Response to the Scottish Government consultation on the Places, People and Planning - Position Statement and Strategic Environmental Assessment

by the National Trust for Scotland

11th August 2017

Question 1 – Views on proposals contained within the Position Statement

- **Vision for a sustainable Scotland** – the revision of the planning system is an opportunity to set out the kind of Scotland we wish to live in and pass on to future generations, supporting heritage, natural beauty and innovation. This has not yet been done in the independent review, or the consultation document, or now in the position statement. We would recommend that the bill be used to set out the Scottish Parliament's objectives for Scotland's physical environment and its public benefits. This could draw on the example of the Swiss Spatial Planning Act.

- **Holistic approach to land use** – the planning system should take a holistic, sustainable approach to place-making, rather than an over-emphasis on a single sector. The position statement does not take a sufficiently broad view of Scotland's physical environment. For example there are seventeen references to housing in the position statement – but no references to landscape, or biodiversity, or amenity.

- **Meet government commitments** – the revision of the planning system is an opportunity to meet government commitment to the UN's Sustainable Development Goal. These include the target to incorporate ecosystems services and biodiversity values into the planning system by 2020. The forthcoming planning bill is an excellent opportunity for the Scottish Government to meet this commitment.

- **Regional planning** – the position statement endorses the removal of strategic development plans, but the continuation of a level of regional co-operation. If these regional agreements are not published or consulted on, then transparency and accountability will be reduced. We support regional planning efforts, and would recommend any replacement scheme maintains public engagement.

- **National Planning Framework and Scottish Planning Policy** – if greater use is to be made of the National Planning Framework, for example by incorporating regional planning, then there should be commensurately greater consultation and greater scrutiny by the Scottish Parliament. We would welcome the Scottish Planning Policy being given an enhanced status.

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- **Supplementary Planning Guidance** – we do not support the removal of Supplementary Guidance. Where resources and expertise are in short supply, this Guidance can be a useful way of ensuring good quality decision-making.

- **Local place plans** – we think these could be a positive development, especially if they are given status within the planning system. However, issues of equity and resources will need to be considered.

- **Equal rights of appeal** – in terms of rebalancing the planning system, we think it is too soon to dismiss this mechanism for giving voice to community interests.

Question 2 – Accuracy and scope of information used to describe SEA baseline

The accuracy and scope of the baseline are adequate for undertaking the SEA.

Question 3 – Predicted environmental effects

The Scottish Government proposals are not yet sufficiently developed for an SEA to be usefully undertaken, especially as many of the measures will be reserved for secondary legislation. It is therefore not yet possible to assess their potential environment impacts – whether potentially enhancing or degrading the environment.

This is particularly the case for proposals around Permitted Development Rights and Simplified Planning Zones.

The SEA should therefore be revisited when there are more concrete proposals to assess.

Question 4 – Findings of SEA and proposals for mitigation and monitoring

As above. For many of the outlined ideas, these have not yet reached the stage of development where their impact could be assessed – and therefore mitigated.

The proposals on monitoring are still in development, but we would welcome a monitoring regime that assessed outcomes – i.e. effectiveness, rather than simply processing – i.e. efficiency.