

Local Living and 20 Minute Neighbourhoods Planning Guidance – Draft for Consultation Scottish Government consultation

Response from Obesity Action Scotland Closing date: 20th July 2023

Question 1 – How helpful is Part 1 of the guidance to further the understanding of local living and 20-minute neighbourhoods in a Scottish context?

Very helpful

The guidance is helpful and it is welcome that Part 1 of the guidance document recognises the importance of health and improving health as a core component of 20-minute neighbourhoods. In particular, it is important that the role of 20-minute neighbourhoods in decreasing health inequalities and promoting healthy lifestyles is recognised. As part of this, it is crucial that easy access to affordable healthy and sustainable food is promoted and facilitated.

We note that the climate and environment section on page 10, in the second paragraph, states ‘*Creating walkable places with easily accessible shops... will play an important role in reduced reliance on car use*’. Whilst this is of course important, we would like to emphasise the need to ensure that these shops, where they are food outlets, provide access to healthy food. This is particularly important if 20-minute neighbourhoods are to play a role in decreasing inequalities (as has been stated earlier). Evidence shows that the clustering of fast food outlets disproportionately affects deprived areas¹, and that healthy food can cost up to three as much in more deprived areas², which can negatively impact on a range of health outcomes, including weight. A 2018 review commissioned by the Scottish Government concluded that increased exposure to outlets selling unhealthy food increases a person’s likelihood of gaining weight³. Therefore, it is critical that in delivering enhanced local living and 20-minute neighbourhoods that access to healthy food outlets is prioritised, in particular to avoid further widening existing inequalities.

This links closely to Policy 27 within the revised National Planning Framework 4 (NPF4)⁴ which outlines a presumption against drive-through takeaways. Policy 27 in NPF4 states that drive-throughs will only be permitted where they are specifically supported within the local development plan (LDP) for a particular area and can only be located in areas where there would be no negative

¹ Macdonald, L, Olsen J. R, Shortt, N. K and Ellaway, A (2018) Do ‘environmental bads’ such as alcohol, fast food, tobacco, and gambling outlets cluster and co-locate more in deprived areas in Glasgow City, Scotland?’ Health and Place 51, 224 - 231

² <https://www.smf.co.uk/wp-content/uploads/2018/10/What-are-the-barriers-to-eating-healthy-in-the-UK.pdf>

³ Ironside Farrar on behalf of the Scottish Government (2018) Research Project: To Explore the Relationship Between the Food Environment and the Planning System

⁴ Scottish Government (2023) National Planning Framework 4

<https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2023/02/national-planning-framework-4/documents/national-planning-framework-4-revised-draft/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4.pdf>

impact on the principles of local living or sustainable travel. As with the above, the primary motivation for this policy appears to be climate focused. Clearly, however, this is also likely to have a positive health impact by reducing the number of these outlets in an area. It is therefore important that any plans related to local living and 20-minute neighbourhoods take note of this policy within NPF4, as it offers an opportunity to improve the healthiness of food offerings within local areas.

Similarly, Policy 23 '*Health and Safety*' in NPF4 outlines that development proposals likely to have a positive impact on health should be supported, alongside not supporting those that are likely to have a significant adverse impact on health. This policy offers a further opportunity to positively influence local food environments and actively empowers local planning teams and officers to take decisions, with a central focus on health, that they may have felt unable to take before. Specific reference to this Policy should be included within Local Living and 20-minute neighbourhood guidance.

It is also welcome the guidance document lists the 6 qualities of successful places, which includes healthy and sustainable. Policy 14 of NPF4 states development proposals will be supported where they are consistent with the 6 qualities of successful places. This should be linked to and be the basis of development proposals within local living and 20-minute neighbourhood guidance. The principles of healthy and sustainable are particularly important with regards to the food environment within local places and should be the guiding principles used when making decisions with regards to the food environment and food provision locally.

Question 2 – Please refer to the Local Living Framework Diagram on page 19 of the guidance. How helpful is the framework diagram for encouraging flexible, place-based approaches to support local living?

