the need to plan, design and deliver places that support local living and 20-minute neighbourhoods, where people can meet the majority of their daily needs within a reasonable distance of their homes.

Local living can support our health and well-being, tackle inequality, increase climate resilience and deliver vibrant local economies. Providing better access to more of the services and facilities that people need on a daily basis can reduce the need to travel unsustainably, increase opportunities for social connections and help to build a positive sense of belonging and community resilience.

Delivering local living and 20-minute neighbourhoods requires an understanding of the specific context of a place. Whatever the context - cities, towns, villages, rural and island communities - the views and interests of local people must be at the forefront of the decisions made about a place. Local living and the 20-minute neighbourhood concept should respond to the assets, opportunities and needs of a place. It is a flexible approach rather than a template and does not restrict movement or impose boundaries, but rather is a way of supporting communities to have more of their daily needs met locally, enabling healthy and sustainable lifestyles.

This guidance document provides further detail to support the NPF4 policy framework on Local Living and 20-minute neighbourhoods. It aims to encourage, promote and facilitate the application of the Place Principle and create connected and compact neighbourhoods which prioritise environmental, social and economic sustainability.

The guidance is intended to assist and support planning authorities, communities and others with an interest in local living and 20-minute neighbourhoods. It is expected to be of particular relevance in the preparation of Local Development Plans (LDPs), Local Place Plans (LPPs) and to support planning decision making. Planning authorities are expected to consider how the guidance can be applied in a proportionate and place-based way and to use their discretion in deciding which components of the advice are relevant to their processes.

This guidance sets out:

- The benefits and context for local living and 20-minute neighbourhoods
- What local living looks like - the key considerations of local living and 20-minute neighbourhoods
- Ways to support the delivery of local living and 20-minute neighbourhoods, including case studies

## Local Living and 20-Minute Neighbourhood Definitions

**Local Living:** Local living provides people with the opportunity to meet the majority of their daily needs within a reasonable distance of their homes.

**20-Minute Neighbourhood:** The 20-minute neighbourhood concept is one method of supporting local living. The concept aims to provide access to the majority of daily needs within a 20-minute walk, wheel or cycle.

# Questions

## 1. Part 1 - Local living, the benefits of local living and 20-minute neighbourhoods

**Q: How helpful is part 1 of the guidance in furthering the understanding of local living and 20-minute neighbourhoods in a Scottish context?**

**Very helpful**

*Please explain your response by adding what else could be helpful:*

We support the 20-minute neighbourhood concept and the vision of how it is described. Developments in Scotland are now required to achieve positive effects for biodiversity in line with the 2019 Planning Act and Policy 3 of NPF4. Considering biodiversity and nature networks in the design and planning of 20-minute neighbourhoods is fundamental to meeting these requirements. Local Authorities are already considering and making provision for nature networks, so it is very important that this is incorporated in the development of 20-minute neighbourhoods as part of a holistic nature-based approach to planning.

It is good to see the principles of local living and 20-minute neighbourhoods embedded in a range of wider policy initiatives including Housing to 2040, the Town Centre Action Plan, the Getting the Right Change - A Retail Strategy for Scotland and NTS2 National Transport Strategy. As stated in the ClimateXChange 20-minute neighbourhoods in a Scottish context report<sup>1</sup>, the 20-minute neighbourhood concept should be the ambition that pulls together all other relevant policies in a given location.

We would like to see links made to the Scottish Biodiversity Strategy to 2045 and Scotland's Forestry Strategy 2019-2029<sup>2</sup>. For example, in Scotland's Forestry Strategy 2019-2029 under 'Expanding the area of forests and woodlands, recognising wider land-use objectives there is a stated objective - Encouraging an increase in tree canopy cover in urban areas. Urban trees have an important role in:

- Biodiversity and green networks
- Carbon sequestration. A single mature tree absorbs carbon at a rate of 21.6kg per year.
- Enhancing the quality of life for people living and working in Scotland's towns and cities, improving physical health and mental well-being<sup>3</sup>. Access to nature and fostering nature connectedness has been shown to have significant impacts on mental and physical health<sup>4</sup>.
- Improving air quality. Particulate levels on tree-lined streets can be up to 60% lower than those without trees.
- Reducing and slowing down rainfall passing through and flooding risk

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<sup>1</sup> <https://www.climateexchange.org.uk/research/projects/20-minute-neighbourhoods-in-a-scottish-context/>

<sup>2</sup> <https://forestry.gov.scot/publications/373-scotland-s-forestry-strategy-2019-2029>

<sup>3</sup> Urban health inequalities and the role of urban forestry in Britain: A review (2010). Forest Research, UK.

