PART C – Draft Guidance on Local Development Planning

15 Do you agree with the general guidance on Local Development Plans?

Not Answered

Please explain why you agree or disagree::

In Paragraphs 20 & 24 It's positive to read the user-centred / community-led design approach in the guidance. It would be good to acknowledge the expertise required to design with a user-centred approach. Design and user-centred research is continuous, not a one-off. This is particularly important considering that plan preparation should take around 3-4 years (paragraph 42).

LDP evidence needs to be gathered continuously with communities. It's often mistaken, even by professional designers, that design is a linear creative process. Instead, constant testing, feedback and evaluation would be required to apply a proper user-centred approach which isn't accurately described in the guidance.

We should prioritise design's impact on the community over the intentions of the designer. Culture Counts support the principles of the Design Justice Network. We would appreciate it if the guidance would encourage LDPs to sign up to the principles.

In Paragraph 21. Whilst planning authorities have a duty to prepare an LDP to achieve the
intended outcomes for people, a wide range of stakeholders will need to play a role. Insert;

Historic Environment Scotland
Creative Scotland
Scotland's Centre for Design V&A Dundee

In Paragraph 25. There is an opportunity for LDPs to address community wealth building

We agree that planning policy should support community wealth building (CWB), but it would be useful to include a definition of CWB in the draft. For example;

'Community wealth building is a progressive approach to economics and economic development.
It seeks to change the way that our economies have come to function by aiming to retain more wealth and opportunity for the benefit of local people.

Scotland's recently published strategy for economic transformation relies on local authorities to include everyone involved in the economy from freelancers and social enterprises to big corporates. It is a mistake to overlook the contributions of individuals and SMEs who are often hidden from statistics.

In paragraphs 33 and 36 there are lists of consultees, for example, a regional transport strategy (either as legislative requirements or regulations). Culture, heritage and historic environment could be included in this list through Scotland's Culture Strategy and the HES Our Place in Time Strategy, to ensure relevant consideration is given to culture and creative industries,

Paragraph 47 lists key agencies including Historic Environment Scotland. Consider inserting;

Creative Scotland
Scotland's Centre for Design (V&A Dundee)
The City Centre Recovery Task Force (Report)

1 https://www.designcouncil.org.uk/news-opinion/design-methods-step-4-deliver
2 https://cles.org.uk/what-is-community-wealth-building/the-principles-of-community-wealth-building/

16 Do you agree with the guidance on Development Plan Schemes?

Not Answered

Please explain why you agree or disagree::

Paragraph 50 / 67 says Statutory guidance on effective community engagement is currently being prepared. This will be subject to public consultation in due course. And aims to reach underrepresented groups as explained in Participation Statements.

Evidence needs to be gathered continuously with communities. Don't pull up the drawbridge after an early round of public consultations. The process needs to be continually open and reflective.

It's often mistaken, even by professional designers, that design is a linear creative process. Instead, constant testing, feedback and evaluation would be required to apply a proper user-centred approach which isn't accurately described in the guidance

While we look forward to contributing to the consolation process, this work must prioritise design's impact on the community over the intentions of the designer. Culture Counts support the principles of the Design Justice Network. We would appreciate it if the guidance would encourage LDPs to sign up to the principles.

17 Do you agree with the guidance on the Delivery Programme?

Not Answered

Please explain why you agree or disagree::

18 Do you agree with the guidance on Local Place Plans?

Not Answered

Please explain why you agree or disagree::

19 Do you agree with the guidance on the Evidence Report?

Not Answered

Please explain why you agree or disagree::

Paragraph 107 explains The Evidence Report should consider the local, regional and national strategies; Insert;

Scotland's Towns Toolkit - Arts section
Scotland's Culture Strategy
The City Centre Recovery Task Force Report

20 Do you agree with the guidance on the Gate Check?

Not Answered

Please explain why you agree or disagree::

21 Do you agree with the guidance on the Proposed Plan?

Not Answered

Please explain why you agree or disagree::

22 Do you agree with the guidance on Local Development Plan Examinations?

Not Answered

Please explain why you agree or disagree::

23 Do you agree with the guidance on Adoption and Delivery?

Not Answered

Please explain why you agree or disagree::

24 Do you agree with the proposed guidance on the Evidence Report in relation to the section on Sustainable Places (paragraphs 240–247)?

