

Response ID ANON-6B79-F7GR-X

Submitted to Local living and 20 minute neighbourhoods: draft planning guidance
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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?

somewhat helpful

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

The overall description of local living and 20-minute neighbourhoods (20MN) is well defined but the guidance is not helpful in furthering the understanding from an island context.

SIF welcomes the concept of the Place Principle and in particular, the commitment to local people being at the forefront of the decisions made about a place. We also welcome the need for broad consideration of daily needs and quality of life within communities.

However, the context, and narrative provided throughout the guidance on local living and 20MN feels un-informed and out of touch with the needs and aspirations of people living in the islands. The setting feels largely urban, with island and rural places confined to a few add-ons.

We are pleased to see recognition within the guidance that its fit with island and rural areas will require flexibility but further exploration of what this will mean in practice would be helpful. 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.

For example, within climate & environment, the key aim is to lower emissions through reduced reliance on private cars. The majority of people living in the islands are and always will be reliant on cars to live well locally, and we would like to see the guidance be more inclusive, going further than acknowledging the lack of fit, and covering the many alternative ways that islands can and do contribute to lower emissions and decarbonisation.

In health & wellbeing the focus is on green space and less reliance on cars which again just doesn't align with island places. Within local economy, while active and vibrant local centres are important, our members have expressed concern that an emphasis on concentrating activity in local centres where there is a critical mass of population, could erode even further the already fragile access to services, transport, jobs, housing, and investment, and gradually undermine the ability to live well locally.

Within 'quality of life,' convenient access to the things we need to access most regularly would be hugely beneficial but the other parts not as relevant. Island communities already have a strong sense of place and access to green areas and therefore priorities for quality of life will be different.

In terms of the policy intent and outcomes, we are fully supportive, but the actual 'how' of how these will be implemented in an island context is less clear. Having a separate section on the rural & island context while welcome on one level, points to the urban focus of the overall guidance. SIF is however strongly supportive of a flexible approach and an approach that drills down to community level.

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 gives a clear visualisation of the themes and categories but as noted previously these are not fully relevant to island places.

Pages 18 & 19 touch on island & rural communities and we agree with the aspirations. However, the live data on the ground in island communities points to a long-term deterioration in the fundamentals of local living including access to housing, transport, services, schools, childcare, health care etc. The higher cost of living in islands is also a barrier to living well locally. How can the framework address these underlying challenges and ensure that places away from the main hubs or centres aren't left behind?

Is it possible to create a planning framework that serves central Glasgow and an island off an island that has 10 people or would it be helpful to have a rural and island planning framework as well as an urban planning framework, that would allow for policy that was relevant to different types of community to be developed.

We note the range of Place Standard Tools available and feel it would be helpful to have one 'through an island lense'.

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:

In general terms there are bits within the categories and key considerations that are relevant, but again feel more suited to urban areas.

Movement: while the need for flexibility is acknowledged, it is stated, 'Local living requires sustainable means of transport to be prioritised' and the focus is on lowering car kilometres which, as noted earlier, is at odds with the reality of living in the islands. Inclusion, however, of a priority that relates to the sustainability of island connectivity, including ferries, air travel and digital infrastructure, would be strongly supported.

The further centralisation of services that may result from local living planning will reduce the travel needs of very local residents but may increase that for residents in outlying areas. Also, while remote access to services can open many doors and benefits for island communities it would be detrimental if it became the default solution.

Low and no parking raises some concern as this will impact directly on those reliant on cars to access the towns and centres.

Working with our partners in the European Small Islands Federation we recently held an online session to share the habitability indicators for viable island societies developed in the Åland islands. The indicators have been developed by islanders to enable communities to develop local place plans based on a thorough understanding of the key considerations needed for the island to remain/become liveable. This may be a helpful tool in exploring further what living well locally means for island communities.

The social economy plays a fundamental role in making island communities viable and attractive places to live and work, with community anchor organisations often driving local development, facilitating local democracy and empowerment, and delivering key services. We would therefore like to see community-led initiatives feature strongly with the key considerations and investment in community capacity identified as a key driver to meaningful community engagement and, particularly in island and rural areas, a key delivery partner in the journey to living well locally.

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

somewhat helpful

Please explain your response adding what else could be helpful:

We agree with the 3 key steps in structuring the approach and much of what is included within this section. However, as noted above, we would like to see stronger emphasis on the role of communities with the approach going further than its intention to 'consider' local views, and instead, supporting a culture of social innovation, giving agency and voice to community anchor organisations.

Strongly agree with the need to eradicate silo working. We would also like to see alignment with the National Islands Plan, Addressing Depopulation Action Plan and the Remote Rural & Island Housing Action Plan.

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:

Yes, it does communicate the importance and we support the emphasis placed on engagement and expertise. Our concern is that current data does not drill down far enough to community-level to accurately inform decisions on the complex, and interrelated threads of living well locally.

