

## Response ID ANON-6B79-F7G6-2

Submitted to Local living and 20 minute neighbourhoods: draft planning guidance  
Submitted on 2023-07-20 14:32:13

### Questions

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

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

We broadly support the considerations in part 1, and welcome the links to the other frameworks and guidance. Three of the four areas which 20 minute neighbourhoods are identified as supporting are priorities we share, as they clearly relate to desirable outcomes (sustainable environment, reducing health inequalities and improving quality of life).

We would prefer that 'local economies' is more clearly defined before it is to be included in this list. Economic growth is not a desirable outcome in itself, and pursuing growth for its own sake is now widely recognised as contributing to climate change and creating inequality. Local economies as we would understand them can be good or bad. Ideally, a local economy should share the features of a wellbeing economy, putting positive outcomes such as wellbeing, human dignity, the environment and participation at its core. We would like to see definitions similar to the Wellbeing Economy Alliance (<https://weall.org/>) incorporated in the description of local economies in the guidance. The People's Health Trust also identifies the ability of local people to affect the local community as important to a local economy that works well <https://www.peopleshealthtrust.org.uk/health-inequalities/what-makes-us-healthy/local-economies>.

In a similar vein, we would like to see more detail in the Public Sector Reform section. While we welcome the link to this policy area, the participation (or people) 'pillar' of the 2010 Christie report should be explicitly mentioned.

Participation is key to any place-based approach, including 20 minute neighbourhoods, and should be given more emphasis throughout the guidance. There is evidence that by working with communities and supporting them to take part in informed ways from an early stage, decisions and outcomes can be improved.

For example, deliberative democracy has shown its potential to generate and provide support for the brave policy decisions required to move away from a focus on economic growth towards prioritising wellbeing. SCDC was directly involved in the Citizen's Assembly of Scotland, which prioritised actions around sustainability and tackling poverty. Through informed deliberative dialogue, assembly members were able to weigh up the different policy considerations at stake and prioritised longer-term wellbeing over short-term growth.

A further example is lived experience panels, in which community members who are worst affected by bad planning decisions, yet have the least influence over them, are supported to contribute meaningfully to planning processes. Scottish Community Development Centre has been setting up a lived experience panel to co-design Glasgow City Region's Capital Investment Health Inequalities Impact Assessment Tool as part of the Economies for Healthier Lives programme. The tool will then be tested on a small number of capital projects, including a £9m housing energy retrofit project and the proposed Glasgow Metro project. Led by Glasgow City Region Programme Management Office, the project aims to ensure that capital investment in the area supports reducing health inequalities and improving health and wellbeing outcomes for people who live and work in the region. Find out more at <https://www.health.org.uk/funding-and-partnerships/programmes/capital-investment-health-inequalities-impact-assessment>

The guidance needs to be clear on how people, particularly those in marginalised communities where community organisation is fragile and there are fewer resources, should be empowered and have more control over what happens in, and to, their communities. 20 minute neighbourhoods, and other place-based approaches to planning can be effective if they are accompanied by good community engagement informed by the National Standards for Community Engagement and community capacity building support to ensure all groups in the community are empowered to take action.

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

somewhat helpful

Please explain your response adding what else could be helpful:

We see some merit in the use of this diagram as a people-centred framework to set out the key categories. However, it has certain weaknesses which should be recognised and stated in the guidance. For instance, it does not clearly illustrate the interrelationship between categories. Some sub-categories such as influence and sense of control are clearly key to achieving progress in other areas.

We support the use of place-standard-type tools when they are used as one tool among others to support communities to meaningfully participate and have influence over planning and decisions. Other key tools and approaches which we would like to see reference to are:

- Deliberative dialogue techniques
- Lived-experience or citizen panels
- Community-led action plans
- The National Standards for Community Engagement and VOiCE
- Participatory budgeting
- Charettes

- Participation requests and outcome improvement processes

Tools such as these can be used in combination with one another, and some will be more appropriate than others depending on the situation and community involved. There should also be an emphasis in the guidance on engaging with communities at an early stage, so that people and groups involved can help to decide on which approaches are most relevant to them.

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

Please explain your response adding what else could be helpful:

The key considerations cover many important dimensions of wellbeing. One aspect we would like to see given more emphasis is the importance of high-quality services which are affordable, reliable, accessible and relevant. This ties in with other points we make in our response such as the importance of good community engagement when planning and designing places and services as well as the need for a preventative approach. Both of these will require a significant increase in investment in public services.

