

SURF Consultation Response: Draft Planning Guidance on Local Living & 20 Minute Neighbourhoods

In July 2023, the Scottish Government [launched a consultation on proposed guidance](#) intended to help local authorities and other relevant actors to progress strategic aspirations for 'local living' and the creation more [20 minute neighbourhoods](#).

The draft guidance is designed to inform decision-making in planning by clarifying the motivation for, and commitment to, the approach. It also shares reference case studies. The Scottish Government invited comment and feedback on the draft guidance and case studies.

SURF responded to the consultation by drawing on the views and experiences shared by participants in [SURF's People in Place Practice Network](#). The Practice Network, which includes more than 300 regeneration practitioners, regularly exchanges on practical opportunities to implement the 20 minute neighbourhood and local living concepts in socially and economically challenged communities across Scotland.

SURF's response to the consultation's nine questions follow.

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

Very helpful. This section concisely explains the linked concepts and their internationally recognised value in the spheres of health and wellbeing, economic development and climate change. Those unfamiliar with the approaches will quickly understand the appeal, the alignment with the United Nations Sustainable Development Goals, and the potential to help deliver a diverse range of national objectives including the Place Principle, the Town Centre Action Plan, and the Fourth National Planning Framework.

SURF's experience indicates that many people working to improve the prospects of residents of poorer places, including local government officers, housing association staff and community volunteers, are not always familiar with all significant elements around the busy and complex policy landscape in place-based regeneration. Despite its prominence in some strategic plans, including previous Programmes for Government in Scotland, an overview of

20 minute neighbourhoods and local living has value in bringing those vague or unfamiliar quickly up to speed.

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.

Some in the SURF network have criticised the quantitative aspect of the 20 minute neighbourhood concept, and its focus on a set walking/cycling distance, rather than the broader objective of enabling people to meet most of their daily needs in their local communities as far as realistically possible. There has also been much discussion about the policy's international roots in cities – it is typically referred to globally as “The 15 Minute City” – and whether 20 minute neighbourhoods can be meaningfully achieved outwith Scotland's cities and larger towns. This situation, coupled with the grouping of “local living and 20 minute neighbourhoods” in the guidance, has the potential for creating some confusion around language and application.

“Living well locally”, which is used by the HITRANS/Nick Wright Planning research study referenced at the end of this section, has resonated strongly with SURF's Practice Network and may provide a clearer alternative that covers both urban and rural places. The research study also demonstrates the value and applicability of removing the 20 minute walking/cycling parameters in rural geographies, while still operating tightly within the intentions of the policy. One example is the provision of an adequate variety of services and amenities across a group of accessible villages in a rural locality, or a whole island, rather than in a single settlement.

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

Somewhat helpful. 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.

The diagram themes generally align with those of the Place Standard Tool. The Tool has been used productively by SURF member bodies to research community views on local places. One challenge such investigations can have, is in enabling ‘consultation fatigue’. Many community groups in the SURF network complain of being repeatedly asked for their views on local challenges, continually highlighting the same local issues over multiple consultations, and not perceiving any meaningful follow-up action.

There is an open question as to whether a fresh round of community engagements, based on an approach and framework diagram with strong parallels to the Place Standard Tool, will be useful in places where community views and demands are clear. It is important to note a high degree of crossover between local living and 20 minute neighbourhoods, and the other policy initiatives and activities that seek to improve place quality. SURF members

regularly draw attention to the contrast between a busy strategic environment around place-based regeneration, and a perceived lack of activity on the ground in many disadvantaged places. Local people that are impatient for regeneration interventions and investments to arrest and reverse decline, would welcome a framework that prioritises delivery and action over further rounds of research and consultation.

Some SURF Practice Network participants have highlighted specific features, including cultural venues, low-cost supermarkets, food banks and growing spaces, which they feel are important components in local living in contemporary Scottish society, but which are not referenced specifically in associated diagrams.

3. Looking at part 2 of the draft guidance: how helpful are the 'categories' and 'key considerations for local living' that are captured within this part of the document?

Somewhat helpful. The categories are derived from the Place Standard Tool, which as stated in the response to question 2 above, SURF members have found helpful in structuring community discussions and consultations, and in exploring a place's strengths and weaknesses in depth.

The five categories and 14 sub-themes are well selected, with inevitable thematic overlap, particularly between 'movement' and 'space', and 'civic' and 'stewardship'. Using these categories as a basis for conversation can be preferable to a blank canvas, which can fail to stimulate discussion. They can also be used to promote practical resources such as funding sources, online tools and research materials, which can support a local action plan. The general nature of the categories means it is difficult to think of a topic that would not fit in any of them, which provides a helpfully expansive space for local views.

One general criticism that features in SURF discussions on place-based consultations and plans, is an overemphasis on physical characteristics, including the quality of the public realm, urban transport routes, parks and town centre buildings. While architecture and urban design are fundamental to how people think about and interact with the places they live in, some argue that social and economic factors have the same status, but are treated with lower priority compared to the built environment.

