

Places, People and Planning – **Scottish Government Position Statement**

RTPI Scotland response – August 2017

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Overview

RTPI Scotland welcomes this next step in the ongoing review of the Scottish planning system. It is useful to be able to analyse in more detail the Scottish Government's plans. Our response is split into three sections: The first gives broad comments on progress so far, and urges the Scottish Government to retain the original ambition of the review. The second section answers consultation question one with regard to each of the four planning review areas, and addresses the consultation questions concerned with the Environmental Report. The third and final section comprises a table with brief comments on the detail of the proposals in the Position Statement where RTPI Scotland has further analysis to add to that already submitted in response to the earlier *Places, People and Planning* consultation, or that included in the five thinkpiece papers we have published in recent months:

[*A statutory Chief Planning Officer in local authorities*](#)

[*Making an infrastructure first approach a reality*](#)

[*Making local place plans work - collaboration rather than conflict*](#)

[*Delivering more homes*](#)

[*A new development plans process*](#)

RTPI Scotland is keen to continue to work with the Scottish Government on taking forward work to realise these changes, through though leadership, member engagement and any working and advisory groups established to help inform specific approaches.

Ambition and scope of the planning review

At this stage we believe it remains important to emphasise some of the wider issues that have arisen in the review, but where change cannot necessarily be brought about by legislative change to the planning system itself.

In December 2016 in the paper *Repositioning Planning: Building a successful and sustainable Scotland*, RTPI Scotland outlined its vision for a reformed planning system. This is a future planning system that is a **corporate and collaborative** service that supports and influences investment and policy across local and national government. It is a **frontloaded and proactive** system to allow for community and stakeholder engagement and agreement on the priorities for an area and who is going to take them forward. It is a system that **delivers development** on the ground by ensuring the vision for an area is viable and resourced. And it is recognised as a valuable way of **providing solutions** to complex issues. RTPI Scotland thinks that to see such a system in place, certain ways of working need to be embedded in and understood of the planning system. We wanted to see the development of a system based on certain ways of working that will deliver the sustainable development that Scotland needs. The cultural change that we have identified as necessary is outlined in the table overleaf.

From planning being seen as:	To:
A drain on resources	A way of working that invests in and adds value to Scotland's assets
Creating uncertainty	A source of certainty and predictability for all stakeholders
Working in silos	An instigator of collaboration and integration
A manager of conflict between different interests	A facilitator for all those who want to make best use of Scotland's land and buildings
Unnecessary red tape and regulation	Enabling the right development in the right places
An overly complex process	Proportionate and flexible

With reference to the ambition of the table above there is much to welcome in the Position Statement. While there is still detail and clarity required on some proposals, many of the procedural changes put forward could in RTPI Scotland's view have a positive impact on the way that the planning system functions.

Work completed by RTPI Scotland in a series of thinkpieces published during the second quarter of 2017 highlights the major gains to be made by seeking reform in the wider context in which the planning system operates. Recognition of this wider scope and ambition will be essential to fulfilling the Scottish Government's aspirations for the planning system.

Infrastructure delivery is an excellent illustration of the importance of this wider context. The proposals made in the Position Statement are in RTPI Scotland's view largely positive. However, the bigger question of how additional local and strategic infrastructure needed across the country to support inclusive economic growth will be delivered in an era of continued public sector austerity is not addressed. Planners have the skills to play an important role in answering this question, and the planning review therefore offers a crucial opportunity to make tangible what this role should be. Achieving this will though depend on broadening the scope of the Scottish Government's response to the findings of the independent panel's review of the planning system.

As well as a narrow scope in places the Position Statement lacks some consideration of how the different proposals made will interact with each other and the impact that this will have on implementation. For example, the proposal to create a statutory link between Community Planning and spatial planning will have profound implications for the skills required of planners. It would be useful to map out these connections and to begin to envision how the reformed system will work as a whole.

