

20 Minute Neighbourhood Consultation (20th July 2023)

Heads of Planning Scotland (HOPS) is the representative organisation for senior planning officers from Scotland's local authorities, national park authorities and strategic development planning authorities.

This consultation response summarises key points made by Scottish Planning Authorities, but we note that there will be differences of opinion between authorities and would defer to their own responses on specific local issues.

1. 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

HOPS support of the context and background provided but note it lacks details on outcomes, benefits, and evidence rather than repeating policy details. Evidence is needed to support the claimed benefits of the concept, including concrete examples and data.

The importance of the Place Principle and public services in implementing the concept should be highlighted, however should acknowledge the impact and implications on other policies related to local living and 20 Minute Neighbourhoods, in particular the policy context section needs elaboration, including the interrelationships between policies and the link to community wealth building.

The financial pressures on Local Authorities, Key Agencies and other public sector organisations needs better recognition in the guidance. In addition, there could be further information on how the private sector is expected to interact with delivery.

The guidance should provide clearer connections between policy objectives, outcomes, and the benefits. It should differentiate clearly between the concepts of 'local living' and '20-minute neighbourhood' and explain how they increase convenience and do not limit freedoms. More clarity and structure is needed in explaining the different contexts and geographies where local living and 20 Minute Neighbourhoods can be applied, as well as the challenges of implementing the concept in rural areas and recognize the complexity of different contexts across Scotland.

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

Somewhat helpful

The framework diagram aligns well with the Place Standard tool, making it familiar in engagement processes. Though we may now be at a stage where there is need for standardisation and integration of all existing tools to ensure consistency in use.

The framework lacks information related to the climate crisis, which is essential for Local Living and 20 Minute Neighbourhoods.

The guidance should clarify how the Local Living Framework relates to development planning and decision-making.

More clarity is needed on how the Local Living Framework applies to Development Management decision making especially in relation to implementation of NPF4 Policy 15.

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The framework should be applied based on local context and community aspirations, managing expectations accordingly. Rural contexts may require a different framework diagram, and a connected community's approach was suggested by rural authorities.

The guidance should consider the quality of data and resource limitations during community consultations.

3. 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

A key concern is the need for better alignment between the 20 Minute Neighbourhood and Local Living guidance, and Local Development Planning Guidance. Practical advice on how to address planning applications based on the criteria would be helpful.

As noted throughout our response we have concerns about the resources for data collection. The level of detail required may be more than development plan cycles allow. In addition, It is recognised that the Local Development Planning Guidance states that "planning authorities are not expected to collect this information as primary data" however this should also be clear in the Local Living and 20 Minute Neighbourhood Guidance.

Themes/topics which have been noted to us that could be addressed separately or in more detail within the guidance:

- Air quality
 - Sport and leisure
 - Long term stewardship
 - Digital accessibility
 - Climate crisis (information could be brought in from Annex A)
 - Nature crisis (information could be brought in from Annex A)
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4. How helpful is the proposed 'structured approach' for use?

Somewhat helpful

HOPS support methodology that combines qualitative and quantitative place-based evidence. This approach balances traditional contextual data gathering with collaborative efforts from communities to create successful places.

More direct reference to the formal requirements for preparation of local development plans, would be welcomed, although it is noted these broadly align with the cycle as presented and further detail is provided within the Local Development Planning Guidance. Achieving Local Living and 20 Minute Neighbourhoods will require a fundamental change in the first cycle of new-style Local Development Plans.

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While the structured approach is helpful as overarching advice, some parts of the document become too prescriptive. There have been suggestions that the guidance should focus on providing principles, allowing locally suitable methods to be developed.

Suggestions have been made to separate the review stage from the implementation stage. The review stage is crucial in understanding the effectiveness of developments and strategies on the ground. Ongoing collaboration and involvement from various sectors, including the private sector, are essential for the success of the approach. Separating out from other processes will help to provide clarity.

Including specific examples for each step and defining the roles of planning and other stakeholders would enhance the guidance's practicality and clarity.

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

Somewhat helpful

Importance of both qualitative and quantitative data, both types of data are needed to create a comprehensive baseline for a place. The guidance should offer more detailed methodologies for assembling, analysing, and presenting data, particularly in the context of quantitative data and digital mapping tools. This would also help ensure consistency of approach by planning authorities. The guidance could provide greater consideration of how the local living approach aligns with the Scottish Government's Digital Transformation in Planning program.