As stated in question 2, some SURF members have drawn attention to areas like cultural opportunities and affordable food provision, which they argue should be highlighted more prominently in place-based considerations around 20 minute neighbourhoods.

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

Somewhat helpful. It is difficult for policy-makers to strike a balance between being too prescriptive and top-down in proposing local approaches, while going too far towards the other end of the spectrum can be too vague and open-ended to help local stakeholders engage with the opportunities offered by emerging policy developments.

A three stage plan, comprising a research and consultation phase, followed by planning and collaboration, then implementation and ongoing review, is logical, as is the cyclical nature of

the process. The placing of community views and demands at the centre of the process comes through strongly. The approach generally aligns well with SURF's two founding principles:

- The people who are the intended beneficiaries of any regeneration effort must be meaningfully involved in the process if it is to be successful in planning, implementation and maintenance.
- Successful and sustainable regeneration is only achievable when all aspects of physical, social, economic and cultural regeneration are addressed in a holistic approach.

This section could usefully be improved with further depth, such as references to additional data sources such as Scotland's Towns Partnership's Understanding Scottish Places toolkit, and examples of effective reviewing and monitoring processes. It contrasts a little with section one in being less introductory, particularly in the section on planning and design. This assumes some prior knowledge and uses some jargon that will be unfamiliar to those inexperienced with the planning system, although the glossary alleviates this.

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

Very useful. Yes, this section highlights the importance of gathering local views and information through both quantitative and qualitative processes. SURF discussions on 20 minute neighbourhoods have indicated there is too great a reliance on mapping, and not enough on the lived experience and local behaviour. Putting pins in a map to measure how close an amenity is in walking/cycling distance, is too simplistic to understand whether a place is, or isn't, a 20 minute neighbourhood.

One example given was a GP practice on an island, which did not have capacity to take appointments within three weeks, leading residents to make a much longer journey to the mainland. What is illustrated as a short journey to visit the doctor's surgery on a map, is not accurate if the required service is not ultimately available. Another example is overlooking how safe people feel when they walk through a housing estate to a high street; if they do not feel secure, they might not be willing to make that journey on foot, and may seek preferable alternatives, such as driving to a retail park, or online shopping.

As this section points out, we need to do more across the board to understand local perceptions of the places people live in, and how they currently interact with them, alongside an accurate picture of the available services and facilities.

References to density need strengthened. While it acknowledges density is required to support services and that there is a difference in expectation between rural and urban Scotland it does not determine what that density is the densest parts of urban Scotland have some of the lowest densities of urbanised Europe. While the densest part of Scotland, Leith, has 13,000 people per square kilometre, Copenhagen has 23,000, Stockholm 27,000

and Paris 50,000 people per square kilometre – see [source](#). Respecting existing densities, or permitting low density suburban extension, is not going to perpetuate the status quo.

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

Somewhat helpful. The SURF network strongly agrees with the Scottish Government's and CoSLA's Place Principle, which calls for a culture change around local partnership working. Too often in place-based regeneration, we use the labels partnerships and collaborations too readily, when such initiatives tend to be led by a single agency, with tokenistic involvement from other sectors and partners. A step-change in place-focused collaboration is not only welcome, but necessary, in utilising all available knowledge, resources and powers to improve the quality of our places in the current context for public sector resources and the general economy.

We view the Place Principle, local living and 20 minute neighbourhoods as interwoven concepts that must be implemented together, backed by serious commitments and resources from multiple players, to produce progress on the ground. This section highlights a commitment to eradicate silo working, scale up collaboration and meaningful community engagement, and pull in multiple sectors.

SURF strongly agree with these aspirations, and while the content of this short section lacks detail or examples, it will have value in demonstrating a strong and sustained national appetite for change around place-based collaborative working over business as usual.

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

Somewhat helpful. There is a repetition in this section on the importance of collaboration, which has been highlighted effectively earlier in the document. This section makes a brief reference to planning application decisions, and the value of reviewing and monitoring processes, but would benefit from further depth and use of examples, especially with regard to the type of monitoring processes that can benefit longer term arrangements.

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.

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

Yes. There is a useful range of good quality examples from a variety of city, island, small town and regional contexts. SURF is working closely with Aberdeenshire Council at present and we have seen first-hand their appetite to utilise and implement the 20 minute

neighbourhood and local living concepts through closer community engagement and deeper collaborations.

The different approaches taken in each place, including the identification and use of Locality Hubs in Shetland, the Local Place Plan in Wester Hailes, and the dual mapping and Place Standard workshop processes to gather data in Stewarton, provide practical inspiration that other stakeholders can learn from as they consider their own local circumstances.

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

No. SURF reviewed the integrated impact assessment reports ([available here](#)) upon publication of the Fourth National Planning Framework and we have no comments or concerns on the update.

End of SURF's response to the consultation for Draft Planning Guidance on Local Living & 20 Minute Neighbourhoods

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Further SURF policy consultations are available from our website:

www.surf.scot/policy

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Supported by: Creative Scotland, Glasgow City Council, Historic Environment Scotland, Museums Galleries Scotland, Scottish Enterprise, the Scottish Government and Wheatley Group.