<https://www.forestresearch.gov.uk/publications/urban-health-and-health-inequalities-and-the-role-of-urban-forestry-in-britain-a-review/>

<sup>4</sup> Bosch M. and Sang A.O. (2017) Urban natural environments as nature-based solutions for improved public health – A systematic review of reviews, Environmental Research, 158, pp. 373-384.

<https://www.sciencedirect.com/science/article/abs/pii/S0013935117310241>

- Providing shade in a warming climate

We would like to see reference to the protection of existing urban trees and planting of further native tree species in the right places.

Furthermore, links to the Scottish Biodiversity Strategy will highlight the need for adoption of nature-based solutions in order to address the climate emergency and biodiversity crisis in tandem. **Nature-based solutions approaches should be at the forefront of any new development and redesign of the urban environment and very much integral to 20-minute neighbourhoods and local living.**

For example, in the urban environment:

- Widespread use of rain gardens as an urban flood prevention measure.
- Green roofs and walls.
- Green communal spaces and ecological networks to be included as a requirement of any new housing build to reduce impacts of fragmentation.
- Incorporation of Sustainable Drainage Systems (SuDs) in housing developments. SuDs have multiple benefits<sup>5</sup> in terms of water management (decreasing flow rates to watercourses and improving water quality), improving biodiversity (providing habitat for many amphibians and invertebrates) and amenity value. Although SuDs are a legal requirement for all new developments in Scotland, the design of SuDs is not always considered during initial site design and best practices are not always followed.
- A focus on nature-based solutions for managing issues such as air quality in urban centres and flooding in many of our towns and cities should be the norm. ‘Hard’ defences should be the last line of defence in making us more resilient to climate change and its associated effects on flooding and air quality.

Mapping multifunctional green infrastructure with the objective of well-connected nature networks integrates biodiversity conservation with planning and land-use objectives to secure ecosystem service delivery, thus providing multiple benefits to nature and people<sup>6,7,8</sup>. Nature networks and green infrastructure facilitate adaptation to climate change<sup>9</sup> and are fundamental components of urban planning in a changing climate.

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<sup>5</sup> [https://www.susdrain.org/delivering-suds/using-suds/benefits-of-suds/Biodiversity\\_and\\_ecology](https://www.susdrain.org/delivering-suds/using-suds/benefits-of-suds/Biodiversity_and_ecology)

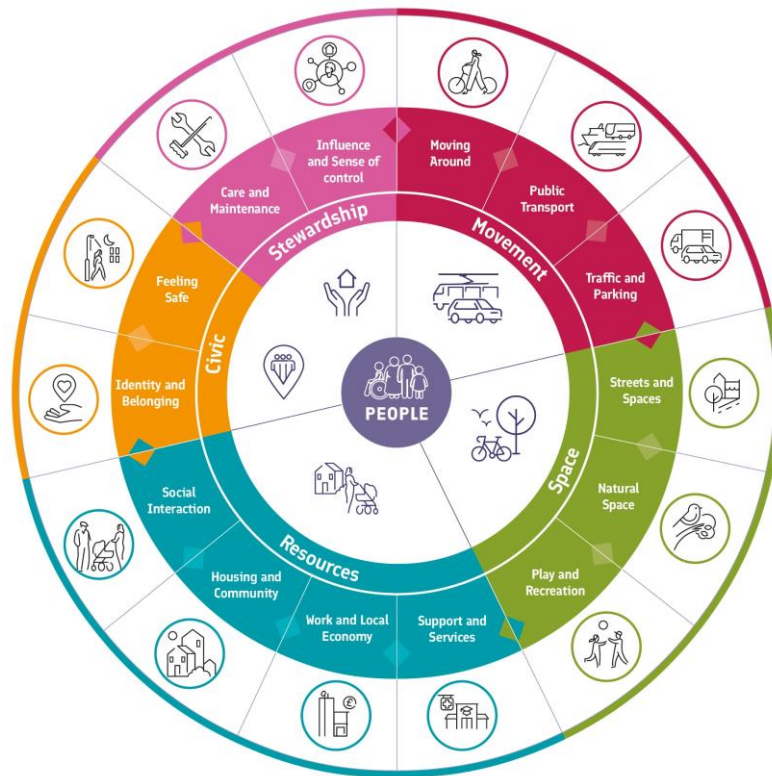
<sup>6</sup> BeneDict, M. A. and McMahon, E.T (2002) Green Infrastructure: Smart Conservation for the 21st Century, Renewable Resources Journal, 12-17.

