



### ENVIRONMENTAL PROTECTION SCOTLAND (EPS) RESPONSE TO SCOTTISH GOVERNMENT CONSULTATION: LOCAL LIVING AND 20 MINUTE NEIGHBOURHOODS DRAFT PLANNING GUIDANCE

18 JULY 2023

Environmental Protection Scotland brings together individuals and organisations across the public, private, and voluntary sectors to discuss and promote ideas, knowledge, and solutions to achieve our aims of a cleaner, quieter, healthier, sustainable Scotland. We are a registered charity that informs debate, provides impartial advice, and policy updates, based on sound science and research in the fields of air quality, land quality, and noise.

Governed by a Board of Trustees and supported by Expert Advisory Groups (EAGs) our structure enables us to take a progressive and pragmatic approach to the issues which concern us, and on behalf of our wide and extensive cross-sector membership, to promote integrated and effective policymaking which supports sensible and workable solutions to pressing environmental challenges. Our EAGs represent a wide spectrum of our members and are chaired by experts in their field, seeking to build stronger alliances and support better collaboration between government, practitioners, legal experts, and researchers. The comments provided below cover all three of our core areas (air, land, and noise) as well as broader areas that must be taken into consideration in relation to local living and 20 minute neighbourhoods.

#### **COMMENTS**

**Q1. How helpful is part 1 of the guidance in furthering the understanding of local living and 20 minute neighbourhoods in a Scottish context?**

- *Somewhat helpful*

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

Part 1 of the guidance provides a greater understanding of local living and twenty minute neighbourhoods in a Scottish context - demonstrating the outcomes and opportunities of implementing the concept in both urban and rural areas. We agree that the operationalisation of local living and twenty minute neighbourhoods is dependent on local circumstances and contexts - demonstrating that twenty minute neighbourhoods cannot be applied uniformly and universally. Despite this - there should be greater clarification on how the key characteristics and considerations of the concept have to change when placed in a rural context - such as in the islands. This is particularly important in recent times given that islanders currently feel let down by ferry services that connect them to the mainland and surrounding islands.

In the first subsection dedicated to the climate and environment (page 10) - there should be increased mention of the benefits that reduced car dependency will have on air quality and health considering that climate change and air pollution are interconnected issues. Land quality should also be acknowledged as a key consideration to support both local living and confront climate change.

For example - vacant and derelict land issues must be addressed if we are looking to make locations that have good quality green space. Furthermore - there is an opportunity in the delivery of local living and twenty minute neighbourhoods to push for community and local food production yet most urban allotments have poor and very diverse soils. How will derelict sites be dealt with that may sit in communities but do not have the commercial opportunity for developers to move forward with it? Local food production will not only help to boost the local



economy - but will also reduce greenhouse gas emissions given that produce will have travelled fewer miles to reach our plates - as well as improve our health given that locally grown food is fresher and thus retains more key nutrients.

Moreover - in the subsection dedicated to the local economy (page 12) and in other relevant sections of the guidance - there should be greater acknowledgment of the importance of a critical mass of people within a given area to support local facilities and services.

For example - shops and restaurants will need a certain level of custom to remain viable and public transport services will need a certain level of patronage. This has been witnessed recently with the announcement from First Bus that they will no longer operate their Glasgow night service due to insufficient patronage - giving people less of an option in terms of which public transport services are available to them late at night - which will have consequences in terms of allowing people to get home safely and sustainably. Moreover - it has the potential to detrimentally impact the local night-time economy in the city centre of Glasgow if people believe they cannot rely on taxi or public transport services to get them home at the end of the night.

Greater clarification should also be given to terms such as walkable places to avoid ambiguity - or at least greater acknowledgment that the perception of walkable places will vary between people of differing abilities. Surely there should be flexibility given to the term given that these neighbourhoods are striving to support lifetime existence.

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## Q2. How helpful is the framework diagram in encouraging flexible, place-based approaches to support local living?

- *Very helpful*

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

Could improved air quality and other health benefits be incorporated into this framework diagram as encouraging outcomes of developing local living and twenty minute neighbourhoods?

Furthermore - could there be a dedicated section to environment and behaviour - given that the behaviour of people will likely be an intervening variable in terms of delivering the principles of local living and twenty minute neighbourhoods. Certain sections of the diagram outline the community aims of local living such as feeling safe and increased identity and belonging - however - it is unclear how these aims are going to be achieved or how they can be integrated into planning processes. It should not be assumed that these desired social behaviours will change just by changing the physical.

Lastly and from a health perspective - is the definition of health sufficiently robust to meet the objective of the report to provide increased health benefits and lifetime existence in such neighbourhoods and to provide decreased health inequalities?

For example - Figure 1 symbolically represents health under Support and Services but there and elsewhere it does not explicitly state what services are needed (such as GP surgeries, dentists, pharmacies, or supported living / retirement homes). Both GP surgeries and supported living / retirement homes are necessary to enable people to remain in their community as they age and maintain a quality of life. None of these is named in the Health and Wellbeing section and there should be greater clarification on the community responsibility and local services required to achieve positive health and wellbeing outcomes.



