

## **Local Government and Communities Committee**

### **Planning (Scotland) Bill**

#### **Submission from Keep Scotland Beautiful**

##### **Introduction**

Keep Scotland Beautiful is the charity that campaigns, acts and educates on a range of local, national and global environmental issues to change behaviour and improve the quality of people's lives and the places they care for.

We work with organisations, communities and individuals to help reduce carbon emissions, improve local areas and adapt to the impacts of climate change.

We also provide advice and support to help create and maintain cleaner, safer and healthier local environments where people and communities can thrive.

We are committed to making Scotland clean, green and sustainable.

##### **General Comments**

Keep Scotland Beautiful welcomes the opportunity to respond to the Call for Evidence on the Planning (Scotland) Bill, launched by the Scottish Government.

We welcome the Scottish Government's vision for a planning system that focuses on empowering communities, being more inclusive, and the commitment which supports the quality of life of all our communities by promoting quality of place. However, we remain concerned at the ability of the revised system to manage the inherent tension between building sustainable, low carbon communities and a strong focus on facilitating housing development and infrastructure, and integration with the achievement of climate change targets.

We also have concerns about the financial cost of adequately supporting and empowering communities, many of which are already finding it hard to resource and recruit volunteers to deliver projects, and would urge the Scottish Government to ensure more clarity is given on any proposed financial arrangements which may be put in place to support the Bill.

Our response to the detailed questions are set out below- our comments are restricted to Questions 1, 4, 6, and 12.

Keep Scotland Beautiful is an active member of the Stop Climate Chaos Scotland coalition and we are broadly supportive of the comments made in its response to the consultation.

##### **Questions**

- 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?**

Keep Scotland Beautiful welcomes the Bill, however would reiterate the point made in our initial response to the *Consultation of the future of the Scottish Planning System*, that there is a tension that will need to be managed between building sustainable, low carbon communities and a strong focus on facilitating housing development and infrastructure that has the potential to negatively impact on our ability to tackle climate change and promote sustainability. It would be helpful if the Scottish Government could provide further details on how it anticipates that sustainable development will be firmly embedded in the new process for the preparation of development plans, to ensure this opportunity is not missed.

We recognise the importance of investment in good quality housing to local communities but this must also help deliver the green infrastructure that is vital to their quality of life (including greenspace, community growing and allotments).

We support the views expressed in the response by Stop Climate Chaos Scotland, particularly with regards to any decisions made about housing, not just in terms of the individual energy performance of houses; but the location, density, and type of development; which affects our energy use, travel distances, resilience to climate change, and other behavioural and wellbeing factors linked to sustainability. As we set out in our initial consultation response, we support the proposal to align community planning and spatial planning by introducing a requirement for development plans to take account of wider community planning, supported by relevant future guidance from the Scottish Government. We would reiterate our view that the UN Sustainable Development Goals should be used as a framework. We agree with the response by Stop Climate Chaos Scotland that outlines measures to ensure Scotland's spatial strategies align with, and contribute to, our statutory climate targets and ambitions, particularly the proposed mechanism.

**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?**

As part of this process we strongly support the need to set out how local communities would be included, and supported, in the development plan process at an early stage (including the use of independent consultation) and that all the required environmental assessment work is undertaken.

In addition to assessing whether or not the development plan takes account of community planning, it may also be helpful to include at this stage an assessment of whether links have been made to relevant policies at a national and local level – for example, we would want to ensure that the development plan clearly sets out links to the delivery of the Climate Change Plan.

We support the response made by Stop Climate Chaos Scotland regarding the planning system's consideration and the long-term costs and implications of climate change impacts of development proposals, and associated measures.

**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?**

We support the response made by Stop Climate Chaos Scotland, particularly welcoming the proposals which give local communities real opportunities to take action on climate change by encouraging community-based development and active participation in plan-making.

However, we have concerns about the level of support, both financial and technical, that will be made available to communities in deprived and more affluent areas, to actively support their long-term involvement.

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

We welcome the emphasis on 'place' in the draft bill. We believe that a strong focus on planning and place can add value across all areas of policymaking.

We reiterate our response to the *Places, People and Planning - Position Statement* in that we fully support the recognition by the Scottish Government that "the quality of the places where we live and work can support health and wellbeing, help to overcome inequality, create jobs and stimulate investment whilst ensuring that we minimise and adapt to the long-term impacts of climate change".

Having worked on a joint project with East Dunbartonshire Community Planning Partnership, and NHS Health Scotland, in *Piloting the Place Standard in Hillhead and Harestanes*<sup>1</sup>, we recognise the importance of involving communities, specifically groups who are currently excluded, in the planning system and allowing them to play an active part in improving their lives by creating better places. This is essential to both reducing inequalities and supporting inclusive growth.

Consideration must also be given to the effect the Bill will have on local environmental quality. In March 2016, we published Scotland's Local Environmental Quality in Decline<sup>2</sup> which highlighted that, after years of steady improvement, environmental quality was declining in communities across Scotland. Our latest report, published in October 2017<sup>3</sup>, highlights the continued decline in local environmental quality. We also identified that those communities most affected by deprivation also suffer from the worst levels of litter, flytipping and graffiti.

---

<sup>1</sup> <https://www.keepsotlandbeautiful.org/media/1559233/ksb-place-standard-report-final-31-05-17.pdf>

<sup>2</sup> <https://www.keepsotlandbeautiful.org/media/1560094/state-of-the-nation-final-100316-low-res.pdf>

<sup>3</sup> <https://www.keepsotlandbeautiful.org/media/1560107/leq-in-decline-report-oct-2017-final-131017.pdf>

We also welcome the section on children and young people and the Bill's aim:

*“to ensure that a wide range of people have an equal opportunity to be involved in planning. The changes proposed through the Bill, as well as actions as part of a wider programme of planning reform, aim to respond to the recommendation of the independent planning review panel that children and young people have better opportunities to get involved in place and development planning.”*

This section is especially important to highlight, not only is this the Year of Young People but, as we work to realise the vision of our world in 2030, young people, who will mature in the next 15 years, will play a crucial part. We administer and manage the Eco-Schools environmental education programme, with funding from the Scottish Government, in which Scotland is a world leader. Our Eco-Schools Scotland programme has been refreshed and aligned to the United Nations Sustainable Development Goals (SDGs). We work with 98% of Scottish schools to provide support and in addition offer professional learning training.

We would be keen to engage in further discussions with the Scottish Government on the potential opportunities afforded by the Eco-Schools Scotland Programme to promote engagement by children and young people with the planning system, including the development of appropriate skills and promoting planning as a positive career choice.

Finally, we recognise that the Bill, when approved, will generate real change and there is a need for an ongoing dialogue regarding how it is implemented and refreshed so it remains a dynamic system.