

Local Government and Regeneration Committee
Scrutiny of the Draft Third National Planning Framework



Written Evidence to Local Government and Regeneration Committee Questions on the Draft NPF3 and Review of SPP

Planning Aid for Scotland

Planning Aid for Scotland (PAS) is a national charity operating on social enterprise principles, working across Scotland to improve the way people engage with the planning system and helping people to contribute to their communities.

Through its impartial advice, training and education services, PAS is actively involved in raising awareness of the opportunities for all people to be involved in planning. PAS is especially interested in planning policy and law; engagement and consultation; and involving all groups of society in a transparent and equitable way with planning matters.

Planning Aid for Scotland has an overall interest in engagement, and in particular, civic engagement through involvement with the land-use planning system, but also beyond. PAS believes that facilitating public involvement in forming a community vision for the future of their areas is a key aspect of civic engagement to create vibrant and confident communities.

PAS would like to focus on the following questions from the perspective of civic engagement with the planning system.

1. Strategic overview of the planning system

What key principles should underpin the strategic vision of the Scottish planning system? How will the draft NPF3 deliver on these principles?

- Effective engagement must underpin the strategic vision (no other public service offers as high a level of possibility for engagement as planning). PAS has welcomed the approach to engagement on NPF3.
- Better engagement on development plans will lead to better outcomes. It is also essential that young people and other seldom heard groups are actively included.
- The highest possible level of engagement in NPF should be aimed for also – national development proposals will impact on affected communities.
- Strong links need to be made between land use planning and community planning.

What are the strategic connections between the National Planning Framework and Scottish Planning Policy? How do they work together to deliver the same priorities?

No comment

How does the National Planning Framework influence local and regional development plans? How does it influence the development of policy by the Scottish Government and local authorities?

- For those who engage with planning including community councils/groups and individual members of the public it is important that there is clarity about how both documents are connected.
- PAS is clear that NPF has clear links to the National Performance Framework/Scotland Performs – as does planning, and the work of PAS –generally.
- Strategic and Local Development Plans will be clearly influenced by the NPF as set out in the 2006 Planning Act – again it is important that key stakeholders and members of the public understand this relationship.

How effective is the NPF Action Plan in translating top-level strategy into the planning system?

no comment.

How does the National Planning Framework link to the National Performance Framework/Scotland Performs?

- The planning system has a key role in helping to meet the aims of the National Performance Framework/Scotland Performs in helping to deliver economic growth and as a public service which offers more opportunities than any other for people to get involved in shaping the future of their local area.
- As a key planning document NPF3 has a clear links to National Performance Framework/Scotland Performs in strategic terms and in setting out National Developments which the Scottish Government believe will benefit Scotland's people.

How does the Framework and Scottish Planning Policy support preventative spending and the Christie Commission agenda for the reform of public services in Scotland?

- PAS has particularly noted the Scottish Governments 4 pillar approach to public sector reform which has followed on from the findings of the Christie Commission:
 - (i) a decisive shift towards prevention;
 - (ii) a greater focus on "place" to drive better partnership, collaboration and local delivery;
 - (iii) investing in people who deliver services through enhanced workforce development and effective leadership; and

(iv) a more transparent public service culture which improves standards of performance.

- PAS advocates effective engagement as a key factor in preventative spend with regard to planning proposals and in particular engaging people in the development plan.
- Linking community planning and land use planning will also lead to better outcomes for communities in particular with reference to place making and service delivery – especially as single outcome agreements are now expected to have a focus on place. PAS has implemented this approach in its Charrette^{plus}™ approach to engagement.

Central to the development and delivery of the planning system envisioned by the NPF and SPP and the definitions of sustainable development and sustainable economic growth. European Union legislation provide an accepted definition of sustainable development as—

"development that meets the needs of the present without compromising the ability of future generations to meet their own needs, in other words ensuring that today's growth does not jeopardise the growth possibilities of future generations. Sustainable development thus comprises three elements - economic, social and environmental - which have to be considered in equal measure at the political level".^[1]

This definition forms the basis of the Scottish Government's own definition of sustainable development in the context of its policies.^[2] However, there does not appear to be a suitably clear definition of sustainable economic growth. Therefore, how does the Scottish Government define sustainable economic growth in terms of the NPF3 and SPP? How do sustainable economic growth and sustainable development relate to each other in terms of planning policy?

- PAS does not support having separate core policies (Sustainable Development / Sustainable Economic Growth) in the first draft of the revised SPP.
- There is no official definition of Sustainable Economic Growth. In addition, the existence of two apparently similar core policies could cause confusion to stakeholders as to how planning decisions are made.
- PAS has generally supported the general policy on Sustainable Development in the follow-up further consultation on this matter on the basis of providing better of clarity to stakeholders.
- The additional consultation on the SPP review sets out a definition of Sustainable Economic Growth - if this term is to define the purpose of a Scottish Government then a set definition across all Scottish Government documents is needed.

2. Supporting policy priorities

How will the draft NPF3, and review of SPP support and influence the development of the Scottish Government's strategies on regeneration and town centre development?

Regeneration:

- Regeneration Strategy: draft Scottish Planning Policy clearly makes the link between the planning system and regeneration in terms of choices to be made about land use.
- PAS has a particular interest in community led regeneration - this matter is given less focus in both documents although it is singled out as a priority in the Scottish Government regeneration strategy.
- The focus on town centres in SPP may offer up opportunities for community involvement and community led regeneration.
- The proposed Community Empowerment (Scotland) Act will offer further opportunities for community led regeneration.

