

# **Local Living and 20 Minute Neighbourhood: Draft Planning Guidance**

## **Analysis of consultation responses**

**Final Report**

**November 2023**

## Contents

Executive Summary.....	1
1. Introduction.....	5
2. Overarching views.....	8
3. Part 1 – Local living.....	16
4. Part 2 – What local living looks like.....	21
5. Part 3 – Ways to support local living and 20 minute neighbourhoods.....	32
6. Part 4 – Case studies.....	46
7. Impact assessment update report.....	50
8. Other considerations.....	54
9. Individuals’ perceptions of local living and 20 minute neighbourhoods.....	57
10. Conclusions.....	59
Appendix A: Other policies and policy-related issues to consider.....	60
Appendix B: Quantitative Analysis.....	64

# Executive Summary

A [public consultation](#) on the [Local Living and 20 Minute Neighbourhood: Draft Planning Guidance](#) ran between 27 April and 20 July 2023. The 10 consultation questions aimed to gather a broad range of public and stakeholder views on each element of the guidance. In total, 615 responses were received from 509 individuals and 106 organisations.

## Overarching views

Organisations viewed the draft guidance positively, almost always rating it as somewhat or very helpful; however, many caveated their support with requests for additional information. Many described the guidance as providing a good overview to understand local living and commented on its usefulness in setting out the broad characteristics of local living. Other prevalent themes included that the guidance was clear and helpful, that it set out the Scottish context and direction of travel well, and that there was a welcome focus on community engagement and the emphasis on the need for collaborative working.

However, there were repeated calls from individuals and organisations for more detail or examples to expand on the guidance and to help it be used in practice. Many respondents, mostly individuals, commented on how the guidance was presented, suggesting it should be clearer and more concise, better structured and written in plain English.

Another prevalent theme was for the guidance to allow greater flexibility when applying the concept, particularly in rural and semi-rural areas. While many welcomed the guidance's acknowledgement of differences by location, this was often as a prelude to requesting further flexibility. Reasons given for the need for more flexibility related to the lack of nearby facilities in large parts of Scotland and that local communities were best placed to determine approaches based on their local population needs and access to facilities.

A recurring theme, raised by individuals and organisations, was ensuring the necessary infrastructure is in place to support local living. Many argued that the lack of infrastructure meant implementing the approach would be challenging or unrealistic. Respondents described the need for improved bus, rail and ferry transport, more investment in public services such as hospitals, the need for better digital connectivity, and the perceived lack of services in residential development areas.

Many commented on the need to consider the resources required to implement the policy - such as the investment in infrastructure and other facilities - at a time of pressure on local authority budgets, cuts to local services and amidst a cost of living crisis. The potential additional workload for local authority planning departments was frequently cited as a concern, particularly around implementing the structured approach outlined in part 3 of the guidance. Specifically, several respondents disagreed with the assertion in the BRIA that the guidance "places no additional requirements on planning authorities".

References to NPF4 and other policies in the guidance, and consideration of how local living could impact other policy areas, were welcomed. However, many called for greater alignment between the guidance and other relevant policies. Comments ranged from suggesting other strategies or frameworks which could be cited, to calls to clarify specific points where respondents felt there were discrepancies between different policy positions.

## **Part 1 – Local living**

Many organisations called for a clearer definition of 20 minute neighbourhoods. There was a feeling that the '20 minute' idea was too prescriptive, did not aid flexibility or reflect lived experiences. There were also calls for the guidance to address misconceptions about local living and 20 minute neighbourhoods. Several felt the guidance should contain more evidence regarding benefits and outcomes associated with the local living approach, demonstrating how benefits and positive outcomes can be achieved in communities.

Some felt that the intended audience for the guidance was unclear. Some also highlighted that the concept required effective and improved multi-agency working and felt the guidance was too focused on local authority planning considerations. In particular, strengthening involvement by the business sector was recommended.

## **Part 2 – What local living looks like**

While almost all organisations agreed in the closed question that the Local Living Framework diagram is helpful, views expressed in comments were mixed. Many commented that the framework was not straightforward to understand, for example, that it appeared to show each component as equivalent in status or was too high level, cluttered with icons and caused confusion. Requests were made for more specificity to allow it to be used, including providing more illustrations, examples or case studies of how it can be applied to differing types of communities or populations.

Conversely, however, the next most prevalent theme was many positive comments about the framework diagram. Comments described it as helpful, comprehensive, a useful visualisation and enabled an easy understanding of the main features of local living. Organisations commonly indicated it would be useful for operationalising the guidance at local level, for instance, by helping identify gaps or opportunities, facilitating community and stakeholder engagement and providing a basis for assessment of local living.

Aligning the guidance with the Place Standard Tool was positively received by several. However, several others felt the Tool and Local Living Framework were too similar or required more distinction. Some felt the guidance and the Local Living Framework should determine which themes or considerations were essential for local living, or how aspects should be prioritised, as this better reflected reality and assisted planning decisions.

The most prevalent theme in relation to the categories and key considerations in part 2 was many suggestions about other aspects to include in the Local Living Framework across all of the five overarching themes. The next most frequently raised comments related to the five themes in the Local Living Framework: Movement, Space, Resources, Civic and Stewardship.

## **Part 3 – Ways to support local living and 20 minute neighbourhoods**

The most common theme in response to Q4 was agreement with the structured approach presented in part 3. Many respondents either agreed, or supported the approach while also noting areas for improvement. Some noted that they particularly liked the flexible and iterative nature of the structured approach, which would help take into account the changing characteristics of living spaces and the diversity of different places in Scotland.

Potential improvements to part 3 were suggested by many. Some organisations requested more detail on how the approach would work in practice such as who should be involved and their roles and responsibilities, expected timescales, details of the positive outcomes that could be expected to arise from using the approach, and more examples of how the approach could, or has been, applied.

Many agreed with the importance of gathering and using data to understand the context of a place, and to create baseline measures which could be monitored over time. Several called for the guidance to set out a preferred methodology for data collection, or provide more information on gathering, analysing, and presenting data, which some noted would help with consistency. Many agreed that using qualitative data is a good way to understand how people live in communities, though others asked for more information about how to collect, analyse and use qualitative data. Some suggested that guidance was needed to ensure qualitative data is up-to-date and representative of a community. Several respondents supported the use of quantitative data, or mentioned the importance of using detailed, high-quality data that is comprehensible to all.

Agreement with the emphasis on engaging with communities and listening and responding to public feedback was another prevalent theme. Several respondents suggested that while they approved of the structured approach, they wanted to ensure that the process started with communities and avoided a top-down approach, with some individuals expressing concern that community opinions may not be taken seriously. Many asked for more guidance about how to collaborate with communities, while others noted that there are existing models for collaboration and engagement but called for them to be more explicitly referenced in the guidance. Several stressed the importance of including third sector and private stakeholders in both the collaborate, plan and design and the implement and review phases of the approach. Churches, schools, shops, wider industrial companies, supermarkets, and healthcare facilities were some examples of stakeholders respondents were interested in involving.

There were repeated calls for more information on the implementation and review section. A few individuals and organisations described this section of the guidance as lighter than other sections or lacking practical detail. This included greater clarity over who would be responsible for review and how accountability would be applied, what frequency and timescales were considered most appropriate for a review, and how any learnings or good practice would be identified and shared. However, several organisations welcomed the inclusion of guidance on how development managers and planning authorities should judge applications against Policy 15 of NPF4.

#### **Part 4 – Case studies**

Among organisations who answered Q8, 88% indicated that the case studies were a useful and appropriate range of examples. The case studies were well-received and were frequently described as helpful, interesting and useful. Many felt the case studies were comprehensive and wide-ranging, appreciating the variety of different approaches, locations, community sizes and geographies they covered. However, many others did not consider the case studies to be a useful tool for communicating information about local living, with some describing them as vague, generic and one-dimensional. Several called for more detail to be included.

A number of improvements to the case studies were suggested. For example, a few respondents said they would have preferred the case studies to follow a more uniform structure, and others felt an introductory contextual paragraph explaining how and why each case study was chosen would have been a useful addition. Respondents commonly welcomed the 'lessons learned' section in the Stewarton case study and called for this to be replicated in the other case studies.

### **Impact assessment update report**

Several felt the EQIA did not sufficiently address the needs of those with protected characteristics, particularly those with disabilities or older people. More broadly, several respondents highlighted the importance of considering the potential impacts of implementing local living. Some reflected that, given the complex nature of inequalities, it should not be assumed that the guidance would improve outcomes for those experiencing disadvantage. Respondents called for greater emphasis on how those with protected characteristics should be involved in decision-making, how they navigate local spaces, and how they access relevant facilities and services.

### **Individuals' perceptions of local living and 20 minute neighbourhoods**

The vast majority of the 510 individuals who responded to the consultation expressed negative views towards the principle of local living and 20 minute neighbourhoods. However, many individuals' comments stemmed either from a concern that the policies will be implemented or imposed to restrict people from travelling more than 20 minutes from their homes, or from a misunderstanding that all services people need should be accessible within 20 minutes.

By far the most prevalent themes raised by this group of respondents related to their perception of the anti-democratic nature of local living and 20 minute neighbourhoods. Comments fell into three strands: how the policy restricts movement, general comments, and the perception that it has been decided to implement the policy without consultation.

Many individuals repeatedly expressed negative views across the consultation. These comments were often brief, but typically expressed a view that local living and 20 minute neighbourhoods are a bad idea and neither wanted nor needed in Scotland. As a result, they called for the plans to be stopped or cancelled, or highlighted that they would continue to strongly oppose the implementation of the policy. The impractical nature of the proposals was also repeatedly raised by many individuals.

### **Conclusions**

Many individuals and stakeholders with detailed knowledge took part in the consultation, sharing their views on the Draft Planning Guidance which will be used to assist the delivery of local living and 20 minute neighbourhoods in Scotland. Overall, the key message was that there is support for the draft guidance among stakeholders and likely users of the document, with a desire to see a future version which includes more detail and examples. The findings from this analysis will be used by the Scottish Government to revise and finalise the guidance.

# 1. Introduction

## Background

The [National Planning Framework 4 \(NPF4\)](#) outlines a clear commitment from the Scottish Government to think differently about places we live in and sets out the concept of local living. The local living and 20 minute neighbourhood concepts aim to create places where people can meet the majority of their daily needs within a reasonable distance of their home, by walking, wheeling or cycling. These concepts were consulted on as part of the preparation of NPF4, which was adopted by the Scottish Parliament in February 2023.

To support the ambitions of NPF4 and to assist in the delivery of the adopted policy position, the Scottish Government has published the [Local Living and 20 Minute Neighbourhood: Draft Planning Guidance](#). This guidance sets out:

- The context and benefits of 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.

The guidance is intended to support local authorities, communities, and others with an interest in local living and 20 minute neighbourhoods. The Scottish Government expect this to be of particular relevance in the preparation of Local Development Plans (LDPs), Local Place Plans (LPPs) and to support planning decision-making. The guidance is intended to provide additional detail and clarification of existing policy to support effective and efficient implementation of placemaking initiatives.

A [public consultation](#) on the draft guidance ran between 27 April and 20 July 2023. Containing 10 questions, the consultation aimed to gather a broad range of public and stakeholder views on each element of the guidance.

The findings from the analysis will be used by the Scottish Government to amend and finalise the guidance prior to publication.

## Respondent profile

In total, 615 consultation responses were received. Almost all were submitted via the online consultation platform, Citizen Space. Those received in an alternative format, for example, an email or PDF document, were reviewed separately by the research team.

Individuals provided 509 responses to the consultation; the remaining 106 were from organisations. To aid analysis, organisations were grouped on the nature of their work. The largest number of organisations were from local authorities and their associated bodies (25), organisations involved in land management, planning, development or architecture (22), health and social care organisations, including advocacy bodies (12), and third sector or other advocacy bodies (12). A full breakdown is included in Appendix B.

## **Analysis approach**

The Lines Between was commissioned to provide a robust, independent analysis of the responses to the public consultation. The main purpose of consultation analysis is to understand the full range of views expressed, not to quantify how many people held particular views. This report provides a thematic analysis of responses based on the analysis approach outlined below.

### **Quantitative analysis**

There were nine closed consultation questions, most of which asked respondents how helpful they found the draft planning guidance.

As not all respondents answered each closed question, each table in this report shows the number and percentage of responses **among those answering each question** and, for the criteria, broken down by individual and organisation responses. Please note that figures in the tables may not add to 100% due to rounding.

A full breakdown of the number and percentage of responses to each question, including by type of organisation, can be found in Appendix B.

### **Qualitative analysis**

Qualitative analysis identifies the key themes across responses to each question. The research team developed a draft coding framework based on a review of the consultation questions and a sample of responses. During the coding process, new codes were created if additional themes emerged.

In a small number of instances where alternative format responses contained information that did not align with specific questions, analysts exercised judgement about the most relevant place to include this material for analysis purposes.

Where appropriate, quotes from a range of participants are included to illustrate key points and provide useful examples, insights and contextual information.

Reflecting the large number of people who took part, it is not possible to detail every response in this report; a few organisations shared lengthy submissions which reflect their specific subject matter expertise. These responses are referenced where possible. Full responses to the consultation, where permission for publication was granted, can be found on the [Scottish Government's consultation website](#).

### **Weight of opinion**

This report presents the themes identified in responses from most to least commonly identified. All themes, including views shared by small numbers of respondents, are covered; an insightful view expressed by a very small number of participants is not given less weight than more general comments shared by a majority.

Similarly, all responses have an equal weighting. We recognise this means a response from an individual has the same weight as the response from an organisation which may represent many members, but this approach ensures all views are presented.



Qualitative analysis of open-ended questions does not permit the quantification of results. However, to assist the reader in interpreting the findings, a framework is used to convey the most to least commonly identified themes in responses to each question:

- The most common / second most common theme; the most frequently identified.
- Many respondents; more than 20, another prevalent theme.
- Several respondents; 10-19, a recurring theme.
- Some respondents; 5-9, another theme.
- A few / a small number of respondents; <5, a less commonly mentioned theme.
- Two/one respondents; a singular comment or a view identified in two responses.

## Report structure

When reviewing the analysis in this report, we would ask that the reader consider that public consultation of this kind means anyone can express their views; individuals and organisations interested in the topic are more likely to respond than those without a direct or known interest. **This self-selection means the views of respondents do not necessarily represent the views of the entire population.**

Many themes were raised by respondents repeatedly across the consultation questions, regardless of the specific focus of a question. All comments have been included in the analysis, and all themes emerging from the analysis are included in this report.

While the consultation focused on the draft planning guidance, the vast majority of individuals responded with negative views on the overall concept of local living and 20 minute neighbourhoods. While their opinions are valid, their responses did not directly address the questions, so a summary of their views is presented in Chapter 9.

Given the above, and to avoid repetition, the report is structured as follows:

- Chapter 2 provides an overview of overarching views on the draft planning guidance. These are prevalent themes which were evident across multiple questions.
- Chapters 3 to 6 present the analysis of responses to Q1 to Q8, which cover the four parts of the guidance.
- Chapter 7 details Q9 which asked respondents if they had any views on the impact assessment update report, and Chapter 8 details other considerations which were raised by respondents at Q10.
- Chapter 9 summarises the views expressed by many individuals on the concepts of local living and 20 minute neighbourhoods.
- Conclusions are set out in Chapter 10.

## 2. Overarching views

While the consultation questions focused on individual parts of the draft planning guidance, some themes were evident in response to multiple questions. To avoid repetition, this chapter outlines these prevalent overarching themes. We highlight both positive views on the guidance and areas where improvements were repeatedly noted.

### Positive views

#### Positive feedback on the guidance

As will be evident in subsequent chapters, organisations typically viewed the draft guidance positively. Many caveated their support with requests for additional information but nevertheless rated the guidance as somewhat or very helpful.

When explaining the reasons for their support, many organisations described the guidance as providing a good overview to understand local living and commented on its usefulness in setting out the broad characteristics of local living. Another prevalent theme among organisations was that the guidance was clear and helpful. It was felt to be presented in a simple, concise way, which would be useful when implementing approaches locally.

Many others felt that it set out the Scottish context and direction of travel well. There was an appreciation of the recognition that flexibility is needed when applying the concepts depending on the location and context of different places. Some found the consideration given in the guidance to rural and semi-rural settings particularly valuable.

“Part 1 is helpful in setting the overall context and notifies intent to public, private and community sector bodies of what is expected for future development proposals set within a strong place-making context.” - Scottish Futures Trust

“The guidance supports understanding of how local living could look within the context of Scotland in both urban and rural contexts, which is helpful for strategic decision making and also staff working operationally.” - NHS Lanarkshire Health Improvement Department

“We welcome the guidance, which is clearly well-intentioned and has been progressed quickly following the adoption of NPF4. It is a positive step forward.” – Hallam Land Management

“The information set out in [Part 3] is very helpful. To some extent, it could be too simplistic, trying to implement the same approach to all different communities across Scotland, but by this being a flexible approach, it offers that potential of adaptability to each scenario and reality.” – Dumfries and Galloway Council

Many organisational respondents supported the direction of the policy and felt it aligned with and complemented existing place-based approaches, aligned to their organisational goals and was in keeping with existing work being undertaken across Scotland. The inclusion of relevant policies and clear links to the Place Principle were welcomed. Respondents felt the approach taken in the guidance gave good, useful context which was aided by the inclusion of the ‘Policy Context’ section.

