COMMENTS from David Sutton MA, Dip Arch, RTPI, RIAS, IHBC (Planner, Architect & Conservationist). With 35 years experience of Strategic Planning and formal Examinations. Who also assists a number of Community Councils (Cambuslang CC & Halfway CC) as well as Planning Democracy and BEFS.

This questionnaire is being sent to those organisations that have an interest in, or which may be affected by, the Planning (Scotland) Bill — Financial Memorandum (FM).

In addition to the questions below, please add any other comments you may have which would assist the Committee's scrutiny of the FM.

Consultation

1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?
   Yes - and responded. But there were no specific queries about financial impacts at that time

2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?
   No. The financial memorandum is simplistic - but does indicate the severe cuts to planning that the SGov seems to predict - even on the limited data provided by HoPS. The suggested budget cuts do reinforce the fact that the Bill will destroy effective Scottish Planning and will remove local democracy (at both Community and Council level).

   Examples of simplistic nature:-
   (1) That moving from a 5 year to 10 year Local Development Plan will halve LPA costs. This ignores the suggested Reviews, the SGov oversight, and need for ongoing data collection.
   (2) The suggestion that Local Place Plans will only cost £13k (x 92 pa ~=£1m pa) - when experience to date is coming out more in the £35k to £40k region.
   (3) The FM ignores the increased costs to the SGov of the centralisation proposed in the planning bill (other than the £85k pa for performance co-ordinator). Crudely these are likely to balance out the reduced savings in Council's

3. Did you have sufficient time to contribute to the consultation exercise?
   No. It is farcical that the planning review has gone on far over 2 years without addressing or listening to local communities. Always with suitably vague proposed changes (as we now have with a Bill but no ideal of the Regulations to follow). Communities are given no extra powers (such as Equal Right of Appeal) which would help them be taken seriously. Instead the Bill removes (destroys) strategic planning expertise; destroys and removes all supplementary guidance (which will remove statutory protection to heritage & conservation areas).

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.
   Communities will simply not be able to afford Local Place plans (which cost nearer £40k than £13k). Why is there not other powers (eg ERA) to ensure communities are taken seriously? Otherwise Community Council's will continue to be ignored.
5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate? 
No. The financial memorandum is simplistic - but does indicate the severe cuts to planning that the SGov seems to predict - even on the limited data provided by HoPS. The suggested budget cuts do reinforce the fact that the Bill will destroy effective Scottish Planning and will remove local democracy (at both Community and Council level).

**Strategic Development Plans**
The FM estimates that planning authorities will save £2.2m moving from the statutory strategic plans to regional partnerships. Yet the legislation is silent as to the details of these "Regional Partnerships" and how they will include Community Councils. As the regional partnerships will have no statutory role, LPAs will likely prioritise other budget areas.

**Local Development Plans**
Whilst the stated aim of the revisions to the LDP is to “front load” the system - moving to a 10-year LDP will instead likely lead to the periodic "REVIEWS" cited in the Bill. As there is no explicit commitment in the FM to provide either powers to strengthen the Community role and input (eg ERA - a low cost option) or to properly fund Community Engagement or LPPs - then meaningful Community Engagement will simply not happen. Recent research by What Works Scotland highlighted the need for greater investment to ensure equitable engagement. The community "war of attrition" to have their voice included in LDP will simply continue - but get angrier. Already we are seeing many LDPs failing to take on board any community Comments (eg Dundee, West Lothian).

**Local Place Plans**
The FM states that the “costs of preparing LPPs are to be found by the community in the first place” (you must be joking!!) - 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 University 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.

If the LPPs are to be a meaningful component of the Local Development Plan then investment in their creation should not be scrimped. Again ERA is a low cost way of ensuring that local Communities cannot be ignored.

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? 
No chance. It simply won't happen. Communities will increasingly revolt aghainst a biased planning system that cuts them out.
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? 
No. It is simplistic - ignoring the numerous extra SGov costs arising directly from the proposed centralisation.

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?
No. It fails to recognise the large increase in SGov costs linked to the proposed centralisation of so much policy and processes.

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?
Yes - there will be the huge cost of community alienation from the planning system, with Council's minimising budgets and cutting staffing & expertise. The whole Simplified Development Zones add a whole layer of complication that is out of proportion to any benefits.

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i [http://whatworksscotland.ac.uk/wp-content/uploads/2017/12/WWSHardToReachOrEasyToIgnoreEvidenceReview.pdf](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](https://strathprints.strath.ac.uk/61442/1/Kennedy_ArchNet_2017_Scotlands_approach_to_participatory_planning_characterising_the_charrette.pdf)