Local Government and Communities Committee

Planning (Scotland) Bill

Submission from the Scottish Planning Consultants Forum

The Scottish Planning Consultants Forum (SPCF) represents the private sector planning profession within the consultancy sector, both individual/independent consultants and those within small companies as well as larger corporate businesses.

The SPCF engaged in the Independent Review of Scottish Planning System, providing both written and oral evidence to the review panel.

The SPCF welcomes the opportunity to participate in the Call for Evidence on the Planning (Scotland) Bill.

The SPCF is aligned with Royal Town Planning Institute (RTPI) Scotland, the champion of planning and the planning profession. While it may be a subsidiary group within the professional body, it nevertheless has an independent voice, representing one particular sector of the planning profession in Scotland.

The SPCF considers that sector to be vitally important in giving first-hand, practical day to day experience at the coalface of the planning system. The SPCF considers that it is critical for the Bill to reflect the views of the most significant number of regular users of the planning system.

The SPCF’s main objective is for the planning system to act as a key driver to facilitate sustainable economic growth in line with national planning policy.

In implementing this objective, the SPCF has set out the following principles which underpin its existence:

- To seek to influence the Scottish planning system, ensuring that the culture change agenda originally proposed in the initial stages of Modernising the Planning System is achieved for the benefit of all users of the planning system, particularly the SPCF members who represent the professionals that use the system most;
- To actively engage with public sector planning professionals to ensure continual improvements are sought within the planning system at all levels of government, including raised standards of customer service delivery and greater speed of decision making. Formal SPCF representation in discussions with Scottish Government officials, Heads of Planning Scotland and the RTPI Scotland greatly assist in that regard;
- To strive for a better planning system in Scotland which seeks to ensure that professional planners are at the forefront of delivering sustainable economic growth for Scotland, rather than empowering unqualified, self interest groups to influence the system in a way that would only hinder progress and cause delays in the planning process; and
To engender a greater cooperation and collaboration between public sector planning professionals and SPCF members in order to reach agreed outcomes on development opportunities which will achieve sustainable economic growth.

Our written evidence on the 12 questions posed by the Local Government and Communities Committee is based on our experience of good practice within the Scottish planning system as well as highlighting areas that might benefit from refinement and further clarity as well as identifying suggestions for improvement. The context for the SPCF’s written evidence is based on its members having the benefit of first-hand, practical day to day experience at the coalface of the Scottish planning system.

The SPCF considers that these views represent of the most significant number of regular users of the Scottish planning system as a whole.

Our membership has participated in every strategic and local development plan in Scotland, from formulisation and to Examination. The SPCF provides an objective and expert view on the development management and development plan processes of the planning system in Scotland.

It is therefore vitally important for the Local Government and Communities Committee to take account of the written evidence presented by the SPCF in its consideration of the Call for Evidence on the Planning (Scotland) Bill.

Yours sincerely,

Scottish Planning Consultants Forum
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?

The SPCF notes the aspiration of the Bill to 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. This aspiration is welcomed and supported.

The independent review of the Scottish planning system identified the following outcomes:

1. Strong and flexible development plans;
2. The delivery of more high quality homes;
3. An infrastructure first approach to planning and development;
4. Efficient and transparent development management;
5. Stronger leadership, smarter resourcing and sharing of skills; and

It is within the context of these outcomes that the Bill should seek to provide the balance that it is aspiring to achieve.

In this respect the Bill needs to be grounded in the reality that no system is perfect. The Scottish Ministers should be clear that this will not be the outcome of the Bill.

The aspired balance being sought may be unachievable given diametrically different views held by these stakeholders (communities, agencies, professionals and developers) on the need for new development to deliver Scotland’s Economic Strategy.

It is fully expected that secondary legislation and further guidance will help identify how that aspiration is achieved and what the appropriate balance should continue to be. The Scottish Planning Consultants Forum is an engaged stakeholder and will assist Scottish Ministers identify the most appropriate means to achieve a balanced planning system for Scotland as desired.