## **The importance of effective community empowerment and collaborative working**

Many welcomed the focus on community engagement and the emphasis on the need for collaborative working. The clear way the guidance was written was considered helpful in enabling meaningful conversations about placemaking with a range of relevant stakeholders. However, there were frequent calls to embed this within the guidance further and emphasise its importance. As these calls often related to specific aspects of the guidance, they are noted at the most relevant points in subsequent chapters.

“The SURF network warmly welcomes the increased focus on places and communities across multiple public policy themes. The provision of an accessible, well-written guide, designed for a generalist, is particularly useful for colleagues operating in environments that have been historically distant from community regeneration.” – SURF, Scotland’s Regeneration Forum

## **Support for 20 minute neighbourhoods and local living**

Several organisations and a few individuals expressed support for the concept and agreed it could produce useful outcomes. One researcher who had conducted research on 20 minute neighbourhoods in England felt it resonated with the research findings that it could provide a useful planning model to meet a broad range of everyday needs locally. Others felt the concept could promote the shift towards prevention, encourage physical and mental wellbeing, and improve local economies and environmental benefits.

“[We] welcome the guidance and supports the principles it seeks to apply.” – Sustrans

“I think this is one of the best initiatives I have seen. I am an advocate but It’s overall premise is admiral. And the objectives are both essential and exciting.” – Individual

“We agree that living well locally, if driven by genuine community-level engagement, could be a useful tool to bring together the many strands that need to work to make thriving, liveable and resilient communities.” – Scottish Islands Federation

“Part 1 is helpful as the pandemic stressed the need for more localised access to facilities and amenities as a means to encourage physical and mental health as well as making more efficient use of infrastructure and resources. Healthy, sustainable places and the opportunity to create conditions required to support economic growth, whilst at the same time contributing to the climate change agenda and protection of the environment, are crucial matters.” – East Renfrewshire Council

## **Areas for improvement**

### **Providing more detail and examples**

A prevalent overarching theme across the consultation, raised by both individuals and organisations, was a call for more information, detail or examples to expand on the guidance and to help it be used in practice. The draft version was felt to be largely aspirational and did not adequately address the diverse nature of neighbourhoods nor how to overcome challenges and obstacles in placemaking initiatives.

While many individuals requested more detail, few elaborated on what additional information was required. Specific points raised by those who did, as well as requests from organisations, have been included in this report where they are most relevant.

A small number of individuals repeatedly called for more balance in the guidance, as they felt that it was too focused on the positive benefits of the approach and did not cover potential negative aspects. However, they did not provide more detail or explanation of what those negative aspects were.

### **Accessibility and use of plain English**

Many respondents, mostly individuals, commented on how the guidance was presented. Views included the need to make the guidance clearer and more concise, better structured and written in Plain English. It was argued that the guidance could be shorter, remove repetition, and the language simplified with jargon avoided. Several queried the terminology used and felt more explanation could be given of terms such as 'quality of public realm', 'climate resilience', 'liveability' and 'supporting wellbeing creation'. There was also a call for more consistent and careful alignment of the language and terms used when discussing benefits. For example, Part 1 refers at different points to 'people, place and planet'; 'Sustainable Places', 'Liveable Places', and 'Productive Places'; and 'environmental, social and economic circumstances'.

The guidance was seen to be targeted at professionals, as it appeared to assume an understanding of terms such as place context and spatial strategies. One felt that extensive references to other documents and policies were overwhelming. A few highlighted repetitions, especially when discussing policies, with one preferring these to be condensed and focused on a list of outcomes required to deliver the benefits of local living.

Some diagrams were seen as unnecessary or not relating well to the text, e.g. one stated that the illustrations on pages 16,17 and 18 were not helpful. A few, including RNIB Scotland (Royal National Institute of Blind People), highlighted concerns about whether the guidance and diagrams such as the Local Living Framework are accessible to those with visual impairments. They noted alternative text and descriptions would help accessibility amongst those using screen-reading software.

More generally, many other individuals frequently criticised the clarity of the guidance in broad terms. For example, it was described as 'nonsense', 'meaningless', 'complicated', 'confusing', using 'flowery language' and 'lacking in substance'. However, these individuals did not explain why they felt this way, or suggest how the guidance could be improved.

### **Further flexibility for both urban and rural areas**

Another prevalent theme across the consultation was the need for the guidance to allow greater flexibility when applying the concept, particularly in rural and semi-rural areas. While many respondents, particularly local authorities and organisations involved in land management, planning, development or architecture, welcomed the acknowledgement of differences by location already in the guidance, this was often as a prelude to requesting further flexibility.

Many argued that the concept was less likely to work in rural and semi-rural areas, but a few also highlighted issues for urban areas. It was felt the guidance was urban-centric and

did not adequately reflect the realities in many communities, with some calling for separate guidance for those in rural areas. It was also highlighted that most of Scotland is rural or semi-rural, with calls for more flexibility to accommodate all areas, including towns.

“However, many places fall somewhere in between. We would suggest further consideration given to the diverse types of settlements we have in Scotland. This could perhaps align with the Scottish Government Urban Rural Classification which categorises settlements based on population and accessibility (e.g., Large Urban Area, Accessible Small Towns, Remote Small Towns).” – Geddes Consulting

“The setting feels largely urban, with island and rural places confined to a few add-ons.... If the shift in policy is intended to be Scotland-wide, we would like to see guidance developed that is as relevant to island and rural places as it is for urban.” - Scottish Islands Federation

Reasons given for the need for more flexibility related to the lack of nearby facilities in large parts of Scotland and that local communities were best placed to determine approaches based on their local population needs and access to facilities. There were also calls for greater recognition of links between places and that there will likely always be a need for individuals to travel to nearby towns or cities to access specific services. It was also noted that areas required sufficient people living within them to justify providing amenities, considered especially problematic in rural areas prone to population decline.

“[Part 1 of the guidance] fails to recognise that development in rural areas will be required as many urban/semi-urban areas are reaching capacity, and this may have to be at a high density to achieve many of the important contributors to local living mentioned in this paragraph. For instance, how can better public transport be implemented in rural areas without a sufficient population to use such services and justify a business model in a more isolated area?” – Angus Council

“There should be... a cross-reference to the ‘Town Centre First’ policy within NPF4, which puts the health of town and city centres at the heart of decision-making. A city such as Aberdeen can't surrender its economy entirely into 20 minute neighbourhoods - city centres play an important role as a result of being a destination in their own right with an economy built around this.” – Aberdeen City Council

### **Greater recognition of the infrastructure needed to support local living**

A recurring theme across the consultation, raised by individuals and organisations, was ensuring that the necessary infrastructure is in place to support the local living concept. Many raised this concern in broad terms, arguing that the lack of infrastructure meant implementing the approach would be challenging or even unrealistic. There was a sense that the quality of infrastructure and provision of local facilities had been declining, and there is a need to invest in this area. Another concern was the lived reality of changes in services due to a lack of funding or changing consumer habits.

“We need to be realistic and practical. We need to work together. We need to recognise that the facilities that make up 20 minute neighbourhoods do not exist in every town or village in Scotland (and where they do, their quality varies significantly). These public and commercial facilities have declined over 50 years plus of under-investment, economic challenges, and changes in lifestyles.” – Hallam Land Management

Additionally, many community-based housing associations are grappling with conflicting contexts: 20 minute neighbourhood guidance encourages local living and promotes easy access to services, but many services are becoming increasingly centralised and moving away from neighbourhood branches. This reportedly includes bodies like police, banks, and health services that are trending away from local offices and high street fronts and towards online or centralised locations. While housing associations and co-operatives largely welcome 20 MN principles, there are difficulties in delivering them in practice, absent appropriate funding, support, and public service reform. The guidance on collaborative practice is somewhat helpful in principle, but delivery partners like [Registered Social Landlords] are facing practical challenges in implementing local living on the ground due to wider challenges that are not addressed under this guidance.” – Scottish Federation of Housing Associations (SFHA)

Respondents described the need for improved bus, rail and ferry transport, more investment in public services such as hospitals, the need for better digital connectivity, and the perceived lack of services in residential development areas. There were calls to clarify what infrastructure was needed to achieve successful local living.

“Outlining the infrastructure required to support the delivery of 20 minute neighbourhoods and, in particular, the role of smart local energy neighbourhoods and mobility hubs would help illustrate how delivering the ambition ('benefits') of 20 minute neighbourhoods requires integrated energy and transport infrastructure at a scale relative to the location.” - Ristol Consulting Ltd

### Access to public services

The need to ensure good access to public services, such as healthcare, education and leisure facilities, was also mentioned by some. Healthcare issues identified included accessing specialist medical care and maternity care in some remote and rural areas. Achieving robust infrastructure was felt to require a whole-systems approach, strong leadership, effective cross-sector working, particularly between public-private sectors, and commercial acumen amongst those with responsibility for developing LDPs.

“The core tenant of the 20 minute neighbourhood concept is that individuals have access to key amenities and services close to them, to underpin a healthier lifestyle and more active communities. General practice is the central pillar of healthcare provision in Scotland, and in order to fulfil the promise of the ‘20 minute’ concept, access to local GPs is essential.” – RCGP Scotland (Royal College of General Practitioners)

Some stated that private newly built housing developments typically did not provide local access to a range of community facilities, such as dentists, doctors, shops, etc., nor were

they close to public transport links. The Robroyston estate in Glasgow was mentioned by a few as an example of a development that did not provide basic amenities for residents.

## Transport

A greater focus on sustainable transport in the guidance was suggested to acknowledge the importance of travel in connecting people with places. Calls were made for an integrated transport system, addressing connectivity within and between places. Other suggestions included subsidizing public transport, cross-local authority planning for public transport, ensuring buses offered safe, regular and reliable services, providing travel information, e.g. at bus stops and recognising the role that community transport plays. The need to improve walking infrastructure was also noted, but again it was felt this would be a particular challenge in rural areas.

“We consider that access to public transport should be included in the definition of a 20 minute journey. Access to services via public transport should, therefore, be taken into account when applying the 20 minute neighbourhood concept.” - Hallam Land Management

“It would be helpful for the guidance to state the need to integrate local living plans with the local transport policy including the Local Transport Strategy and Active Travel Strategy. Many of the policies included in this draft guidance need to be part of an integrated transport strategy to achieve the wider strategic outcomes/targets set out in the guidance such as 20% reduction in car km.” - Strathclyde Partnership for Transport

The development manager of a large urban expansion development highlighted current issues with public transport systems were adversely impacting the ability to achieve local living principles. This respondent called for service providers, including NHS, Network Rail and public transport providers to work in an active improvement programme to improve services. Aberdeenshire Council felt, if realised, local living would place unreasonable demands on public transport systems. The Scottish Futures Trust argued that revenue funding for improved bus services was likely to be more cost-effective than the capital investment required to provide services and facilities in multiple locations.

## Other infrastructure issues

Achieving the optimal mix of facilities, including residential, affordable and commercial properties and amenity space, was felt to be a challenge by several. These respondents felt consideration of public transport links between and within areas - whilst outwith the planning domain - was crucial. Without sufficient demand, it was noted services could be withdrawn. This could impact urban as well as rural areas, with one highlighting a recent decision by one bus company to stop providing a night bus in Glasgow which could impact the night-time economy.

Other issues highlighted included: that differences between areas could cause disparity in terms of access to facilities; difficulties reversing previous planning decisions; and a recognition that some types of services, such as hospitals, could not all be provided locally. Respondents felt such challenges should be more explicitly acknowledged within the guidance, with an indication of how they could be addressed.

## Funding and staffing concerns

Many respondents commented on the need to consider the resources required to implement the policy - such as the investment in infrastructure and other facilities - at a time of pressure on local authority budgets, cuts to local services and amidst a cost of living crisis. The potential additional workload for local authority planning departments was frequently cited as a concern, particularly around implementing the structured approach outlined in Part 3 of the guidance (see Chapter 5) and was also raised in relation to the Business and Regulatory Impact Assessment accompanying the draft guidance (see Chapter 7). It was noted that some areas would require more investment and development than others or were more asset-rich, which could lead to disparities between areas.

“Whilst delivering new 20 minute neighbourhoods in the context of new housing developments could be funded directly by developers, it is less clear how they can be delivered in existing built-up areas where public sector organisations are under significant financial constraints.” – City of Edinburgh Council

Staff resources were also mentioned, with calls for more skilled planners and data experts or for more training and practical guidance. For instance, local authorities may not have the resources or staffing to use spatial mapping and GIS<sup>1</sup> or to create sufficient baseline data, with qualitative data gathering, ongoing monitoring and reporting, and effective community engagement felt to be particularly resource intensive. Wholesale changes to the planning system were also considered likely to require staff training and upskilling. The Royal Town Planning Institute Scotland (RTPI) argued that implementation would be hampered by insufficient resources and called for the Scottish Government to publish a comprehensive resource and skills strategy as part of the Delivery Programme of NPF4.

CLD Standards Council suggested referring to the new National Occupational Standards relevant to Community Learning and Development (CLD) practice, which could be used alongside the CLD Competencies. Volunteer Scotland highlighted recent findings from the Scottish Third Sector Tracker that almost a third of organisations reported their organisation was in jeopardy as a result of rising costs. A few felt such challenges should be acknowledged in the guidance.

“Clarity on the resourcing and delivery of the guidance is essential to ensure it can be implemented effectively at the local level. This should include consideration of what skills are needed and how these will be provided, and by whom; and how barriers to implementation can be overcome.” – Scottish Futures Trust

“Unless public sector bodies have the skills and resources to engage in the process delivering new 20 minute neighbourhoods will be a challenge, especially if there is no funding to deliver or operate the facility.” - Persimmon Scotland

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<sup>1</sup> GIS stands for geographic information systems and includes geospatial data that can be accessed for free through the Scottish Government and other public bodies.



“West Dunbartonshire Council is very concerned that the level of information being suggested is far more detailed and resource-intensive to collect than the plan-making cycle would allow. It questions whether this is proportionate to expect at a local authority-wide level when preparing the next local development plan. 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.” – West Dunbartonshire Council

### **Alignment with other policy areas**

References to NPF4 and other policies in the guidance, and consideration of how local living could impact other policy areas, were welcomed. However, many respondents called for greater alignment between the guidance and other policies they felt were particularly relevant. Comments ranged from suggesting other strategies or frameworks which could be cited in the guidance, to calls to clarify specific points where respondents felt there were discrepancies between different policy positions. For example, it was argued that the Public Service Reform information sat better in the context of the Place Principle section, with a clearer connection made between the two.

“We believe that Part 1 of the guidance could be improved by offering more comprehensive context by showing how it clearly aligns to wider strategic or legislative agendas outwith that of NPF4, as is done in Part 3 of the guidance under the ‘Implement and Review’ section... it would be beneficial to see how ‘Local Living’ and ‘20 Minute Neighbourhoods’ align with other relevant strategies set by the Scottish Government, including but not limited to: Housing to 2040, Just Transition plans, National Plan for Scotland’s Islands, Dementia in Scotland: Everyone’s Story, Scotland’s National Strategy for Economic Transformation, and A Scotland for the future: opportunities and challenges of Scotland’s changing population.” – Age Scotland

The vast majority of these comments were made by one or a few respondents, often reflecting their specific area of expertise. These have been grouped by policy area where possible e.g. transport, health, the environment, etc, and summarised in Appendix B. However, points raised by multiple respondents have been noted in the main report.

More specifically, the Improvement Service, Place and Wellbeing Collaborative and Public Health Scotland suggested a new paragraph to emphasise policy alignment at a local level: “Local living can equally be bolstered when the policies, strategies and investments of local government and their stakeholders align around its delivery. This can include Local Outcomes Improvement Plans, Housing Plans, Climate Strategies, Economic Strategy, Masterplans, Development Frameworks, Community Wealth Building, Equality Outcomes and Fairer Scotland Duty and local neighbourhood plans, including Local Place Plans. Each can consider its impact on the key considerations that enable local living.”

### 3. Part 1 – Local living

This chapter presents an analysis of responses to Q1, which asked respondents for their views on part 1 of the guidance.

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

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful
<b>All answering (%)</b>	<b>596</b>	<b>38</b>	<b>10</b>	<b>28</b>	<b>62</b>
Individuals	501	27	7	20	73
Organisations	95	99	27	72	1

All but one organisation that answered Q1 found part 1 of the guidance helpful to some degree; 27% found it very helpful and 72% somewhat helpful. The proportion who found it very helpful varied by type of organisation, from 14% among transport organisations and 16% among local authorities, to 43% of housing/property organisations, 44% of third sector organisations, and to 100% of retail (2 organisations).