For example, SIMD is mentioned but this has often been highlighted as flawed for island and rural communities, lumping communities together based on proximity rather than reflecting the nuances. For example, Bressay is linked with Lerwick and Raasay is linked with Skye.

As well as exploring the island habitability tool, we would recommend exploration of the island typologies work currently being developed by Kirsten Gow.

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

somewhat helpful

Please explain your responses adding what else could be helpful:

We welcome this section of the guidance but again emphasize the need for genuine community empowerment and support to ensure planning and design is aligned to community action plans.

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:

This approach will need additional resource at a local level. Many of the council areas with rural and island communities have small planning, housing and strategy teams. It will be difficult for them to undertake this work in the first place, never mind review and rework it.

Alignment of government policy and investment and a move away from silos is welcome.

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

No

If yes, please tell us about it:

Not fully from an island perspective but the inclusion of the report from HITRANS and Sustrans is welcome and explores and seeks to find solutions for a number of the concerns we have highlighted.

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?

Not Answered

Please tell us here:

SIF acknowledges special efforts invested to date in consulting island community interests regarding impacts of NPF4 and 20MN, but is concerned that consultation methodologies adopted may not be properly fit for purpose in relation to most island communities, where 20 minute neighbourhood ideals do not and cannot realistically apply in many respects.

Although SIF is generally keen to gather and present perspectives of island communities on matters which most affect us in response to official consultations, relatively few islanders are likely to have had time or inclination to properly review or digest such wordy guidance involving multiple links to other lengthy documents, as fully informed responses to this particular question would necessarily require.

SIF membership spans extensive disparities of local opportunity available to island residents, but the local living guidance seems primarily concerned with more urban situations, making meaningful input difficult. We welcome the report by HITRANS and Sustrans, as the guidance currently doesn't address specific, immediate and important challenges actually facing islanders and similarly remote communities, such as access to dental care and medical services; affordable housing options for folk of working age; local provision for secondary education; fuel poverty; sustainable waste management and more affordable groceries, all contributing to disproportionately high costs of island living and disadvantage, relative to mainland populations.

We would welcome the opportunity to explore the concept further from an island perspective in support of the ICIA.

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

Please let us know here:

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. It may also signal a welcome move away from silos and top-down decision making towards more cross-sectoral collaboration and alignment.

However, in its current form, the guidance doesn't include the needs and ambitions of island communities or the richness of assets and opportunities that an island holds within its people, vibrancy of culture and community, produce, environment and natural resources.

As noted within the SRA report on 20 Minute Neighbourhoods - "The desired outcomes of 20 MNs - decreased health inequalities, improved local economy, climate action, improved liveability and ability to age well in place - are indisputably important for rural and island communities. With a small number of exceptions, the pathway to achieving these outcomes in rural and island communities is unlikely to be through applying the 20 MN method. Indeed, applying the 20 MN method is likely to centralise services and increase structural and institutional barriers to addressing poverty and inequality and, as a result, to addressing climate change".

"As roundtable practitioners pointed out, centralisation is ruinous for community resilience and for local economies. It reinforces the structural barriers people face to participating in community life and also perpetuates negative population trends, including the outmigration of younger people. Hence there are significant tensions between 20 MNs and the Scottish Government's rural repopulation agenda".

Being able to live well locally is vitally important to the prosperity and future of islands and there is no shortage of people that want to remain, return, and move to the islands. Increasingly though, we learn of barriers getting in the way: a housing crisis, cost of living that is significantly higher than in the mainland, loss of services and connectivity, closure of schools, lack of childcare, healthcare, dentists etc.

Similar challenges may be evident across Scotland but the solutions for islands are different, and although the need for a flexible approach is highlighted within the guidance, the focus on distance throughout, which makes sense for urban areas, just doesn't fit with islands.

Islands, although bound by the sea, are also sustained through relationships with other islands and with other places and we mustn't be forced into a story where everything is in one place, we need other places to access stuff, and policy must address this reality of life.

There are good examples of living well locally in the islands and at a local community level we can see how it can work and this is explored through the report from HITRANS and Sustrans. The main concern of our members is that without an island liveability lense, the guidance, when combined with budget pressures and a framework that prioritises distance and consolidating services, may lead to unintended consequences that could see further centralisation of island services, housing and jobs and reduced local investment.

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

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

Publish response with name

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

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

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

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

Please enter comments here.:

The consultation itself is good and clear but it is the time and capacity needed via volunteer time to respond that is a challenge, not just for this consultation, but more generally when trying to input an island perspective into the many consultations and calls for views that come up each month. Sometimes an opportunity to speak with representatives directly through an online meeting can help but we understand this isn't always possible.

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

Please enter comments here.:

Very easy to use, thank you.