

Tackling the nature emergency – delivery plan on biodiversity

Submission to Parliamentary Committee on Net Zero, Energy & Transport

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About the RTPI

The Royal Town Planning Institute (RTPI) is the professional body representing the planning system and planning professionals in the UK and internationally, and has more than 27000 members worldwide. The Institute champions the power of planning to create sustainable, prosperous places and vibrant communities. As a learned society, we use our expertise and research to bring evidence and thought leadership to shape planning policies and thinking.

Overview

RTPI Scotland welcomes this opportunity to comment on the Scottish Government's biodiversity strategy and delivery plan, and we welcome the very positive policy steps being taken to tackle the nature emergency in Scotland. The strategy and the delivery plan are both important in the attempt to secure a step change in the protection and restoration of habitats and natural environments in Scotland. We support the overall strategic vision and the 6 objectives which underpin the delivery plan.

We also note the ambitious goals of National Planning Framework 4 which put the twin challenge of the climate and nature emergencies at the heart of planning decisions and plans in Scotland. RTPI Scotland supports planning as a means to protect critical natural capital and deliver nature positive development as part of a just transition.

Delivery Plan – who, when, where

The delivery plan includes a very long list of actions and initiatives. There are lots of good ideas here, and these actions and initiatives are to be welcomed. However, the document is very quiet on actual delivery mechanisms and processes. The following questions need to be addressed for each of the actions specified:

Who is the lead agency and who are the key delivery partners?

When will the action be delivered?

Which actions are part of existing work programmes and which are new?

Which actions are priorities, and which are secondary?

What is the spatial context for the delivery plan? Which actions are being undertaken in which parts of Scotland?

Resourcing

RTPI Scotland would like to see additional information in the delivery plan about the resources needed for each action. Some actions will require budget for staff, others will require other types of resources, e.g. technology, data and skills.

The Institute is very concerned about the additional work that local planning authorities are being asked to do whilst also losing staff and losing budget. This action plan includes a number of items related to



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planning, but there is no indication here about the resources needed to deliver those actions at national or local level.

Our latest analysis of data about planning resources in Scotland shows a very challenging situation, with the public sector workforce at the lowest level in five years. There were 1205 members of staff in local authorities as of 2022/23. The previous year's level was 1242.

RTPI Scotland's 2022 update reported that the Planning (Scotland) Act 2019 introduced 49 unfunded duties on local authorities. The Scottish Government's roll out of this legislation risks planners (and the planning system) being immediately placed on the back foot in terms of delivering on these duties without a robust resourcing and upskilling strategy in place.

[RTPI | Resourcing the Planning Service \(RTPI Scotland Research briefing\) December 2023](#)

Skills

Skills and skill development is going to be important in the delivery of the actions set out in the delivery plan. Many authorities have lost in-house expertise on trees, green infrastructure, biodiversity and/or nature conservation. Tackling the nature emergency effectively will require access to this type of expertise, and professionals will need additional training and support to make new statutory targets work in practice. We know from our work in England that the introduction of biodiversity net gain has created a lot of uncertainty about the technicalities of measuring



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and assessing biodiversity, with our members reporting only a very low confidence (rated as 2/10) in their knowledge of this topic. This is a significant risk to the implementation of a new biodiversity metric or tool.

Green Infrastructure & Good Practice

Biodiversity is a complex policy area, there are already multiple strategies and work programmes that cover biodiversity, nature conservation and green infrastructure. Some of these are mentioned in the delivery plan but not all, and we are concerned that the delivery plan does not fully reflect these existing strategies. For example Nature Networks might be expected to build on and interact with Open Space Strategies, Green Infrastructure plans, Forestry and Woodland Strategies and Local Biodiversity Action Plans. Other missing elements include hedgerows, local place plans, regional spatial strategies and habitat regulation assessments.

We are concerned that the delivery plan does not appear to build on previous experience or good practice in Scotland. In relation to the creation of 6 large scale landscape restoration areas (Objective 1), [the Central Scotland Green Network](#) would appear to be a relevant model for these areas, as a national green infrastructure project with a 40 year timeline, a delivery body and an established management and governance structure. We would like to see the excellent work of CSGN partners on green infrastructure planning to be acknowledged and included in the delivery plan.

Environmental Justice & Urban Interventions

Objective 1 focusses on the large-scale restoration of ecosystems. We suggest that this part of the delivery plan should include actions on the most nature-deprived communities in Scotland. We know that there are

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many neighbourhoods with poor environmental quality, and that living in these places can have a profound effect on health and well-being. The delivery plan will need to recognise current environmental inequalities, and to include targeted action to reduce them. We suggest that this part of the delivery plan includes some actions which focus on urban landscapes/contexts, particularly nature-deficient places.

The place principle

RTPI Scotland supports the Scottish Government's policy on place and place-making, including 20 minute neighbourhoods and local place plans. We think that the biodiversity delivery plan could make explicit use of the place principle. The principle recognises the combined impact of services and built and natural assets on Scotland's places and communities across scales, sectors and disciplines. It seeks to break down organisational and sectoral boundaries to improve collaboration and enhance impact on the ground. Tackling the nature emergency will require a combined cross-disciplinary and multi-sectoral approach in partnership with communities and across multiple scales. For the delivery plan to have the necessary impact in tackling the nature emergency, it is vital that it embeds the objectives of the place principle in a way that clearly and transparently establishes responsibilities, delivery partners and collaborative ways of working to achieve the desired aims. For example, enhancing biodiversity in Scotland's blue and green spaces (Objective 2) could be achieved by integrating nature into place-making approaches rather than by establishing a new National Charter.



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Conclusion

Overall, while we welcome many of the ideas and initiatives contained within the Delivery Plan, we would like to see a lot more information in the plan about who, when and where delivery of each action will happen. Many of the actions have insufficient information to know or understand how things would work in practice, including how specified actions interact with existing strategies or processes such as NPF4, development plans and local place plans.



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