Not Answered

Please explain why you agree or disagree::

Paragraph 247 ends in a comma, is the section complete? It's not clear what the relevant of design is to quality and place int his section?

Paragraph 244/5 are limited to a technical exploration of climate nature crisis solutions. Consider a progressive and more creative approach in the guidance. Creative practice (like design) shares skills and perspectives in a technical capacity as described in the draft. But they also re-imagine our places and can embed sustainability within them.

There are successful projects where embedding practicing artists into places can bring new perspectives and processes to planning projects. These include artists recovering old mining sites into useful community spaces in Ohio. And Glasgow's own Creative Communities project.

25 Do you agree with the proposed guidance on the Evidence Report in relation to the section on Liveable Places (paragraphs 248 – 283)?

Not Answered

Please explain why you agree or disagree::

Paragraph 248 introduces the idea of 20 minute neighbourhoods, and explains the principle can be adjusted to include varying geographical scales. It doesn't cover how it can scale?

The 20 minute model of neighbourhoods may not map into what currently works in rural communities. The principle is designed so that all people can meet the majority of their daily needs within approx. 800m. This suggests distances beyond 800m are too far, or inconvenient. However, what looks like inconvenience from the outside might embody something essential to those who live there.

Mobile services can create connected neighbourhoods. Mobile cinemas and libraries, for example, create social occasions. They create opportunities for communities to meet and to feel a sense of connection and belonging.

These cultural services encourage and enable the gathering of people to participate in a community event, which produces a local opportunity for connection and belonging, reducing isolation, and improving mental health.

While recognising the strategy is to change the way we live in the future, it's important we work towards community-led and community-controlled outcomes. Culture Counts support the principles of the Design Justice Network. We would appreciate it if the Scottish Government would consider signing up to the principles.

Rural areas are source of valuable alternative models to 20 Minute neighbourhoods. Many central belt communities are not so much post-industrial as reverting to a pre-industrial model, with a mix of self-employment, small (often craft) businesses, people with multiple jobs, and with such communities often effectively made into islands by poor transport links. Rural communities have had generations of coping with such models; these former industrial areas have seen massive change in just one generation.

The many urban peripheral housing estates which lack access to facilities, also lack the accessible and affordable transport links to bring their inhabitants to the city or town centre. These communities need to be considered in between the needs of rural and urban.

Digital infrastructure is often pointed to as way of reducing unsustainable travel, and as a means of delivering principles such as 20 minute neighbourhoods in rural communities. However these digital services can have significant environmental impact that isn't addressed. As we continue to consume more internet data, the electricity consumed by the internet is growing too. Every click, swipe and log in has an energy cost. Energy efficient digital design can include;

digital service providers using green hosting
reducing friction in user journeys through UX design
clean and efficient code that minimises server load

Paragraph 249 suggests the focus should be on maintaining mixed uses and improving the quality and diversity of local areas. However many cultural activities require very specific facilities, much like sport.

A community space that tries to offer everything will potentially offer very little in the way of cultural engagement. A choir rehearsal needs good acoustics. A printmaking workshop requires a wet studio. Embracing local specialisms, at the expense of variety, can offer a deeper connection to the activity, people and place.

Arts and culture, like sport, requires spaces for excellence and spaces for access.

An example of Access is Feis Ros
An example of Excellence is the Royal Conservatoire of Scotland

In our liveable places we need to have access to places to make and rehearse and be within reasonable distance of places to perform at the highest level.

Falkirk Council have a well-resourced offer to communities of interest, ensuring access within a reasonable travel time, for example Falkirk has a concert venue and theatre space, library, and museum

Bo'ness has a cinema, a range of halls, performance and event spaces, a library, and a museum at Kinneil.

Grangemouth has a range of halls for hire which can be used for performing arts, including as rehearsal spaces and a stadium which can be used for large scale concerts.

Even smaller towns within the Falkirk area such as Denny, Slammanan (population 1400 approx) and Bonnybirdge have community facilities available, including libraries. The library is placed in a disused shop front on the main street.