Conversely, in a pattern seen in all quantitative questions, the majority of individuals (73%) felt part 1 was not at all helpful. One fifth (20%) felt it was somewhat helpful and 7% very helpful. This reflects individuals' overall negative views on the concepts of local living and 20 minute neighbourhoods outlined in Chapter 9. A full breakdown of results of all quantitative questions is in Appendix B.

Almost three quarters of respondents left an open-text comment in Q1. Many used Q1 to express their views not only on part 1 of the guidance, but on 20 minute neighbourhoods and local living more generally. The most prevalent themes in responses to Q1 were overarching themes which have been covered in Chapter 2 i.e. positive comments on the guidance, the need for greater flexibility when applying the concept in both rural and urban areas, and greater consideration of the infrastructure and services needed to successfully implement 20 local living. The analysis below therefore presents other themes which emerged in Q1, from most to least prevalent.

#### **Define 20 minute neighbourhood and local living**

Many organisations called for a clearer definition of 20 minute neighbourhoods. There was a feeling that the '20 minute' idea was too prescriptive, did not aid flexibility or reflect lived experiences such as journey times changing with different transport modes. For instance, a 5 minute cycle journey may take 20 minutes to walk. One felt it was a borrowed concept that did not transfer well to the Scottish context, while a few others noted that other countries refer to 15 minute neighbourhoods. These concerns led some to call for its removal or to argue that the concept of local living should be emphasised over a 20 minute neighbourhood. Should both concepts continue to be used, respondents felt there should be more clarity about the differences between the two and how they linked together.

“It is considered that the term 20 minute neighbourhood is rather misleading and can lead to misunderstanding of the concept. Consideration should be given to only using Local Living, as this appears to be a better description.” - Tactran (Tayside and Central Scotland Transport Partnership)

“It would be helpful for additional detail to be provided within the 20 minute neighbourhood definition that explains that 20 minutes is the time for a return and not one-way journey. Acknowledgement should also be given to the differences in distance covered dependent upon whether individuals are walking, wheeling, cycling or cycling an electric bike and the implications of this for planning local living and 20 minute neighbourhoods.” – The Highland Council

Dundee City Council also recommended a clearer definition of ‘Liveable’, noting the NPF4 definition was vague. They preferred the term ‘Liveable Neighbourhoods’, also wishing to move away from the 20 minute concept.

### **Impact of local living approaches on equalities**

Several respondents felt it was important to consider the impact of the proposals and ensure they did not worsen outcomes for certain populations, such as older or disabled people or those living in poverty. This is covered more in Chapter 7, alongside an analysis of comments in relation to the Equalities Impact Assessment.

### **Consider the role of other partners**

A recommendation to consider the roles of agencies and groups beyond those mentioned was made by several organisations. Some felt that the intended audience for the guidance was unclear. Some also highlighted that the concept required effective and improved multi-agency working and felt the guidance was too focused on local authority planning considerations. The Place Standard Tool Design Version was cited as an example of this focus, given that the Design Version is perceived as a tool for planning professionals.

“It would be very useful if the guidance specified at the outset its target audiences. It is clear that it is aimed at planners in a range of sectors, but what about communities who are preparing Local Place Plans or Community Action Plans; NHS/health authorities; infrastructure providers; and funders? The guidance could also be very useful to those who are making bids for participatory budgeting funding... All of the aforementioned will have key roles in helping to deliver Local Living/20 Minute Neighbourhoods.” – Planning Aid Scotland (PAS)

In particular, strengthening involvement by the business sector was recommended. For instance, LDPs could be required to consider how to support local business growth to help generate local employment, develop local rural hubs with mobile services visiting, or extend community ownership models such as buy-outs or social enterprises.

A few called for more specificity regarding which agencies should be included in an LDP. One felt the guidance should be more cognizant of the role and purpose of community and locality planning. Other specific suggestions included ensuring community learning and development teams and community groups, funding bodies, builders and developers and

local businesses were involved in place decision-making, linking with Regional Transport Partnerships and the third sector. Some highlighted opportunities, such as community wealth building and participatory budgeting.

“Addressing the roles of local authorities, communities, and private sector in operationalising 20 minute neighbourhoods/local living is crucial in understanding how each party involved can work together and respond accordingly.” – Angus Council

This theme is also explored in the analysis of Q6 and Q7 in Chapter 5, where respondents commented on the collaboration required as part of the collaborate, plan and design, and implement and review, phases of the structured approach.

### **Provide more evidence on outcomes and benefits**

Several respondents felt the guidance should contain more evidence regarding benefits and outcomes associated with the local living approach, demonstrating how benefits and positive outcomes can be achieved in communities.

### **Governance**

Several respondents raised governance issues in response to Q1 and called for more detail to enable effective operationalisation of the guidance. The need to address the reuse of vacant and derelict sites was raised by a few, and a few felt that responsibility for long-term infrastructure maintenance costs should be clarified. Stronger guidance on embedding the Place Principle into local policy, planning and place-based decision-making was recommended by RTPI Scotland.

### **The importance of effective community empowerment**

Many welcomed the focus on community engagement, though there were calls to embed this within the framework further and emphasise its importance. The success of the framework was felt to be dependent on effective community participation and that citizens should lead, or at least influence, decisions made about how to improve their local area.

“It must be recognised that collaboration and community engagement is vitally important. Therefore, Planners must plan with, rather than for, those who are to be party to any changes in local living.” - Dundee Civic Trust

“It needs to go much further in offering detailed guidance to the importance of valuing community voice throughout all processes.” – CLD Standards Council

More effort to understand the diverse needs and lived experiences of local populations was felt to be required. South of Scotland Enterprise suggested Pathfinders around housing developments<sup>2</sup> as a useful method for better understanding the impacts on people living in rural communities. Anderson Bell Christie felt their clients would benefit from descriptions of local living from the perspective of different user groups, for instance, how neighbourhoods would be used by older people, wheelchair users, families and so on.

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<sup>2</sup> [An example of a housing Pathfinder project in Scotland](#)

Possible power imbalances in decision-making were raised, whereby community members' needs were often subordinate to market forces and professionals, as was the ability of marginalised groups to contribute effectively. Examples of the negative impact of poor consultation were provided, highlighting how disillusionment could occur.

“Many of these initiatives are just paying lip service to Community Empowerment. Citizens are consulted on a chosen approach when the experts have sliced, diced, and analysed all the complex factors and come up with proposals that are judged to be affordable or practicable by professionals. What is needed is for community-led local organisations to have a seat at the table when resource allocation decisions are taken.” - Transition Edinburgh

Specific suggestions for enabling community involvement included using delegated budgets at the ward level and cultural asset mapping. Community skills sharing was also felt to be absent in the guidance. The need to engage with children and young people, was also highlighted, with Public Health Scotland suggesting the Place Standard Tool Inclusive Communication Toolkit and Children and Young People’s versions be referenced.

“Empowering people might be better achieved with simpler guidance outlining basic process mapping, and then advocating for a team of dedicated interdisciplinary support professionals, properly resourced within local authorities to carry out the related work.” – Angus Council

Concerns were expressed about the capacity of community members to undertake the envisaged role in the guidance, with calls for greater resourcing and support. Volunteer Scotland felt increasing responsibilities were being given to community groups who were constrained in their ability to deliver, highlighting examples of trustees who were often also in full-time employment and around a third of voluntary sector organisations reporting volunteer shortages as one of their top three challenges.

CLD Standards Council highlighted the central role that Community Learning and Development professionals could take in supporting community involvement.

“The professional practice of CLD supports volunteers and community groups with not just personal organisational skills and underpinning knowledge, but also with engagement, support for funding applications and the range of approaches available to support the long-term sustainability of community groups and asset transfers.” – CLD Standards Council

### **Welcomed focus on sustainability**

Several organisations appreciated the focus on sustainability, with the benefits of environmental sustainability being welcomed in particular. There was support for encouraging greater access to green spaces, including urban tree coverage, and a few noted how the guidance aligned with their sustainability objectives. Environmental Protection Scotland argued that the guidance should emphasise the benefits of reduced car dependence on air quality and health and that land quality should also be acknowledged as a key consideration. The Shetland Islands Council suggested

mentioning the ‘whole lifecycle’ approach to both new and re-used structures and considering the adaptations required to meet future changes in need.

Land quality, safety and sustainability of town centres were features mentioned to strengthen in the guidance. CIEEM (Chartered Institute of Ecology and Environmental Management) suggested the sustainability could be incorporated within urban environments by: use of rain gardens to support urban flood prevention measures, green communal spaces and ecological networks being required for new builds, incorporation of Sustainable Drainage Systems (SuDs) in housing developments and a focus on nature-based solutions to manage air quality and flooding.

“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. Nature networks and green infrastructure facilitate adaptation to climate change and are fundamental components of urban planning in a changing climate.” – CIEEM

### **Welcomed focus on addressing health inequalities**

Several welcomed the inclusion of health and wellbeing as a key consideration and focus. It was felt that a clear definition could be given of health and have this positioned at the start of the section, highlighting direct and indirect links between place and health. Specific suggestions included strengthening the guidance in relation to healthy eating and land for growing food, e.g. allotments, the impact of working from home and a greater focus on the benefits of retrofitting new technology and broadband within deprived areas.

### **Address misconceptions about the 20 minute neighbourhood**

Several felt the guidance did not help address misconceptions about the local living concept and that efforts should be made to do so. This could include emphasising that the concept is not about restricting people in their communities, and ensuring professionals avoid taking inward-looking decisions without considering wider infrastructure and relationships between different areas. Specific suggestions were to place households at the centre of decision-making rather than a bounded geographical area, include more positive examples of benefits from using the approach, use effective national and local publicity campaigns and produce guidance to support public engagement.

### **Other themes**

Some felt that, apart from acknowledging the rural dimension, not enough had been done to place the guidance in a Scottish context in Part 1. For instance, one highlighted that Scotland’s relatively unique situation as a devolved nation was not mentioned.

## 4. Part 2 – What local living looks like

This chapter presents an analysis of Q2 and Q3, which asked for respondents views on the key considerations for local living and the Local Living Framework, presented in Part 2 of the guidance. Responses to these two questions overlapped; to avoid repetition, views on the Local Living Framework concept and diagram are presented under Q2 and views on the themes and considerations included in the framework are presented under Q3.

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

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful
<b>All answering (%)</b>	<b>590</b>	<b>31</b>	<b>9</b>	<b>21</b>	<b>69</b>
Individuals	498	18	6	12	82
Organisations	92	98	28	70	2

Almost all organisations (98%) agreed that the framework diagram in part 2 of the guidance is helpful; 28% very helpful and 70% somewhat helpful. The sectors most likely to consider it very helpful were third sector organisations (56%) and retail (50%), followed by place-based organisations (40%) and health and social care (40%). Among individuals, 82% felt the guidance was not at all helpful.

### The framework diagram is not accessible or clear

Over seven in ten respondents left an open-text comment in Q2. Many respondents felt the framework was not straightforward to understand. Comments included that the diagram appeared to show each component as equivalent in status or was too high level, cluttered with icons and caused confusion. For instance, one queried why the movement illustrations showed a car and a tram when the focus in the movement section was on walking and cycling. Another queried why social interaction was included with resources and suspected it was related to social capital.

A few commented on the diagram's place in the guidance. For instance, the diagram was not embedded in the main body of the text, and the illustrations were unclear or open to misinterpretation. A small number felt the Place Standard Tool Design Version was easier to follow and had fuller explanations, though there was a feeling many tools were already in use, which could lead to confusion, especially for community groups.

“The Place Standard tool was already considered by many users (specialists and generalists) to be complex. Many practitioners believe there should be some simplification and tailoring to make it easier to use. However, the many new versions and lenses are making it seem even more complex. In effect, it is considered this framework diagram may be adding more complexity to an already complex concept and diluting the place standard.” – Angus Council

## **The framework diagram is helpful for supporting local living**

Conversely, however, the next most prevalent theme was many positive comments about the framework diagram. Comments described it as helpful, comprehensive, a useful visualisation and enabled an easy understanding of the main features of local living. Organisations commonly indicated it would be useful for operationalising the guidance at local level, for instance, by helping identify gaps or opportunities, facilitating community and stakeholder engagement and providing a basis for assessment of local living.

“Creating a single diagram that incorporates the multi-faceted complexities of the myriad qualities, services and amenities that support local living is a major challenge. It will not be possible to please all stakeholders. The diagram does an admirable job in capturing a wide range of fundamental characteristics.” - SURF

“The diagram appears to be relevant in the identification of categories to consider local daily needs.” – North Lanarkshire Council

## **More detail is required to enable effective planning decisions**

The next most common theme was that the framework needed to be more specific to be useful in planning decision-making. Geddes Consulting suggested adding a narrative of: ‘When assessing or establishing 20 minute neighbourhoods as part of LDP preparation and planning applications, the principles set out in Part 1 of this guidance should be utilised’. It was argued that the framework should facilitate community involvement while noting the potential for consultation fatigue.

“This diagram does not really explain anything beyond summarise the key aims. It does not help me to understand how it will actually be implemented or what the result will look like.” – Individual

“The guidance should clarify how the Local Living Framework relates to development planning and decision-making.” - Heads of Planning Scotland (HOPS)

One suggested producing a complementary local living checklist for developers, providing a spreadsheet tool similar to that adopted elsewhere, e.g. Transport for London’s Healthy Streets indicators, stating:

“Such a tool will help developers to make sure any proposed development results in improvements in line with the local living Approach, scoring the proposals against the identified local living indicators. Such an assessment could be used to show planning authorities and the public alike how development will result in improvements.” - Tactran

## **Alignment with the Place Standard Tool**

Aligning the guidance with the Place Standard Tool was positively received by several. However, several others felt the Tool and Local Living Framework were too similar or required more distinction.

The Place Standard Tool was considered to be well-established, evidence-based, commonly used and recognised locally. Therefore it was felt to provide a robust framework



for the development of local living initiatives. For instance, Dundee City Council noted that the categories aligned with data currently being mapped and analysed using GIS. East Dunbartonshire Council outlined earlier difficulties in marrying NPF4 requirements with the place principles and felt the framework offered a 'very clear steer' on which tools to use and easily allowed engagement to be aligned to the Place Standard Tool Design Version.

Public Health Scotland called for their report - [Evidence behind Place Standard Tool and Place and Wellbeing Outcomes](#) - to be referenced more explicitly in the guidance. The Place and Wellbeing Collaborative suggested the Outcomes would be better suited to the end of the section on the benefits of local living and to state that achieving them "can positively influence the delivery of all the impacts of local living". It highlighted the need to clarify that the Place and Wellbeing Outcomes set out the characteristics required in every place to enable wellbeing, while the Place Standard Tool provides a set of questions to assess how much an area meets key place and wellbeing considerations.

Several felt that the framework was too similar to the Place Standard or that there should be more clarity about the difference between the two. A few called for the Place Standard Tool to be used instead of the framework, or to strengthen existing processes. A few felt better linkages and explanations of each of the place-based concepts or tools, perhaps including a summary diagram, would be helpful.

"Our preference would be the development of a more coherent, less fragmented process to underpin place-based approaches, including supporting local living within the planning system. Either a companion to the Place Standard tool, which explains how to interpret that tool in the context of local living or an 'add on' which facilitates this as a next step in the process would be preferable." – North Ayrshire Council

### **Use of data at a local level**

The need for firmer guidance on how measures could be used to achieve local outcomes intended by the framework was raised by several. There were calls for a framework that could be applied in practice, following a determined methodology and structured around outputs and outcomes; it was felt that this could aid consistency and reduce local resource requirements. Calls were made particularly for more quantitative measures and data, for instance, to measure the term 'high quality'. However, one suggested more creative methods could help engage communities in data-gathering processes.

"It would be useful if the guidance provided further in-depth detail of the 20 minute neighbourhood approach being investigated and actioned within an area, both in terms of what the data looks like, how it was gathered, how partnerships were formed and the practicality of actions coming to fruition. NLC have recently appointed a person specifically for the undertaking of data collation and analysis. It would be interesting to see what others have done or plan to do as more of the authorities begin to progress with the local living and 20 minute neighbourhood concept." – North Lanarkshire Council

Anderson Bell Christie suggested such a framework should consist of: a clear definition of 20 minute neighbourhoods with assessment criteria and key performance indicators (KPIs) to help plan, implement and monitor the neighbourhood; a guideline for how a 20 minute neighbourhood and its KPIs can be assessed and integrated with planning,

implementation and operational phases; a KPI assessment tool to monitor performance; neighbourhoods with different ambition levels and pilot projects to validate the definition through testing and implementation.

