

# **SPF submitted Local living and 20 minute neighbourhoods draft planning guidance consultation**

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## Questions

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

very helpful

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

We welcome the 20-minute neighbourhood concept as it has the potential to bring forward a number of benefits to help improve the accessibility, sustainability and quality of local communities. Part 1 of the guidance is a useful introduction into understanding the benefits of the concept to address environmental, social and economic factors. It is also helpful that it aligns these challenges with more specific government initiatives such as the Climate Change Plan, the Place and Wellbeing outcomes and Housing to 2040 as well as providing a more realistic approach for island and rural communities by defining 'local liveability' instead. It is also helpful to see how the concept is situated within NPF4 which supports a wider reformed planning system.

Apart from distinguishing island and rural communities within the guidance, the benefits of incorporating the approach are generic and do not necessarily make clear how it specifically relates to a Scottish context.

We cannot also overlook the significant costs associated with the additional infrastructure that is required to make successful 20-minute neighbourhoods. Many developers are already constrained financially by policies in NPF4 which require additional contributions such as providing schools, green spaces, parks and affordable housing as well as covering a range of environmental assessments and planning fees. The construction industry has also been significantly impacted by the recent high inflation which has increased labour, material and borrowing costs.

It can also be challenging to ensure neighbourhoods have the right mix of commercial, residential, affordable housing and amenity space to attract new residents while also remaining profitable. Predicating the market in terms of what the neighbourhood requires for the future can be challenging and if there is an imbalance between the provisions of different neighbourhoods then this may limit the success. It is also unclear in this section who is responsible for the long-term maintenance of the infrastructure and amenities which will inevitably be constrained by both public

and private sector budgets.

The investment community operates in a risk adverse environment and therefore viability and certainty of returns is a key issue for our members. We feel it is important that developments are not discouraged or excluded if they are unable to deliver additional infrastructure or facilities which are required by the new standard; this is quite an important consideration in large swathes of Scotland.

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

somewhat helpful

Please explain your response adding what else could be helpful:

The diagram is a useful illustration and breakdown of the local living framework concept. Displaying the categories and relevant icons is a clear way of highlighting the 14 key considerations and the various elements of local living. As this is a new approach to planning in Scotland, ensuring quality access to information about the 20-minute neighbourhoods' concept is welcome.

However, we acknowledge that throughout the document, it has been referenced that 20-minute neighbourhoods is a concept and not a rigid objective (ref page 18 & 19) but the key definition of 10-minute return journey seems restrictive. There must be flexibility and greater stress is needed in this section of the guidance to make it clear that the concept can be applied across a range of urban and rural environments. Additionally, the local authorities should not use this strictly as a basis for assessing development proposals.

We consider that it is unclear where 'retail' and specifically access to food fits into the framework diagram as a key consideration for local living. Although 'healthy food' is mentioned as a key consideration in the 'support and services' category, this is not an obvious category nor very clear from the diagram. A category which better reflects retail and food, which is supported by service industry of storage and logistics would enhance this diagram, as this reflects growth areas of our economy, where jobs are currently being created.

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

somewhat helpful

Please explain your response adding what else could be helpful:

Each category is distinct enough to clearly show how it supports the concept of 20-minute neighbourhoods. It is helpful to have the key words associated with each place standard tool to identify how each category could be achieved. While we recognise the local context needs to be considered, it is unclear how much a new development needs to accommodate the key considerations.

Although we welcome convenient and relevant aspirations, we feel some of the language is idealistic and not practical. As mentioned, there is no specific mention of 'retail'. Whilst the retail landscape is changing and future demand will depend on the local context, we cannot assume that it will completely

diminish. It is surprising to see no specific mention of 'retail'.

It is important that communities have access to healthy eating that is locally sourced, but we need to be realistic in terms of the affordability of produce and account for seasonal variations in the produce. There is no mention of how this could be achieved.

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

somewhat helpful

Please explain your response adding what else could be helpful:

This is a concise section and somewhat helpful for understanding how the concept can be realised. Whilst we understand data and evidence is important to inform planning decisions, it is unclear where the responsibility lies for collating the quantitative and qualitative data recommended in the guidance to help understand the context of Scotland's places. The guidance simply states that 'planning authorities are ideally placed to gather the quantitative and qualitative data' (page 33, para. 2). Equally, it is unclear as to who is responsible for bearing these costs. We consider that as part of the new style local development plans preparation, that planning authorities must have the responsibility of gathering this initial data and undertaking regular data collection and analysis of local neighbourhood's performance in achieving local living goals. As mentioned, developers have a variety of increasingly significant added costs such as additional developer contributions, planning fees, technical assessments and reports required to demonstrate development plan compliance and added to this, may also soon be liable for empty property rates. It is essential that the need for these baseline metrics do not add additional complexity and costs for the private sector in delivering new developments, which then renders them unviable.

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

somewhat useful

Please explain your response adding what else could be helpful:

It is somewhat useful. We welcome the approach of using the database and applications like GIS for spatial data collection and building on it by collecting metrics like frequency of use and major routes of travel. The guidance needs to be more specific and firmly place the onus on planning authorities for the collection and management of the data as part of the Evidence Report stage for the new style LDP preparation.

The importance of both quantitative and qualitative data would also be helpful to realise the difference between various regions of Scotland. Apart from urban and rural differences, there are regions which are densely or sparsely populated with different range priorities in terms of economy, nature and culture. All these regions would need a tailored approach. We cannot end up with a situation where 20-minute isochrones are being rigidly drawn around application proposals by planning authorities in development management decision making. We stress again that the guidance must be abundantly clear that the 20 minutes neighbourhoods is a 'concept' and considerations of what constitutes a reasonable distance will vary across every town, city and neighbourhood across Scotland. What is important, is that the guidance endorses the principle of encouraging compact, sustainable neighbourhoods and communities, rather than an explicit 20

minute 'one-size fits all' approach.