As the review has progressed it has also become clear that the Planning Bill is likely to be enabling legislation, meaning that we do not expect full clarity of the detail of the reforms until the secondary legislation process is reached. Likewise, many of the changes proposed will be implemented through policy and guidance. Further information from Scottish Government regarding their expected timetable for this implementation would be valuable.

Answers to consultation questions

1. *Do you have any views on the proposals contained within this Position Statement?*

The table following our response to the consultation questions contains comments on the specific proposals included in the Position Statement where there is supplementary information to add to comments already submitted by RTPI Scotland to the *Places, People and Planning* consultation paper, or to those suggestions included in the five planning review thinkpieces published by RTPI Scotland during recent months. All of RTPI Scotland's previous submissions regarding the planning review are available on our [website](#).

As can be deduced from the comments below, while further detail is sought on some of the proposals, RTPI Scotland believes that taken as a whole the reforms could have a positive impact on the operation of the planning system. However, we remain concerned that the reforms will focus on procedural change to the planning system itself.

Without a wider scope that also takes in the context within which planning operates – in particular access to and control over land, resources, and corporate priorities – there is a risk that the planning review will not have a 'gamechanging' impact. Under each area of review we have therefore also briefly suggested how the scope of the reform could be widened to increase its potential impact.

Making plans for the future

RTPI Scotland believes that more could still be proposed to ensure that Local development plans become corporate documents at the heart of local government investment strategies.

Requiring Chief Executive sign off of LDPs is a good start to this, but we are concerned that this involvement at such a late stage of preparation would not create the corporate integration that we believe is necessary for planning to achieve its full potential.

RTPI Scotland has proposed the introduction of a Chief Planning Officer to each local authority. This post would include duties and responsibilities ensuring that the impacts of investment on place would be taken into account by local authorities at the corporate management level.

People make the system work

It is increasingly clear that to achieve positive community engagement in planning, and to reduce conflict in the system, there needs to be a concerted effort to improve trust between planners and the public, and vice versa. One of the key starting points for rebuilding this trust will be stronger communication of the purpose of planning; to make decisions on complex and sometimes contentious issues, in the broad public interest. Also crucial will be leadership from Scottish Government regarding how they envision the role of the public in this decision-making. 'Empowerment', 'engagement', 'participation' and 'consultation' can be used interchangeably, and without recognition of their differing purposes. Guidance on whether the Scottish Government intends to 'empower' communities to essentially make planning decisions themselves, or to improve and increase the influence of 'engagement' on those decisions made by existing public institutions, would be welcome.

It remains unclear what the format and role of Local place plans will be. Or, given the flexibility that the Scottish Government wants to imbue in the Local Plans process, it is not clear what will constitute a Local place plan, and what the objectives of these

documents will be. There is also still an absence of scrutiny of the resources that introducing a new layer of plans is likely to induce, and the capacity likely to be required in community groups hoping to prepare a Local place plan.

Even if the system created is light touch and flexible, as the Environmental Report identifies, statutory plans must be subject to a Strategic Environmental Assessment. In most cases this is likely to demand at least some guidance and support from the relevant local authority.

RTPI Scotland continues to agree with the Scottish Government that introducing a third party right of appeal would not help to achieve the more positive and proactive engagement of the public in the planning system that is our shared ambition. We believe that better and more meaningful engagement of the public in planning processes, and especially the early stages of plan-making, will be a more effective means of improving public trust in the planning system, and ensuring that decisions about development and land use are taken in the public interest.

Building more homes and delivering infrastructure

RTPI Scotland is optimistic that the measures for improving infrastructure delivery included in the Position Statement will contribute to overcoming current blockages and delays.

However, Scotland faces a major structural challenge with regard to infrastructure. Projects of both a local and strategic nature are needed all over the country to support housing and commercial development, and the inclusive growth that the Scottish Government aspires to.