Practical suggestions on the use of data included:

- Providing guidance on how the concepts should be implemented and assessed.
- Referring to the [www.usp.scot](http://www.usp.scot) toolkit, a free online platform providing consistent and robust data on local areas in Scotland, allowing comparison between them.
- Developing an accessibility tool or reference to map-based approaches such as the shared data resource being developed by the Scottish Government's Digital Transformation team.
- Quantifying distances for what are considered necessary to meet everyday needs. The Scottish Government could release available datasets to produce GIS-based maps with isochrones<sup>3</sup> for various travel modes.
- A before, during and after assessment of each component of the diagram could help evidence change over time.
- Considering cross-boundary assessment across local authorities to consider linkages and proximity of facilities.
- A minimum set of proximity-based standards could allow investment to be better targeted at areas failing to meet those standards.
- Exploring habitability indicators for viable Island communities developed in the Åland islands for creating local place plans.
- Indicators could be linked to the Scottish Government's wellbeing economy approach, drawing on the Wellbeing Economy Monitor measures which include inequalities. This also links well with community wealth building.
- Methodology and data sources to conduct local accessibility assessments could be included, the output of which could map good, limited or poor accessibility areas.
- Using an approach similar to the toolkit set out in the RTPI's Measuring Planning Outcomes research could enhance the 'implement and review' stages.
- Emphasising the role and importance of equalities impact assessments.
- Improving data sharing between private and public sectors.

### **More detail is needed**

Several called for more clarity on this part of the guidance. Requests were made for more specificity to allow it to be used, including providing more illustrations, examples or case studies of how it can be applied to differing types of communities or populations. For instance, Environmental Protection Scotland felt the definition of health was not robust enough and noted key health and community living enablers, such as GP surgeries and

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<sup>3</sup> An isochrone map in geography and urban planning is a map that shows the area accessible from a point within a certain time threshold.

supported living facilities, were not mentioned in the Health and Wellbeing section. It was suggested that other dimensions of health could usefully be referenced, such as social, emotional, mental and spiritual, while one suggested using the WHO (World Health Organisation) definition of health.

A few called for the research cited on page 16 to be referenced. Geddes Consulting noted a concern about how the 20 minute concept could be interpreted by authorities and potentially used to reject developments not in line with the definition of 'key destinations'. They called for this phrase to be further defined. Public Health Scotland argued that wording about using the approach should better recognise the complexities involved:

“The framework risks being too high-level to constructively support the various components of civil society which must all be engaged in delivering the Local Living Framework. Current wording only states *[the concept]* “should be considered and where appropriate, addressed in delivering successful local living”. This gives insufficient weight to their delivery and fails to acknowledge that no single organisation or sector can deliver these key considerations in isolation.” – Public Health Scotland

Some respondents in Q2 and some in Q3 suggested improvements to enable the framework's use in practice. One felt the text should clarify that the key considerations formed the overarching themes when undertaking the process set out in Part 3. Others preferred the diagram to be located alongside a key and explanatory text. South of Scotland Enterprise suggested adding a separate diagram for rural areas, perhaps using a jigsaw illustration to demonstrate that different elements may combine uniquely in one or more places to form a whole.

### **Prioritise the elements of successful local living**

Some felt the guidance and the Local Living Framework should determine which themes or considerations were essential for local living, or how aspects should be prioritised, as this better reflected reality and assisted planning decisions. Greater recognition of these spatial challenges was recommended, particularly the need for communities to be designed around good transport links to work, education and health centres.

A few highlighted the need for the guidance to address competing priorities and trade-offs. One individual cited research<sup>4</sup> that found housebuilders' claims went largely unchallenged and that planners felt the public appeals process prioritised housing delivery over other objectives such as design. Another pointed to the proliferation of student flats and holiday homes when market forces prevailed.

The Young Foundation highlighted their research findings that residents were prepared to make trade-offs if these would facilitate other benefits of local living, with good transport infrastructure always prioritised.

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<sup>4</sup> [Research on Delivering Design Value by UK Collaborative Centre for Housing Evidence](#)

“The document could do more to assist planners in situations where the localities are inherently constrained in how it can implement competing demands, or where demand for one land-use or amenity is a more important trade-off due to local conditions.” - Individual

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?

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful
<b>All answering (%)</b>	<b>584</b>	<b>34</b>	<b>10</b>	<b>24</b>	<b>66</b>
Individuals	490	22	7	15	78
Organisations	94	98	27	71	2

All but two organisations who answered Q3 (98%) considered the categories and key considerations in part 2 helpful; 27% very helpful and 71 somewhat helpful. The proportion who felt they were very helpful ranged from 17% of local authorities to half (50%) of health and social care and retail organisations. None of the seven housing/property organisations who answered found the categories very helpful, but all found them somewhat helpful. Over three quarters (78%) of individuals answered not at all helpful.

**Additional aspects to include in the framework**

Just over three fifths of respondents left an open-text comments in Q3. The most prevalent theme in Q3 was many suggestions about other aspects to include in the Local Living Framework across all of the five overarching themes. Features respondents felt should be added or strengthened included:

- Health - food, healthy eating and community gardens, other health benefits, hospitals, health centres, GP practices.
- Education – schools, educational activities, outdoor learning centres.
- Community – volunteering, burials and cremations, culture and creativity, community centres, sporting and leisure facilities.
- Spaces and climate – green and blue infrastructure<sup>5</sup>, nature networks, landscape, land use, air quality, water and flood management.
- Economy – local businesses, shops, digital connectivity, home working, practical and commercial economic realities of what can be achieved.

<sup>5</sup> Green and blue infrastructure (GBI) refers to the natural spaces and features in our landscape, that when connected, deliver quality of life and environmental benefits for communities and the nature that thrives in them. Parks, gardens, rivers and trees are all examples of GBI.

- Built environment – historic and existing buildings, landscaping, high density of new development in urban centres.
- Legal – policing, enforcement measures, personal safety, local democracy.
- Principle-based - inclusive, resilient, affordable, connected.

Many organisations provided detailed responses, particularly those with expertise in a particular area or representing interest groups, with some giving reasons and suggesting how these could be incorporated into the framework. For instance, The Built Environment Forum Scotland felt the historic and existing built environment should be reflected across other themes, such as Space, not just the Civic category. RTPI Scotland suggested that quality be extended across all themes, including Movement and Resources. The reader is advised to refer to the individual responses to the consultation for more information.

“The diagram doesn’t make it clear where specific items would fit within the themes in the diagram. For example, the preceding paragraphs of the diagram include a mention of core daily needs, including eating healthy food, but it is not clear under which of the 14 themes eating healthy would be placed.” - Obesity Action Scotland

Two organisations called for consistency in referencing wider policies, noting that several policies are references in the Movement section, but other sections have limited or no references. They argued that similar references would give each section equal weight.

### **Comments on the Movement section**

The next most frequently raised comments related to the five themes in the Local Living Framework: Movement, Space, Resources, Civic and Stewardship.

Suggestions were made for additions and corrections to the Movement section. Mention of public transport was welcomed, with suggestions made to explicitly reference various types of movement as these are used as part of a public transport journey, strengthen commitments to accessibility and address cost and service reliability. Bus travel was felt to be a more accessible form of travel than other types of movement, such as cycling. It was felt that the movement of disabled people should be considered further, with, for instance, accessible public spaces and pavements and car use and the Blue Badge scheme.

CLD Standards Council expressed concern that some learners and families were unable to access community facilities as public transport no longer operates in their area. It recommended a mapping exercise such as using a digital space to record and share information on community groups and mobility/transport support, e.g. bike lending and buddy lifts.

“Scottish Government funding and long-term commitment is needed to address transport issues and support the development of public/community transport where service buses are not willing to run, but the route is a lifeline to those isolated and vulnerable.” – CLD Standards Council

“The Highland Council’s Active Travel Strategy includes a prioritised list of infrastructure interventions for the Inner Moray Firth area and for a number of settlements across the area. The prioritisation process scores possible interventions on a number of criteria, including social deprivation, car ownership/access and existing transport interconnections, including public transport. This makes explicit the connections between local living and access to travel options and allows the Highland Council to focus resources on the interventions which will have the greatest positive impact.” – The Highland Council

Other specific aspects considered worth including were low and no parking provision, trades access and parking, travel information provision especially at bus stops, car use by disabled people, and strengthening references to: driving speeds and road safety, quality of required infrastructure e.g. footpaths and cycle lanes, 20 mile per hour zones, bike (included adapted bike) storage and reduction of travel distances. A few pointed out that the reference to Sustainable Transport Hierarchy should read ‘Sustainable Travel Hierarchy’<sup>6</sup>. Falkirk Council suggested reframing the section into separate categories of walking, wheeling, cycling and public transport to reflect the Sustainable Travel Hierarchy.

### **Comments on the Space section**

Suggestions were made by several to strengthen the Space theme. In particular, examples of blue and green infrastructure could be incorporated based on the NPF4 definitions, or the diagram could include a quadrant on this topic. Two mentioned including Sustainable Drainage Systems (SuDS) for their rainwater management function as part of this, with one suggesting SuDS be included in the descriptor of spaces.

An explanation of how the climate crisis could be addressed could be included. This could, for instance, make stronger reference to nature networks and existing natural land use such as landscapes, the historic environment, natural heritage, productive growing spaces and the interconnectivity between streets, spaces and facilities.

‘Growing’ was felt to require clarification, for instance, using ‘food growing’ instead and referencing community food production. Public Health Scotland suggested more emphasis could be given to how interventions increase access to healthy foods, whilst greater recognition of the contributory role of food growing was suggested by another.

Other factors suggested for consideration included the height of buildings, whether indoor and outdoor spaces should be included in the same section, emphasising orientation and wayfinding tools to help people navigate their surroundings, expanding the description to account for exercise and leisure space, and recognising active travel, for instance, how well-kept streets can encourage movement and how well-designed spaces support changes in transport use.

### **Comments on the Resources section**

Several made varied comments on the Resources section, often supporting specific aspects.

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<sup>6</sup> [An introduction to the sustainable travel hierarchy](#)

“The “Housing & Community” theme within the “Resources” category lists considerations including “accessibility”, “adaptability”, “relationship with local area”, and “range of tenures, types & sizes”. Collectively, these considerations provide a solid basis for planning and developing housing that meets people’s needs and fits well with the surrounding services and communities.” - Health and Social Care Alliance Scotland

Comments on the structure of this section were received. One felt Resources and Civic were unclear terms and could be combined under Society instead. Another suggested Support and Services is too broad and differs from the term used in the Place Standard Tool. They recommended that it be split into local shopping, health facilities and schools instead. Other comments included that the category could include a Social Action theme or list the key considerations of Social Interaction in the Civic category.

Some welcomed the inclusion of healthy food. Comments included: the need for greater emphasis on affordable healthy eating or amending the term to ‘healthy local produce’; no link being made between healthy food and community assets which are currently in different sub-categories; the need to mention access to affordable healthier foods when discussing shops, cafes etc.; adding allotments as an example of community assets and; ensuring new developments and regeneration initiatives include land for growing.

Specific additions to this section recommended by respondents included cost, purchaser/provider roles, resource distribution, and the circularity of resources. Places of worship, access to arts and culture, libraries, retail and community development, informal social spaces, tourists and visitors and storage and parking were suggested additions or areas to strengthen. The Shetland Islands Council felt the section could mention the potential for resources and public space to futureproof against obsolescence and changes to community needs over time. Other factors respondents felt should be considered included quality and a holistic focus on creating places and supporting healthy, sustainable lifestyles. Increased emphasis on community wealth-building was suggested. For instance, one recommended further integration of community wealth-building principles into the policy context, emphasising opportunities to engage in public-interest led development under NPF4.

### **Comments on the Civic section**

Views on the Civic section, particularly aspects regarding the concept itself, safety and belonging, attracted comments from several. The Civic term and concept were felt too high-level and abstract to be useful by some, with calls to use a revised term. For instance, the meaning of ‘gateways’ in the Identity and Belonging category was queried. Suggested additional wedges were Spirituality, to capture faith, and History and Culture. One suggested combining the Civic and Stewardship themes.

The Feeling Safe section could be strengthened by recognising the role planning professionals and landscapers can play in contributing to safety, prioritising improved street lighting, acknowledging the multi-dimensional nature of feeling safe for a range of community groups and referring to feminist approaches to planning. The Landscape Institute, for instance, highlighted Glasgow City Council’s adoption of a feminist approach to planning to ensure public spaces are inclusive and accessible. Maintenance could

usefully be added after 'care', given care suggested informal upkeep and repair measures, whilst maintenance indicated more formal input.

"It is encouraging that feeling safe is a stand-alone subgroup. We want to request that this be defined further as something which is far more than physical safety in a community and that it links back into social interaction to support services and community. It is about having people and places around you, in the community, which are easily accessible when you find yourself in a vulnerable position at any point in your lifetime." - CLD Standards Council

Comments on promoting Identity and Belonging highlighted aspects that facilitated this, such as horticulture, historic buildings, community ownership and youth work. A few called for more focus on community action such as what constitutes meaningful community participation, how communities can source funding, and ways to sustain community dialogue. A few also highlighted the need to incorporate accessibility in the section, including recognition of the diverse needs and preferences of community members.

### **Comments on the Stewardship section**

Several respondents made specific comments on the Stewardship section, with some arguing that the term should be replaced as it was not commonly understood at a community level. A few also highlighted it could be too vague to operationalise, for instance, difficult to apply spatially or due to the lack of reference to accountability and redress as considerations under Care and Maintenance. Greater definition of roles and responsibilities for place maintenance, re-use and improvement was sought, with more recognition of the roles communities could play in this.

A greater focus on community resilience and empowerment was recommended, such as highlighting initiatives which have successfully stimulated appetite for public involvement. For instance, examples of communities working together to deliver valued services, share ownership and maintain areas could be highlighted. Further, the roles of Community Councils, access panels and CLD in enabling public participation should be emphasised. It was felt important to tighten the guidance in this area, not least to ensure communities had the capacity to participate and that difficult decisions or challenges were not offloaded to communities to deal with.

"The guidance needs to be clearer about the role of planning in the long-term stewardship of places, for example in Fife, we currently only condition that developers must maintain landscaping for up to five years but stewardship goes beyond planning controls and policies and implies greater citizen, community, and public body care and maintenance outwith the control of planning." – Fife Council

### **Focus on accessibility**

Several respondents in Q3 felt more attention should be paid to accessibility, including digital and physical accessibility features of place.

It was felt that digital accessibility could focus on the range, type and quality of digital services that are accessible, with practical guidance given on how to achieve this.



However, Fife Council argued digital access to facilities could only be included as a consideration in development management processes if more work were done to implement this in practice. A few mentioned the need for digital infrastructure to be strengthened to help access, for instance, health services or employment opportunities.

“As it is, the draft guidance does not propose any methods for assessing accessibility via digital services, including the key considerations. The draft guidance also does not provide any considerations or advice for achieving the right balance of physical and digital access for different groups or communities.” - Strathclyde Partnership for Transport

The need to ensure access to places for all members of communities, including those with disabilities, was emphasised, as was the need to involve them in place decision-making. East Dunbartonshire Council expected to see prioritisation of each need or facility based on direct accessibility. Practical accessibility solutions for outdoor spaces were given, including reducing hazards on pavements, the importance of signal-controlled pedestrian crossings and detectable kerbs, avoiding moving vehicles, public and adaptable toilets, accessible play areas, spaces for rest and segregated walking infrastructure.

“Research has shown that a kerb height of at least 60mm is the only reliable marker for blind and partially sighted people to identify when a footway changes to a road or other surface. Long cane users and guide dog owners are reliant on this feature as a means of orientation and guiding.” – RNIB Scotland

“Simply referring to “accessibility” without reference to whom spaces need to be accessible for may lead to some people being forgotten or missed in planning. Indeed, there are no explicit references at all to disabled people and only very limited references to older people in the guidance document.” – Health and Social Care Alliance Scotland

One felt care should be taken in town centres to ensure accommodation was not exclusively located on first and upper levels above shops with no lift access. MACS (Mobility Access Committee for Scotland) argued for transport to healthcare to become an integral part of care pathways and to include access to healthcare as a consideration when designing 20 minute neighbourhoods.

## 5. Part 3 – Ways to support local living and 20 minute neighbourhoods

This chapter examines Part 3, Structuring the Approach, and the three key steps in delivering local living which comprise this approach: understand the context; collaborate, plan and design; and implement and review. It emphasises that the approach will be iterative and incremental as it responds to the lived reality of delivering 20 minute neighbourhoods to communities.

Q4: How helpful is the proposed 'structured approach' for use?

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful
<b>All answering (%)</b>	<b>574</b>	<b>30</b>	<b>11</b>	<b>19</b>	<b>70</b>
Individuals	488	18	7	11	82
Organisations	86	99	33	66	1

All but one organisation (99%) who answered Q4 felt the proposed structured approach was helpful. One third (33%) felt it was very helpful, and 66% somewhat helpful. There were marked differences by organisation type: While both retail organisations, 75% of other organisations and 71% of third sector organisations felt the structured approach was very helpful, only 20% of local authorities, 17% of transport organisations, 14% of housing/property organisations and 11% of place-based organisations viewed it as very helpful. Over four fifths (82%) of individuals felt the proposal was not at all helpful.

Around two thirds of respondents left a comment in Q4. As well as commenting on the structured approach, many commented on each of the three steps. These comments have been included below in the analysis of Q5, Q6 and Q7, which focus on each step.

