

# **SCOTTISH CIVIC TRUST RESPONSE TO SCOTTISH GOVERNMENT REVIEW OF THE PLANNING SYSTEM**

**30 November 2015**

## **Development Planning**

Combining effective community engagement with encouraging and providing new development can be challenging. We need exemplar engagement projects to demonstrate to planners, developers and communities that engagement can lead to better outcomes. Too often the community is consulted at a stage where many of the key decisions have already been made leading to confusion and friction, slowing up the process and resulting in unsatisfactory developments.

A holistic approach needs to be taken to development planning which is not developer-led but driven by the needs of the community. The Call for Sites element of development planning encourages developers to take the lead which results in communities acting defensively rather than engaging meaningfully and creatively. Neighbourhood analysis and impact assessment should be carried out and funded by the developer, but prepared under the direction of the local planning authority.

In the context of World Heritage Sites, the Statement of 'Outstanding Universal Value' and the provision of the current 'World Heritage Site Management Plan' should be fully incorporated into Strategic Development Plans.

## **Housing Delivery**

The focus seems to be on speed of delivery not quality. A holistic whole-town approach needs to be taken when assessing housing needs and community impact. A top-down approach from Scottish Government causes resentment at community-level, particularly when signed-off local development plans are ignored to meet national housing targets. The planning system should compel housebuilders to listen and respond to the concerns of local residents around issues such as lack of infrastructure, school provision, transport and town centres at risk. The planning system should be more pro-active in this area, not just reactive to pressures from housebuilders.

Other ideas for improving housing quality and delivery include:

- Bring back mandatory space standards for volume-built housing
- Encourage designs that provide usable attic space
- Renovate existing empty properties
- Encourage housing design competitions to raise design quality standards
- Focus on gap sites and brownfield area
- Use conservation area appraisal techniques as part of the masterplanning process
- Planning must ensure all new housing developments are services with accessible and affordable transport links.

## **Development Management**

Developments in and around conservation areas need to be controlled and driven by existing legislation – specifically the *Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997* which states that: “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”. It is clear that this does not always happen and, increasingly, the uniqueness and integrity of conservation areas are being eroded by inappropriate and piecemeal developments. There needs to be more enforcement of the existing legislation.

## **Community Engagement**

The planning system needs to draw more on the expertise and knowledge available in local communities. More needs to be done to educate and train Community Councillors, other elected representatives and members of local amenity societies in engaging constructively with the planning system and development process. The Scottish Government’s emphasis on economic regeneration and a simplified planning system may lead to further exclusion of communities from the decision-making process, causing more confrontation and dissatisfaction. Planners should be leaders not just mediators between developers and communities. Also, for engagement to work, planners need to be explain to members of the public what they can and cannot influence.

The charrette process is a useful tool for engaging with local communities to help determine local priorities, challenges and opportunities for effective and positive development. However, the visionary approach of charrettes is meaningless if it is diluted by national economic drivers. Current efforts to improve links between spatial and community planning are welcome but these should be driven by the community empowerment agenda.

Developers should be required to provide good quality, realistic and reasonably-sized images which are easily accessible through the planning portals and from mobile and desktop devices. People want to know what developments will look like from typical viewpoints and what their relationship is to their local surroundings.