Written evidence to the Finance and Constitution Committee on the estimated financial implications of the Planning Bill

Scottish Environment LINK is the forum for Scotland’s voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

LINK members welcome the opportunity to provide evidence to the Finance and Constitution Committee on the Planning Bill (hereinafter referred to as the Bill). Overall, LINK members wish to highlight the need for:

1. Planning to have an overarching purpose of achieving sustainable development
2. Greater ownership of planning, particularly the National Planning Framework by Scottish Parliament
3. Better funding and resources for planning teams and departments

More specifically, LINK members call for the Bill to address the following aspects.

1. **Planning must have a clearly articulated overarching purpose of achieving sustainable development**

As the Scottish Government notes in its press release following the publication of the Bill\(^1\), “the places where we live, work and play can have a major impact on our health, wellbeing, sense of identity and prosperity” and therefore “planning can nurture our places, our environment and our communities and guide future change so that it benefits everyone”. What is more “planning can co-ordinate and support investment, ensure that future growth reflects the needs of communities and is sustainable”.

Despite the above, there is little in the Bill itself regarding the purpose of planning which would reflect the avowed views of Scottish Government. Specifically, the purpose of planning is not defined in the Bill and this is regrettable given the increasingly important role of planning in wider policy making. **Given the Scottish Government’s commitment to the UN Sustainable Development Goals, LINK members consider that sustainable development and its principles need to be fully reflected in the Bill in a statement that captures the purpose of planning.**

A key document which seeks to steer the future development of Scotland is the National Planning Framework (NPF). The current NPF is described by Ministers as “the spatial expression of the Government Economic Strategy”. The independent review of the Scottish planning system\(^2\) recognized the significance of the NPF but suggested that it “could go further in providing a clearer vision for infrastructure investment and development” while “fuller integration of the NPF with wider national plans, programmes and strategies was widely supported”.

**LINK members would urge the Scottish Parliament to consider going even further than the report recommendations and consider the importance of aligning the NPF with key policy papers for both our natural**

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\(^1\) [https://beta.gov.scot/policies/planning-architecture/reforming-planning-system](https://beta.gov.scot/policies/planning-architecture/reforming-planning-system)

and built environment. Seeking to align the objectives of the NPF with other strategies such as the Land Use Strategy, Marine Planning or the Biodiversity Route Map would provide a more holistic approach to considering what we would want a future Scotland to look like.

2. Greater ownership of planning including the National Planning Framework by Scottish Parliament

In addition to the above comments regarding the need to align planning with wider priorities, it is important to ensure an improved level of democratic accountability and engagement of the NPF, which after all provides a spatial vision for all Scotland.

Currently, the NPF is laid before the Scottish Parliament for a “period of Parliamentary consideration” and Scottish Ministers are only required to “have regard” to the views of the Scottish Parliament on the NPF. This level of scrutiny and engagement is disproportionately small given the impact of the NPF in determining priorities for development. What is more, the proposed Bill will make the NPF an even more powerful document, with more detail on what should happen at a regional level and an opportunity for full revision only every 10 years instead of 5 years as is the case at present. At the same time, the opportunities for the Scottish Parliament to influence the document will remain very limited.

LINK members would welcome provisions in the Bill to ensure that the Scottish Parliament is able to scrutinize, amend and is required to approve the NPF.

3. Better funding and resources for planning teams and departments

LINK members have not developed detailed views regarding the financial implications of changes to fees. However, it is important that planning authorities and others, particularly in the key agencies, have access to sufficient resources and expertise both to engage with communities of place and interest to develop the innovative vision required to make Scotland a more successful and sustainable place and to scrutinize the implications of development proposals to ensure they make a positive contribution toward achieving sustainable development. If fees are to be raised, it is vital that these additional funds are used to better resource planning teams and key supporting expertise.