Local Government and Communities Committee

Planning (Scotland) Bill

Submission from PAMIS

Introduction

PAMIS welcomes the opportunity to provide the Local Government and Communities Committee with evidence on the Planning (Scotland) Bill. PAMIS welcomes this Bill and the opportunity it provides to create a planning system which is more inclusive and capable of bringing about transformational change as well as providing solutions to issues around the current inequalities within Scotland in relation to people with complex needs and profound and multiple learning disabilities.

Who We Are

PAMIS – Promoting A More Inclusive Society is a registered Scottish charity, established in 1992, to work with people with profound and multiple learning disabilities (PMLD) and complex health care needs, their parents, carers and interested professionals. PAMIS is also founder of the UK Changing Places consortium and supports families across Scotland who require access to fully accessible toilets – Changing Places toilets.

Housing

The planning review seeks to address the housing shortage in Scotland and aims to deliver more homes. Consideration should be given to setting a national target based on needs assessments. Within this, PAMIS would like to see the introduction of regional targets developed by local authorities which include a commitment to achieve certain targets in relation to fully accessible housing. Future residential housing should be planned with disability in mind from the outset and there is scope within the Planning Bill to go much further in this respect, challenging developers to adopt a policy that requires inclusive design to be an integral part of the planning process embedding a more consistent and coherent approach to accessible housing across Scotland. The reality for the families that PAMIS supports is that they are isolated as a result of the lack of accessible housing. As an example, families cannot visit relatives easily as relatives houses are not accessible and do not provide the facilities they need. Opportunities that others may take for granted such as spending Christmas Day with their loved ones are not possible for people with PMLD.

Local Place Planning and Community Engagement

We are keen to see a statement of principles for the planning system within the Planning (Scotland) Bill and this should include a strong commitment to accessibility and inclusion. PAMIS strongly support the concept of making local communities
integral to the planning and development of Local Place Plans. However, the main challenge for this to work in practice is to think creatively about how to enable communities to participate in this process. Currently, people with PMLD, their families and carers cannot attend planning consultations and related events. They cannot join their local access panel. They cannot engage with the current processes central and local government have in place. This can be because these meetings take place in a venue that is not accessible and does not provide the correct facilities such as a Changing Places toilet. How do we ensure their voices are heard? The Scottish Government need to really consider how to achieve true engagement as part of this review of the planning process. What are the specific barriers to participation and how do we ensure these groups can actively develop Local Place Plans?

To ensure local place planning is meaningful, planning authorities need to have the resources and a far greater understanding of disabilities, specifically complex disabilities. We advise that authorities clearly state how they intend to engage with these groups specifically and that this has been considered as part of the gatecheck. Communities should be involved far earlier in the planning process and encourage and enable people to plan for what they need. PAMIS notes that Changing Places toilets are frequently not included in plans for new buildings and often only considered as an after thought or not at all. It is financially sensible to ensure new developments meet with inclusive design standards from the outset and include a Changing Places toilet as it is far more economical to plan for this from the outset.

PAMIS supports the requirement for local government councillors to be trained in planning matters prior to becoming involved in planning decision making and would go further to ensure councillors are resourced and trained in inclusive design principles and the need and function of a Changing Place toilet. This is also the case for Community Councils. Local councils and community councils should be supported to develop their engagement and facilitation skills particularly around hard to reach groups. There are some excellent examples of this work in Scotland but PAMIS note that this is sporadic and not replicated across the entire country. PAMIS can offer advice to local councils on how they can improve their community engagement. We would also suggest that the quality of community engagement with hard to reach groups is part of any annual performance monitoring and we support the development of national benchmarks and indicators to help drive improvement in these areas.