

Scottish Women's Convention
response to the Scottish
Government's consultation on:

Local Living and 20 Minute Neighbourhoods: Draft Planning Guidance



July 2023

Premise

The Scottish Government's National Planning Framework (NPF4) includes a commitment to consider how Scottish communities can be structured differently, with the concept of 20 minute neighbourhoods being at the forefront. This idea is centred around accessibility and how restructured spaces can facilitate equitable, healthy and green, spaces.

This consultation asks how 20 minute neighbourhoods could work in Scotland to achieve these goals, while also expanding to create 'local living' for rural locations, who due to geographical barriers, 20 minute services cannot be guaranteed.

After the Scottish Government have received consultation responses, they shall consider alterations that are required and rectify their plan accordingly – incorporating suggestions made.



The Scottish Women's Convention (SWC)

The SWC is funded to engage with women across Scotland to ensure that their views are represented in policy and decision-making processes. The SWC uses the views of women to respond to a variety of parliamentary, governmental, and organisational consultation papers at Scottish, UK and international levels.

The SWC gathers information using different methods, including roadshows, thematic conferences, surveys, and both in-person and online roundtable events. This submission presents the views of a range of women, reflecting their opinions, ideas and lived experience. Working together with many other equalities organisations and community groups, we use our broad network to ensure that women from a range of backgrounds are heard and acknowledged. We are continually reviewing innovative ways of engaging with women and developing our trauma-informed and culturally sensitive practice to support vital contributions from as many women as possible.

Our Response

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

Part 1 of the guidance provides a good overview to further understand local living and 20 minute neighbourhoods. By breaking down the concept into key elements an easy-read document has been created. Part one also goes into a good amount of detail surrounding each component, offering the benefits of such an approach, as well as potential challenges to implementation.

However, there is a lack of information on how local living and 20 minute neighbourhoods will work in a Scottish-specific context within part one. Out with the rural and island framework provided, there is no further information about Scotland's relatively unique situation as a devolved nation. Due to the complex entwining of UK and Scottish Government policy, it can be difficult to create clear planning. The proposed plans are revolutionary in making Scotland's communities more environmentally and people friendly, however, due to the large scope of such concepts, one must question whether UK Government policy may interfere or create additional barriers which have not been covered in this proposal.

Furthermore, part one would have benefitted from including mention of intersectional approaches as an underlying principle of these proposals. It is naïve of the Scottish Government to not openly accept that intersectional disadvantage is prominent across Scottish neighbourhoods, and essentially, a one-approach-fits-all mentality will not adequately support everyone across the country. Traditional systems have consistently placed white, heterosexual, able-bodied men at the centre, ignoring the needs of everyone else, and it is therefore, vital that the Scottish Government consider which groups are being catered for throughout proposals.

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

Very helpful

The provided diagram clearly shows the key areas that are the focus of this policy: movement, civic, spaces, resources and stewardship. By providing further information within each sector of the diagram, readers can clearly understand what 'spaces', for example, will include.

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

Somewhat helpful

Movement - Figure 5 provides a good visual aid in understanding the many categories discussed throughout these proposals. We are particularly pleased with the inclusion of accessibility and inclusivity, with disabled women consistently feeling that their needs are not being met across infrastructure. However, new plans to relax outdoor seating rules for pubs and restaurants to allow seating to be placed on pavements without submitting planning applications this year, could create significant challenges for those with mobility needs. This proposed concept

appears to be in direct conflict with the accessibility element of the 'movement' section, and therefore, the Scottish Government must ensure that the 20 minute neighbourhood planning is done in accordance with existing and new legislation. We believe that through collaboration with disabled women, future policies can be properly reasoned and applied. It could therefore be valuable to consider the makeup of lived experience boards, with it being key that disabled women are included, alongside other minority groups.

We are also disappointed to see that accessibility has not continued throughout the 'movement' section, as women with accessibility needs have explained that they are regularly not able to use public transport, due to a lack of space and accommodation from bus drivers. It would, therefore, be valuable for the 'public transport' section to include commitments of improved accessibility to ensure that everyone in Scotland can easily negotiate their local communities.

Civic - Within the 'feeling safe' section, we are surprised to see no prioritisation of increased lighting and feminist town planning models, despite the utilisation of an image of a woman walking below a street lamp. Lighting is mentioned within Annex B; however, women have regularly explained that it is a key barrier to walking within their local communities, particularly in parks. We believe it is therefore vital that lighting is placed within the key considerations of the 'feeling safe' section of the proposals. Women have also gone on to explain that without feminist town planning models, it is unlikely that women's community needs will be properly met.

- "I don't like walking in the dark anyway, so I don't really go out unless I've got a lift."
- "We should be able to go out at night and feel safe."
- "...architecture, lighting, populated areas, etc. must all be designed around safety for women"

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

Somewhat helpful

As an organisation which deals solely in qualitative data, we are pleased to see its inclusion throughout this policy. We agree that qualitative data can provide lived experience and gives a wider picture of complex societal issues. 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.

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

Somewhat helpful

Women have consistently stated their disappointment in the continual use of siloed public services. They have explained that this causes further complication when accessing services and can create barriers to service-provision. Therefore, we welcome commitments to reduce siloed working practices, as well as an increase in community engagement, which also aligns with the wants of women. Women have stated that through community activity, poverty and social disadvantage can be more effectively targeted.

In relation to the 'planning and design' element of the part three, it is stated that "Planning authorities are ideally placed to gather the quantitative and qualitative data that is essential" (page 33). From conversations with women who work within local authorities, the viability of this statement can be questioned. These women have explained that local authorities have incredibly stretched budgets, with productivity outweighing resource input. Despite local authorities being better placed to understand a community's particular needs, without increased financial aid they are unlikely to adequately deliver such large promises made in this proposal.