We support and encourage the approach to sustainable transportation, but we do realise the barriers in making it more useable. The approach can be stimulated by subsidising public transportation to make it more accessible and incentivising the shift to sustainable public transport options.

Also, with regard to the paragraph on page 33 which states: “ Leadership at a local level is a strategic component in the delivery of local living and 20 minute neighbourhoods as evidenced in many of the recent examples of successful roll out of similar concepts across the world” , this mentions leadership and global examples but no global examples are cited in the guidance in the Part 4 - Case Studies section and there are no specifics of what is meant by 'leadership at a local level'. Who will be responsible for managing the delivery of these neighbourhoods, the local authority, the community council or the developer? There can be significant discrepancies based on what leadership means at a local level to different parties. With leadership also comes accountability and this requires to be more clearly specified.

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

somewhat helpful

Please explain your responses adding what else could be helpful:

It is somewhat helpful, we support the key steps to collaborate, plan and design approach to support local living but the steps are not detailed in the guidance in terms of what tools or models will be used, this would help guide local authorities and developers.

Plan: the alignment of plans is deemed to be necessary but it also worth mentioning that achieving all the specifications mentioned in above chapters should be encouraged but should not be compulsory for a developer as that would be unachievable and would discourage investment and development.

There is a mention of aligning investment, which we recognise as necessary. There should be funding mechanisms in place to support 20 minute neighbourhoods as developers cannot be expected to fund all aspects of it.

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

somewhat helpful

Please explain your response adding what else could be helpful:

As mentioned above, we support the approach of revisiting and monitoring the data. However, if the baseline data is collated at the Evidence Report stage of the LDP process, the guidance should set out a recommendation for a review period of say 3-4 years. It is also equally important to highlight that planning authorities would have the responsibility to undertake this review and monitoring.

This guidance can definitely steer expectations for applications, but it shouldn't mandate the local authorities to make decision on applications based on this guidance for local living.

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

Yes

If yes, please tell us about it:

The case studies are somewhat useful. It will be difficult to find case studies that will help all community scenarios because the scope and context of communities varies so greatly. Whilst helpful to consider varying planning initiatives as case studies, these in themselves do not deliver 20 minute neighbourhoods.

We consider that further case studies would help the guidance. This would include approaches to 20 minute neighbourhoods in remoter areas such as the Highlands, or indeed where communities are seeing to achieve 20 minute neighbourhoods in mid size towns and urban settlements.

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

yes

Please tell us here:

Yes, because there is no consideration of the risk involved with major development planning applications.

The impact assessment is a brief overview of the positive outcomes associated with the local living places Policy (15). The analysis is broad and can possibly be criticised for being too generic in its assumptions. For example, the BRIA states that as the policy will affect locational issues for development then there are few costs to businesses. This is not necessarily the case. Seeking to develop on sites that are close to a range of infrastructure will be sought after locations which may bring significant land values which will test the viability of development proposals. Urban development proposals are often likely to be brownfield locations that require significant investment to enable their development potential to be realised, decontamination/ground conditions/site preparation or assembly. Alternatively, proposals for a new development in a more rural location may require very significant investment in social and community infrastructure that if applied rigidly as planning conditions or obligations, might make a development unviable. The 'major development' planning process is complex as it relates to strategically important developments that can be susceptible to market and economic conditions with considerable community, political and regulatory overview. Developers will of course make the risk assessment for each project based on its own assessment of these circumstances. If the planning process looks as though it will be too risky, expensive and/or complex to navigate as a result of the additional policy requirements of NPF4 including Policy 15, then the concern is that a significant number of developers will simply decide it is easier to do their business outside Scotland, in northern England, where a number of key regional cities have local leadership, ambitious and economically focused devolution, or indeed other locations/conurbations.

It is important therefore that the application of the 20 minute local living concept is not used to oppose developments that may achieve a certain number, but not all of the aspirations of Policy 15. Many successful communities will not be within a 10 minute walk of some key amenities. Whether or

not to support a development or investment should be a balanced planning decision and it will be important to avoid a rigid approach to adopting the principles of local living that could frustrate new communities or developments being brought forward.

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

Please let us know here:

The Local Living and aims of 20 minute neighbourhoods should seek to specifically embrace new development, as this should be positively seen as a means via which the range of facilities and services could improve within local communities in both urban and rural settings.

The leadership and accountability of these areas requires greater focus, perhaps based on Council wards, a means of funding these areas require to be thought through. To provide local autonomy funds could be devolved from central and local government to these local areas. This may be a means of securing increased engagement from local communities where decisions are taken against an opportunity to fund certain services important to that community e.g. library or community hall.

The 'big' strategic view should not be forgotten, 'major developments' have the opportunity to provide significant numbers of jobs, skills, education and economic stimulus to a wide area across several 20 minute neighbourhoods up to a city region scale. These developments have broader benefits to Scotland and its economic, social, climate change and community aspirations. They must be positively referenced in the 20 minute neighbourhood consultation as without reference, there may be a tendency for the stated aspirations of this document to be viewed as solely local and inward looking, whereas the key has to be to achieve both.

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

## Organisation:

SPF is a membership organisation representing the views of real estate industry business and professionals in Scotland. Our membership includes a widerange of businesses and professionals, agents, investors, lenders, lawyers, planners and architects. We provide their perspectives to the government of the day at local, Scottish and UK levels.

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