Town Centre Policy:

- The draft SPP has a core policy on Town Centres. The findings of the Town Centre Review group and the Scottish Government's response (the Town Centre Action Plan) will need to be taken into account.
- PAS supports the idea of a people-orientated, collaborative approach to town centre regeneration - this must involve business, young people, residents, local authority, community groups etc. Their agreed vision or plan for their town centre should then be reflected in the local development plan (spatial elements) and Community Planning (the public service delivery elements).
- It is useful that the need for land use planning and community planning to align better is now specifically made in the draft SPP, and singled out as important with regard to town centres.

How is top-level planning policy integrated into the economic and social regeneration strategies by planning authorities in Scotland?

No comment.

How will the draft NPF3, and review of SPP support and influence the community planning process?

How do these top-level planning policies ensure that community planning partnerships deliver spatial planning under single outcome agreements? In other words, how do SOAs ensure the effective connection between land use planning and community planning?

- The interface between land use planning and community planning is a matter of particular interest to PAS and we have commented on this in our response to the

proposed Community Empowerment (Scotland) Bill.

- It is often acknowledged that there needs to be an inter-relation between the two but it seems that this is not always easy to achieve in practice.
- PAS welcomes the inclusion of the diagram on page 2 of the draft NPF3 clearly setting out the position of community planning in the context of the Scottish Government's Purposes.
- PAS believes that Local authorities need to integrate community planning and land use planning at local level, leading to better placemaking and more efficient delivery of public and private sector investment. Scotland can no longer afford for land use planning and community planning to operate as parallel systems, as the latest Scottish Government Circular on Development Planning makes clear.
- A fundamental part of this integration is about involving local communities in decision making about the future of their places, to feed into Development Plans and Community Plans (as PAS has demonstrated through its Charrette^{plus} model) and the community empowerment agenda (such as through an extension of PAS's long-standing mentoring scheme for community development trusts and other community organisations). PAS and its network of professionally qualified, experienced personnel are ideally placed to partner the Scottish Government in rolling out the reform agenda at the local level.

How are the outcomes of the NPF to be measured? How does the SPP relate to local government benchmarking and best value?

No comment

How does the Scottish Government incentivise planning authorities to achieve the delivery of the outcomes from the NPF and SPP (e.g. through variations in the planning fee system etc.)?

- PAS gave evidence in June 2013 to the Economy, Energy & Tourism Committee and did not support the Regulatory Reform Bill consultation proposal to raise fees for poorly planning authorities. This appeared counter-intuitive to the spirit of planning reform which has been predicated by promoting and sharing good practice.
- PAS also noted that it would be hard to set out a definition of "poorly performing".

3. The process for development and review of NPF and SPP

How effective has the Government's consultation process been on the development of the draft NPF3?

- PAS has supported the Main Issues Report-based approach to both consultation processes, and the alignment of the two. This has made it easier for stakeholders to

consider how both documents related to each other.

- PAS appreciates that it is easier to engage members of the public at a more local level – however NPF3's proposed National Development may have huge impacts on relevant areas so community councils, community groups and local people need to be informed.

The 2006 Act requires the Scottish Government to review the NPF at regular intervals (currently 5 years) and to lay draft revisions of the NPF before the Parliament for consideration. However, no such statutory requirements exist for reviews of the SPP. Should there be an agreed cycle for review of the SPP (statutory or otherwise)? Should this be linked to the cycle for review of the NPF?

- PAS supports this as it will make it easier for those responding and be likely to encourage bodies such as community councils to respond.

Should the SPP be subject to a similar level of parliamentary consideration as the NPF?

- Because the revised SPP is being produced alongside NPF3 there may be some sense in it being discussed in parliament. One approach might be that the core policies in SPP (Sustainable Development, Engagement, Climate Change, Placemaking etc) could be debated – but not the detailed subject policies.

Is the 60-day statutory timeframe for parliamentary consideration of the draft NPF sufficient to allow for proper scrutiny?

No comment

4. The planning process and the work of the committee

During its recent scrutiny of the Scottish Government's 2014/15 draft budget, the Committee received evidence of a reduction in local government staffing level of over 30,000 in the last five years. As part of this evidence the Committee received anecdotal evidence of a major reduction in the level of resources for the planning system in the financial year 2012/13.^[3] In light of this evidence, is the current number of planning officers employed by planning authorities across Scotland adequate?

- PAS is aware of this matter, and of the difficulties some graduates with planning qualifications have in securing related employment (many of whom volunteer or intern with PAS in order to gain experience). A reduction in staff may however open up the opportunity to discuss new and innovative ways of delivering planning services.

In the wake of the recent review, is the current planning fee regime in Scotland sufficient to support the planning system?

- PAS believes that there should be a dedicated budget for engagement within planning authorities, given the statutory duty that they have to engage with members of the public and that planning reform has been predicated on effective and innovative engagement as well as efficiency.

How does reform of the planning system feature within the Scottish Government's/COSLA's plans for delivery of the Christie Commission principles?

- PAS believes that the planning system has a key enabling role and is the glue between many inter-related aspects of local government. Effective engagement is of paramount importance.
- A key reform of public service delivery which is required is better collaborative working between planning and community planning.
- Looking at the planning system in the widest sense, it is important to recognise the essential role it has in improving public health, creating places people want to live in and benefits to physical and mental health - and in engendering a sense of inclusion, confidence and well-being.