- "The biggest barrier in terms of going forward is money, local authorities have no money...they had no money before, where's it coming from now?"

Furthermore, traditionally town planning methods have consistently ignored the wants and needs of women, which has led to highly impractical cities and towns for over half of the population. It is questionable whether feminist town planning models have been effectively implemented across Scottish planning authorities, despite progress being made in Glasgow City Council for example. Therefore, we recommend that the Scottish Government provide further investment for local councils and push for increased guidance for planning departments to properly engage with feminist town planning.

- "...everything is built with men in mind because they've been at the head of everything for such a long time, but when are we changing this? We've been active participants in society for quite a long time now"
- "...I don't think women are at the top of anyone's mind when they're designing anything"

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

Somewhat helpful

The inclusion of community organisations and the third sector as key collaborators is welcomed, with these groups consistently feeling isolated from decision-making. It can be said that this was evidenced by the recent 'Community Wealth Building' plans, which did not include grass-root movements or community groups within the stakeholder exercises. Community wealth building has been discussed during part three as a key policy in establishing 20 minute neighbourhoods, however, due to a lack of community engagement during the development of such a policy, we must question whether the Scottish Government are truly carrying out a collaborative approach with all sectors.

In addition, the continued tightening of third sector budgets has caused distress across the industry, alongside staff shortages and burnout. It is questionable therefore, how this sector can effectively collaborate with public and private sector entities, with both possessing larger financial and staffing pools. It is therefore important that the Scottish Government look to

properly value third sector and community groups through increased financial aid, as well as creating effective power parity between each sector.

- “It comes back to resourcing and implementing things, and providing funding and access...If you look at other agencies, we're all struggling to keep up with demand, so funding has to be available for it”
- “...we need resources, and we can't do that on a shoestring. We can't do it on small pots of money, because you spend your whole time trying to find funding that enables posts to continue”

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

Yes

The multiple case studies present a varied picture of Scotland, with each area displaying its own unique challenges. These are well-presented alongside a robust explanation of some of the work has been carried out. The case studies also evidence how a place-based approach can allow for flexibility, however, it is key that each presents ‘lessons learned’ as seen in the Stewarton, East Ayrshire case study. By understanding how the project could be altered to have more impact, local councils can develop their processes and solutions. This is key if the Scottish Government is hoping to properly implement local living across the country.

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

Sex - With regards to the ‘sex’ characteristic discussed in the impact assessment, it is stated that local living provides opportunities for women to access employment opportunities. This may be the case; however, women are already far more likely to access employment that is nearby their home. Women have cited caring responsibilities and lack of access to a personal vehicle as barriers to accessing employment further away. The work within local communities, is more likely to be part-time work, for example, retail and hospitality. Through this work, women's continued economic subjugation becomes engrained, as does their ability to access further education. 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. The Scottish Government must work with large organisations to ensure their presence across local communities, rather than moving into out-of-town estates, which are harder for women to access.

- “We need to be thinking about how we can support people to have more equitable access to employment and good employment more widely.”

Island and Rural Communities - It can be said that the inclusion of an impact assessment within this policy is a welcome addition, as is the development of ‘local living’ which can provide a flexible approach to the policy. We agree that a flexible approach is required, due to the varied nature of social and physical barriers facing island and rural communities in comparison to Scottish cities.

However, from our regular interaction with rural and island communities we have a good understanding of the areas of worry that they face. Women have explained that they are concerned about healthcare, transport, poor infrastructure, depopulation, amongst other social issues. The vast majority state that this is the result of increased centralisation and a continual lack of consultation with locals. We hold concern that the proposed plans will not effectively reverse the effects of centralisation that these communities are consistently battling against.

- “I’m quite pissed off with the Scottish Government at the moment. I don’t think they’ve ever cared about the rural areas; they’ve centralised everything.”
- “Everyone has these stories, so I think we would hate to see anymore centralisation, we just want to see things coming back”

In particular, healthcare is of great concern, with some women travelling hours to access vital services. They have explained that services have been removed from small practices, leaving them with poor service-provision. For example, women from Caithness and Sutherland have to travel to Inverness for gynaecological healthcare, a commute of three to four hours. This clearly goes against the values at the centre of this policy, yet accessible healthcare is not discussed as a core target. Also, by properly catering for these communities the Scottish Government can work towards implementing a wellbeing economy, as is their aim. At the moment, the healthcare services provided do not meet the requirements of a wellbeing economy, with the consistent pressure on residents to travel for vital healthcare rather than stay locally, being at odds with Scottish Government proposals. Therefore, we would like to see further commitments to reduce the impacts of centralisation for rural and island communities across proposals, with current planning not going far enough.

- “We’ve had quite a lot of women say to us that if they were given the option, they’d rather get the ferry to Orkney than drive down to Inverness. I’m with them. It’s much safer to get on a boat for an hour and a half than it is to drive down the A9”
- “We have had an instance...where a snowplough led an ambulance down to Inverness, and it was a woman in labour in that ambulance. You’re risking a lot of lives.”

Conclusion

Having listened to women, our three key recommendations on this topic are:

- An intersectional approach to community planning must be embedded throughout.
- Collaborate with third sector organisations to improve the gathering of lived experience data.
- Increase funding for local councils, to ensure that local living and 20 minute neighbourhoods can be properly implemented.

The SWC is grateful for the opportunity to respond to the Scottish Government's consultation on **Local Living and 20 Minute Neighbourhoods: Draft Planning Guidance**. As an organisation, we will continue to work with women from across Scotland to gather voices and experiences relating to this topic and its effects on women's equality.

For further information or to share your views, please contact:

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