We believe that this demands a new approach to infrastructure forecasting, planning and delivery that does not fall within the scope of the proposals made so far. RTPI Scotland understands that the Scottish Government does not believe that a new agency is the best solution to this challenge, and in addition that new resourcing for such activities is not available. We are of the view that there still needs to be stronger national and regional coordination, leadership and upfront resourcing for infrastructure. In a thinkpiece [Making an infrastructure first approach a reality](#), RTPI Scotland proposed the introduction of a task force charged with carrying out a national infrastructure audit. This would not require the setting up of a new infrastructure agency, but could help to improve horizon scanning for needed national and strategic infrastructure projects. There is also some scope to explore further the role of the Scottish Futures Trust.

We urge the Scottish Government to consider how changes to development finance could be introduced with the aim of capturing a substantial proportion of the uplift in land value created when a site is either allocated for development or made viable for development by the public provision of infrastructure. RTPI Scotland has submitted to the Scottish Law Commission's consultation on the Tenth Programme of Law Reform the suggestion that the Commission explore legal mechanisms for achieving this.

Stronger leadership and smarter resourcing

Policy and legislative reforms to the planning system should be designed with a constant view to the skills development that will be needed for their implementation. RTPI Scotland believes that further thinking about how existing skills shortfalls will be bridged, while making provision for the demands of the reformed system, is necessary at this early stage. As the Position Statement indicates, we look forward to being part of this process alongside the Scottish Government, Heads of Planning Scotland, and the Improvement Service.

2. What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report?

No comment.

3. *What are your views on the predicted environmental effects as set out in the Environmental Report?*

RTPI Scotland welcomes the acknowledgement in the Environmental Report that the introduction of Local place plans as possibly a further tier of statutory development plan could have environmental implications. Likewise, the identified need for guidance to support the implementation of SEA by communities preparing Local place plans is an important step.

4. *What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?*

The Environmental Report rightly highlights that change to the planning system in itself will not necessarily have direct environmental impacts, as the planning system simply provides the structure within which decisions regarding land use and development are debated and made. However, as the Report also identifies, reform to the planning system could have indirect environmental impacts, both positive and negative, including with respect to the fact that a well-functioning system has a better chance of enabling evidence based and balanced policy and decision-making.

It is important to note that this well-functioning system will depend on proper resourcing, with both the required skills and funding in place to take full consideration of environmental issues through the planning process. Successful implementation of the proposed reforms will require strategies to develop and deploy the skills that are needed. While RTPI Scotland agrees with the Scottish Government that opportunities for sharing specialist skills should be explored it is important to emphasise that awareness of the potential environmental impacts of planning decision making should be embedded throughout the profession and system.

The proposal in the Environmental Report to better align SEA reporting with development planning processes, which if implemented should allow SEA to add value through being used as an integral development planning tool rather than as a separate regulatory process, is welcome. Related to this point RTPI Scotland is pleased to see the proposal to develop new guidance regarding the application of SEA and Habitat Regulations Assessment (HRA); not just to local development planning preparation, but also the proposed local place plans process

Comments on individual proposals

The table below includes brief comments on individual proposals where RTPI Scotland has analysis to add to that already submitted to the earlier Scottish Government *Places, People and Planning* consultation.

1.Aligning community planning and spatial planning	
We are minded to propose a statutory link between development planning and community planning in the Planning Bill.	Assuming the link is reciprocal, RTPI Scotland would welcome this.
We agree with views that spatial planning should also be better recognised by community planning, and believe this would be supported where local authority Chief Executives ‘sign off’ local development plans.	Sign off is welcome, but we believe that more than this is required to achieve full integration between community and spatial planning. For example, could community planning funding be linked to place-making outcomes? How will the system ensure that Chief Executives and their senior management teams will be involved throughout plan preparation, ensuring that it informs and is informed by other corporate strategies?
2.Regional partnership working	
...we expect to bring forward changes to remove current requirements for strategic development plans to be prepared and replace them with more flexible, but clearly defined duties and powers at this scale.	If SDPs are to be removed, a robust system needs to replace them. The details of this system, and resources needed to make it operational, should be made clear as soon as possible, to offer certainty particularly for the strategic planning sector. A sound strategic planning system is essential to support the infrastructure provision needed to support Scotland’s growth.