<sup>7</sup> Jalkanen, J. Toivonen, T., Moilanen, A. (2019) Identification of ecological networks for land-use planning with spatial conservation prioritization, Landscape Ecology, 1-19. <https://doi.org/10.1007/s10980-019-00950-4>

<sup>8</sup> Scottish Environment LINK briefing paper on Nature Networks (2020) <https://www.scotlink.org/publication/nature-networks/>

<sup>9</sup> MacKinnon, K., Ham, C., Reilly, K., Hopkins, J. (2019) Nature Based Solutions and Protected Areas to Improve Urban Biodiversity and Health, Biodiversity and Health in the Face of Climate Change, 363-380. [https://doi.org/10.1007/978-3-030-02318-8\\_16](https://doi.org/10.1007/978-3-030-02318-8_16)

## 2. Part 2 - Local Living Framework Diagram



**Q: How helpful is the framework diagram in encouraging flexible, place-based approaches to support local living?**

**Somewhat helpful**

*Please explain your response by adding what else could be helpful:*

To make places more inclusive, diverse, vibrant, resilient, and empowering we should ensure equitable access to greenspace (both in terms of amount and quality), sustainable transport routes and blue-green infrastructure. Greenspaces should be connected and provide a green 'highway' to all areas of the town or city for the benefit of people and nature. Embedding Nature Networks in planning needs to be strengthened in the framework as a strategic, long-term approach to manage, restore and enhance Scotland's habitats and landscapes. Nature Networks offer a means of functional and ecological connectivity, where increased connectivity has a positive impact on ecosystem services<sup>10</sup>. A fully functioning Nature Network, keyed into green and blue infrastructures is one of the key targets that must be met by 2030<sup>11</sup>.

<sup>10</sup> Harrison, Laura Jane, White, Piran, Crawford, Limond and Odell, Simon (2016): Connectivity and ecological networks : Technical Information Note 01/2016. Research Report. Technical Information Note . The Landscape Institute.

<sup>11</sup> Scottish Environment LINK briefing paper on Nature Networks (2020) <https://www.scotlink.org/publication/nature-networks/>

### 3. Part 2 - Categories and Key Considerations

The categories - Movement, Space, Resources, Civic, and Stewardship and the related key considerations support the local living framework and are detailed in part 2 of the guidance. They provide detail on the important issues that should be considered and where appropriate, addressed for successful local living.

**Q: Looking at part 2 of the draft guidance: how helpful are the 'categories' and 'key considerations for local living' that are captured within this part of the document?**

#### **Somewhat helpful**

*Please explain your response by adding what else could be helpful:*

Under the natural space section, the following phrases are included:

*Parks & open space, natural landscape, visual connection, existing features or landforms, access & connectivity, climate resilience, ecosystems, blue & green infrastructure, biodiversity, growing, productive spaces, educational benefits*

This could be improved. For example, we would like to see the inclusion of high-quality green space for people and nature.

In the 'additional information on spaces' section at the end of the document it does refer to high quality natural space or greenspace and gives further information:

*Local access to high quality natural space or greenspace is an essential feature of local living and 20- minute neighbourhoods. Spending time in natural spaces or greenspaces improves health and wellbeing, provides opportunities for connections with nature and for play and activities outdoors, fundamental in physical, cognitive, social and emotional development.*

We would like to see high quality green spaces incorporated into part 2 of the guidance.

### 4. Part 3 - A structured approach to delivering local living

Part 3 of the draft guidance offers a structured approach that can assist with delivering local living. Three 'key steps' are detailed that can be repeated for incremental change. These are:

1. Understand the context - understanding the context of the place through the use of quantitative and qualitative information
2. Collaborate, plan, design- developing collaborative models of working to inform place-based planning and design processes
3. Implement and review - aligning investment, developing delivery capacity and supporting new ways of working

**Q: How helpful is the proposed 'structured approach' for use?**

**Somewhat helpful**

*Please explain your response by adding what else could be helpful:*

This section is missing reference to qualitative and quantitative data on open green spaces, as an example see Aberdeen City<sup>12</sup>, <sup>13</sup> or nationally<sup>14</sup> and crucially how these green spaces are important as components in nature networks see Edinburgh City example<sup>15</sup>. Many Local Planning Authorities have audited their green spaces and have associated strategies so reference should be made to these as data sources. Likewise, there should be inclusion of local designated sites - Local Nature Reserves (LNRs) and Local Nature Conservation Sites (LNCSs), nationally designated sites - [Sites of Special Scientific Interest \(SSSIs\)](#), and [National Nature Reserves \(NNRs\)](#) and internally designated sites [Special Area of Conservation \(SAC\) and candidate SAC \(cSAC\)](#), [Special Protection Area \(SPA\) and proposed SPA \(pSPA\)](#).