### Agreement with the structured approach

The most common theme in response to Q4 was agreement with the structured approach presented in Part 3. Many respondents either agreed or supported the approach while also noting areas for improvement as described below.

"This is all very clear and looks like a sensible approach." – Individual

"The proposed structured approach to local living is concise and pragmatic - emphasising that the delivery of local living and 20 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." - Environmental Protection Scotland

"The 'structured approach' is concise, easy to understand and easily explainable to various stakeholders." – Dundee City Council

Some noted that they particularly liked the flexible and iterative nature of the structured approach, which would help take into account the changing characteristics of living spaces and the diversity of different places in Scotland.

“RTPI Scotland supports the iterative process proposed as part of this structured approach. This type of cyclical process recognises that Scotland’s places are living, breathing, vibrant, diverse and continuously subject to change. Town planning has a crucial role to play in the design and development of high-quality spaces that prioritise health, happiness and the wellbeing of individuals and communities.” - RTPI Scotland

“It highlights previous information with the document which states that local living will be adaptable to different areas throughout Scotland by ensuring the approach begins with understanding the context of a certain area.” - South Ayrshire Council Planning Strategy

“The structured approach is simple and not over-complicated, and the circular aspect of the approach will help ensure that the planning and development of places remains dynamic, adaptive to change and flexible.” – Landscape Institute

### **Calls for greater detail**

Potential improvements to Part 3 were suggested by many respondents. Within this, some organisations asked for more information about the structured approach, requesting more specific detail on how the approach would work in practice such as:

- Who should be involved and their roles and responsibilities.
- Expected timescales.
- Details of the positive outcomes that could be expected to arise from using the approach.
- More examples of how the approach could, or has been, applied.
- Providing more depth to some references, for example, SURF asked for more information about the “additional data sources” referred to in the guidance.

“It is interesting how it takes on Placemaking Principles, particularly around understanding the context and the collaboration component with wider community engagement. This proves that the structured approach can be adapted or used with other tools if leaders or LAs wish to go further. The iteration loop aims for continuous improvement, which is crucial in cities and towns where there could be varying demographic and socioeconomic trends. One thing it doesn’t clarify is how often these iterations should be done, should they follow the LDP frequency, or maybe more often.” - Dumfries and Galloway Council

Changes, additions and deletions to Part 3 were also suggested. Several expressed a concern that the language currently used in the guidance did not accurately reflect the scale of the changes felt to be required to implement the structured approach effectively. For example, West Dunbartonshire Council recommended acknowledging the necessary ‘fundamental shift’ in planning.

Other specific changes included:

- Some respondents did not believe that Figure 7 in Section 3 worked well, and a few suggested it was overly simplistic. A few noted that while the depiction of the process was circular, it was linear in application and called for more feedback loops.
- A few mentioned the need to highlight the positive impact the approach would have on the environment, such as improved land and air quality, the latter of which will directly benefit health.
- Environmental Protection Scotland suggested the context of a place 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.”

“The current review process needs to be more rigorous to identify, plan for and implement considered collaborative solutions which help to tackle the climate and biodiversity crises.”

- Individual

Conversely, a few respondents felt the guidance was too prescriptive. For example, Scottish Borders Council suggested Part 3 could be streamlined further.

### **Funding and staffing concerns**

As mentioned in Chapter 2, several respondents noted concerns about resourcing, staffing, and funding. These concerns were frequently raised around Part 3, with some arguing it could add to the already high workloads of local authority planning teams and other stakeholders. A few suggested that an incremental approach will require continued investment over extended periods of time. Concerns were particularly acute in relation to data collection and management, especially qualitative data, which a few noted would be more time consuming to gather than quantitative data.

“There is concern within the line on community engagement ‘the results of previous engagement exercise like these can form a valuable starting point for qualitative information’ (p31). Suggesting the existing community engagement work as only a ‘starting point’ for qualitative information gathering is unreasonable given the timescales for producing an evidence report.” - Aberdeenshire Council

“Understanding context is vital in understanding the unique characteristics of the area/community and ensure that interventions are relevant and successful. As noted above, the importance of gathering quantitative and qualitative information is fundamental to success of this step. However, it is the qualitative information gathering that may prove challenging.” – Moray Council

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

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful
<b>All answering (%)</b>	<b>578</b>	<b>33</b>	<b>11</b>	<b>22</b>	<b>67</b>
Individuals	487	21	7	14	79
Organisations	91	99	32	67	1

Virtually all organisations (99%) agreed that part 3 of the guidance was helpful in clearly communicating the importance of data in establishing a baseline for a place. One third (32%) felt it was very helpful, though again this varied by type of organisation from 13% of local authorities to 50% of health and social care and third sector organisations and both retail organisations. None of the seven housing/property organisations who answered found the categories very helpful, but all found them somewhat helpful. Among individuals, 79% felt it was not at all helpful.

### Positive feedback

Just over three fifths of respondents provided an open-text response to Q5. The most common theme was support for the guidance’s clear communication of the importance of both qualitative and quantitative data. Many agreed with the importance of gathering and using data to understand the context of a place, and others supported the creating baseline measures which could be monitored over time. However, some caveated their agreement with suggestions and calls for more detail, which are explored below.

### Qualitative data

Many respondents noted the importance of qualitative data, agreeing it was a good way to understand how people live in communities. A few others mentioned the importance of including qualitative insights when establishing a baseline for each community. Cycling UK in Scotland noted that qualitative data could help create a vision that was appealing to community members.

“The history of a place, the heritage and the interests, needs and skills of the inhabitants are primary in setting the context - not an academic exercise but storytelling with people’s research and contributions from the schools, the churches, the housing associations and (of course) the allotments. This brings people to gather, engages them, and from this, you can develop plans - bottom up, not top down.” – Individual

“Engagement should include both online and in-person events to hear from locals and fully take their views on board. GIS is a useful tool but understanding and appreciating community concerns is critical.” – Individual

A few emphasised how qualitative data would provide greater depth of understanding, especially about the resources available in communities, e.g., rather than the number of

shops, qualitative data could explore the types of services provided by each shop and how useful these are to a community.

“This is particularly important in relation to ensuring shops and services adequately meet the needs of local people, identifying barriers to access or where improvements can be made. Qualitative data also provides an opportunity to give additional insight and draw out benefits of projects or services which may not be immediately apparent. This is particularly relevant to generative enterprise models such as community services or shops as these types of activities may have wider social and economic benefits for the community.” - North Ayrshire Council

Many respondents asked for more information about how to collect, analyse and use qualitative data. Some respondents suggested that guidance was needed in assessing qualitative data to ensure that information was up-to-date and representative of the community. A few others highlighted the benefit of using the Place Standard Tool to collect qualitative data. A small number stressed the need to ensure the language in the guidance gives equal weighting to qualitative and quantitative data.

“Overall, yes, although we would avoid referring to “hard data” to describe quantitative data as this suggests that it is somehow more real or concrete than qualitative data.” – Diabetes Scotland

The importance of engaging hard-to-reach communities and speaking to minority groups or audiences that are often not consulted was mentioned by several. A few individuals were concerned that “loud voices” or minority opinions would be considered more than harder to reach groups. A few supported the use of qualitative data collection as they believed it would allow greater engagement with minority groups. However, one individual cautioned that qualitative data collection could be considered intrusive into people’s lives.

“We are fully supportive of the principles of informed decision-making and collaboration set out in this section. This would be stronger if there was explicit reference to inequalities within this section and the need to ensure that a diverse range of voices are deliberately sought.” - NHS Fife Public Health Department

“A further key advantage however which has been omitted, is qualitative data ability to cover more intricate details missed by quantitative research methods. This is particularly valuable when considering the experiences of often ignored groups, such as ethnic minority women, disabled women or LGBTQ+ women. Ethnic minority women for example are less likely to engage with online materials and instead direct conversations can be more valuable and inclusive. We are aware that this has been touched on, however, it is vital that despite the difficulties in carrying out good quality qualitative research, the Scottish Government strive to improve methodologies. This could be done through collaboration with third sector organisations who already work with women and marginalised groups.” - Scottish Women's Convention

## Quantitative data

Several respondents supported the use of quantitative data. A few specifically mentioned the value of GIS data and national spatial datasets, although they asked for further guidance on how to use different sources.

“Qualitative data helps capture the experiences, values, and aspirations of people, while quantitative data provides measurable indicators and trends. Together, they provide a more robust baseline for assessing the current state of a place, identifying challenges and opportunities, and informing future planning and decision-making processes.” – Moray Council

Several asked for more information about quantitative data collection, and others provided suggestions about what should be included, such as a mapping of:

- All facilities, including food outlets and the availability of affordable healthier food and hygiene registers.
- Access to green spaces.
- Places with natural and heritage designations.
- Topography of places.
- Disparities in access to recreational opportunities.
- Transportation, such as frequency and use of major routes and access to alternative transport modes.
- Variety in types of housing in specific areas.

A few respondents also asked for guidance about which data is or should be, compulsory for a planning application and where to find it. Others mentioned where some of this data could be accessed, such as existing council sensors or counters, Scottish Government Open Data portal, UK Data Service, OpenStreetMap, Scottish Index of Multiple Deprivation and Census data, Scottish Public Health Observatory (ScotPHO) Profiles Tool, Scottish Household Survey data explorer, National Records Scotland, Scottish Living Locally Data Portal, surveys gathered through the Scottish Health Survey, and registers held via Food Standards Scotland.

“The Council considers there are still some matters requiring further clarification, specifically how this information is gathered and the expectations in terms of where and how it is applied. For example, it would be useful if the guidance could set out a comparison between how the approach would apply to a master planned site versus the development of a Local Place Plan.” - City of Edinburgh Council

“Quantitative data should include measurable and quantifiable data about the relevant community and place, including large datasets detailing nuance and subdivision within community data” – Shetland Islands Council

## Importance of detailed, high-quality data

The importance of detailed, high-quality data that is comprehensible to all was mentioned by several. Others highlighted the importance of data that is up-to-date and reflects all communities, especially those in rural and island locations. A few raised concerns that qualitative data, in particular, could be considered too subjective and may not stand up to criticism. Ensuring data is not biased was a concern for a few. For example, a small number of individuals were concerned that data could ignore specific perspectives and be used to support positions favourable to the Scottish Government or local authorities.

“SPT agrees that the assessment needs to make best use of quantitative and qualitative data. However, it is important that anecdote is not substituted for qualitative ‘data’.” - Strathclyde Partnership for Transport

Volunteer Scotland asked that the language be adjusted to say that quantitative and qualitative data should be “current, relevant and robust to ensure conclusions drawn are accurate and representative of the collective community experience.”

## Methodological expectations and suggestions

Several respondents called for the guidance to set out expectations for a preferred methodology for data collection. This included requests for further guidance on gathering, analysing, and presenting data, which some noted would help with consistency.

“Part 3 identifies the kind of data that might be used to establish a baseline, but again the guidance is very general. The guidance might have been expected to provide a more detailed methodology as to how data might be assembled, analysed and presented, including the use of GIS/digital mapping. Real-life, illustrated examples of the application of the methodology and digital mapping tools to a particular area might have been useful.” – Falkirk Council

Though not necessarily expecting a full approach to be outlined in the guidance, several other respondents asked for clarification on who is responsible for conducting the data collection, the connection between data collection and the planning process, and information on the relationship between qualitative and quantitative data.

Others recommended certain methodologies they would use, such as participatory qualitative methods and local-level quantitative data collection. A few others also recommend clearly defining the boundaries of places to allow for a clearer understanding of the quantitative data presented.

“To do this successfully, it will be vital to have clear definitions and boundaries of a place or community that align to existing data categorisations, allowing the aggregation or disaggregation of quantitative information to better inform understanding.” - South of Scotland Enterprise

Some others emphasised the importance of accessible data. For example, this would include ensuring that data collected by public bodies is published for public use, and effective data sharing between public bodies and local authorities.



## Other themes

Some respondents mentioned other types of data that should be considered, such as flood risk, access to work including a greater range of jobs, travel behaviours, impacts of climate change and population density.

A few others pointed out that existing community engagement could be used to understand context, and Aberdeenshire Council suggested that the perspectives of visitors also be considered as they are economically and socially important to different areas.

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

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful
<b>All answering (%)</b>	<b>572</b>	<b>32</b>	<b>9</b>	<b>23</b>	<b>68</b>
Individuals	483	20	6	14	80
Organisations	89	94	24	71	6

One quarter of organisations (24%) felt part 3 of the guidance was very helpful in supporting collaborative practices. A further 71% felt it was somewhat helpful, meaning 94% of organisations felt it was helpful to some extent. With the exception of the two retail organisations who both felt it was very helpful, third sector organisations were then next most likely to feel it was very helpful (50%). Local authorities were least likely to find it very helpful (8%). Four fifths of individuals (80%) found part 3 not at all helpful.

## Importance of public engagement

Just over three fifths of respondents commented in Q6. The most prevalent theme was an emphasis on the importance of engaging with communities and listening and responding to public feedback. Several respondents suggested that while they approved of the structured approach, they wanted to ensure that the process started with communities and avoided a top-down approach.

Respondents noted that collaboration with communities was essential, but some individuals expressed concern that community opinions may not be taken seriously. A few organisations and individuals highlighted negative past experiences where community consultation has been used after decisions have been made. Similarly, a small number suggested that LDPs had not listened to communities previously and were therefore doubtful this would start happening now.

“Adoption of a suitable baseline from which to develop plans, and ongoing reviews and updates look like a sensible approach (to deliver almost any project), however, so far I have seen nothing to give me confidence that local people will be involved in decisions that affect them” – Individual

“Previous experience with collaborative co-design has felt like communities being asked to approve previously decided plans. There must be a solid commitment to properly engage with communities. To let them lead with the plans, from asking what services are needed but currently lacking, to how to transform transport options to ensure access to those services, and to implement as far as possible the community’s suggestions.” – Common Weal

“Language in the Case Studies section like “Council Led Regeneration” are not helpful, and throughout the document greater emphasis should be given to ensuring coproduction and community led regeneration is front and centre to the approach, if we are taking a place based approach around 20 minute neighbourhoods / local living this should be community led and co-produced. This would be supportive of the Community Empowerment legislation and duties too.” - NHS Lanarkshire Health Improvement Department

Other organisations stressed the importance of interacting with specific groups, including young people, and a small number emphasised using intersectional approaches.

### **Positive feedback**

Many respondents provided positive statements about the collaborate, plan and design phase. While several provided general positive feedback, several others approved of the proposal’s inclusion of collaborative working. This included support for collaboration with communities, cross-sector private organisations, and the public sector. A few again emphasised the importance of moving away from silo working.

“Hallam agrees with this section, particularly as it emphasises the need for cross-sector commitment and acts to show Hallam that the Scottish Government does recognise that further collaboration across stakeholder groups is needed.” - Hallam Land Management

“This section presents a useful holistic view of the ways different sectors can collaborate to help achieve local living and 20 minute neighbourhoods. It outlines the key role planning authorities play, alongside a broad range of other stakeholders.” - The Highland Council

### **Calls for greater detail**

Many respondents asked for more guidance and information about how to collaborate with communities. Respondents noted that while they liked the theory presented in the structured approach, they were unsure how it would work in practice. Others noted that there are existing models for collaboration and engagement but called for them to be more explicitly referenced in the guidance. Several respondents requested more examples and case studies to show how collaboration, planning and designing work in practice.

“It is too vague to be very helpful. Reference to NPF4 policy isn't enough. Just stating ‘Collaborative approaches’ without explaining the ‘how’ isn't really enough.” - Kintore and District Community Council

Calls for more information and guidance were made by several respondents, including requests for more specific details about:

- Distinguishing procedures for changing existing communities and developing new 20 minute neighbourhoods, which respondents note will be different processes.
- Investment plans and investment decisions that will help local authorities delivery local living goals.
- Guidance on agencies that will or should be involved.
- More information about a ‘town-centre first’ approach and how it relates to 20 minute neighbourhoods in urban areas with larger distances between the centre and outlying neighbourhoods.
- Details about what is meant by ‘affordable living’.
- Information on public service reform as it relates to this section.
- Guidance on new processes for land allocation.
- Chief Planning Officer Guidance, which should outline the role and how it is supported by local living guidance.
- More information about risk assessment will be carried out to assess the impact of the proposal on different businesses and infrastructures.

Several respondents provided suggestions to improve the ‘Collaborate, plan and design’ step of Part 3. These included:

- Placing greater emphasis on the quality of new builds and properly functioning places.
- Using Delivery Plans to clarify the approach.
- Emphasising the importance of strong local leadership, effective decision-making capacities, and providing further details on expectations and examples from other places implementing local living strategies.
- Considering links to active travel and public transport.