<p>To achieve this, a number of duties could be introduced, including:</p> <ul style="list-style-type: none"> • A duty to work together to address nationally and regionally significant spatial planning and development issues. • A duty to undertake joint evidence gathering including on delivery of cross-boundary infrastructure requirements. • A duty to contribute to the preparation and implementation of a National Planning Framework delivery programme. 	<p>Is ‘A duty to work together to address...’ enforceable? A great deal of this review is about outcomes, and this wording does not reassure that better outcomes will be achieved. RTPI Scotland would welcome the duty to include ‘agreed outputs’, such as a regional spatial strategy.</p> <p>It will be important to state which comes first; will the new regional strategic plans shape the NPF, or will the NPF shape strategic development?</p>
<p>We will also consider additional powers for local authorities to work individually or in partnership with others on a more discretionary basis, focusing on issues with a cross-boundary dimension including infrastructure delivery and housing.</p>	<p>We welcome this flexibility.</p>
<p>Authorities would still be free to work together to prepare spatial strategies for their areas to support wider regional partnership working. Although they would not form a statutory development plan, they could contribute to the evidence base for the National Planning Framework.</p>	<p>With reference to the above point about enforceability, RTPI Scotland is of the view that there should be a requirement to prepare spatial strategies, through which agreement on strategic questions is reached. We agree that this plan would not necessarily be part of the development plan, but could form a constituent part of the strengthened NPF.</p>
<p>3.Improving national spatial policy</p>	
<p>Restating national policy in local development plans adds time and complexity.</p>	<p>We are agreed that national policy shouldn’t need to be restated. If national policy is to be enhanced, its role in and relevance to Local development plans and regional spatial strategies should be clear in local development plans.</p>

<p>Given the need to deliver the Planning Bill, Scottish Ministers do not expect to adopt the next version, NPF4, within 5 years of NPF3 being produced (by June 2019). We will issue a fuller, collaborative programme for preparing NPF4 in due course, but currently expect its preparation to commence in 2018 with a view to adoption in 2020, and for the Scottish Planning Policy to be reviewed in parallel.</p>	<p>We believe that the transition arrangements make sense.</p>
<p>We will also ensure that the review of the National Planning Framework is aligned and where possible integrated with the review of the National Transport Strategy, Strategic Transport Projects Review and Infrastructure Investment Plan.</p>	<p>We have concern about the wording ‘where possible’ – National strategies should by nature be integrated with each other, and ‘where possible’ suggests that this integration is not a major priority.</p>
<p>4.Stronger local development plans</p>	
<p>[We remain of the view that...] supplementary guidance should be removed.</p>	<p>We believe that there will still be a need for supplementary guidance to provide more detail on specific policies or to update LDPs. As per the RTPI Scotland response to the previous consultation, we believe that this could be non-statutory.</p>
<p>We will provide greater clarity on how a 10 year timescale could operate, including through provisions for plans to be amended or updated between full review cycles.</p>	<p>RTPI Scotland looks forward to seeing detail on this, particularly on the mechanisms for carrying out updates.</p>
<p>We will define the specific circumstances where updates may be triggered within the ten year period.</p>	<p>This will be useful for giving certainty. We believe it will be important that the specified circumstances take into account differences across local authority areas, for example an urban or rural context, or a stronger or weaker prevailing economy.</p>