Regarding the Bill, there is scant information provided by the Scottish Ministers on a number of key proposals which prevent a comprehensive assessment of how the desired aspiration can be achieved.

The Bill is a framework, with secondary legislation to come forward later. This applies to a number of key areas of the Bill, including the Community Infrastructure Levy, Simplified Development Zones, and Local Place Plans. Secondary legislation and further guidance need to be published concurrently in order to allow an informed debate to take place between stakeholders, both within and outwith Parliament.

Some measures proposed in the Bill have the potential to deliver development at a reduced cost and at an increased pace.
The increased role for the National Planning Framework will decrease opportunity for other stakeholders to comment on key issues, such as housing land supply and infrastructure provision.

The incorporation of Scottish Planning Policy into the National Planning Framework will further remove opportunity for communities and other stakeholders to comment on the appropriateness of policies. The increased role for the National Planning Framework requires a commensurate increase in consultation and scrutiny. Debate in Parliament alone is unlikely to ensure stakeholder voices are heard.

Releasing Local Development Plan resources to focus on place and delivery is welcomed. However, this must be balanced against the need to maintain a locally responsive policy framework which is supported by a robust and credible evidence base.

The intent behind the Local Development Plan to have a 10 year cycle is welcomed and this should avoid the constant treadmill of development plan preparation and allow a greater focus on development plan delivery. This extension in cycle will assist the delivery of Scotland’s Economic Strategy.

Given the Local Development Plan 10 year cycle, the spatial strategy needs to be able to respond to changing local circumstances. There is a need for Local Development Plan review triggers to be clearly defined in further legislation or regulation to allow such changes in local circumstance to be responded to timeously. The Bill does not make the provision for consultation during the evidence “gate check” stage. This will further reduce the opportunity for other stakeholders to comment on a number of key policy areas, such as establishing the appropriate housing supply targets and housing land requirements to be delivered within local authority areas.

This “gate check” stage needs to be informed with robust and credible evidence agreed with key stakeholders. The “gate check” should be inclusive of all stakeholders willing to participate.

While increased community participation in development planning is positive, the introduction of Local Place Plans risks duplicating existing processes in community planning.

If the Scottish planning system is to balance all views then seeking to “Empower people and communities to get more involved and to have a real influence over future development” will likely introduce anti-development feelings and thereby cause delays in the process.

The Scottish Ministers need to be aware of this potential discord if the Scottish Government is to achieve its objectives of sustainable economic growth. If planning professionals are not be afforded the trust in moving the planning system in Scotland forward, then there must at least be parity among the stakeholders, with no imbalance to give uninformed, unrepresented local communities a greater voice than the development industry. It is this sector that has the necessary skills and expertise to deliver developments which will not only be realistic based on viability but will also meet place making planning objectives.
The relationship between Local Place Plans and Local Development Plans is poorly defined within the Bill. Clarity is required to understand their relationship to prevent conflicts between these plans in the future. A greater distinction needs to be made between Local Place Plans and Local Outcome Improvement Plans in order to prevent unnecessary duplication and consultation fatigue with communities.

The Bill states “The local authority will need to have regard to the LPP when preparing its LDP, either through an amendment or to inform a future review of the plan”. The Local Place Plan should be prepared in line with an extant Local Development Plan. Local Place Plans should not influence matters of national policy or local planning policy since the Local Development Plan has been through a process of consultation. Any bottom-up approach to planning such as this will only restrict development and cause delays in the planning system.

With the removal of the Main Issues Report stage, it is important that Local Place Plans can feed in to plan preparation at an informative stage. Further draft guidance and regulations referenced in the Bill need to be brought forward earlier in order to allow a full consideration of these issues.

The Bill comes at a time where austerity is projecting on local authority cuts which ultimately requires local authority services to function and improve with less investment and funding.

In this context, higher planning application fees are being sought for proposals, while other fees may be introduced for certain services to provide a high quality planning service. Without ‘ring fencing’ these funds, austerity will further affect the functioning role of planning departments across Scotland’s local authorities, and they will continue to have workload capacity issues.

