

Finance and Constitution Committee
Room T3.41
The Scottish Parliament
Edinburgh
EH99 1SP

26th January 2018

Dear Committee Members

Thank you for consulting on the Planning (Scotland) Bill – Financial Memorandum.

Built Environment Forum Scotland (BEFS) is an umbrella organisation that brings together 23 non-governmental organisations across Scotland's built environment sector. Drawing on extensive expertise and knowledge in a membership-led forum, BEFS - informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's built environment.

BEFS wishes to make the following responses in relation to the Finance and Constitution Committee Questionnaire.

Consultation

1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?

BEFS did respond – and raised concerns over the constrained resourcing present for planning in the current climate.

2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?

n/a

3. Did you have sufficient time to contribute to the consultation exercise?

Yes

Costs

4. If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.

n/a

5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?

BEFS has comment in relation to the following areas:

Strategic Development Plans

The FM estimates that planning authorities will save £2.2m moving from the statutory strategic plans to regional partnerships. Our submission to the Local Government and Communities Committee has flagged that as the regional partnerships would not be statutorily required, planning authorities may take the opportunity to disinvest in strategic planning at the regional level and reallocate funds to other statutory areas not necessarily associated with planning.

Local Development Plans

The aim of the revisions to the LDP is to “front load” the system but there is no explicit commitment in the FM to greater funding for community engagement. Recent research by What Works Scotland¹ highlights the need for greater investment to ensure equitable engagement.

Local Place Plans

The FM states that the “costs of preparing LPPs are to be found by the community in the first place” but then illustrates previous examples that have been undertaken with funding available from the Scottish Government. The financial memorandum suggests LPP costs of £13K – and whilst this may be possible for some communities, recent charrettes have often cost substantially more. Independent research carried out by Strathclyde Universityⁱⁱ places the average cost closer to £18K and some communities have recently received a second tranche of funding – a proposed Leith Place Plan has recently received Scottish Government funding of £35K, building on the Leith Blueprint engagement exercise which was reported to have cost £46K. If these are the real costs that lead to the creation of a Local Place Plan then the financial memorandum is a gross underestimate.

Whilst that is one example, in consultation with those who deliver charrettes, their costs are regularly £30-40k per charrette – sums less than £25k were thought to erode the effectiveness of the process and final product.

If the LPPs are to be a meaningful component of the Local Development Plan then investment in their creation should not be scrimped.

6. If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?

n/a

7. Does the FM accurately reflect the margins of uncertainty associated with the Bill’s estimated costs and with the timescales over which they would be expected to arise?

n/a

Wider Issues

8. Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?

n/a

9. Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?

n/a

If the Committee have any questions, or require further information on any of the points made, please do not hesitate to contact BEFS.

Yours faithfully,

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ⁱ <http://whatworksscotland.ac.uk/wp-content/uploads/2017/12/WWSHardToReachOrEasyToIgnoreEvidenceReview.pdf>

ⁱⁱ https://strathprints.strath.ac.uk/61442/1/Kennedy_ArchNet_2017_Scotlands_approach_to_participatory_planning_characterising_the_charrette.pdf