<p>We will also develop guidance to support any such change which provides clarity on the relationship between the plan review cycle, plan preparation period, updates and delivery programme.</p>	<p>As above, we would welcome the certainty this should offer.</p>
<p>Matters which could be tested within the gatecheck could focus on:</p> <ul style="list-style-type: none"> • whether there is an adequate evidence base (e.g. infrastructure capacity, environmental assets and constraints, housing land assessments and audits); • outcomes to be sought from the plan (housing requirements, targets for other development types, reuse of vacant and derelict land); • proposed departures from national policy on the basis of local circumstances; • methods for the plan preparation including the approach to engaging delivery bodies and the public, alignment with community planning and the scope of the accompanying environmental assessment. 	<p>This is largely in line with our thinkpiece A new development plans process; particularly welcome is the focus on evidence and project management.</p>
<p>The purpose of the gatecheck would be to provide reassurance on the evidence base and approach early enough in the process to take remedial action, rather than at the end of the process through the current examination process. Whilst we will look to clarify Ministers' powers for intervention in the local development plan process, our aspiration is that future arrangements will see more straightforward examinations as a result of the early gatecheck.</p>	<p>The introduction of gatechecks should mean simpler examinations, and therefore 'aspiration' for this is a bit vague. It would be good to have a commitment from Scottish Government that the examination process will be sped up alongside the introduction of gatechecks. That said gatechecks should ensure that the integrity of the process is upheld.</p>
<p>5.Making plans that deliver</p>	

<p>We expect to bring forward measures to strengthen local development plan delivery programmes in the Planning Bill and through changes to secondary legislation.</p>	<p>We welcome the procedural change proposed, although we are not convinced that the proposals here are enough to guarantee stronger delivery without the provision of additional tools and resources that assist with land acquisition and funding.</p>
<p>We will therefore develop more specific proposals for adjusting pre-application consultation requirements which are more proportionate for allocated sites. These proposals are expected to involve future legislative change, as well as being supported by guidance.</p>	<p>We believe that community engagement on allocated sites should focus on design detail, with principles agreed at the plan making stage.</p>
<p>We will work with stakeholders to explore a proportionate framework to provide clarity on delivery whilst minimising additional investment in assessment. We expect to support this proposal through secondary legislation and guidance.</p>	<p>RTPI Scotland feels that this could be useful, but again the real challenge will be funding for infrastructure – see sections below for more detail.</p>
<p>6. Giving people an opportunity to plan their own place</p>	
<p>We expect the Planning Bill to include proposals for local place plans that are consistent with the local development plan.</p>	<p>RTPI Scotland welcomes the principle of local place plans, but is concerned that the relationship with Community Planning, and locality plans in particular, has not been clarified.</p>
<p>We are minded to leave processes and procedures for their preparation as flexible as possible so that communities themselves can define the best way of doing this for their area.</p>	<p>This principle is logical, and <i>could</i> result in fewer resource demands for local authorities and communities. However, there is the potential for the system to lack clarity to such an extent that communities have a right to prepare plans, but are frustrated by their inability to do so, and then to deliver the proposals in them, without considerable support from local authorities. This approach is also likely to favour plans being prepared in</p>

	communities well-resourced with the time and skills to outline the process, and then see it through.
We will set out how local place plans should be incorporated into the local development plan through an update that still allows for wider public consultation and independent scrutiny.	Welcome that in order to form part of the LDP, LPPs will be subject to thorough scrutiny, including deliverability. There should also be consideration of how LPPs will link with Community Planning documents, including Local Outcome Improvement Plans and Locality plans.
We recognise the widespread support for community councils being involved in preparation of the development plan scheme and are therefore minded to take this forward. We would want to ensure, however, that wider organisations, such as community development trusts, also have an important and positive role in helping to deliver change.	We understand that the development plan scheme is primarily procedural; what does the Scottish Government anticipate the role of community councils being in this?
Recognising the importance of stronger links with community planning, we will also look at the role of locality plans as part of this.	RTPI Scotland believes that this link should arguably be a core part of the local place plans proposal.
As well as legislative change, local place plans in particular will require guidance and support for effective implementation. As a starting point, this year's programme of design-led engagement ('charrettes') will explore the challenges and opportunities arising from local place plans in more detail.	It is agreed that charrettes will be a useful source of information. Going forward the potential for charrettes to inform a first round of Local place plans should be explored. However we are of the view that this should however be rooted in a robust analysis of the effectiveness of the charrettes process, and improvements that could be made, especially to the delivery of the desired outcomes identified.
7. Getting more people involved in planning	

