



RTPI Scotland

mediation of space · making of place

Royal Town Planning Institute Scotland

18 Atholl Crescent

Edinburgh EH3 8HQ

Tel: 0131 229 9628

Fax: 0131 229 9332

Email: scotland@rtpi.org.uk

Website: www.rtpi.org.uk/scotland

Patron HRH The Prince of Wales KG PC GCP

16 June 2017

Dear Sir/Madam

**Guidance on engaging communities in decisions relating to land –
RTPI Scotland consultation response**

The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 2,100 members in Scotland and a worldwide membership of over 24,000. We:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members, and therefore the majority of the planning workforce, to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places in Scotland; and
- improve the understanding of planning and the planning system among policy makers, politicians, practitioners and the general public.

Overview

RTPI Scotland welcomes the Scottish Government's efforts to ensure that communities are more informed, and where possible more involved, in decisions about land use, including those outwith the planning system. These efforts cut across several policy arenas, including community empowerment, regeneration, housing and planning. RTPI Scotland therefore urges the Government to consider how a holistic approach can be taken; we believe that this will allow for more efficient, and effective, implementation.

Our response to the consultation focuses on two issues; the principles that RTPI Scotland believes should frame community empowerment and engagement, and, the need for the guidance to complement existing procedures for community engagement and consultation.

Principles on Community Empowerment and Engagement

In previous submissions to the Scottish Government regarding the Community Empowerment Bill (now the Community Empowerment (Scotland) Act 2015), RTPI Scotland suggested ten tests that should be met in taking forward the community empowerment and engagement agenda:

1. allow for a clearly stated and democratically agreed vision of national spatial priorities, including meeting needs for housing and infrastructure, and addressing the challenges of climate change;
2. take a broad view of sustainable development that requires all involved to place economic, social and environmental sustainability on an equal footing;
3. do not assume that the Government's agendas for sustainable economic growth, for meeting targets for reducing emissions and increasing renewable energy, for social inclusion and housing delivery will be achieved simply because there is the freedom of choice to do so;
4. any duties placed on local government and others are clearly defined, are resourced and are enforceable where necessary;
5. any rights given to communities are not token rights unsupported by resources, expertise or democratic challenge;
6. the understandable desire among communities for immediate investment in local facilities does not prejudice longer term investments to meet larger-scale needs such as hospitals, waste facilities and transport infrastructure;
7. approaches to planning within neighbourhoods not only serves to provide what local communities desire, but also allows for what wider communities need;
8. in exercising powers over the future of their areas, communities accept and fulfil the responsibilities attached to doing so and community groups recognise that they will need to consult as well as be consulted;
9. give an equal opportunity for all communities to be involved in shaping their own futures, including those communities and groups whose engagement has often been neglected; and
10. It does not hamper the ability of RTPI members to continue to provide a professional, independent, un-biased, evidence-based service to all those involved in, and affected by, planning.

We believe that these principles remain relevant in the context of this consultation, and recommend that they frame the final guidance published by the Scottish Government.

A cross-cutting approach to engaging communities in decisions relating to land

The planning system is the most powerful tool that we have for intervening in the use of land in Scotland. And, the ongoing Scottish Government review of the planning system has identified achieving greater involvement of the public in planning decision making as one its highest priorities. This is of course set in the context of community empowerment

as a key tenet of the Government's agenda; as is this consultation on *Guidance for engaging communities in decisions relating to land*, for those issues that sit outwith the planning system.

RTPI Scotland agrees with the assertion made by the Cabinet Secretary in her introduction to the consultation document that 'land is...key to the success and development of Scotland's people and communities alike'. We believe that the Scottish Government's ambition to realign influence over land use decisions will only succeed if the various policy levers available are used in a coordinated fashion. We therefore urge the Scottish Government to consider how this guidance regarding land use decisions that sit outwith the planning system can be developed to better sit within the suite of statutory consultation and engagement procedures that already exist in relation to land use.

The Community Planning agenda in particular has triggered a rethink on how professionals and practitioners engage with people in talking about their places. The Place Standard tool, developed in partnership by NHS Scotland, Scottish Government and Architecture and Design Scotland, has provided a means of opening a conversation about how people feel about the places where they live and work. There is an ongoing dialogue among professionals and practitioners, including in the context of the planning review, about how community engagement should be rooted in this 'whole place' approach, instead of completed on an ad hoc basis in response to proposals for land use change as and when they are made. This means maintaining an ongoing conversation with the public about their places, with local government, agencies and relevant private sector bodies (including landowners) then taking responsibility for implementing the actions for which a need has been identified. This guidance clearly falls within the scope of this agenda, and RTPI Scotland do not believe that this context is adequately outlined in the consultation draft. Below we have outlined two specific areas of reform in the planning review that are relevant to this evolving approach.

Frontloading and local place plans

There is consensus among Scottish Government and most other planning and land use stakeholders, including RTPI Scotland, that decisions on key issues in planning should take place earlier in the process, during the development planning phase instead of the development management phase. This would introduce greater certainty to the system, for public and private sector stakeholders as well as communities. An improved final version of this guidance could prove useful in this context, and it could encourage landowners to consult with communities about possible plans for land use change or development before the statutory requirement to do so as part of the formal planning process is arrived at.

The general ambition of the planning review to increase community influence over planning decisions is supported by the proposed introduction of several new procedures, including the possibility of community prepared 'local place plans'. These would be spatial plans, proactively written by communities to support Local Development Plans. RTPI Scotland has proposed that support for these plans should be offered in particular in priority areas identified in Local Outcome Improvement Plans, and areas of major change identified in Local Development Plans. If communities are to be able to prepare and deliver such plans successfully clearly there will be a need for transparency between those communities and local landowners. Without this transparency it will be

impossible for communities to anticipate where change could, and could not, occur in their places.

While especially relevant to the preparation of local place plans, greater community involvement in land use decisions in general will also depend on improving the transparency and accessibility of information about how these decisions are made. Because the draft guidance does not clearly outline how it fits within the wider context of community rights and responsibilities regarding land use decisions, RTPi Scotland cautions that it could in fact lead to confusion, and further disenfranchisement. This is especially true for those communities who are already excluded from these processes because of a lack of access to the resources and expertise often needed to influence decision making. This guidance has the potential to be an important tool for enabling this transparency. However, there will need to be stronger links made between the community empowerment, Community Planning, and planning review agendas.

I trust that you will find these comments helpful. RTPi Scotland would be happy to provide further guidance to the Scottish Government on how a more integrated approach to community involvement in land use decision making could be achieved. If you would like to discuss this, or require clarification of any points raised in this response, please contact me on 0131 229 9628 or by email to kate.houghton@rtpi.org.uk.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K Houghton', with a stylized flourish at the end.

Kate Houghton
Planning and Practice Officer