### **Q3. 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 adding what else could be helpful:**

Part 2 of the guidance breaks down and provides a greater explanation to each of the categories and key considerations for local living - emphasising that twenty minute neighbourhoods should be treated as an aspirational gauge and that the means to deliver local living should be flexible so as to support the context and local needs of each given area. However - it should be made clear which of these categories are more important than others (if this is the case) or at least which of these categories would serve as a good starting point for local authorities and other relevant stakeholders.

As previously mentioned - land quality should also be included as a key consideration for local living.

There should also be greater clarification provided for the type of housing required to achieve the aims of local living and twenty minute neighbourhoods. For example – it should be made more explicit to developers and local authorities that monofunctional housing sub-divisions that keep people isolated from key services and facilities - should be avoided. The same explicitness is required for the development of supported living spaces and care homes to ensure those that require additional support needs are not isolated from the rest of the community.

The same approach should be taken when permitting developments on vacant land such as drive throughs - which only serve to encourage private car use.

Furthermore - in terms of town centre regeneration (page 24) – it should be made clearer that the centre of a town or city must be connected to surrounding neighbourhoods via an efficient, affordable, reliable, and integrated public transport network to support the diversity and activity of that centre. While the first step should be improving the public service infrastructure of the local area - tangible steps should be taken to ensure these areas are not only well connected to each other via public transport but also well connected to the relevant city centre.

Lastly and as mentioned in the previous section – there should be increased reference to air quality in the relevant sections - as well as a dedicated section to environment and behaviour? For examples -should clean air measures such as low emission zones or car free zones also be included as key considerations to achieve local living and twenty minute neighbourhoods. However - such measures can only be put forward as solutions if they are paired with vast improvements in public transport.

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### **Q4. How helpful is the proposed 'structured approach' for use?**

- *Somewhat helpful*

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

The proposed structured approach to local living is concise and pragmatic - emphasising that the delivery of local living and twenty minute neighbourhoods is a continuous and repetitive process – and summarises a number of significant considerations to deliver local living. This is a useful tool to have when taking steps to develop and deliver local living. However - it would be helpful to have more specific examples or guidelines for each step of the process so that local



authorities and relevant stakeholders are able to effectively map out what has to be done in the context of their given area - in terms of planning and development. That being said - the guidance should seek to go beyond planning and development by also setting out other roles for other stakeholders, sectors, and members of the public - to continuously foster collaboration and principles of care within the community.

The first paragraph on page 28 briefly outlines what has to be examined in order to understand the context of a place. This list should be expanded to include proximity (the closeness of things); accessibility patterns (such as closed or non-adaptive developments); and the impact of choices and behaviours made by people on the viability and deliverability of local living. Furthermore - each of these terms could be further defined and expanded on to avoid ambiguity of what each means.

Furthermore - in the section dedicated to quantitative data and qualitative data (pages 29 to 30) - accessibility patterns should be expanded on in terms of what can be done to make closed or non-adaptive settlements and developments more accessible. For example - how can existing settlements be retrofitted to deliver the outcomes of local living? Could the guidance include a list of options that are available to developers dependent on the context and needs of the area they are working on?

Lastly and again – there should be further reference to improvements to air quality - specifically on page 33 as one outcome that will emerge from climate adaptation work. Improved land quality could also be included here as an outcome emerging from climate adaptation work. Furthermore - with reductions in private car use - noise pollution from car traffic as well as air pollution will also be reduced - which would bring more subtle but important benefits to human health and environmental health. Reductions in noise pollution should therefore also be considered as a key outcome of local living and should be referenced throughout the guidance.

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### **Q5. Does part 3 of the guidance clearly communicate the importance of both qualitative and quantitative data in establishing a baseline for a place?**

- *Very useful*

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

Could this be expanded to include the importance of collecting data on air and noise pollution in a given area or local authority to support the delivery of local living and twenty minute neighbourhoods?

Furthermore - greater clarification should be provided on who exactly is responsible for undertaking this qualitative and quantitative data and how involved the community will be in this data collection. There should also be formal processes around gathering feedback from the community on developments put in place to deliver local living and twenty minute neighbourhoods.

Nevertheless - the guidance clearly communicates the important of collecting qualitative as well as quantitative data in establishing a baseline for a place.

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### **Q6. How helpful is the 'collaborate, plan, design' section of part 3 in supporting collaborative practices?**

- *Somewhat helpful*

**Please explain your responses adding what else could be helpful:**



This section of part 3 is helpful and concise in its approach - correctly outlining that everyone has a role to play in order to deliver local living. One question is whether the Scottish Government will support local authorities to discover wider

opportunities for collaboration and investment - given the significant amount of time and effort this will require from already stretched departments.

Furthermore - the critical mass of people should again be acknowledged as a key consideration in the planning and design of new public buildings and there should be greater emphasis placed on the design quality of new spaces and buildings.