<p>We are also considering how we can take forward the recommendations arising from the research, including steps needed to achieve a real shift away from consultation towards more meaningful community empowerment within the planning system. Development plan schemes, and in particular participation statements, could play an important role in this and we will therefore look to strengthen the provisions for them in the legislation.</p>	<p>This should be addressed holistically alongside spatial planning's relationship with community planning. There also needs to be a link through to the skills and resources that will be needed to support this community activity.</p>
<p>We will also continue to explore the scope for community empowerment and capacity building which extends beyond the planning system.</p>	<p>RTPI Scotland believes that participation in planning is just one piece of the community empowerment jigsaw. It is good to see recognition of this, although it could be made clearer by the inclusion of more consideration of how the link between spatial planning and community planning will make provision for community involvement in the planning process. We also make reference to our comments above in response to consultation question one, regarding the need for clarity from the Scottish Government on how it envisions the role of the public and communities in planning, and whether its ambition is for 'empowerment' or more influence through better 'participation' and 'engagement'.</p>
<p>9.Keeping decisions local – rights of appeal</p>	
<p>There would also be merit in reviewing the effectiveness of local review bodies to explore lessons learned, share issues and solutions, and identify scope for future improvement. In the meantime no further legislative change is proposed.</p>	<p>We are of the view that the mixed experience with local review bodies suggests that learning from best practice could be a good approach.</p>
<p>At this stage we do not propose to introduce fees for lodging either</p>	<p>RTPI Scotland is disappointed that fees will not be introduced for appeals. This measure could help to assuage public concerns about</p>

reviews or appeals.	perceived imbalance in the appeals system. To avoid vexatious use of the mechanisms, could the fee be refunded if an appeal were to be successful?
We are exploring the scope for mandatory training for elected members who are serving on a planning committee or Local Review Body, potentially supported with testing. We have already offered financial support to planning authorities who are taking forward training following the May 2017 local elections.	Training in the context and complexity of planning is essential.
10. Being clear about how much housing land is required	
Whilst it will be important to ensure that future changes to the planning system are equipped to deal effectively with planning for housing, we expect this to be addressed as a priority in policy and guidance, rather than through structural change to the system.	Guidance will need to be strong to move away from lengthy debates about the housing need/demand evidence base. Gatechecks will have an important role in ensuring that decisions about the baseline of LDPs are frontloaded, and decided as early as possible in the plan preparation process. It will also be important for the Scottish Government to address what the role for Regional Planning Partnerships, and regional spatial strategies as discussed above, will be in this?
Bearing in mind our proposals for enhancing the role of the National Planning Framework and Scottish Planning Policy, we will continue to work with housing professionals, planning authorities and developers to identify a solution which minimises the level of debate on how much land is required for housing.	We wonder if community representatives should be involved in this discussion, to ensure that they are satisfied with an agreed methodology?
11. Closing the gap between planning consent and delivery of homes	