“It is easy to encourage more collaborative working, but how is this to be done in practice? How will structural impediments to collaboration within and between public sector organisations, between local and national government, and between the public and private sectors, be overcome? How should local government go about ‘eradicating silo working and aligning investment, development delivery capacity and resources’? How can resource-constrained local authorities engage those who do not typically participate in community engagement activities? What support will be available to communities so that they can work out how to implement 20 minute neighbourhood objectives in their own neighbourhoods? How do we shift the mindset and ways of working (across all development sectors not just planning) from merely consulting local communities to genuine co-production? And, in all of this, what is the role of the Scottish Government?” – Individual

## Consider links with private and third sector

In response to both Q6 and Q7, several respondents stressed the importance of including third sector and private stakeholder in both the collaborate, plan and design and the implement and review phases of the approach. Churches, schools, shops, wider industrial companies, supermarkets, and healthcare facilities were some examples of stakeholders respondents were interested in involving. In particular, respondents frequently welcomed the recognition in the implement and review section that various key players have different skills and capabilities, though several respondents either called for more information on how this could be utilised or highlighted challenges to collaboration.

The role of the third sector was noted by some, although there were concerns about the assertion that they have capacity; it was noted that many currently face significant staffing and funding challenges and are unlikely to have capacity. A few welcomed the third sector and community development being treated on a par with other stakeholders, but CLD Standards Council asked to see the CLD profession and practice noted. The Scottish Churches committee called for recognition of the role of faith organisations.

Similarly, some welcomed the reference to engaging with the private sector, but called for more guidance into how to engage the private sector given their role in providing some services to communities. Two called for more information about how the private sector could be encouraged to invest in communities.

“As we note in our response to earlier questions there are a range of stakeholders involved in delivering local living. We welcome this section because it recognises this and the need for collaboration. The private sector should however be listed as one of the parties under the collaboration bullet point given that they are one of the partners in delivering the 20 minute neighbourhoods.” – Persimmon

More generally, several respondents highlighted broader challenges around coordinating multiple, varied stakeholders who could have conflicting or competing agendas. Respondents called for more guidance on how ‘each sector can support others to access resources and help share capacity and knowledge’, for national leadership and coordination, for clarity that delivery is not seen as solely the responsibility of the local authority, and for support for statutory bodies who are involved in implementation.

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

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful
<b>All answering (%)</b>	<b>565</b>	<b>30</b>	<b>10</b>	<b>20</b>	<b>70</b>
Individuals	482	19	7	12	81
Organisations	83	94	29	65	6

The implement and review section of part 3 was considered helpful by 94% of organisations who answered Q7; 29% felt it was very helpful, and 65% somewhat helpful. Among individuals, 81% considered this section not at all helpful.

### **Calls for greater detail**

Just over half left an open-text comment in Q7. Most prevalent in comments were calls for more information on implementation and review. A few respondents, both individuals and organisations, described this section of the guidance as lighter than other sections, lacking practical detail or, in a few instances, not adding to existing knowledge or processes.

“Implementation and review are perhaps two of the most important aspects of realising 20 minute neighbourhoods, however, this section of part 3 of the report seems underdeveloped.” – RICS (Royal Institution of Chartered Surveyors)

Many argued that the guidance requires more information about review and monitoring in particular. This included greater clarity over who would be responsible for review and how accountability would be applied, what frequency and timescales were considered most appropriate for a review, and how any learnings or good practice would be identified and shared. For example, one organisation questioned if the review stage would be driven by the Action Programme of the LDP to demonstrate the effectiveness of delivery; another stated that ‘if the baseline data is collated at the Evidence Report stage of the LDP process, the guidance should set out a recommendation for a subsequent review period’. A few called for examples or case studies of monitoring processes to be included.

A small number of organisations noted the importance of a consistent approach to review being used across Scotland; one called for local authorities to develop a shared set of implementation processes and review criteria which are broadly similar across Scotland to avoid data being presented differently.

While slightly less frequently mentioned, several others called for similar information about responsibility and timescales for implementation. A few individuals argued that their local authorities had a poor track record of implementation generally.

“However it is not clear who is carrying out implementation, who is conducting the review, or where these findings are communicated to. More information on this would result in greater transparency, accountability and further confidence in delivery.” – National Trust for Scotland

“It is very basic information on implementing and reviewing. It would have been useful to know the key steps of implementation, number of tiers, at what level what organisation would be involved. Time frames and cost involved in doing this. How the implementation would be reviewed - approaches used, who to be involved.” – NHS Lanarkshire Health Improvement Department

### **Implement and review section is helpful**

Several respondents, mostly organisations, agreed with the importance of considering implementation and review and considered the section helpful. In particular, they

supported the mentions of other policies, strategies and investments in the guidance and the emphasis on the importance of collaborative and cross-departmental working.

“This section is a really helpful contribution to the guidance, and we welcome the explicitly iterative nature of the process and the commitment to review and learning lessons.” – Living Streets Scotland

“Overall, “implement and review” is critical in supporting the delivery of collaborative approaches by promoting accountability, learning, and the long-term success of local living initiatives.” – Moray Council

### **Relationship with LDPs and NPF4 Policy 15**

Several organisations welcomed the inclusion of guidance on how development managers and planning authorities should judge applications against Policy 15. Often this guidance was welcomed because, while there was recognition that this process would become part of new LDPs, these would take some time to be widely embedded and used. For the same reason, a few, including Angus Council, The Highland Council and RTPI Scotland, called for further guidance to assist in implementing NPF4 in planning decisions. A few called for guidance about planning applications to be included earlier in the document.

“This guidance document acknowledges that the relevance and assessment against Policy 15 “will vary between applications and contexts” and that LDPs will provide “a further steer on expectations for applications”. While local authorities are awaiting this “further steer”, more clarity should be provided to local authorities on how their DM officers should apply these guidelines when assessing planning applications.” – RTPI Scotland

“For the guidance to carry weight, it must give planning authorities the confidence to reject applications where community engagement and collaboration is insufficient. SURF stakeholders often point to the reality that more than 95% of planning applications are approved annually, and regularly cite specific proposals, including out-of-town mixed use developments and isolated new-build housing, which receive approval despite apparently running counter to policy intentions for more 20 minute neighbourhoods.” - SURF

### **Comments on Figures 11 and 12**

Mixed views were expressed on the trip chain diagrams used in this section. Some felt they were useful, while some respondents criticised the simplicity of the diagrams, calling for greater explanation of what they were trying to show, or suggesting they did not add anything to the guidance. A few specifically criticised Figure 11 for presenting life as linear when people’s needs vary.

### **Resource and funding implications**

While some noted or welcomed the acknowledgement that there are ‘limited resources and capacity for delivery’, several reiterated the additional workload and cost to local authorities of implementing effective and high-quality review and monitoring processes. A few called for the guidance to set out other sources of funding opportunities which could help implementation, such as City Deal funding, the Scottish Government’s Edinburgh Process Fund, or grants or loans available to third sector or community organisations.

## Other comments

Scottish Community Development Centre, East Dunbartonshire Council and Dundee Civic Trust suggested that implement and review should be treated as two separate stages to ensure each gets adequate attention and to create a more complete learning cycle.

“The proposed three stage structured approach conflates ‘Implementation’ with ‘Review’ and it misses out ‘Revise implementation’ as another step. It should be a five-stage process as follows: 1. Understand context; 2. Collaborate, plan, design; 3. Implement; 4. Review; and 5. Revise Implementation.” - Dundee Civic Trust

## 6. Part 4 – Case studies

Q8 asked for respondents' views on the six case studies contained in Part 4 of the draft guidance; just over half of respondents left an open-text response. This chapter presents general feedback on the case studies, followed by more specific feedback relating directly to each of the case studies.

Q8: Looking at part 4 of the draft guidance: do the case studies provide a useful and appropriate range of examples of good practice?

	n=	% Yes	% No
<b>All answering (%)</b>	<b>563</b>	<b>23</b>	<b>77</b>
Individuals	479	12	88
Organisations	84	88	12

Among organisations who answered Q8, 88% indicated that the case studies were a useful and appropriate range of examples. At least three quarters of organisations in most sectors appreciated the case studies, with the lowest levels of agreement among housing/property organisations (57%) and other organisations (67%). Among individuals, 88% felt the case studies were not helpful or appropriate.

### Positive feedback

The case studies were well-received by many respondents and were frequently described as helpful, interesting and useful. Many felt the case studies were comprehensive and wide-ranging, appreciating the variety of different approaches, locations, community sizes and geographies they covered. A few added that they thought the case studies were effective at explaining the concept of local living in an understandable and relatable way.

“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.” – Environmental Protection Scotland

“The broad range of areas used in the case studies is particularly helpful as they each have different challenges to consider which can be applied to council own areas with similar challenges.” – East Renfrewshire Council

“The different approaches taken in each place... provide practical inspiration that other stakeholders can learn from as they consider their own local circumstances.” – SURF

### Negative feedback

However, many others did not consider the case studies to be a useful tool for communicating information about local living, with some describing them as vague, generic and one-dimensional. Several called for more detail to be included, such as referring to: timings and key milestones; budgeting and resourcing information; planning and decision-making processes; business generation and economic growth; other aspects



of climate-change mitigation activity, such as renewable energy; and monitoring and evaluation processes.

Concerns were raised that the case studies do not reflect the wider geography of Scotland; for example, some felt there is not enough representation of places outside the central belt or from areas with no public transport links. One questioned if it was necessary to include two case studies from Edinburgh. Some added that the case studies do not reflect the reality of living in rural areas, noting that the active travel options discussed in the case studies are often not feasible in such places due to the condition of local roads and the terrain of the landscape. A few felt it was unhelpful to present case studies of large, urban, populous areas like Edinburgh alongside those about smaller communities like Huntly in Aberdeenshire, fearing it invites unfair and unhelpful comparisons.

Some individuals expressed suspicion that the case study areas had been 'cherry-picked' to show successful examples or that areas with less capacity for local living had been omitted. Others felt that the case studies present an overly positive picture and minimize any potential disadvantages or detriments of 20 minute neighbourhoods.

A small number criticised the absence of any references to accessibility for people with disabilities or additional support needs within the case studies.

### **Suggested improvements**

A number of improvements to the case studies were suggested. For example, a few respondents said they would have preferred the case studies to follow a more uniform structure, and others felt an introductory contextual paragraph explaining how and why each case study was chosen would have been a useful addition.

"It would be helpful to the reader/guidance user for those case studies to be structured clearly in an order/format to reflect the range of differing geographic scales and locations, and an explanation as to why they were chosen and also why the approach is suitable for the scale it has been applied to." - Perth & Kinross Council

A few respondents, including The Highland Council, suggested that producing case studies in video format would be helpful in making the application of the policy more accessible and inspiring to the public. The Highland Council also noted that the graphics and figures in the case studies do not have captions and suggested adding these to provide more context for the reader. A few others found the images in the case studies to be blurry and unclear and called for high-quality images to be used.

Some suggested stronger links between the guidance and the case studies, for example, by referencing the case studies at relevant points in the document. Others called for a wider variety of case studies, including smaller-scale projects, mid-size towns, and non-council-led initiatives i.e. community partnership or private sector-led. A few said they would welcome more evidence of community input in the case studies, such as quotes from residents living in the area.

“Maybe there isn’t community capacity enough to express need and no resources to do anything about them. As well as guidance for the best scenario, and possibly even more, guidance is needed for the worst scenario. Examples of small-scale interventions or small decisions that can have a significant impact... We would also encourage the use of personas to exemplify “everyone” and the range of different daily needs, with an emphasis on those with greatest need and most limited resources, to show how local living can support a fairer society. We find that personas are very helpful in allowing consideration of different experiences of a place.” Architecture and Design Scotland

## **Aberdeenshire**

A few described the Aberdeenshire case study as less detailed than the other case studies and called for more specific information about what actions were taken and what the outcomes were. One said it was ‘premature’ to use the town of Peterhead as an example of good practice, given how early it is in the journey towards local living. Food Standards Scotland appreciated that the case study highlighted the importance of having access to healthy food rather than food more generally.

Nestrans felt that the description of Aberdeenshire, specifically the phrase “from the Cairngorms to the suburbs of Aberdeen”, does not reflect the diversity of communities in the area and suggested amending the wording to: “260,000 people live in Aberdeenshire, in different types of communities from the rural towns/villages such as those in the Cairngorms National Park, the coastal communities such as Peterhead and Fraserburgh, and the suburb towns to Aberdeen such as Westhill and Portlethen.” Nestrans also called for a reference to Integrated Travel Towns to be included in the case study.

## **Edinburgh**

A few felt there was a good level of detail in the Edinburgh case study. Two highlighted the Powderhall example as being particularly useful, although one said more information on the strategy that City of Edinburgh Council used to achieve the results would be helpful. However, a few individuals criticised the perceived lack of public consultation in the example used in the Edinburgh case study. It was described as being solely from the perspective of the planners, with no consideration of the views of the citizens who live in the area. The Improvement Service suggested including a reference to the Rapid Scoping Assessment - now called Place and Wellbeing Assessments - which compared the 20 minute neighbourhood approach with the traditional approach in Edinburgh.

## **Stewarton, East Ayrshire**

Respondents commonly welcomed the ‘lessons learned’ section in the Stewarton case study and called for this to be replicated in the other case studies. A few acknowledged the ‘lesson learned’ regarding the challenge of retrofitting the 20 minute neighbourhood principles into existing settlements and highlighted this as particularly important.

“We note that the East Ayrshire Case Study includes a paragraph on the lessons learned from the process. This is very useful in providing a level of critical assessment and knowledge sharing that provides valuable insight into the potential pitfalls (as well as the successes) of local living implementation. We believe all case studies in this section of the guidance would benefit from a ‘lessons learned’ component.” – RTPi Scotland

While a few appreciated that surveys and data collection had taken place, a small number commented on the small sample size and highlighted this as a limitation of the findings.

### **Wester Hailes, Edinburgh**

Few respondents commented specifically on the Wester Hailes case study. West Lothian Council highlighted it as a good example of securing and utilising funding to achieve what was originally identified as a key need; in this case the lack of indoor community meeting space. Fife Council added that it demonstrates the importance of partnership working between the local authority and the community. Geddes Consulting highlighted that Wester Hailes' classification as an 'accessible small town' is inconsistent with Scotland's Urban Rural Classification, which identifies Wester Hailes as part of a Large Urban Area.

### **Drymen, Loch Lomond and the Trossachs National Park**

Only five respondents commented directly on the Drymen case study. Nestrans advised that it would be valuable to mention the role of tourism in local living in this case study. Two reiterated the challenges related to the lack of amenities in the local area. One felt that the Drymen case study "helpfully shows that councils should treat 20 minutes as a guide time rather than an absolute." One felt that the map infographic in the case study would benefit from being a larger size and with higher resolution so that the text can be made out more clearly.

### **Shetland**

Several respondents welcomed the inclusion of an island community as the subject of a case study. Shetland Island Council and Comhairle nan Eilean Siar welcomed the references to Shetland's Main Issues Report and Transport Strategy. A few appreciated the case study's acknowledgement that a 20 minute neighbourhood may not be possible in Shetland. They endorsed having less focus on a time-limit and supported reframing the approach around simply living locally.

"Drymen and Shetland case studies show much can be achieved in rural areas when you break out of the mental constraint of taking the 20 minute neighbourhood literally. It shows how Living well Locally is a tool for engaging with local people to find out what it is they would like to change to improve their quality of lives." – Individual

Scottish Land & Estates called for more consistency between the approaches in the case studies and the suggestions in the guidance, pointing out that the Shetland Active Travel Strategy "does not appear to align with a suggestion to cluster and concentrate services".

### **Suggestions for other case studies**

Some respondents suggested other areas and initiatives which they felt would make worthy case studies. These included: the regeneration of Achtercairn, Gairloch, and Craigmillar, Edinburgh; community-led developments in Staffin, Skye and of Ardgeal near Kincaig in the Cairngorms; the place-making approach taken by North Lanarkshire Council to transform its town centres; and International examples in France, the Netherlands, Belgium and Sweden

## 7. Impact assessment update report

This chapter presents an analysis of responses to Q9, which asked respondents for their views on the impact assessment update report. This included updates to the Equalities Impact Assessment (EQIA), Business and Regulatory Impact Assessment (BRIA) and Island Communities Impact Assessment (ICIA).

Almost three fifths left an open-text comment in Q9, mainly addressing the EQIA and BRIA. More generally, however, several respondents in Q1 and Q10 highlighted the importance of ensuring local living is equally available to all and does not worsen inequalities or outcomes for marginalised groups or those with protected characteristics. To avoid repetition, these comments are presented below alongside the analysis of Q9.

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?

	n=	% Yes	% No
<b>All answering (%)</b>	<b>534</b>	<b>48</b>	<b>52</b>
Individuals	464	48	52
Organisations	70	41	59

Two fifths (41%) of organisations who answered Q9 indicated that they had views on the impact assessment update report. Health and social care and transport organisations were most likely to have additional views (67% and 60% respectively) and Land management / planning / development / architecture organisations were least likely (31%). Individuals were evenly split, with 48% indicating they had further views and 52% not.