As mentioned above - another suggestion is to include improvements in air quality, land quality, and noise as key opportunities that will arise as a result of collaborative approaches and integrated processes - to encourage cross sector collaboration and working.

Lastly and to circle back to our point on local food production and the local economy - should the Scottish Government aim to support setting up collaborations with local as opposed to global businesses? For example - local coffee

enterprises vs the likes of Starbucks or Costa. This level of cooperation between local businesses would help to reduce emissions and boost the local economy.

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### **Q7. How helpful is the 'implement and review' section of part 3 in assisting the delivery of collaborative approaches to support local living?**

- *Somewhat helpful*

Same as above in that this section adopts a concise and pragmatic approach. Would it also make sense to include the CAFS2 as another strategy that can be aligned with the commitment to support local living - to ensure that air quality matters are being taken into consideration?

Greater clarification and detail should be provided on the ways in which the public and private sector can merge forces to make things happen. Furthermore - whilst local authorities may have the desire and plans to deliver on local living - they lack the resource to achieve this alone as the previous section implies. How can the public sector incentivise the private sector to invest in these developments? Perhaps this should be included in the guidance to encourage private developers and investors?

Lastly - further detail must be included in terms of how often review and monitoring should be required in order to pick up on any problems and changes in a timely manner and greater clarity should be provided on who is responsible for this review and monitoring process.

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### **Q8. 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 case studies are useful as they cover a wide range of urban and rural areas of various sizes across the country, demonstrating that the delivery of local living and twenty minute neighbourhoods can be implemented across a wide range of towns, cities, and regions.

Moving forward - these case studies should be updated to reflect the continuous and evolving approach to deliver local living and twenty minute neighbourhoods as it would be useful to also see tangible outcomes of any implemented actions and initiatives. For example - through continuous monitoring and assessment - has there been an increase in health benefits or improvements in air quality in twenty minute neighbourhoods?

Furthermore, what is being done to ensure that twenty minute neighbourhoods across the country are not being planned in isolation from each other? Are there plans to create well-connected sustainable networks between towns, cities, and regions to avoid vehicular through-traffic?

Lastly - it would also be useful to have global examples that demonstrate best practice. What could we learn from our countries around the world (if any) that have successfully implemented twenty minute neighbourhoods?

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**Q9. Looking at the impact assessment update report: do you have any views about the initial conclusions of the impact assessment update report that accompany and inform this guidance?**

- No

**Please tell us here:**

No comments.

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**Q10. Additional information: please provide any further comments on the draft guidance document.**

**Please let us know here:**

(A) In the Useful Resources section (Annex B) - reference should be made to national legislation and guidance relevant to air pollution, noise pollution, and land contamination.

(B) On a more general note - greater emphasis and consideration has to be given to a) the impact of people's behaviour and choices on the deliverability and viability of twenty minute neighbourhoods and b) measures being taken to ensure vulnerable groups are placed at the forefront of planning.

In relation to the former - there should be greater acknowledgment and awareness that even if all of the means available to achieve twenty minute neighbourhoods are aligned - such as settlement patterns, density and scale, connectedness, proximity of resources and services - it does not necessarily mean that desired social behaviours from individuals and/or communities will emerge.

In relation to the latter - to ensure that the elderly and disabled still have a good quality of life - varying gait speed and user ability when planning and developing walkable neighbourhoods must be prioritised and this is perhaps something that should be further clarified within the guidance.





Moreover - research has shown that gentrification can occur where neighbourhoods have developed high levels of walkability - driving up prices and rents - which may push those with lower socio-economic status out of these areas. This has also been a well-documented concern with the creation of green space. What is being done to ensure that special attention is given to these vulnerable groups?

(C) There should be further clarification within the guidance outlining how the success of twenty minute neighbourhoods will be continuously assessed and measured and by whom.

(D) There should be further clarification on how design quality can be ensured during and after the development and implementation of concepts such as twenty minute neighbourhoods. For example - how can local authorities and relevant parties ensure that green spaces are kept safe and clean and how can they ensure bus services offer a safe and reliable journey?

(E) What percentage of the delivery of local living will be delivered by local authority development vs private development - for example? As mentioned throughout - this should be given further clarification beyond the acknowledgment that local living and twenty minute neighbourhoods will have to be delivered by various actors and groups.

(F) Although the case studies outline the contextual challenges of delivering local living and twenty minute neighbourhoods - could there be a separate section of the guidance dedicated to common obstacles and challenges that relevant authorities and developers may face on their journey towards denser and more diverse neighbourhoods - and as mentioned - clearer ways in which places and buildings can be retrofitted?

(G) Connected neighbourhoods and local living must be achieved primarily through community led approaches given that they are created to serve the needs and wants of the community in a given area. How can we ensure that approaches to local living and twenty minute neighbourhoods will not just be heavily dictated by third party investors?

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Organisation

#### **What is your organisation?**

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Yes I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

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