<p>We maintain that fuller information on the viability of sites and development delivery should be part of a planning process and will continue to develop this further with a view to future guidance.</p>	<p>This push for transparency and informed decision making, particularly at the plan-making stage, is welcome.</p>
<p>Whilst changes to Compulsory Purchase Orders, Compulsory Sale Orders and a development land tax could all influence the context for planning for housing, we are exploring options around these separately and they will not be taken forward as part of the Planning Bill. We will, however, pursue revised guidance for operation of existing CPO powers in the short term.</p>	<p>The role of the context in which the planning system operates, particularly the land market, should not be underestimated in attempts to make the system work more smoothly. There is a need to explore what progress has been made on CPO since the Law Commission’s 2015 report. We acknowledge that the Scottish Government wants local authorities to make more use of existing powers, but there is strong feeling that the legislation as written is not fit for purpose. There are connections between the deliverability of plans and trust in the planning system, and therefore the usability of Compulsory Purchase and Sale Orders is tied to the wider objectives of this review.</p>
<p>12. Releasing more ‘development ready’ land for housing</p>	
<p>We expect to bring forward proposals for legislative change that will refresh and rebrand Simplified Planning Zones and allow them to be progressed in a wider range of circumstances.</p>	<p>This legislation must address funding, as planning fees are not collected on SPZ sites. We reiterate that SPZs should be rebranded to better reflect the purpose envisioned in <i>Places, People and Planning</i>: tools for encouraging masterplanning and the use of strong design codes.</p>
<p>We will look at broadening the way in which the idea of establishing a zone can be progressed, including by allowing for Ministers to direct a zone to be established where it is in the national interest. Both local authorities and site promoters could also be given scope to bring proposals for zoning forward.</p>	<p>Is there a link between SPZs and infrastructure delivery, with an intention to use SPZs in a similar way to the way that Strategic Development Zones are utilised in Ireland? RTPI Scotland believes that there is potential to use ‘special planning zones’ as key economic drivers, where planning is harnessed to proactively promote certain types of development on well-located sites.</p>

	<p>Will Ministers be able to establish SPZs for, for example, NPF project sites? And would there be an associated fee/compensation thereof for the relevant local authority? How would local authority and/or resident concerns be addressed?</p>
<p>13.Embedding an infrastructure first approach</p>	
<p>Scottish Ministers remain of the view that a new agency is not needed to improve the links between planning and infrastructure.</p>	<p>RTPI Scotland understands that the Scottish Government does not feel that the new infrastructure approach has to include a new agency. But we are concerned that taken together these proposals do not form a strategic and long term approach to addressing a challenge of the scale faced. The short term measures outlined below are welcome, but it seems clear that structural change to the way that infrastructure is planned for and delivered is needed. RTPI Scotland is not convinced that taken together the measures here will achieve that.</p>
<p>As there are different views on appropriate arrangements, but consensus on a need for action in the short term, we have asked the Scottish Futures Trust to work with us to take forward support for significant stalled sites in combination with the ongoing brokerage role of the Chief Planner. This will also link with the More Homes Scotland programme. Rather than having statutory powers, this would be led by the Scottish Government and involve infrastructure providers as and when required. We believe a task based approach is likely to have the greatest impact in the shortest time.</p>	<p>Would more evidence on why sites have stalled will be an important contribution to this?</p>

<p>Furthermore, we are continuing to consider options for a national delivery group to support improved co-ordination of development and infrastructure issues. To inform this we will continue a dialogue with the current key agencies and private sector delivery partners including transport (rail), electricity, gas, heat, telecommunications and digital infrastructure providers. Over the coming months, this would provide a useful forum to discuss any potential changes to duties and powers to be considered for inclusion in the legislation.</p>	<p>RTPI Scotland welcomes this measure, and would be pleased to be involved in such a national delivery group.</p> <p>It will also be important for this delivery group to link back to horizon scanning for future infrastructure projects. There should be a connection between this proposal and that which follows.</p>
<p>We will continue to engage in the forthcoming review of the Infrastructure Investment Plan to ensure that the National Planning Framework informs decision making about future investment priorities. As proposals take shape, continuing alignment with ongoing work on the Enterprise and Skills Review and the National Transport Strategy's review of transport governance at the national, regional and local levels will be critical over the coming months.</p>	<p>We believe that ensuring alignment between different national strategies will require the NPF to be a more influential corporate document within Scottish Government.</p>
<p>To develop the regional scale of infrastructure planning in more detail, we will explore approaches to regional infrastructure audits further over the coming months.</p>	<p>How will these link to the duties and powers described in the strategic planning proposals, and the requirement to ensure that the new strategic planning arrangements deliver?</p>
<p>We will also continue to work with infrastructure providers to define how best to facilitate their involvement in the planning system.</p>	<p>Further detail and clarity on this would be welcome, including how the Scottish Government intends to influence decision-making in key agencies, utilities and private sector providers.</p>
<p>14. Creating a fairer and more transparent approach to funding infrastructure</p>	

