

Proposals on regulations for Local Place Plans

Cycling Scotland submission June 2021

Question 1 - Do you agree with the proposal that community bodies should have regard to any Locality Plan that is in place for an area under consideration when preparing their Local Place Plan?

- Yes

Please comment on your answer (particularly if you do not agree)

It is important that existing Locality Plans, where applicable, are considered when a Local Place Plan is being prepared. Locality Plans set out priority issues and proposed improvements to the area that have already been agreed upon by the local community groups and organisations. They also cover a wide range of topics and therefore provide a good starting point to build upon. Having regard to Locality Plans also ensures consistency in focus and avoids unnecessary duplication.

Question 2 – Do you consider that community bodies should have regard to other additional matters beyond the Locality Plan when preparing their Local Place Plan?

- Yes

Please comment on your answer, giving examples (particularly if you agree)

Where a community/area does not have a Locality plan, it could be helpful to take into account additional plans and concerns, such as a Local Outcome Improvement Plan (LOIP). Also, some Locality Plans may be out of date, and so may not reflect current issues and concerns of the community. Where additional matters are taken into account, it is important that these remain focused on development, as development priorities and outcomes are the central focus of LPPs.

For example, the Covid-19 pandemic has led to significant changes in many aspects of life and has brought to the forefront new priorities for development in many communities. A positive outcome of the pandemic has been a significant increase in rates of cycling seen across the country, and increased prioritisation of local places and spaces, with greater emphasis on accessing essential services and fulfilling daily needs within communities or neighbourhood localities. A range of developments are needed to support this, including enhanced provision of dedicated active travel infrastructure and road space reallocation, and exploration of 20-minute neighbourhoods. Such issues may not previously have been sufficiently accounted for in Locality Plans and other relevant plans. As such, community groups should have regard to some issues beyond the Locality Plan (where one exists) to reflect changes and shifts in priorities for development in local communities, such as those seen during the Covid-19 pandemic.

Question 6 – Do you agree with the proposal that there should be a minimum statutory requirement on the community body to consult the community once a draft LPP has been prepared and before submitting an LPP?

- Yes

Please comment on your answer (particularly if you do not agree)

It is important that communities are consulted at some stage in the process of LPP development. Consulting with the local community can help to ensure that the LPP will reflect the main priority issues for members of the community and also increase its legitimacy by ensuring community buy-in. If people feel they have had the chance to express their opinion and have their voices heard, they are more likely to be accepting of the outcome. However, it should also be noted that consultation is not a perfect process and is unlikely to reach all people in the community, and so the findings from any consultation may only reflect the concerns of certain sections of the population.

We welcome reference in the consultation document to the Place Standard Tool. The Tool could be used as part of community consultation to facilitate involvement. It enables a standardised approach to be taken to consultation and can offer a useful starting point for individuals and groups who are unsure how to participate or get involved. The Tool includes reference to key desirable elements of an area or community, including provision of walking and cycling facilities. Utilising the Place Standard Tool in this way can also help to ensure important linkages with the planning system are drawn out and considered.

Question 7 – If a requirement to consult across the community on the content of a draft LPP is to be put into law, what should any minimum requirement should be?

As a minimum, there should be a consultation period of 6-8 weeks, during which time the local community can submit their views and feedback.

Question 9 – Do you agree that alongside the LPP itself, the community body should submit a statement on how it has complied with the legal requirements?

- Yes

Please comment on your answer (particularly if you do not agree)

N/A

Question 15 – Please give us your views on the content of these partial assessments?

Annex A:

We note reference to the cost of developing Local Place Plans is detailed at approximately £15,000. This is likely to be unaffordable for smaller community groups and organisations, and so might not be a viable option for some. This subsequently impacts on equality outcomes between different communities and areas.

Annex C:

We note the differing transport challenges faced by island communities is acknowledged in the partial assessment, which is welcome. The assessment details the importance of and reliance on public transport by certain demographics in these communities. However, in relation to this and in the context of the assessment more widely, no reference is made to active travel. This is a significant omission. Active travel plays a crucial role in helping to improve connectivity, specifically in promoting modal integration with public transport. Further, the sustainable transport hierarchy outlines that active modes should be prioritised above all other transport modes. We would like to see reference to active travel included in the assessment as an essential component, alongside public transport, of improving connectivity and transport options in island communities.