There should be a requirement that these additional funds are ‘ring fenced’ and invested to ensure that local authorities have enough appropriately skilled officers, as well as suitably trained local government councillors, in post to deal with the demands required to stimulate and take advantage of investment opportunities.

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?

The independent review of the Scottish planning system identified that Scottish Government supports the delivery of more high quality homes. The conclusions reached by the Independent Panel recommended proposals to ensure that planning does all it can to deliver on this recognised national priority.

The Bill will require more substantive changes to be delivered through secondary legislation, further guidance and the National Planning Framework if it is to be effective in achieving this outcome.

The Bill appears to reduce the opportunity for consultation at a formative stage in Local Development Plan preparation. The Bill must ensure that, for the effective delivery of homes, there will be opportunity for stakeholders involved to engage with
the Local Development Plan early, in order to feed into the “gate check” stage and the associated evidence report.

As the “gate check” aims to front-load the Examination process, it is vital to ensure that stakeholders can work with planning authorities to ensure that there is agreement going forward. At a national level, there also needs to be further details provided regarding how the National Planning Framework will approach issues of housing need and demand and how this will be disseminated to the local planning authorities.

It is suggested that the Bill should oblige evidence on housing need and demand and infrastructure capacity (transport and education) to be included in the formulation of the National Planning Framework and the associated evidence report. This can be achieved within the proposed new Section 3AA(2) of the Planning Act.

Section 15(5) of the Planning Act would also require to be amended to ensure that this is also taken into account in the formulation of emerging Local Development Plans.

The Bill should oblige stakeholder engagement in the preparation of the evidence report, to allow appropriate scrutiny to provide a robust and credible evidence base for Local Development Plans.

The support for engagement at the “gate check” stage is essential to ensure that Local Development Plan preparation begins with a full understanding of the context to achieve higher levels of new house building required by Scottish Ministers.

The Local Development Plan 10 year cycle will inevitably reduce the responsiveness of planning authorities to changing circumstances, with underperforming housing allocations likely to remain allocated for longer periods. The Scottish Ministers need to consider what circumstances would require a review of the housing strategy, if during the 10 year cycle, the housing supply targets and housing land requirements are not met.

At present Scottish Planning Policy requires planning authorities to maintain a minimum of a five year effective housing land supply at all times over the period of a Local Development Plan.

The SCPF considers that this remains an appropriate review mechanism and should remain a policy position within the National Planning Framework.

In addition, the proposed changes to Action Programmes appear largely cosmetic and will do little to strengthen their role in ensuring allocated housing sites come forward within the development plan period.

While the freeing up of planning resources away from Local Development Plan preparation could allow for a further focus on delivery of new homes, there needs to be greater assurances that these resources are put back into the planning system. There should be a requirement that these funds are ‘ring fenced’ and invested to ensure that local authorities have enough appropriately skilled planning officers, as
well as suitably trained local government councillors, in post to deal with the demands required to stimulate and take advantage of investment opportunities.

There also needs to be firmer commitments regarding the funding arrangements for the Local Place Plans to ensure that adequate funds are made available for their delivery without eating into funding for Local Development Plans.

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 ending of Strategic Development Plans was supported by the SPCF. As a result, planning authorities will be required to demonstrate effective regional teamwork and compliance with the Duty to Cooperate.

Without a coordinating role of a Strategic Development Planning Authority, issues such as housing land supply and infrastructure delivery within a regional context will need to be considered through the Duty to Cooperate. There is a risk that cross boundary issues will become amplified without a mediator to address these issues. The Duty to Cooperate needs to be properly enforced.

Scottish Government and Regional Partnerships will be required to provide this role. However, there is a lack of detail within the Bill to identify how this will be established and how Regional Partnerships will be properly resourced.

A strategic steer from the Scottish Government would be putting the best foot forward to ensure it was clear from the very top of the country’s decision makers where the priorities lay and how best to achieve them at a local level through to delivery.

The Bill could refer to Regional Partnerships throughout Scotland and their relationship to Local Development Plan preparation within the proposed new Section 3AA(2) of the Planning Act as well as further revisions to the existing Section 15(5) of the Planning Act.