We note that the key considerations under Stewardship emphasise place's impact on community resilience and participation but not the reverse. For places to work for communities they need to reflect the priorities of people who live in them. However, many groups, particularly disadvantaged and marginalised communities, tend not to have a voice in the planning and decisions which affect their communities. Support needs to be provided to reduce barriers to participation for these groups so that they can contribute to placemaking.

We sense that the document recognises this, and the reference to NPF4 and the importance of early, meaningful engagement in planning is welcome. However, the guidance needs to be unambiguous that support, or community capacity building, has to be a priority from the start of any policy regarding 20 minute neighbourhoods.

4 How helpful is the proposed 'structured approach' for use?

somewhat helpful

Please explain your response adding what else could be helpful:

We support the use of structured, cyclical model that recognises the importance of planning and reviewing as well as community engagement. The VOiCE online platform offers a similar model, with a particular focus on community engagement. We believe it would be helpful to highlight VOiCE as a useful tool for ensuring planning is participative, meets community priorities as well as being structured.

A key difference between the model presented and VOiCE is that the latter separates implementation ('do' in VOiCE) from reviewing. In doing this, VOiCE ensures that reviewing is not simply an add-on to implementation. In turn, this ensures that activity is properly reviewed so that learning can be gained, and activity better planned and carried out in future.

We would recommend that the model in the guidance treats these stages individually in order to give them the importance they deserve.

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 useful

Please explain your response adding what else could be helpful:

Quantitative and qualitative data are rightly given equal weight in the guidance, and we welcome the references in this section to more 'bottom-up' forms of qualitative evidence such as community action plans and local place plans. This list of sources could be supplemented by two other forms of evidence generated by communities - research carried out by community groups and evidence generated through lived experience panels,

SCDC has developed and delivered a range of programmes supporting community-led action research, in which people in communities are trained and assisted to plan, carry out and make use of their own research to further their aims and benefit the wider community. Given the trust, reach and understanding community groups have in respect to their communities, this approach is an invaluable source of qualitative (and sometimes quantitative) evidence, generating unique insights and other positive outcomes.

The section on community engagement does not mention the importance of listening to, and engaging with, marginalised and disadvantaged communities, who are very often impacted on the worst by poor planning. Lived experience panels offer a supportive and meaningful way to engage with communities with the least voice and should be used in conjunction with other approaches that are more likely to bring in well-connected and higher capacity communities.

6 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:

We welcome the recognition of the importance of community engagement in planning, and the links to community action plans and local place plans.

We would prefer to see more emphasis on the meaningful and early participation of communities. The people who live in, work in and use a place are the most knowledgeable about what makes a place suitable for them. They need to be given more say in how places are planned and developed, including the facilities and services they prioritise locally.

Most importantly, any approach used needs to support marginalised and disadvantaged communities to fully participate. This support can be provided in the following ways:

- The National Standards for Community Engagement and the associated VOICE online platform should be key resources in developing town centres, as they can help ensure engagement is inclusive, well-planned and effective.
- Learning from co-production in Scotland, including recent examples such as the All in for Change programme, in which people with lived experience of homelessness and front-line workers have been effectively supported to shape policy in relation to homelessness.
- Supporting community-led approaches as part of a collaborative approach. The emphasis should be on community-led action plans, participation requests and community-led action research. Again, we welcome the inclusion so far of local place plans and community action plans.
- Ensuring the above community-led approaches are built into 20-minute neighbourhood planning and carefully taken into account of.
- Working in partnership with third sector organisations and community organisations who already support and engage with marginalised and disadvantaged groups, so these communities can have more input in 20-minute neighbourhoods.
- Supporting all stakeholders in 20-minute neighbourhood planning, including planners, decision makers and other relevant officials, to understand, support and respond to community-led approaches.

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

Please explain your response adding what else could be helpful:

As we said in response to question 4, we would prefer the guidance to treat implementation and review separately, in order to encourage planning partners to give these stages the care and attention they deserve.

We support the reference to community engagement in relation to implementation and would also like this to be included in the separate review stage we envisage. Although it may be self-evident that the success or otherwise of 20-minute neighbourhoods can only be established by asking communities for their experience, it is often the case that community engagement is inadequate at review stage.

To ensure that planners engage with communities meaningfully at implementation stage, the guidance should cover the following:

- That early, well planned, community engagement in planning and stages will lead to implementation that is more relevant and appropriate for people in communities.
- Community engagement should focus on supporting the voice of disadvantaged and marginalised communities, who are impacted most by planning decisions
- That creative, engaging methods should be used, including participatory budgeting. The guidance is an opportunity to encourage planners in local authorities to build 20-minute neighbourhoods into efforts to meet the target of using PB to spend 1% of budgets.