<p>We remain of the view that options for a levy or charge merit further consideration. We will finalise and publish a Stage 3 research report which identifies options that could be tested further. We will continue to explore this with assistance from the Scottish Futures Trust before coming to a view on the level of detail that can or should be included in the Planning Bill.</p>	<p>RTPI Scotland supports an infrastructure levy to fund non-local projects, subject to the resolution of a number of questions. These include the cumulative impact of a new infrastructure levy and existing Section 75 arrangements on developers and development viability. It is also important that any new fund will be able to deliver infrastructure up front. The possibility of managing the fund to leverage its value has been raised, so as to introduce a long term solution to Scotland's infrastructure challenge.</p> <p>More detail on how the fund could be administered, especially in relation to stronger national coordination on infrastructure planning and delivery, is included in the thinkpiece <i><u>Making an infrastructure first approach a reality</u></i>.</p> <p>RTPI Scotland is disappointed that the Scottish Government has not made complementary proposals for capturing the land value uplift that is created when sites are allocated for development through the development planning or development management system.</p>
<p>15. Innovative infrastructure planning</p>	
<p>We have taken forward enhanced permitted development rights for telecommunications infrastructure and will continue our work on education infrastructure planning in the coming months.</p>	<p>This is a sensible procedural change, but we are not sure how transformative this might be.</p>
<p>16. Developing skills to deliver outcomes</p>	
<p>We will continue to work with RTPI Scotland, Heads of Planning Scotland, COSLA and the Improvement Service on skills development.</p>	<p>RTPI Scotland looks forward to working with the Scottish Government to clarify the detail of what this might consist of.</p>

<p>We will also explore the scope for shared services, and expect there could be particular benefit in developing more effective sharing of expertise in some specialisms such as archaeology or environmental assessment.</p>	<p>There is still a lack of detail on what is meant by ‘shared services’ and how it could operate in practice.</p>
<p>17. Investing in a better service</p>	
<p>Following a separate consultation, we have increased the maximum planning fee. We will not consult on further changes until after the Planning Bill has been considered by Parliament, to ensure we have a clear idea of the resource implications arising from the finalised changes to the planning system.</p>	<p>We agree with logic that fees requirements should be assessed once changes to the system are known. However, new facets of the system should not be introduced before the fees that will allow them to operate as effectively as possible, as this could lead to frustration and poor implementation.</p>
<p>However, given the limited existing powers in current legislation around resourcing, we expect the Planning Bill to include additional enabling powers that provide scope to widen discretionary charging and to extend the range of services for which fees can be charged.</p>	<p>With respect to the comment above, if used these powers could help to ensure that resourcing of the planning system catches up with the expectations of it.</p>
<p>18.A new approach to improving performance</p>	
<p>We will continue to work with the High Level Group and others in pursuit of improved performance.</p>	<p>We would welcome more detail here. Will a new performance framework be designed to fit with the reformed system, with a focus on quality outcomes?</p> <p>RTPI Scotland would be pleased to be involved in discussions about how performance measurement can be refined.</p>
<p>20. Innovation, designing for the future and the digital transformation of the planning service</p>	

<p>We recognise the huge potential that exists through harnessing use of digital technologies and data more effectively and will be setting out our ambitions for a future digital planning service in Scotland shortly.</p>	<p>Any technology related reforms should run in parallel to other reforms, or there is potential for wasted resource. E.g. If a new LDPs process is put in place, it should be put in place with the supporting technology infrastructure, with shared procurement opportunities taken advantage of.</p>
<p>We are moving forward with establishing a Digital Task Force to lead and shape these broad and transformational aspirations, as well as inform on more specific ideas and innovation in this key area.</p>	<p>It is good to see that this taskforce is now being convened, and look forward to seeing outputs soon.</p>



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