Greenspace Scotland welcomes the opportunity to provide a submission at this stage of the Planning (Scotland) Bill.

Greenspace Scotland is an independent charitable company. Since 2003, we have provided a national lead on greenspace working towards our goal that everyone living and working in urban Scotland should have easy access to quality greenspace which meets local needs and improves quality of life. We work with a wide range of national, regional and local organisations and community groups on projects to create, manage, use, promote and evaluate greenspaces and green networks.

This evidence is based on our experience of working across urban Scotland with a wide range of organisations and communities. We support a network which brings together groups and organisations involved in greenspace management. The network continues to grow with the biggest increase in applications being from community groups who are involved in managing their local greenspaces. Greenspace Scotland has supported a range of communities in local placemaking projects which have seen community organisations taking a lead in the process of transformation of their neighbourhoods and settlements. We also work with local authorities on the development and implementation of open space audits and strategies, green network and green infrastructure plans, and convene Scotland’s Park Managers Forum.

Overall, we welcome the objectives of the Bill in relation to simplifying the planning system and allowing planners to focus on delivery rather than drafting policy and plans. We do, however, have some concerns about:

- the potential for losing detail and clarity around the provision of quality, multifunctional greenspace and green infrastructure
- adequate investment in capacity building and support for communities to ensure that all are able to prepare Local Place Plans and influence local development plans – without this, there is a risk that inequalities will be increased between communities
- the practical challenges of managing the transition between the current and new planning systems - ensuring that all elements of the system are in place to support each other (see below).

Specific questions asked in the Call for Evidence

1. Do you think the Bill, taken as a whole, will produce a planning system for Scotland that balances the need to secure the appropriate development with the views of communities and protection of the built and natural environment?
We believe that the Bill should produce a planning system that balances development, community views and the environment – so long as implementation clearly recognises and articulates all three elements.

2. To what extent will the proposals in the Bill result in higher levels of new house building? If not, what changes could be made to help further increase house building?

No comment

3. Do the proposals in Bill create a sufficiently robust structure to maintain planning at a regional level following the ending of Strategic Development Plans and, if not, what needs to be done to improve regional planning?

The proposed structure for regional planning seems logical and workable but this is one of the areas where timing and sequencing of changes are critical (see 12 below).

4. Will the changes in the Bill to the content and process for producing Local Development Plans achieve the aims of creating plans that are focussed on delivery, complement other local authority priorities and meet the needs of developers and communities? If not, what other changes would you like to see introduced?

If planning is truly front-loaded and transparent then the proposals should achieve the stated aims – community empowerment in the proposed system is predicated on effective engagement in plan development and in the design of development proposals.

5. Would Simplified Development Zones balance the need to enable development with enough safeguards for community and environmental interests?

If the development and designation of Simplified Development Zones includes full consideration of community and environmental interests and these are incorporated in the planning of the Zones then these proposals should be positive in their impact - however, it is possible to envisage situations where these interests could be overlooked or under considered.

6. Does the Bill provide more effective avenues for community involvement in the development of plans and decisions that affect their area? Will the proposed Local Place Plans enable communities to influence local development plans and does the Bill ensure adequate financial and technical support for community bodies wishing to develop local place plans? If not, what more needs to be done?

It is very difficult, from our reading of the Bill, to see what financial and technical support for communities is being proposed. Without investment in capacity building, there is a real risk that these proposals will increase inequality between communities – with the most capable influencing the LDP process and the least capable losing out.

The proposal for greater frontloading of the process is a positive one for community engagement if it is implemented properly.
We would emphasise the need for collaborative and supportive approaches and to ensure that they are fully inclusive and engage with the less usual audiences. For example, our work with Youth Scotland on the Young Placechangers programme was developed because young people are almost invisible in the public realm and are a missing voice in local place consultations. Young Placechangers puts young people in the lead role – bringing together the wider community to look at local spaces and plan improvements. ‘Greening Dunfermline Town Centre - a placemaking approach driven by greenspace and public spaces led and facilitated by young people’ used both the Place Standard and Town Centre Toolkit, and was part of the Scottish Government’s Town Centre Planning Pilot programme. Case study link http://www.scotlandstowns.org/greening_dunfermline_town_centre and more about Young Placechangers http://www.greenspacescotland.org.uk/young-placechangers.aspx

7. Will the proposed changes to enforcement (such as increased level of fines and recovery of expenses) promote better compliance with planning control and, if not, how these could provisions be improved?

No comment – other than to stress the need for the planning system to be funded at an appropriately level through a range of mechanisms including fines and fees.

8. Is the proposed Infrastructure Levy the best way to secure investment in new infrastructure from developers, how might it impact on levels of development? Are there any other ways (to the proposed Levy) that could raise funds for infrastructure provision in order to provide services and amenities to support land development? Are there lessons that can be learned from the Infrastructure Levy as it operates in England?

We feel that the Infrastructure Levy is an appropriate mechanism for securing investment in key infrastructure but would prefer (particularly in light of the comments in the SEA about prioritising green infrastructure to deliver positive environmental impact) to see green infrastructure explicitly referenced in the definition of infrastructure.

9. Do you support the requirement for local government councillors to be trained in planning matters prior to becoming involved in planning decision making? If not, why not?

We support the proposals for local government councillors to be trained in planning matters (including awareness raising relating to green infrastructure)

10. Will the proposals in the Bill aimed at monitoring and improving the performance of planning authorities help drive performance improvements?

No comment.

11. Will the changes in the Bill to enable flexibility in the fees charged by councils and the Scottish Government (such as charging for or waiving fees for some services) provide enough funding for local authority planning departments to deliver the high –
performing planning system the Scottish Government wants? If not, what needs to change?

See 7 above.

12. Are there any other comments you would like to make about the Bill?

- Supplementary Guidance

Currently, the detail of open space, greenspace and green infrastructure protection and provision relies on a combination of Open Space/Green Network Strategies (which often have the status of supplementary guidance for the Local Development Plan) and statutory supplementary guidance. These allow the Local Development Plan to be a slimmer and more concise document. With the proposed loss of statutory supplementary guidance this detail will need to be incorporated into either the National Planning Framework/Scottish Planning Policy or the Local Development Plan. While general principles relating to open space, greenspace and green infrastructure can be provided at a national level, experience to date shows that many aspects of open space etc. cannot – for example, the possibility of developing national open space standards has been explored several times and the conclusion each time is that these need to be set locally.

We would be keen to work with colleagues in Scottish Government during the development of the next iteration of the National Planning Framework and the associated guidance on developing Local Development Plans to explore the potential options for accommodating open space etc. and to ensure that the balance between national policy and local flexibility is optimised.

- Coordination of the proposed changes to the Planning System

This is our major concern moving forward with the proposals.

As described, the new Planning System has several neatly dovetailed elements which are interconnected and interdependent: the National Planning Framework and Scottish Planning Policy, the Local Development Plan, the Local Outcome Improvement Plan, Local Place Plans and Locality Plans. All of these need to be in place for the system to operate effectively. This means that producing and promoting the requirements for each element is crucial – we are already seeing community groups frustrated by the fact that the outputs from their charrettes etc. are not being treated by Planning Authorities as Local Place Plans.

Clear, logical and effective transition processes between ‘current’ and ‘proposed’ systems will be essential. Without them, quality and consistency within planning and placemaking are likely to suffer.