Somewhat helpful

The diagram on page 19 is helpful and provides a useful visualisation of the framework and the 14 themes included within it, which are derived from the Place Standard Tool⁵. However, the diagram doesn't make it clear where specific items would fit within the themes in the diagram. For example, the preceding paragraphs to the diagram includes 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. The framework diagram could be improved by providing examples of what is expected to sit under each of the 14 themes. This is expanded upon in later pages in the guidance document, but is it not immediately clear from looking at the diagram, and this could be improved.

Additionally, there is an inconsistency in the diagram and the more detailed information supplied on each theme in the following pages. In the diagram on page 19, the theme is titled 'Support and services', within the resources category. However, in the expanded information on the resources category detailed on page 24 of the consultation document, the theme is titled 'Facilities & Services'. This could have the potential to cause confusion as to what exactly is meant by the theme and what is to be included under the theme. There should be consistency between the diagram and expanded information provided and this needs to be clarified and corrected within the document.

⁵ <https://www.ourplace.scot/sites/default/files/2022-11/Our%20Place%20Place%20Standard%20Tool%20final%20version%20-%20Print%2C%20Interactive%20and%20booklet%20details%20-%20Oct%202022.pdf>

Question 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?

Very helpful

Please see our answer to question 2 above, which addresses some of the content of this section.

It is welcome that healthy food is included within the resources category, under the facilities & services theme. This outlines the importance of the food environment and the provision of healthy food in an area in achieving local living objectives, and is helpful for ensuring local places promote and facilitate access to healthy food environments.

Regarding the Place Standard Tool, it is welcome this has been included in this section, recognising the opportunity it offers to individuals to influence the design and make-up of their local places and spaces. For the first-time healthy food is explicitly mentioned in the tool (in the facilities and services section). By explicitly including it as one of the things to consider when discussing local facilities and services in their place, it encourages local communities to think about their local food environment. An issue is much more likely to be discussed and considered when it is explicitly listed, and this in turn is more likely to result in impetus for and possibly influence change. It is also a positive recognition of the importance of the food environment in determining the quality of places. However, it remains unclear how priorities identified by local communities via the tool, like the need for a reduction in unhealthy takeaways for example, would be translated into change on the ground and how these priorities link in with the wider priorities of NPF4 and overarching local living and 20-minute neighbourhood principles, which ultimately dictate the direction of travel. Stronger guidance on this would be helpful.

Question 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

In terms of understanding context, using both quantitative and qualitative data is important and a helpful approach, to help provide a more rounded evidence base.

On quantitative data specifically, the guidance document does not make it clear which data sources will be used and/or how the data will be gathered to measure this. For some categories and themes, it could be challenging to gather this data. For example, with regards to facilities and services, and specifically measuring access to healthy food, there is currently limited data on this. It is therefore important that data sources are identified for each theme to ensure each can be measured equally and give equal consideration. The data sources to be used should be listed in any guidance document(s) produced.

With regards to healthy food, data on diet, including fruit and vegetable consumption, is gathered via the Scottish Health Survey, through self-reporting. This is available at both local authority and health board level, but not by neighbourhoods for example. There are also local authority food premises/food hygiene registers, which is also held nationally by Food Standards Scotland. This could be broken down into neighbourhoods and areas within a local authority. In terms of outlets/provision of healthy food within a specific area, data on this is limited. Local authority planning teams control and make decisions on approval or rejection of planning applications, and should therefore hold this information. We would like to see an ask of local authorities to routinely report such information, which could be helpful for informing guidance and strategies like this one.

Question 6 – How helpful is the ‘collaborate, plan, design’ section of part 3 in supporting collaborative practices?

Somewhat helpful

The section of the document clearly outlines the process for collaboration, planning and design and how this could operate in practice.

It is welcome that the Place Principle is front and centre of this section of the guidance document, with a recognition of local land-use planning being a fundamental tool for embedding local living and 20-minute neighbourhood practices into communities.

