Local Government and Communities Committee  
Planning (Scotland) Bill  
Submission from Judy Wilkinson

Background

I am a member of Scottish Allotments and Gardens Society (SAGS) and have had discussions with other committee members about planning and in particular Part 9 (Allotments) of the Community Empowerment (Scotland) Act 2015. This places duties on the local authorities to provide allotments for those who wish to cultivate them. Planning is fundamental in finding the land to enable the local authority to comply with this duty.

I have been fortunate enough to have participated in the Planning Bill Review workshops. Planning is a complex process and can't be seen in isolation from issues such as land ownership, land prices and proper local democracy; it is an integral part of a much wider and complex system of public services that serve the community. There may be conflicting interests and these should be solved by negotiation, co-partnership working and agreement about what is acceptable not confrontation.

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 want a new way of planning and a planning system that is based on constructive, front-loaded discussion with an agreed vision and route map to achieve that vision.

Reinforcing the links between spatial planning and community planning should lead to greater coherence on the ground and a clearer rationale for the decisions made by the planning process.

Decisions should be taken, wherever possible, as close to the communities that are affected by them. However in order to make informed choices, everyone in the community should be aware of the benefits of the land use and the options for use that is being decided. Allotments are an integral part of place but often neglected and their role in the wider community not respected or appreciated. How consultations and engagement take place is fundamental to success of a good planning system.

Planning authorities must have a robust approach to engagement and co-working with the local communities particularly with groups who traditionally face barriers
to participation. These groups must be considered an integral part of the gatecheck. Gatechecks should be a statutory requirement.

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 focused on delivery, compliment other local authority priorities and meet the needs of developers and communities? If not what other changes would you like to see introduced?

There should be a policy on the provision of allotments within all 32 Local Authority (plus National Parks) Local Development Plans. People who live in high density and medium density housing areas do not have access to a growing space comparable to that available to those in low density housing developments. Therefore in social justice and equity everyone who wishes should have access to a green, growing space which they can tend which usually means access to an allotment.

As a means of achieving this there should be stronger link between Local Development Plans and other health and socio-economic outcomes. This could be achieved through a statutory link with Local Outcome Improvement Plans.

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?

The gatecheck should take place in two stages, with the second stage taking place later in the process. This second stage would consider the action or non-action that has been taken as a result of engagement with the community.

There is an important role for mediated process in the early stages of plan development. Introducing a duty to consider using mediation in the preparation of Local Development Plans would strengthen the collaboration between planning authorities, communities and developers.

Local place planning should be considered in the context of the preparation and delivery of the Community Plan/ LOIP and Local Development Plan. To engage the wider community the focus of these should be integrated with wider government policy ambitions - for example Part 9 of the CEA!

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?
This is very, very important but should be co-training open to members of Community Councils, representatives of community groups and Council officers working in other areas. This would provide an opportunity for them to all work together to gain an understanding of the planning process - the possibilities but also the barriers.

It is important that this stage is carried out slowly and carefully because this knowledge and understanding will underpin the success of failure of the rest of the process including the gate checks.

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

This will depend on the regulations from the Scottish Ministers make about the form and content of the report and the process to be undertaken in preparing the report. If the suggestions for community engagement are strong and clear then it will work.

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

None of the existing Government Acts, policies or even books and articles on planning contain any explicit recommendations on number allotments required or size of plots. They suggest consultation with relevant user groups but unless people have experience of growing on an allotment they have no idea whether they would benefit from the experience, what skills they possess or need to acquire and most importantly what size of plot they can manage. Unless there is an initial engagement with everyone concerned, planners, developers and community members that ensures they have all visited existing sites, talked to existing allotmenteers and understood the benefits then consultation is pretty meaningless.

Allotments are a microcosm of the world and this process of experiencing the land use and ramifications that is proposed should be embedded in the planning system for all citizen’s concerns. A new planning system should be a front-loaded and proactive system to allow for community and stakeholder engagement and agreement on the priorities for an area and who is going to take them forward. It needs to be a system that delivers development on the ground by ensuring the vision for an area is viable and resourced and where a holistic view of place has been co-created by all those living there. The planning system should be recognised as a valuable way of providing solutions to complex issues.

The National Planning Framework should receive parliamentary approval. It should include a national development beyond that of CSGN for all forms of food production including allotments and market gardens. It should involve public agencies and stakeholders working together to align their policies, programmes
and actions to achieve a common aim of the wellbeing of the Nation through the planning process.