The guidance emphasises using data already collected through community-centred engagement or action programs to promote collaboration and efficiency. However, the relevance and up-to-dateness of the data should be considered.

Further information could be provided to understand complex data relationships such as that between deprivation and place.

The recommendation of using the Place Standard tool for Local Living and 20 Minute Neighbourhoods is helpful for collecting qualitative data.

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

Somewhat helpful

HOPS supports the recognition of a collaborative approach to escape silo working and bring services together. However, ambitions require buy-in from partners outside of the local authority, like the NHS. In addition, planning is just one part of the broader picture of achieving local living, and investment decisions in capital projects and services are significant. Strong local authority leadership and cross-service coordination are essential for successful implementation.

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There is a need for more in-depth information on processes involved, particularly distinguishing between retrofitting existing communities and developing new 20-minute neighborhoods. Additional support for approaches like "town centre first" and co-location of services is welcomed.

The allocation of land in accordance with the local living approach requires a measurable decision-making process.

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

Somewhat helpful

HOPS appreciate that the guidance notes that delivery of local living requires wider buy-in beyond planning authorities. However, there is need for better alignment of government policies across sectors and clear identification of responsibilities for delivering local living initiatives is stressed. We note a lot of responsibility on Development Management services to interpret and implement the Policy.

HOPS supports the inclusion of expectations for assessing planning decisions and how applications should demonstrate how their proposal responds to this at the local level.

Resourcing remains a key concern, not only for planning authorities but other partners as well. The alignment of investment programs to support local living is welcomed, but the constraints of budgets and competing priorities should be recognized. More information on funding and resources available for partner organizations to support local living initiatives would be welcomed.

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

HOPS are pleased with the inclusion of a sufficient number of detailed case studies showcasing the 20-minute neighbourhood concept in various contexts and settlement sizes, using different approaches to tackle unique issues and opportunities. More detail was wanted on information gathering, analysis stages, and reflections on challenges faced in the case studies are made. The lessons learned from the Stewarton case study was seen as very useful.

Further information on why each case study was chosen and the scale that the approach is intended to be used and direct links to the main guidance may be beneficial. In addition

HOPS would also like to see case studies captured in the future as work progresses, this could be highlighted through the OurPlace website or another national resource. In particular, more case studies related to; smaller applications, practical examples of interaction with Community Wealth Building work, examples from the private sector, and existing local living neighbourhoods from around the world were raised.

As in previous questions concerns have been raised regarding the lack of resources planning authorities may have to support similar projects.

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9. 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?

Business & Regulatory Impact Assessment (BRIA)

The draft guidance sets out a very resource intensive approach to understanding local living and 20-minute neighbourhoods, which has largely been based on focussed collaborative placemaking at the scale of a single community. Replicating this approach across a local authority area, has significant resource implications, which have been overlooked in the guidance and understated in the BRIA.

Equalities Impact Assessment (EQIA)

The Equalities impact assessment provides a lot of interesting information about how people with a range of different characteristics can be impacted on by local living proposals. Much of this information and the data which it is based on could have been highlighted within the guidance itself.

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

HOPS have concerns about the target audience for the document. The guidance may be prohibitively long for practical use by planning officers, there is repetition throughout, and important information could be signposted more clearly. It could be strengthened by providing a clearer Scottish context, linking it to existing policies, and offering practical examples to make it more user-friendly. We do appreciate that some of it may be written with non-planning staff as the target.

The importance of individual behavioural change to promote walking and wheeling should be emphasised, especially in areas already walkable but with a reluctance to use public transport.

The definition of 20-minute neighbourhoods should explicitly state that it includes round trips and sustainable transport options, aligning with NPF4's definition. A clear definition of definition of "high-quality" active travel networks is also required.

The guidance should be more explicit on requirements rather than considerations to empower Planning Authorities when determining planning applications. More specific, actionable details are needed in the guidance, including clear parameters for development management purposes and for site allocation.

Concerns were raised about the guidance's impact on existing town centres if large new housing developments are placed outside the 20-minute radius, potentially hindering town centre regeneration.