At review stage, the guidance should cover:

- Using VOICE or similar community engagement planning tools, in order to ensure review brings in all relevant voices and is part of a learning cycle.
- The opportunity to engage with communities at review and planning stage together at the same time. Not only is this an effective way to complete the learning cycle, as the learning from communities feeds directly into planning, but it avoids creating consultation fatigue and duplicating effort.
- At the same time, this should not mean that new information and evidence from communities, contained in the approaches listed above in question 2, should not be sought in order to bring in community perspectives that might be missed otherwise.

8 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:

We find the case studies helpful at illustrating the approach. Given the geographically diverse nature of Scotland's communities it would be beneficial to include in the additional case studies a case study of a small island community serviced by a large local authority. Such communities will have distinct needs and priorities, and the local authorities serving them often develop unique solutions. An example is peripatetic health and care services, a model which might lend itself to other areas. The challenges of delivering services such as this would also be useful, such as staffing issues.

Some communities on small islands have expressed a preference for services to be spread around different towns on the same island, in order to ensure that all towns are well-visited and that no one community loses out. This may mean that people have to travel longer distances in order to reach the services they require than if all the services were contained together in a community-hub model.

Small island communities therefore offer a good illustration of why community engagement is needed to unearth crucial insights into the needs and priorities of communities, and why one-size-fits-all models are often inappropriate. The need to engage meaningfully with all communities in order to ensure important priorities and insights are not missed is just as relevant to a densely-populated urban area as it is to rural communities.

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?

yes

Please tell us here:

We welcome the impact assessment, particularly in relation to equality.

In the equality impact assessment statement, there is a statement that the consultation on the 20 minute neighbourhood guidance will contain questions relating to equalities factors. This is in fact an area which we feel the consultation, and guidance, to be weaker on, particularly in relation to planners engaging with marginalised communities.

We note that the EQIA statement goes on to say that the Scottish Government will respond to comments on equality issues received through the consultation process. We would like to see issues relating to community engagement with groups with equality characteristics included in this response.

We would furthermore like to see this response cover issues in relation to inequality and poverty. We acknowledge the point that the Fairer Scotland Duty does not technically apply since the guidance is not 'strategic'. However, this does not mean that any response along the lines above cannot now include considerations of inequality, which are central to a place-based approach.

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

Please let us know here:

There is a risk that 20-minute neighbourhoods and local living alienates many people. Many people, not just those who subscribe to conspiracy theories, are likely to be averse to policies which challenge their lifestyle, especially if this is seen as top-down and one-size-fits-all.

Despite some welcome references to challenges faced by rural and other communities in the guidance, we would like to see the guidance better explain the flexibility contained within the 20 minute neighbourhood approach. This would highlight, for instance, how many people in rural areas rely on having one, or more, cars in order to do essential things like work, shop and visit vital services. Confidentiality is another reason why many people, including many vulnerable individuals and families, prefer travelling longer distances to services. This should be recognised in the guidance.

We would also like to take the opportunity to state that the guidance on its own will not be enough to achieve the policy ambitions of 20-minute neighbourhoods. This applies equally to realising the concept of a 20-minute neighbourhood and to broader outcomes such as environmental sustainability and addressing health inequalities.

In order to achieve these goals, the following additional actions need to be taken:

- Spending and investment in public services and related infrastructure needs to be increased. For instance, investment in currently under-used public transport needs to precede the increased demand which would arise from designing other services (ranging from health services to shops and leisure services) according to a 20-minute neighbourhood model. Without this, many people from rural, disadvantaged and marginalised communities, will be further disadvantaged by changes, particularly if driving and parking options are decreased.

- Decision-making around tax and spending needs devolved so that local authorities can afford to invest in public services. There is an opportunity here to link developments in 20-minute neighbourhoods and community wealth building to the local governance review, and to ensure that local authorities are empowered to work with communities and other partners in order to improve services and outcomes.

- There needs to be a wider conversation about our society and our health and wellbeing, including environmental sustainability, inequality and tax and spending to pay for essential public services. We believe that a ready-made way of doing this is to build on Scotland's Citizen's Assembly and Climate Assembly. These initiatives, as well as similar international versions, have proven themselves to be effective at building public support for, and understanding of, difficult policy decisions which need to be taken in order to address inequality and climate change. They also help to strengthen trust and engagement with wider democratic institutions.

About you

What is your name?

Name:

Andrew Paterson

What is your email address?

Email:  
andrew@scdc.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:  
Scottish Community Development Centre

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

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

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: