

## **The Institute of Historic Building Conservation (Scotland Branch)**

### **Written evidence to the Scottish Parliament's Finance and Constitution Committee on the Planning (Scotland) Bill Financial Memorandum**

#### **Consultation**

1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?

*We have taken part in all of the consultations preceding the Bill. Our previous comments have only touched lightly on financial aspects (which have mostly only appeared between the lines of these consultations). In general it could be said that we seek the provision of a Planning System which is sufficiently skilled and resourced to deliver Sustainable Development in Scotland.*

2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?

*Our comments have had no visibly significant impact in any area in the course of the consultative processes.*

3. Did you have sufficient time to contribute to the consultation exercise?

*Consultation exercises which extend over the winter holiday break never give sufficient time for consultees, and should not be encouraged.*

#### **Costs**

4. If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.

*Our organisation anticipates that unless greater resources and skills are afforded within the sector but especially by Planning Authorities, our Members' activities in Scotland will appear to be disregarded. For example the Conservation Area Appraisals that are already a valuable long-term investment in place-making for those special areas, a focus for much regeneration investment by Heritage Lottery Fund, Historic Environment Scotland, and others, will have been wasted if their status as Supplementary Guidance to Local Development Plans is abandoned. On the other hand the application of the hitherto failed Simplified Planning or Development Zone to conservation areas will require a great deal more prior work to establish what can indeed be safely 'simplified', which means revising and updating the appraisals that exist. This work, in the past performed by local authorities, might have to be done more expensively in future at each SP/DZ by private and third sector members of our Institute. Our organisation looks forward to a surge in membership and paid work arising from the Bill.*

5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?

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*Regional Partnerships are an unknown quantity but we contend that there has been a continued shrinkage to a statutory skeleton of planning work, and without a clear statutory commitment to work at the strategic level (where there is a considerable history of successful planning in Scotland, albeit somewhat chequered more recently), it is likely to fall away.*

*We are particularly concerned that, unless there is a recognition that the uplift in planning fees cannot alone be hypothecated to ensure an adequately resourced Scottish Planning System, without provision through some other route the credibility of that System with communities and others will continue in free fall: that credibility can be adversely affected by the expectation that the System be resourced through fees, as it may be easy to draw the conclusion that the greater the fee, the more likely the developer will get "what he/she pays for".*

*Without effective engagement by communities of place and communities of interest, starting right at the survey stage of Local Development Plans, plans will be much the poorer, and these communities will continue to believe the Scottish planning system unfit for purpose.*

*The planning and conservation needs of a community should not be met solely by its ability to pay. We believe that planning at the level of Local Place Plans, sitting within Local Development Plans, should be an integral part of the Scottish Planning System, not a bolt-on based on the resources, economic, social and environmental, available (or not) to each community. If the figures cited for charrettes, Strathclyde University research, and work such as the Leith Blueprint engagement exercise are more realistic than the £13000 in the Financial Memorandum, and we think they are, then there is a sound argument that they are not the most economic way of delivering community engagement, because each is a one-off, delivered by some of our private sector members who can look forward to more expenditure in this area. It is at least arguable that some if not all of these LPPs should be carried out by adequately skilled and resourced Planning Authorities, working with communities of place and interest.*

6. If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?

*Obviously our Members and the Institute more generally will work as well as we can with any systems resulting from the Bill*

7. Does the FM accurately reflect the margins of uncertainty associated with the Bill's estimated costs and with the timescales over which they would be expected to arise?

*At this time there is low public confidence in the Scottish Planning System, yet it is widely acknowledged that it has had a key role in the design and delivery of a sustainable Scotland: it is surprising that the financial strategy proposed*

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*is to make significant savings by omitting or trimming some of its more strategic and its more locally important aspects. It is difficult to make any sense of the proposed savings, especially when figures are bald and seem to have no qualitative backgrounds and, apparently, no negative consequences.*

### **Wider Issues**

8. Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?

*No, see above, and the Institute cannot judge whether the new system is likely only to increase costs as it beds in, or permanently.*

9. Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?

*Yes. It would be possible to have a better idea of such costs only if they were more clearly and transparently laid out. The Bill seems particularly light on environmental consequences. The Institute is disappointed that after more than two years' work the Bill appears to spurn the opportunity to do more than just tinker with a system that is widely believed to be unfit for purpose: a chance to revitalise such matters as Enforcement, Compulsory Purchase, Conservation, Community Engagement, and the effective integration of land use, community and marine planning into a Scottish Planning System, delivering sustainable development, may not appear again soon, but will surely require to be addressed.*

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