There are successful projects where embedding practicing artists into places can bring new perspectives and processes to planning projects. These include artists recovering old mining sites into useful community spaces in Ohio. And Glasgow's own Creative Communities project

Paragraph 255's audit of infrastructure should include culture and leisure. The list refers to Recreation. Recreation is not really used in day to day language and means different things to different people.
We propose that 'Recreation' is replaced throughout with 'Culture and Leisure'.

In relation to audits, the 20 minute neighbourhood principle is clear in encouraging people to live more locally.
This requires places to provide communities with local access to a wide range of facilities. The National Performance Framework Outcome for Culture reads: We are creative and our vibrant and diverse cultures are celebrated and enjoyed widely. A baseline of how much provision isn't clear. We can't have a cinema every 800 meters, but could there be a base-level commitment to access to culture? i.e.

A town with 10,000 inhabitants should have access to:

High Speed Broadband [minimum xx MbPS]
Local cinema provision [within xx miles]
Local visual arts provision [within yy miles]
Local performing arts provision [within zz miles]
Access to National Companies' work xx times per year
Access to a place to perform work within x miles
Access to a place to rehearse and or make work within x miles

26 Do you agree with the proposed guidance on the Evidence Report in relation to the section on Productive Places (paragraphs 284 – 296)?

Not Answered

Please explain why you agree or disagree::

Paragraph 288 should reference the agent of change principle when referring to music venues and culture venues.

This action misses out valuable jobs and industries, such as software and games development, a key growth sector. If we want to attract people to Scotland, we have to have a cultural offer. A job in a space-port will be available to very few people; whereas tech jobs could be available to thousands if we create places where people want to live. e.g. Places with libraries, gardens, hot-desk hubs, cafes, cinemas, parks. This is why it's important to look more closely at the word wellbeing. We don't have to start with economic growth and end up with wellbeing. We could if we were radical start with well-being and end up with economic growth.

In Paragraph 290 Our definition of the circular economy could be more ambitious. While it might be helpful to illustrate the waste hierarchy, it would be more progressive in this section to define waste and pollution as design flaws.

Rather than explain circular economy as a reduction in demand of raw materials, it should be clearer that the aim is to close material loops, and shut off any route for materials to reach landfill.

27 Do you agree with the proposed guidance on the Evidence Report in relation to the section on Distinctive Places (paragraphs 297 – 310)?

Not Answered

Please explain why you agree or disagree::

Paragraph 297 should include Scotland's Towns Toolkit - Arts section as a resource for making distinctive places. The City Centre Recovery Task Force Report should also be included as a resource. The report tells us;

City centres also host a large share of Scotland's cultural assets in the form of museums and galleries, theatres, and music venues. The seven local authorities that contain SCA cities offer over 60% of all employment in the creative, cultural and entertainment sectors in Scotland.10
Cultural institutions, such as museums, also play a key role as anchor institutions in the communities where they are based.11 The V&A Museum in Dundee, for example, has been designated Scotland's Centre for Design as part of the waterfront city centre regeneration of the city. While employment in the cultural sector can often be insecure, these institutions provide secure employment, and crowd in economic activity by bringing customers to local cafes and restaurants, and so work in support of city centres' role as consumption hubs. They often also offer a number of benefits for the local communities, like accessible and affordable leisure and meeting spaces, thus contributing to the quality of life in cities.

28 Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Sustainable Places (paragraphs 317 – 328)?

Not Answered

Please explain why you agree or disagree::

29 Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Liveable Places (paragraphs 329 – 400)?

Not Answered

Please explain why you agree or disagree::

30 Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Productive Places (paragraphs 401 – 424)?

Not Answered

Please explain why you agree or disagree::

31 Do you agree with the proposed guidance on the Proposed Plan in relation to the section on Distinctive Places (paragraphs 425 – 466)?

Not Answered

Please explain why you agree or disagree::

32 Do you agree with the proposed thematic guidance on the Delivery Programme (paragraphs 467 – 482)?

Not Answered

Please explain why you agree or disagree::

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Culture Counts

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

Publish response only (without 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?:

Please enter comments here.:

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

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