Policy 15 in NPF4 is discussed here as the mechanism by which such an approach will be embedded/adopted and sets an expectation on local planning authorities to support local living, including 20-minute neighbourhoods, which in turn should then be used to inform Local Place Plans and Local Development Plans. This is a welcome approach.

Examples given within this section of the guidance document include consideration of the location of new public buildings to promote local economic prosperity and to avoid clustering, and the location and density of new housing developments to minimise the need to travel. As part of these examples, it is vital that access to affordable healthy food is considered and prioritised. Shopping is one of the areas listed under the policy in NPF4 to be considered within new developments, but it says nothing about what these shops should be. For example, it would be counterproductive if the shops provided increased access to unhealthy food and other health harming commodities. Therefore, it would be helpful to include considerations of outlet density and what will be supplied by shopping outlets, and how this will be factored in to any decision-making processes, to avoid further exacerbating inequalities and worsening health outcomes.

This can be supported by other policies within NPF4. Whilst NPF4 stops short of fully incorporating health as a material planning consideration, it offers opportunities to make health a more central focus of the planning system and planning decisions. As already mentioned in our answer to question 1, Policy 27 in NPF4 sets out a presumption against drive-through takeaways, and Policy 28 details that Local Development Plans should identify areas where proposals for healthy food and drink outlets can be supported, and that small-scale neighbourhood retail development will be supported where it can be demonstrated to contribute to the health and wellbeing of the local community. This should help to create more healthy food environments in local areas, and links closely to the principles of Policy 15.

It would be helpful for this section of the document to be updated to also include reference to these policies, as supporting components for achieving healthy food environments within 20-minute neighbourhoods. These policies will be important for ensuring the consideration of shopping under Policy 15 is shopping which facilitates easy and equitable access to affordable healthy food. Such policies should be considered together and not taken in isolation, to ensure decisions made under one policy do not have unintended consequences for another.

Question 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.

In the 'implement and review section' on page 34 of the guidance document, we note reference to the private sector which states they are "...highly effective at making things happen". Whilst we recognise the important role for the private sector in planning, it is important that they do not have any role in public health policy decision-making, as this could be a conflict of interest, particularly when commercial actors such as large food and drink and retail corporations, for example, are involved. Development proposals and planning decisions must account for public health, and avoid prioritising development/growth and business need at any cost.

The trip chain diagrams are effective and clearly illustrate the need to ensure services and amenities within a local area are planned together, to avoid unintended consequences.

Question 10 – Please provide any further comments on the draft guidance design document

Annex A – Additional Information on Resources category

It is welcome that within the Work & Local Economy section it is recognised that planning and 20-minute neighbourhoods support a positive approach to local economic activity, linked to a Community Wealth-building approach. In this regard, it is also important to link this to the wellbeing economy and moving beyond GDP as the sole measure of economic success. Including a measure of access to and affordability of healthy food within a local area, for example, provides a much truer and richer picture of the local environment and health outcomes of the area. The places and spaces we live in, visit and use every day have a profound impact on our health and wellbeing, and thus their impact needs to be measured accordingly.

The Scottish Government has nationally adopted a wellbeing economy approach and has introduced a Wellbeing Economy Monitor, which measures 14 outcomes, including inequality⁶. This links closely with community wealth building as tackling long standing systemic structural inequalities within communities is a key focus of the approach. We would welcome the guidance on local living and 20-minute neighbourhoods taking the principles of the wellbeing economy and considering how this can be delivered as part of community wealth building.

About us

Obesity Action Scotland provide clinical leadership and independent advocacy on preventing and reducing overweight and obesity in Scotland. For any enquiries relating to this submission, please contact Jennifer Forsyth, Policy and Evidence Manager - jennifer.forsyth@obesityactionsotland.org

⁶ Scottish Government (2022) The Wellbeing Economy Monitor – December 2022 update
<https://www.gov.scot/binaries/content/documents/govscot/publications/research-and-analysis/2022/06/wellbeing-economy-monitor/documents/wellbeing-economy-monitor/wellbeing-economy-monitor/govscot%3Adocument/wellbeing-economy-monitor.pdf>