The Bill could identify that the Scottish Ministerial powers to direct planning authorities to work together will be enacted only where Regional Partnerships are not established voluntarily, as proposed within the new Section 3AA(1) of the Planning Act.

Secondary legislation and further guidance can be set out in other documentation but being more explicit that Regional Partnerships are expected to be established rather than the exception is a key step to underline that expectation.

Mechanisms to ensure that these issues are addressed at an early stage will need to accompany the Bill. Conversely, the wider reforms also seek a greater role for the National Planning Framework in identifying housing need and demand at a national level and infrastructure delivery in the city regions.

The setting of the Community Infrastructure Levy levels at a national level does not take account of local circumstances and will prevent local authorities opting-out, except in particular exceptional circumstances defined by the Scottish Government.
Community Infrastructure Levy charges may not be suitable in all circumstances and some sites may struggle to come forward with the added burden of Community Infrastructure Levy payments. Planning at a national level will not take local circumstances into account, and the Bill must ensure that there is flexibility to adapt to individual circumstances of planning authorities.

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?

The Bill does not provide great detail on Local Development Plan preparation. Secondary legislation and further guidance will be required.

The Bill is not clear on how Local Development Plans, the National Planning Framework and, if prepared, Local Place Plans will interact. At present there are references to Local Development Plans taking into account the National Planning Framework; and Local Place Plans would have to have regard to Local Development Plans.

The inclusion of the National Planning Framework as part of the statutory development plan, as well as the incorporation of Scottish Planning Policy within the National Planning Framework, is welcomed by the SPCF. However, the reforms must ensure that there remains scope for planning authorities to adapt policies to suit local circumstances and need. As such, the National Planning Framework policies should be limited to matters where national guidance is necessary, such as housing land supply and greenbelt.

Presently, the Local Development Plan must be consistent with the Strategic Development Plan as set out in Section 16(6) of the current Planning Act. Therefore, there must be a clear statutory requirement for the Local Development Plan to be consistent with the National Planning Framework. This reflects the hierarchy of the development plan and that inter-relationship must be retained within the Scottish planning system.

The change in status of the National Planning Framework therefore also necessitates a change in how this interacts with other parts of the development plan. In addition, the ability of one part of the development plan to be at odds with another, as would be permitted by the proposed revisions to Section 24 of the Planning Act, will fundamentally undermine the effectiveness of the development plan process.

The requirement for Local Place Plans and Local Development Plans to simply have regard to one another is a reasonable default position. Where a Local Place Plan is to be taken forward as part of the Local Development Plan through a review or amendment, the test can then be that the Local Place Plan is consistent with the development plan (National Planning Framework and Local Development Plan).

The requirement for the Local Development Plan and the delivery programme to be endorsed by full council as set out in the proposed changes to Sections 18 and 21 of
the Planning Act can assist in elevating the importance of the development plan within planning authorities. This will ensure that proposed development strategy will have corporate endorsement.

This may assist in addressing internal conflicts between services within a local authority and will assist in ensuring that planning services are properly funded by local authorities given the fuller recognition of the value and importance of the planning function by full council corporate endorsement.

To ensure the long term legitimacy of Local Development Plans, the front-loading of evidence at an early stage is both necessary and desirable. The ability to amend Local Development Plans within the plan-period, as set out in proposed Section 20 to the Planning Act, is therefore a necessary function in order to ensure that the planned system is not undermined. At present Scottish Planning Policy requires planning authorities to maintain a minimum of a five year effective housing land supply at all times over the period of a Local Development Plan. The SCPF considers that this remains an appropriate review mechanism and should remain a policy position within the National Planning Framework.

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

It is not clear from the proposal whether Simplified Development Zones will be liable for Section 75 or Community Infrastructure Levy contributions. Due to the scale and nature of residential uses, a complete exemption may be counterproductive to the wider aims of the Bill with regard to infrastructure development. However, as Simplified Development Zones are likely to be used in circumstances where delivery has been a historic issue, there must be an option to opt out of Community Infrastructure Levy.