5. Part 3 - Ways to support local living and 20-minute neighbourhoods; key step 1 - understand the context

**Q: Does part 3 of the guidance clearly communicate the importance of both qualitative and quantitative data in establishing a baseline for a place?**

**Somewhat useful**

*Please explain your response by adding what else could be helpful:*

As highlighted in the previous question there are many important data sources not mentioned.

6. Part 3 - Ways to support local living and 20-minute neighbourhoods; key step 2 - Collaborate, Plan, Design

**Q: How helpful is the 'collaborate, plan, design' section of part 3 in supporting collaborative practices?**

**Very helpful**

Please explain your response by adding what else could be helpful:

Although it is clearly laid out how collaborative approaches can help achieve local living we have concerns around resourcing and the current reality.

A CIEEM survey of Local Planning Authority capacity in Scotland<sup>16</sup> sheds light on significant gaps to deliver effective ecological work in planning and the ambitions for positive effects for biodiversity in NPF4. Twenty-two per cent of respondents said they have no current ecological resource or expertise available and one third said there had been cutbacks to ecological provision within their LPA (either staffing or resources) over the past 5 years, with many others citing that cutbacks had happened prior to this. Two thirds of respondents rated lack of

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<sup>12</sup> <https://spatialdata-accabdn.opendata.arcgis.com/datasets/accabdn::aberdeen-city-interactive-map-2/explore?layer=10> ;

<sup>13</sup> <https://www.aberdeencity.gov.uk/services/environment/open-spaces/green-space-network>

<sup>14</sup> <https://www.greenspacescotland.org.uk/greenspace-map>

<sup>15</sup> <https://storymaps.arcgis.com/collections/9e57bb4b3d4c443889392b725ad2ae46>

<sup>16</sup> <https://cieem.net/survey-of-scottish-local-planning-authority-capacity-highlights-risk-to-delivery-of-npf4/>



enforcement staff to ensure compliance as a high or very high risk to their LPA's ability to implement the forthcoming NPF4 and Positive Effects for Biodiversity. These gaps must be addressed to ensure there is sufficient ecological expertise and capacity to advise and deliver NPF, Biodiversity Strategy and the ambitions set out for 20-minute neighbourhoods and local living.

In addition, a key part of local living is that local people feel involved in the planning process. Local Place Plans offer communities the opportunity to develop proposals for their local area, expressing their aspirations and ambitions for future change. However, we have not seen much evidence of these being widely adopted across Scotland, with many community councils that could support this not having the capacity and knowledge to assist in supporting this.

## 7. Part 3 - Ways to support local living and 20-minute neighbourhoods; key step 2 - Collaborate, Plan, Design

**Q: How helpful is the 'implement and review' section of part 3 in assisting the delivery of collaborative approaches to support local living?**

**Very helpful**

*Please explain your response by adding what else could be helpful:*

Although this is a useful section to include, it is very generic. It could be useful to refer to one of the case studies where collaborative approaches across organisations and sectors have delivered maximum benefits.

We are pleased to see that it is stated that review and monitoring should be undertaken. Establishing robust monitoring is essential. This should be clearly designed at the start of any project and properly funded for the duration. As well as updating the assessment of context and quantitative and qualitative data it needs to be clear that monitoring will generate data to add to existing and new datasets and ideally this should be open access data for all to use. We would like a statement added highlighting the importance of establishing robust monitoring at project initiation. The important role of local record centres should be highlighted. However, provision of biological record centres across Scotland is variable and full geographic coverage is not at present achieved with steps to address this currently being reviewed as part of the Scottish Biodiversity Information Forum - Better Biodiversity Data Project.

This section lists a number of cross government policies, strategies and investments that can support local delivery. There is however no reference to any biodiversity related opportunities. It might be useful to indicate types of funding available that can help deliver the ambitions. For example, all local authorities are receiving a share of £6.5 million directly from the Scottish Government's Edinburgh Process Fund - the second stream of the £65 million annual Nature Restoration Fund. In addition, councils can also apply to top up their direct allocation from a £1.5 million pot to deliver larger scale, multi-year nature restoration projects. Councils can use this funding to implement nature-based solutions in urban areas to address the biodiversity and climate crises. Some councils have already utilised this funding to improve the quality of their green spaces as a result of this funding.

## 8. Part 4 - Case Studies

**Q: Looking at part 4 of the draft guidance: do the case studies provide a useful and appropriate range of examples of good practice?**

**Yes**

If yes, please tell us about it:

The inclusion of the case studies is very helpful. A range of rural, urban and city case studies with differing considerations in each have been provided which is very useful. Some of the images would benefit from being larger and with higher resolution for example the Drymen map when zoomed in is all fuzzy.