

Planning Democracy
16 December 2025

Re: Outcomes of the Planning Democracy Meeting with Scottish Government Officials – 29 October 2025

Dear Local Government Housing and Planning Committee,

We have spoken in evidence sessions regarding the annual review of NPF4 that we would further engage with Scottish Government officials.

We met with officials on the 29th October and have had some subsequent correspondence with the team.

We wish to formally inform you of the issues raised and the concerns expressed at that meeting and in subsequent correspondence. The discussion covered Local Place Plans, NPF4 implementation, biodiversity, enforcement, and community involvement. While we appreciate the time given by officials and we welcome their agreement for continued engagement on some of the issues around training and the Local Place Plan review, we remain deeply concerned that the current direction of policy and practice is failing communities, failing biodiversity, and failing to meet the ambitions Ministers have repeatedly set for a fair, transparent and environmentally responsible planning system.

Local Place Plans (LPPs)

Officials informed us that the LPP review will not begin until mid-2026 and will conclude at the end of that year. We stressed that a meaningful review must look beyond procedural data and assess whether LPPs are genuinely building trust, shaping decisions, or improving relationships between planners and communities. At present, there is no evidence they are doing so.

We made it clear that community experience must shape this review from the outset, not as an afterthought. **We continue to believe that independent oversight or an advisory group is necessary to ensure credibility.**

NPF4 and Biodiversity

We raised strong concerns that communities are not seeing promised improvements on the ground. Despite the ambition of NPF4's nature and climate policies, enforcement remains inconsistent, biodiversity is not being protected in practice, and communities often experience planners as defending development rather than public interest outcomes.

We cited local examples where biodiversity is being eroded and where the complexity of planning law effectively excludes community participation. We also reiterated that **competing Government priorities, such as housing emergency measures, freeports, and energy infrastructure are undermining nature recovery and creating significant public distrust.**

Policy 3 and Research Evidence

Early findings shared by researchers suggest little behavioural change in planning authorities despite NPF4. This aligns with what communities are experiencing. **We believe Ministers need to take a stronger leadership role to ensure the original intentions of NPF4 are not lost in day-to-day decision-making.**

Training and Skills

Although officials described a wide range of training for planners, very little is designed to support dialogue between planners and communities. The current approach remains top-down and technocratic. **We reiterated that cross-learning is essential if Ministers want a planning system that is genuinely collaborative and trusted.**

Conditions, Enforcement and Community Liaison

We raised repeated examples of failure to enforce planning conditions and of responsibilities being offloaded onto communities. The situation is unacceptable. **While officials encouraged us to send examples, communities should not have to gather evidence case by case for Government to recognise a systemic problem. A full review of enforcement practice remains essential.**

Governance and Representation

We again requested that community-based organisations be represented on the High-Level Group. It is not credible that a group advising on national planning performance excludes the very communities most affected by planning decisions. **Relying solely on PAS as a proxy for community representation is inadequate and risks reinforcing institutional blind spots.**

House of Rosskeen Case Raises the Need for Rights of Appeal....Again

We raised again the problems surrounding the House of Rosskeen case, which we had asked unsuccessfully to be called in by Scottish Ministers in August 2024, because of what we felt were problematic issues. Scottish Government officials sent a response, however the content amounted to a dismissal of the concerns raised and underscores the wider systemic issue: there is effectively no meaningful oversight of local authority decision-making, and communities have no route to redress when planning decisions appear to contradict the Local Development Plan, involve questionable processes, or result in avoidable biodiversity loss.

In this case—as in many others—the community has been left with no option but to shoulder significant personal financial risk by pursuing judicial review. This is an unacceptable burden on volunteers and local residents and reflects a profound failure of the planning system to provide fair, accessible, and accountable mechanisms for challenge. **The toll on the community, their resources, and their trust in both local democracy and the Scottish Government's willingness to uphold environmental and community interests has been severe. This is unacceptable and should be addressed by giving communities a right of appeal.**

Summary for Ministers

The message from communities is clear: despite the strong ambitions of NPF4 and decades of commitments to improve participation, the Scottish planning system is still experienced as developer-led, difficult to influence, and poorly aligned with the urgency of biodiversity and climate commitments. Without stronger Ministerial leadership on enforcement, on community representation, on aligning Government priorities, and on meaningful LPP reform and rights of appeal for communities these issues will continue to undermine public trust.

We would welcome the opportunity to discuss these concerns directly with Ministers and to work towards a planning system that better reflects Scotland's climate, nature and community commitments.

Yours sincerely,

Clare Symonds
Planning Democracy