### Greater consideration of equalities and unintended consequences

Several respondents felt the EQIA did not sufficiently address the needs of those with protected characteristics, particularly those with disabilities or older people. More broadly, a recurring theme highlighted by several respondents, was the importance of considering the potential impacts of implementing local living. Some reflected that, given the complex nature of inequalities, it should not be assumed that the guidance would improve outcomes for those experiencing disadvantage. Respondents called for greater emphasis on how those with protected characteristics should be involved in decision-making, how they navigate local spaces, and how they access relevant facilities and services.

“After all, not all communities are the same and not all individuals in a community are the same. Much research has been undertaken about the implications of spatial planning policy and design practices on individuals of different age groups, genders, racial identities and disabilities (to name a few). For example, RTPi research on women, children, and individuals living with dementia reveals the many barriers that individuals can face because public spaces were not designed with their needs in mind.” - RTPi Scotland

Respondents felt that involving such groups at an early planning stage would assist their inclusion. The Scottish Community Development Centre suggested linking with Scotland's Citizen's Assembly and Climate Assembly to help address inequality, tax and spending and environmental sustainability. Differences in resources between communities, including investment, were also felt likely to result in varying outcomes for people across different areas. One felt, for instance, that the guidance did not reflect the capacity and resources required to enable communities to drive local change.

A few felt the evidence on which the EQIA was based should be highlighted in the guidance itself. RNIB Scotland called for explicit reference to be made to the need for accessible information and transport, as well as recognition that disabled people may need to travel beyond their neighbourhood to access support. A few felt the EQIA was too broad and generic in its assumptions.

"This is written from the perspective of people with no health problems. There is nothing to support disabled people having full access to the public sphere." – Individual

"I would question whether enough assessment has been given for those members of our society with disabilities, mobility issues or the elderly." - Individual

Strengthening the guidance in relation to accessible housing and transport was also recommended. Age Scotland noted that a range of accessible transport options enables independence for many older adults in a community. Public Health Scotland suggested cycling was not an accessible form of transport and should be removed. MACS argued that accessibility should be a criterion for determining if a community is a successful place and called for a definition of 'Inclusive Design' that advocated for the early involvement of the end user in the design process.

Another prevalent theme was that the Scottish Government should require LDPs to consider how local living can impact inequalities, with poverty, in particular, needing to be more explicitly referenced. A few noted potential negative impacts should be considered, with Tactran noting that the Local Living Framework will likely be more difficult to achieve in areas of deprivation. Whilst one local authority agreed with the decision to not produce a Strategic Environment Assessment and Fairer Scotland Duty Assessment, others felt inequalities should still be considered.

"It is disappointing not to see a full Fairer Scotland Duty assessment when transport access and usage, as well as road safety and air pollution, are so unequally distributed between poorer and richer individuals and communities in Scotland. While the scope of this guidance may be arguable in terms of its "strategic" nature, there is a missed opportunity to clarify the specific capacity of planning to address inequalities of outcome."  
– Living Streets Scotland

A few also felt health inequalities could be better referenced, with Public Health Scotland arguing that health mentions in the EQIA "lacked mechanistic detail and consistently clear outcomes". It suggested mentioning the benefits of a Health Impact Assessment (HIA) approach in the guidance when considering the impacts on different groups, highlighting their HIA on Road Space Reallocation in Scotland, published in 2022. Similarly, RCGP

Scotland explored how current planning practices can lead to health inequalities through fewer public facilities and public and active transport options in more deprived areas.

“The guidance could usefully include and amend these impacts to focus more specifically on issues relevant to local living and spatial planning... We would support a clearer definition of health inequalities and more mechanistic detail outlining how local living interventions can lead to reductions in health inequalities... It would be helpful... to explain that health inequalities are the unjust and avoidable differences in people's health across social groups and between different population groups. The fundamental causes of inequalities are the unequal distribution of power, income and wealth. These inequalities can then influence the wider environment in which people live and work, and in turn shape their individual experiences and health.” – Public Health Scotland

The Health and Social Care Alliance highlighted the need to ensure that digital access to services is a choice for people rather than the only available option. Age Scotland and others noted that care must be taken not to assume digital literacy or access to IT equipment. They referred to their partnership work to develop five Human Rights Principles for Digital Health and Social Care. Aberdeen City Council also highlighted that access barriers are not only distance-related but include, for instance, safety factors. Diabetes Scotland cited evidence showing a higher prevalence of diabetes amongst people from ethnic minority backgrounds and, therefore, the importance of enabling access to facilities and spaces that can help reduce risk factors.

Incorporating intersectionality as an overarching principle was suggested by the Scottish Women's Convention. They and others called for community capacity building to strengthen community empowerment and ensure bottom-up solutions were found in local communities. The Scottish Women's Convention also highlighted that women frequently work in their local area, for instance, due to lack of access to a car or caring responsibilities. It was therefore felt important to ensure the guidance did not further compound the situation of women in low-paid, insecure but local jobs.

“It is therefore vital that the 20 minute neighbourhoods consider the types of employment available within the local community so that women can have access to better quality, better-paid work.” – Scottish Women's Convention

One individual felt in order for children and young people not to be discriminated against, local facilities would also need to be provided for them. Another felt that the statement regarding the inaccessibility of facilities for pregnant women and mothers of young children did not provide reassurance for these women.

### **Positive views of the Equalities Impact Assessment**

Some welcomed the inclusion of the EQIA and associated documents, with comments that the Assessment was clear and well-organised and provided a useful focus on equalities. It was also felt to be comprehensive, summarised key aspects relevant to local living from an NPF4 perspective, and gave helpful information.

“We welcome that the Equalities and Society Impact Assessment outlines the need to include under-represented and lesser heard voices, given the close links between health and social inequalities.” – Place and Wellbeing Collaborative

“The impact assessment reports provide a clear and progressive approach to the development of NPF4 and it is acknowledged that this guidance has been fully assessed as part of this process.” – Moray Council

### **Comments on the Business and Regulatory Impact Assessment (BRIA)**

Several respondents disagreed with the assertion in the BRIA that the guidance “places no additional requirements on planning authorities”. As described in Chapter 2, it was felt that implementing the guidance could have considerable resource implications, with some noting that placemaking had tended to focus on individual, single neighbourhoods and had not been replicated at scale across local authority areas.

“The East Ayrshire Local Development Plan 2: Proposed Plan includes 47 designated settlement boundaries, and these settlements vary greatly in terms of size, number of residents, and services available. There will be significant resource implications associated with implementing this policy in a way that is uniquely suitable to each individual settlement.” – East Ayrshire Council

A small number also felt that insufficient attention had been paid in the BRIA to the risk of the planning process becoming so complex and burdensome that developers consider investing elsewhere instead, such as Northern England regeneration areas.

The Scottish Futures Trust welcomed the consideration of the impacts of proposed legislation in the BRIA. They argued that building upon existing policy frameworks should be explored first, with additional legislation only developed as a final solution.

### **Comments on the Island Communities Impact Assessment (ICIA)**

Some mentioned the inclusion of the ICIA. It was felt that the Assessment covered its brief and raised clear issues associated with 20 minute neighbourhoods. However, it was argued that the guidance document itself could better reflect these issues, notably infrastructure challenges and the tendency towards centralisation in rural areas. Bòrd na Gàidhlig called for the final ICIA to include potential impacts on the Gaelic language, noting this was required under the Scottish Government [ICIA guidance](#).

### **Other comments**

A small number felt the consultation paper was unclear about which impact assessment update report was being referred, as the website link landed on a page containing multiple assessment documents.

## 8. Other considerations

This chapter provides an analysis of responses to Q10 which was answered by just over three fifths of respondents. A broad range of issues were raised, most of which have been covered earlier in this report. For example, the most prevalent themes in responses were general positive feedback on the guidance and considerations for the infrastructure required to implement 20 minute neighbourhoods. Additional themes, covered below, include planning considerations, potential benefits of implementing the guidance and local living, as well as the need for wider attitudinal and behaviour change.

Q10: Additional information: please provide any further comments on the draft guidance document. - Please let us know here

### Planning considerations

In the most prevalent theme, many commented on the role of planning in implementing 20 minute neighbourhoods and local living. In particular, respondents requested more detail to assist planning considerations and felt the guidance should better recognise the benefit of building developments and input from non-planning professionals.

Several felt the guidance was not specific enough to aid planning decisions. They requested more specific, actionable details, e.g. focusing on requirements rather than considerations. A few expressed a view that the guidance appeared more useful for local authorities to assist in the preparation of LDPs, rather than as detailed, technical guidance to apply in planning application decisions. The need to balance flexibility with more precise guidance was evident in some responses.

“We are concerned that this guidance (in its current form) could lead to variances in implementation and interpretation across the new LDPs as well as within the interim period before LDPs are adopted. Whilst we understand that the delivery of 20 minute neighbourhoods will vary depending on context, we believe inconsistencies in the overarching principles should be avoided as far as practical.” - Geddes Consulting

Specific areas respondents suggested required further clarification included:

- Whether the guidance was focused on requirements for LDPs, Local Place Plans or Development Management Processes.
- How to apply the approach before local approaches have been set out in LDPs to help avoid challenges.
- LDP housing site releases and housing site design briefs may need to be redesigned to align with the Local Living Framework.
- Further information to inform the allocation of sites in LDPs, and how to use the information to inform development management decision-making.
- Clearer ways in which places and buildings can be retrofitted or repurposed.
- Stronger guidance for planning and licensing to reduce access to unhealthy products.



- Consider what parts of Policy 15 can be adapted should some objectives be met but others are found to be impractical.
- Clarify how the process will affect planning in relation to existing and proposed allocations and the determination of planning applications.

Other suggestions for improvement included providing the evidence base to underpin and inform local LDPs, outlining common obstacles or barriers authorities or planners may face, more acknowledgement of the housing challenges in rural areas and prioritising walking and wheeling in planning developments. More broadly, calls were made to attempt to reverse previous poor planning decisions and to recognise the complex, resource-intensive nature of planning.

A few felt the guidance should emphasise that development should not be stifled by the Local Living Framework, and could highlight the benefits of some developments for communities. One suggested mentioning major developments that often serve several neighbourhoods as a way to avoid local living being viewed as too inward-looking. At the other end of the scale, Paths for All highlighted small local projects could also make a useful contribution in meeting local priorities and contributing strategically.

### **Benefits of using local living approaches**

Several discussed the value of adopting the framework in Scotland, highlighting the potential benefits of living locally on individuals' quality of life and the environment.

“The value of 20 minute neighbourhoods is recognised in its ability to promote local liveability and places where the environment improves the quality of life.” – Public Health Scotland

In particular, the potential of the approach to strengthen and increase community participation and a sense of ownership in place was welcomed. Benefits included that the approach could help social cohesion, local regeneration initiatives, address inequalities and improve personal outcomes, e.g. through volunteering. The Chartered Institution of Highways and Transportation (CIHT) felt it had the potential to bring a more even spread of services, employment, housing and green spaces.

Similarly, some outlined visions for their communities. These also centred on participation and acknowledging community-led action and volunteering across Scotland or gave specific examples of local interests and facilities, e.g. locally grown produce, creative groups, shops and wider use of Gaelic.

### **Address attitudinal change**

Some noted that public attitudinal and behavioural change was required for the framework to be successful. In particular, persuading people to reduce their car use or adopt healthier behaviours was frequently noted. More research into identifying motivators and drivers for lifestyle choices was recommended by South of Scotland Enterprise. It was also noted that more work was required to encourage people to see the benefits of introducing local living and 20 minute neighbourhoods, as there was a danger that the public could feel alienated if it was seen as being imposed rather than introduced with their cooperation.

“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.” - HOPS

### **Gentrification**

Related to wider equalities issues, a small number of respondents highlighted a potential consequence of improving neighbourhoods could be gentrification, which could act against local living principles. They argued that a greater focus on the ability of residents to ‘remain in place’ could complement other policy agendas, such as community living for older people.

“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?” - Environmental Protection Scotland

“People’s ability to stay in their homes despite changing circumstances (whether financial or personal) is an essential piece of belonging. We would like to see this reflected more fully in the diagrams and key criteria of the guidance.” – SFHA

## 9. Individuals' perceptions of local living and 20 minute neighbourhoods

The vast majority of the 510 individuals who responded to the consultation expressed negative views towards the principle of local living and 20 minute neighbourhoods. A large number left the same negative comment repeatedly – 112 individuals left exactly the same comment at nine or all 10 of the open questions in the consultation, meaning their answers made up over one quarter of the 4,000 comments received in total.

Many individuals' comments stemmed either from a concern that the policies will be implemented or imposed to restrict people from travelling more than 20 minutes from their homes, or from a misunderstanding that all services people need should be accessible within 20 minutes. While these views are important to consider, they do not directly address the focus of the consultation i.e. the content of the draft planning guidance. For transparency and completeness, this chapter provides an overview of the range of themes expressed in these comments.

### **Anti-democratic restriction on freedom of movement**

By far the most prevalent themes raised by this group of respondents related to their perception of the anti-democratic nature of local living and 20 minute neighbourhoods. Comments fell into three strands: how the policy restricts movement, general comments, and that a decision has already been made.

Respondents frequently expressed the view that 20 minute neighbourhoods were to be imposed on them and that this represented an infringement on their human rights and limits their freedom of movement. Terms such as 'prisons', 'ghettos' and being penned or caged in were often used to express how respondents felt they would be restricted.

More broadly, this feeling led many to describe the proposals as government overreach or authoritarian, totalitarian or dystopian in nature. More specifically, some others suggested that introducing these measures was part of a wider conspiracy under the guise of the World Economic Forum's Agenda 2030.

While policy of 20 minute neighbourhoods was widely consulted on as part of the development of NPF4, another strand of this theme was a perception that a decision on proceeding with local living and 20 minute neighbourhoods had already been made. These respondents argued that that the policy had not been consulted on or voted for, and some specifically suggested that the consultation paper was biased in presenting the concepts as going ahead.

"Restricting the free movement of people is a terrible concept. What would be helpful is cancelling this completely." – Individual

"These are not things that anyone has voted for, and such attempts to radically shift the style of living should not be being processed by the back door. If indeed these are so critical and with such overwhelming support, explain exactly what these entail and what is intended, and have a referendum on them." – Individual

## General negative comments

Many individuals repeatedly expressed negative views across the consultation. These comments were often brief, but typically expressed a view that local living and 20 minute neighbourhoods are a bad idea and neither wanted nor needed in Scotland. As a result, they called for the plans to be stopped or cancelled, or highlighted that they would continue to strongly oppose the implementation of the policy. A few argued that the plans were a waste of time and taxpayer money.

## Impractical or unrealistic

The impractical nature of the proposals was repeatedly raised by many individuals. While these themes aligned with challenges noted in detail throughout this report, most comments provided little detail. They typically stated that:

- The concepts were unrealistic to implement, without elaborating on why. Terms such as fantasy, pipe dream, and pie in the sky were often used.
- A lack of services and effective infrastructure means people would be unable to access everything they need in their local area, and that there are also insufficient public finances to improve those provisions.
- Many people have work or family commitments beyond 20 minutes from their home and, therefore, it would be impossible to live their lives fully if they were restricted to their immediate local area. A few specifically highlighted concerns about a lack of job opportunities within each area.
- Local living and 20 minute neighbourhoods are impractical in rural areas and only appropriate for urban areas.

“Improve local town centres, local businesses and public transport that actually links communities and places where people want to go - that's the way to organically bring about 20 minute neighbourhoods, not by forcing them on people with fines and security cameras.” - Individual

“This is absolute nonsense and makes no sense. I work over an hour away from home and have to commute. Stop interfering in people's lives.” – Individual

“I work in the NHS which is currently 20-25 mins away via car. Would I then need to seek employment elsewhere? My son lives maybe same distance away; does that then mean I cannot see him again?” - Individual

## Criticism of government

Criticism of the Scottish Government, SNP and Scottish Green Party, and local government was evident in comments. Respondents expressed a range of views, including a dislike of individual politicians, lack of effectiveness of central and local government, a distrust of government, and calls for a greater focus on other policies such as health and transport.

A small number of respondents repeatedly either raised their dislike of the government's focus on tackling climate change or questioned whether climate change exists.

## 10. Conclusions

Many individuals and stakeholders with detailed knowledge took part in the consultation, sharing their views on the Draft Planning Guidance which will be used to assist the delivery of local living and 20 minute neighbourhoods in Scotland. Reflecting their experience and perspectives, this report provides a high-level summary of the consultation responses. For more detail, readers are encouraged to look to individual responses where permission was given for publication<sup>7</sup>.

Organisations viewed the draft guidance positively, almost always rating it as somewhat or very helpful. The draft was seen as providing a useful overview of local living, and respondents welcomed the recognition that flexibility is required when applying the concepts and the focus on community engagement and collaboration. Positive feedback was received on each part of the proposed structured approach to applying the guidance.

However, both organisations and individuals frequently called for more information, detail or examples to expand the guidance and to help it be used in practice. For example, requests were made for more information on how to engage and empower communities, and to collect and use data. More specifically, organisations often noted concerns around the potential cost and resource implications of following the structured approach and ensuring the concepts are implemented effectively.