The range of delays in the planning system in Scotland is extensive and whilst a Simplified Development Zones can make an important contribution to address one issue, if utility capacity cannot be made available or infrastructure constraints cannot be overcome, any development unviable and delivery will continue to be delayed.

It is difficult to assess whether the sections will give suitable safeguards for community and environmental interests as these are to come forward in separate regulations. As these regulations are not currently available, it cannot be assessed whether the safeguards will be effective.

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 SCPF considers that community involvement is an important objective to pursue. The inevitable challenge to that objective is to ensure that communities understand
and accept the value and importance of new development, that sufficient development is promoted in appropriate locations and that there can be confidence it can and will be delivered.

The current climate of developers having to provide community infrastructure through planning obligations associated with new development should not be lost on local communities: there are very little other options available to improve facilities in local communities due to UK Government austerity measures currently in place which restrict local authorities in providing the required facilities for their local area.

The Bill will not deliver enhanced community engagement in the planning process. The changes in associated development management functions are generally positive but limited. There are no substantive changes set out within the Bill to enhance involvement in the development plan process.

The scope and content of Local Place Plans has not been defined, with further details to come forward through secondary legislation and further guidance. If Local Place Plans are to be pursued, further details must be provided to clarify how they are to be produced, including the evidence base required. This must be provided to ensure that LPPs are not produced to undermine, pre-empt or otherwise prejudice the strategic development proposed by the statutory development plan (National Planning Framework and Local Development Plan).

The Bill should oblige collaborative stakeholder engagement as an essential element of the evidence report and subsequent appraisal at the “gate check”.

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?

The nature of enforcement regarding discretionary powers means little consistency would ever be achieved to promote better compliance. Increased level of fines would only hurt those that have naively broken the law as they did not have the prior knowledge of the planning system.

Currently there is no fee for making an enforcement enquiry with each requiring to be investigated and reported by the local authority. There could be a fee for making an enquiry which would be reimbursed if enforcement action was undertaken. This would discourage petty enquiries and allow local authorities to concentrate their time on breaches that make an adverse impact on the built or natural environment.

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?
The SPCF recognises that further work is needed to better define the context for, and secondary legislation necessary to support, the introduction of the Infrastructure Levy in Scotland.

The details of proposals for the Infrastructure Levy have still to be finalised, with no detail about the final formula currently available. Accordingly, how the Infrastructure Levy could operate in practice currently remains unclear. There could be significant viability issues for major developments coming forward if there are significant costs that need to be paid on gaining planning permission.

Any Infrastructure Levy should not undermine the competitiveness of Scotland as a location within which to invest and deliver Scotland’s Economy Strategy.

Scotland is not a single homogenous market place, therefore applying a blanket Infrastructure Levy at national, regional and local level would be inappropriate as development viability could be adversely affected. In the meantime, the need for investment in new infrastructure remains live and there is a need to ensure that this is addressed.

The SPCF notes the proposed expansion in the Bill of the remit for Planning Obligations under the proposed changes to Section 75 of the Planning Act. Such changes will allow for greater flexibility in what Section 75 agreements can be used to pay for. There would remain a necessity that any such expectations are justified and that justification appropriately evidenced through planning policy.

The case for reasonable infrastructure funding through planning obligations can be secured with the assistance of the tests in Circular 3/2012 Planning Obligations and Good Neighbour Agreements.

The changes proposed to Section 75 may be a means to then address what the Infrastructure Levy would otherwise address.

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?

The SPCF supports appropriate and proportionate training for all elected members who are dealing with planning matters.

There is an extensive library of legal statutes, statutory instruments and planning policies that those professionals working within the Scottish planning system must consider.

There needs to be less politicising of decisions at a local government level. The SPCF accepts that this is a difficult conundrum to overcome.

Therefore, to ensure that planning decisions on development management and development plans are robust and credible, those making the decisions must be aware of how the planning system works, what it is intended to achieve, and the roles of various parties within the system, including stakeholders.
However, why should those with a limited knowledge of the Scottish planning system be overturning professional officer recommendations or decisions?