Mixed views were expressed on the Local Living Framework; many viewed it positively, but others felt it was unclear, or offered suggestions for how it could be structured differently or other categories or key considerations which could be included. Similarly, while many described the case studies as comprehensive and wide-ranging, others suggested improvements such as ensuring they follow a more uniform structure and include a 'lessons learned' section.

There were also calls for the guidance to allow further flexibility when applying the concepts in rural and semi-rural areas, for greater recognition of the infrastructure which is required for local living, and for greater alignment with and reference to other policies and policy areas. While some welcomed the inclusion of the updated Equalities Impact Assessment, some highlighted the need to ensure that those with protected characteristics are included in decision-making and not adversely impacted by introducing local living.

While individuals typically expressed negative views about local living and 20 minute neighbourhoods, their comments often stemmed from a misunderstanding of the aims of the policy, leading some organisations to call for the guidance to do more to address these misconceptions.

Overall, the key message was that there is support for the draft guidance among stakeholders and likely users of the document, with a desire to see a future version which includes more detail and examples. The findings from this analysis will be used by the Scottish Government to revise and finalise the guidance.

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<sup>7</sup> Responses are published on the [Scottish Government's consultation website](#)

# Appendix A: Other policies and policy-related issues to consider

This Appendix contains a list of policies that respondents felt could be usefully included in the guidance, as well as recommendations for linkages between policies or the potential for conflict between them. The categories reflect the main policy areas on which views were given. Each point was raised by one or a very small number of respondents.

## Planning

- Greater alignment with the Place Principle and other policy aims would support a more whole-systems approach and broaden the concept beyond physical planning.
- The guidance should better reflect different sized places, including urban, town and rural contexts, using expanded graphics explained in a more structured way. This could assist planners' understanding and application of the 'where relevant' clause in Policy 15.
- It should be explained that Local Place Plans (LPPs) and Local Development Plans (LDPs), alongside NPF4, provide the basis for place-based and people-centred planning decisions created in line with the Place Principle. Local Place Plans will have a key delivery role and should be further emphasised.
- Closer links between the guidance and the Local Development Planning Guidance should be made. For instance, explaining what stage in the plan-making process information should be collected, for example, to inform the Evidence Report. A step-by-step guide, like that in the Local Development Planning Guidance, would be helpful in the context of this guidance.
- The need to prepare a Regional Spatial Strategy as part of an LDP should be mentioned, signposting to Annex C from NPF4 – Spatial Planning Priorities.
- Mentions of re-use could be further strengthened by clearer alignment to Infrastructure Investment Plan recommendations on existing housing, specifically 'enhancing and maintaining existing assets ahead of new build'.
- Statutory Local Heat and Energy Efficiency Strategies (LHEES) should be included. The mention of 'retrofitting and repurposing existing buildings' and also 'building social capital and creating resilient and diverse places' should tie into relevant LHEES delivery plans at the local level.
- Consider how the approach can be linked to the Scottish Government's Digital Transformation in Planning programme.
- Other policies that could be referred to more substantially or that could be reviewed to align with the living local model included: Infrastructure First, the NPF4 Sustainable Transport, Design, Quality and Place section and the UN Sustainable Development Goals.
- The National Strategy for Economic Transformation could be used as a way of asking how the 20 minute notion supports the wellbeing economy.

- Increase the focus on assets in line with the Infrastructure Investment Plan Investment Hierarchy, considering how services interact to provide a joined-up approach, including co-location of services.
- Potential for the policy to conflict with ‘town centre first’ principles if shops and services are sited elsewhere to meet the 20 minute neighbourhood approach.
- Aspects of economic policy may conflict; for instance, recently announced Investment Zones aim to attract high-value jobs but are unlikely to be aligned to 20 minute neighbourhoods.
- Conflict may occur between the policy and planning decisions that favour brownfield development over greenfield, which could hamper private-public partnerships to deliver local living. A solution may be to acknowledge the value of public space and parkland and create new public spaces in brownfield land in urban areas.
- More cohesive strategies between planning, housing standards and net-zero guidance would assist developers in meeting building requirements.
- Housing, particularly affordable housing, should be more centrally located throughout the guidance, e.g. emphasising the Scottish Government’s quality and affordability commitments in the Housing to 2040 strategy. The right to live safely in a home could be emphasised.

#### **Comments on NPF4**

- The guidance should be expanded to discuss the six overarching spatial principles and how they link to local living considerations.
- The reference to the six qualities of a successful place within the Place Context section would sit better in the policy section and links made between NPF4 Policy 14 and Policy 15.
- Relevant guidance on placemaking should be more prominently featured in the main body of the guidance, in addition to signposting to Appendix D of NPF4.
- A link could be made to Policy 27 of NPF4 that states drive-through fast food outlets will only be permitted where specifically supported within the relevant LDP.
- The NPF4 Policy Outcomes section could be strengthened by including considerations of how any neighbourhood work must be informed by communities

#### **Transport**

- Public transport should be more centrally located and aligned with the intent of NPF4, which covers using sustainable transport options and references mobility hubs and shared transport.
- The guidance could improve alignment between the outcomes presented in Figure 3 and those in the National Transport Strategy 2, 4 priorities.
- The role of Regional Transport Partnerships and their statutory requirements to publish a regional transport strategy could be added.
- Make more explicit links to the Active Travel Framework, for example, links to Cycling by Design, Designing Streets and the National Walking Strategy.

- The new flexible planning rules to relax outdoor seating rules for pubs and restaurants to allow seating to be placed on pavements could create accessibility challenges for those with mobility needs, at odds with the movement section.
- The role of appropriate and effective transport appraisals undertaken in line with relevant transport appraisal guidance should be strengthened. In line with NPF4, proposals should be informed by evidence of the area's transport infrastructure capacity and an appraisal of the spatial strategy of the transport network.

### **Health and wider public services**

- More detail on Public Service Reform would be welcomed, with better linkages between public services and the proposals and expanding on the paragraph to ensure all parties have an upfront understanding of obligations and responsibilities.
- The guidance could consider “health in all policies”, focusing on key sectors in local living such as planning, transport, housing, education and sports. “Health in all policies” is a cross-sectoral public policy approach that systematically considers the health implications of decisions.
- The alignment between active everyday journeys, local living and public health benefits should be explicitly referenced alongside other policies and strategies.
- Licensing and other planning contexts that can influence access to unhealthy commodities, e.g. alcohol and gambling, should be aligned.
- Culture could be incorporated into the outcomes by revising the wording: ‘Places that are planned to improve local living in a way that reflects local circumstances, culture and historic importance’ and ‘New and existing communities are planned together with homes and the key local infrastructure including schools, community centres, cultural venues, local shops, greenspaces, health and social care, digital and sustainable transport links.’
- ‘Quality of life’ could be considered alongside ‘decreasing health inequalities’ linked to the themes of people, liveable places, and social.

### **Community and community empowerment**

- Include relevant policies, e.g., the Community Empowerment (Scotland) Act 2015 Parts 1,2,10, the Equality Act 2010, the National Standards for Community Engagement, Fairer Scotland, Principles for Positive Partnerships, National Youthwork Strategy, Adult Learning Strategy and Scotland's Volunteering Plan.
- Scottish Government guidance ‘Planning with People’ (2023) sets out expectations and standards for health and social services consultations with communities that could be applied here.
- The link between other policies and community wealth building could be stronger. North Ayrshire Council launched Scotland's first Community Wealth Building Strategy in May 2020.
- Local empowerment could be strengthened in this part by mentioning the participation (or people) ‘pillar’ of the 2010 Christie Commission Report, Volunteering Action Plan, Local Governance review and community empowerment agenda.



## **Environment**

- Links to Scottish Biodiversity Strategy to 2045, Scotland's Forestry Strategy 2019-2029, Water Resilient Places Policy Framework, forthcoming Flood Resilience Strategy and Cleaner Air for Scotland 2 strategy.
- Clarify how the guidance aligns with strategies on climate mitigation, carbon reduction, and a Just Transition and more explicit links to the UN Sustainable Development Goals and exemplar locations (cf. Ramboll Climate Exchange report.)

## Appendix B: Quantitative Analysis

This appendix provides more detailed breakdowns of the 9 quantitative closed questions included in the consultation.

The tables for each question show:

- The number of respondents from the total sample of 615 respondents who selected each response, and the corresponding percentage.
- The number and percentage response among those who answered each question, broken down by Individual and organisation responses and by type of organisation.

Please note that the row percentages may not add to 100% due to rounding.

### Sectoral classification

	Number of respondents	% of total sample
<b>Individuals</b>	<b>509</b>	<b>83</b>
<b>Organisations</b>	<b>106</b>	<b>17</b>
Local authority & associated bodies	25	4
Land management / planning / development / architecture	22	4
Health & social care (inc. advocacy)	12	2
Third sector / other advocacy	12	2
Place-based organisations	10	2
Housing / property	8	1
Transport	8	1
Retail	3	<1
Other	6	1

Q1: How helpful is part 1 of the guidance in furthering the understanding of local living and 20 minute neighbourhoods in a Scottish context? (About Part 1 of the guidance)

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful	% No answer
All respondents (n=)	615	228	60	168	368	19
All respondents (%)	615	37	10	27	60	3
<b>All answering (%)</b>	<b>596</b>	<b>38</b>	<b>10</b>	<b>28</b>	<b>62</b>	-
Individuals	501	27	7	20	73	-
Organisations	95	99	27	72	1	-
- Local authority & associated bodies	25	100	16	84	0	-
- Land management / planning / development / architecture	20	95	30	65	5	-
- Health & social care (inc. advocacy)	11	100	27	73	0	-
- Third sector / other advocacy	9	100	44	56	0	-
- Place-based organisations	10	100	20	80	0	-
- Housing / property	7	100	43	57	0	-
- Transport	7	100	14	86	0	-
- Retail	2	100	100	0	0	-
- Other	4	100	25	75	0	-

Q2: How helpful is the framework diagram in encouraging flexible, place-based approaches to support local living? (Part 2: Local Living Framework)

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful	% No answer
All respondents (n=)	615	180	55	125	410	25
All respondents (%)	615	29	9	20	67	4
<b>All answering (%)</b>	<b>590</b>	<b>31</b>	<b>9</b>	<b>21</b>	<b>69</b>	-
Individuals	498	18	6	12	82	-
Organisations	92	98	28	70	2	-
- Local authority & associated bodies	25	100	20	80	0	-
- Land management / planning / development / architecture	20	100	25	75	0	-
- Health & social care (inc. advocacy)	10	90	40	50	10	-
- Third sector / other advocacy	9	100	56	44	0	-
- Place-based organisations	10	90	40	50	10	-
- Housing / property	6	100	0	100	0	-
- Transport	6	100	33	67	0	-
- Retail	2	100	50	50	0	-
- Other	4	100	0	100	0	-

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? (Part 2: Key Components for local living)

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful	% No answer
All respondents (n=)	615	198	58	140	386	31
All respondents (%)	615	32	9	23	63	5
<b>All answering (%)</b>	<b>584</b>	<b>34</b>	<b>10</b>	<b>24</b>	<b>66</b>	<b>-</b>
Individuals	490	22	7	15	78	-
Organisations	94	98	27	71	2	-
- Local authority & associated bodies	24	100	17	83	0	-
- Land management / planning / development / architecture	20	100	20	80	0	-
- Health & social care (inc. advocacy)	10	100	50	50	0	-
- Third sector / other advocacy	9	89	33	56	11	-
- Place-based organisations	10	90	40	50	10	-
- Housing / property	7	100	0	100	0	-
- Transport	8	100	38	63	0	-
- Retail	2	100	50	50	0	-
- Other	4	100	25	75	0	-

Q4: How helpful is the proposed 'structured approach' for use? (Part 3 - a structured approach)

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful	% No answer
All respondents (n=)	615	172	61	111	402	41
All respondents (%)	615	28	10	18	65	7
<b>All answering (%)</b>	<b>574</b>	<b>30</b>	<b>11</b>	<b>19</b>	<b>70</b>	-
Individuals	488	18	7	11	82	-
Organisations	86	99	33	66	1	-
- Local authority & associated bodies	25	100	20	80	0	-
- Land management / planning / development / architecture	20	100	35	65	0	-
- Health & social care (inc. advocacy)	6	100	50	50	0	-
- Third sector / other advocacy	7	100	71	29	0	-
- Place-based organisations	9	100	11	89	0	-
- Housing / property	7	100	14	86	0	-
- Transport	6	100	17	83	0	-
- Retail	2	100	100	0	0	-
- Other	4	75	75	0	25	-

Q5: Does part 3 of the guidance clearly communicate the importance of both qualitative and quantitative data in establishing a baseline for a place? (Part 3: understanding the context)

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful	% No answer
All respondents (n=)	615	193	65	128	384	38
All respondents (%)	615	31	11	21	62	6
<b>All answering (%)</b>	<b>577</b>	<b>33</b>	<b>11</b>	<b>22</b>	<b>67</b>	<b>-</b>
Individuals	486	21	7	14	79	-
Organisations	91	99	32	67	1	-
- Local authority & associated bodies	24	100	13	88	0	-
- Land management / planning / development / architecture	19	100	37	63	0	-
- Health & social care (inc. advocacy)	10	100	50	50	0	-
- Third sector / other advocacy	8	100	50	50	0	-
- Place-based organisations	10	100	30	70	0	-
- Housing / property	7	100	0	100	0	-
- Transport	7	100	29	71	0	-
- Retail	2	100	100	0	0	-
- Other	4	75	75	0	25	-

Q6: How helpful is the 'collaborate, plan, design' section of part 3 in supporting collaborative practices? (Part 3: Collaborate, Plan, Design section)

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful	% No answer
All respondents (n=)	615	183	51	132	388	44
All respondents (%)	615	30	8	21	63	7
<b>All answering (%)</b>	<b>571</b>	<b>32</b>	<b>9</b>	<b>23</b>	<b>68</b>	<b>-</b>
Individuals	482	21	6	14	79	-
Organisations	89	94	24	71	6	-
- Local authority & associated bodies	24	92	8	83	8	-
- Land management / planning / development / architecture	19	95	32	63	5	-
- Health & social care (inc. advocacy)	8	100	38	63	0	-
- Third sector / other advocacy	8	100	50	50	0	-
- Place-based organisations	10	90	20	70	10	-
- Housing / property	7	100	14	86	0	-
- Transport	7	100	14	86	0	-
- Retail	2	100	100	0	0	-
- Other	4	75	0	75	25	-



Q7: How helpful is the 'implement and review' section of part 3 in assisting the delivery of collaborative approaches to support local living? (Part 3: Implement and Review)

	n=	% Helpful (Total)	% Very helpful	% Somewhat helpful	% Not at all helpful	% No answer
All respondents (n=)	615	168	57	111	396	51
All respondents (%)	615	27	9	18	64	8
<b>All answering (%)</b>	<b>564</b>	<b>30</b>	<b>10</b>	<b>20</b>	<b>70</b>	-
Individuals	481	19	7	12	81	-
Organisations	83	94	29	65	6	-
- Local authority & associated bodies	24	92	25	67	8	-
- Land management / planning / development / architecture	18	94	28	67	6	-
- Health & social care (inc. advocacy)	8	100	50	50	0	-
- Third sector / other advocacy	8	100	50	50	0	-
- Place-based organisations	8	100	25	75	0	-
- Housing / property	6	100	0	100	0	-
- Transport	5	60	20	40	40	-
- Retail	2	100	50	50	0	-
- Other	4	100	25	75	0	-

Q8: Looking at part 4 of the draft guidance: do the case studies provide a useful and appropriate range of examples of good practice? (Part 4 - Case Studies)

	n=	% Yes	% No	% No answer
All respondents (n=)	615	130	433	52
All respondents (%)	615	21	70	8
<b>All answering (%)</b>	<b>563</b>	<b>23</b>	<b>77</b>	-
Individuals	479	12	88	-
Organisations	84	88	12	-
- Local authority & associated bodies	24	96	4	-
- Land management / planning / development / architecture	19	89	11	-
- Health & social care (inc. advocacy)	8	88	13	-
- Third sector / other advocacy	7	100	0	-
- Place-based organisations	8	75	25	-
- Housing / property	7	57	43	-
- Transport	6	100	0	-
- Retail	2	100	0	-
- Other	3	67	33	-

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?

	n=	% Yes	% No	% No answer
All respondents (n=)	615	254	280	81
All respondents (%)	615	41	45	13
<b>All answering (%)</b>	<b>534</b>	<b>48</b>	<b>52</b>	<b>-</b>
Individuals	464	48	52	
Organisations	70	41	59	-
- Local authority & associated bodies	21	38	62	-
- Land management / planning / development / architecture	16	31	69	-
- Health & social care (inc. advocacy)	3	67	33	-
- Third sector / other advocacy	7	43	57	-
- Place-based organisations	7	43	57	-
- Housing / property	6	50	50	-
- Transport	5	60	40	-
- Retail	1	0	100	-
- Other	4	50	50	-



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