There is concern that the increased delegation of matters to Local Review Bodies, such as certificates of lawfulness which need to be considered on a point of law and advertisement consents which have a unique assessment process, will be assessed by local government councillors with no professional experience.

A knowledge of the Scottish planning system, however limited, should result in improved decision making and reduce the need for planning by appeal.

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

At present, planning authorities complete a voluntary annual Planning Performance Framework response that is administered by Heads of Planning Scotland.

The effect of the proposals in Part 12A to the Planning Act is to formalise that process and the SPCF supports this approach.

The added powers to assess performance and report on that assessment will also allow for both good practice to be identified and promoted or issues of concern to be formally acknowledged and remediation measures then progressed.

The SPCF considers that its constituent members are best placed to provide constructive feedback to local planning authorities on how they perform and how they provide a customer service that meets the needs of those who use the system the most.

The SPCF is willing to work in partnership with local planning authorities and the Scottish Government to achieve improved standards and the culture change required to create a more collaborative and efficient planning system.

The SPCF will engage with Heads of Planning Scotland to assist the delivery of an effective Planning Performance Framework.

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?

The Bill comes at a time where austerity is projecting on local authority cuts which ultimately requires local authority services to function and improve with less investment and funding.

In this context, higher planning application fees are being sought for proposals, while other fees may be introduced for certain services to provide a high quality planning service. Without ‘ring fencing’ these funds, austerity will further affect the functioning role of local authorities, and they will continue to have workload capacity issues.
There should be a requirement that these additional funds are ‘ring fenced’ and invested to ensure that local authorities have enough appropriately skilled officers in post to deal with the demands required to stimulate and take advantage of investment opportunities.

The need for full council to approve a Local Development Plan and delivery programme can help elevate the importance of the planning function corporately.

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

The SPCF appreciates the aspirations set out in the Bill and is generally supportive of the overall package of measures presented. However, there is a lack of detail in the Bill that ultimately undermines the process.

The SPCF considers that:

- The Bill is being promoted without the resources to support its aspirations in local authorities;
- The Bill is well intentioned but does not represent the actual performance of the Scottish planning system on a day to day basis;
- The Bill does nothing to improve cultural issues between planning authorities and land developers;
- The Bill does not address the commercial viability of land or reference the Scottish marketplace;
- The Bill identifies links with performance but there is a lack of targets and incentives for planning authorities to perform effectively; and
- The Bill does not place enough emphasis on identifying resources to manage workload.

The SPCF considers that retaining current rights of appeal is paramount. A local community’s view is considered through the local democratic process and is reflected in the planning decision that is made by a planning authority.

An applicant’s rights are only then protected through the appeal process. Any removal would then be contrary to principles of natural justice and contrary to the European Union’s Human Rights Directive. The reason for an applicant’s right of appeal is set out in the Scottish Government’s Rights of Appeal in Planning - Consultation Paper published in 2004:

“This existing right of appeal should be seen in the context of the introduction of the current system of planning legislation in 1947 which, in effect, had the potential to restrict a property owner’s "right" to develop their land. The appeal provision formed part of the planning process to provide appropriate scrutiny of the denial of that right to develop.”

Following the consultation, the Scottish Ministers concluded that: a. Adding a new right of appeal against decisions to grant planning permission would inevitably build new delays and unpredictability into the system, adding costs to development that may act as a deterrent to the investment that the economy, the environment and
society needs; and b. Introducing a new right of appeal would risk undermining local authority decision making.

These reasons remain valid today. The Scottish planning system must remain objective and evidence led, operated by professionals with experience and knowledge. Achieving greater effective collaboration from all stakeholders in development plan process, including local communities, is an important and valuable aspiration that will assist understanding of the Scottish planning system. If undertaken transparently and inclusively, the “gate check” and evidence report will achieve this.

A Scottish planning system that drives stakeholder engagement at its core is an essential to ensure that new development in Scotland will come forward within the timescales, scale and locations to deliver sustainable economic growth and support Scotland’s Economic Strategy.