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Dear Sir or Madam

Resourcing a High Quality Planning System – Scottish Environment LINK response to consultation paper

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations - over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. This response is prepared by LINK's Planning Task Force, and supported by the following LINK members:

Archaeology Scotland
Friends of the Earth Scotland
Mountaineering Council of Scotland
National Trust for Scotland
The Royal Society for the Protection of Birds
Woodland Trust Scotland

Q1. What measures could be implemented that would improve the quality of applications and supporting information?

It is in the interests of all stakeholders that the planning system runs efficiently. It is the experience of LINK members that delays occur in applications when the information provided falls short of that required, both in large complex applications and smaller, more basic ones.

Clear guidance is needed from Local Planning Authority's and Government Agencies on both the scope of information and also the standard of information required, for all scales of development. It also requires commitment from applicants, that the information they provide meets these standards and is provided in a timely manner.

Public participation is a vital component of a fair and accessible planning system, this needs to be maintained in any changes to common practice and reflected in guidelines.

Scottish Environment  The voice of Scotland's environment movement

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Q2. Would you be in favour of the introduction of a charge for pre-application discussions? In considering your response, should this be a one-off payment or should it be discounted against the subsequent submission of a planning application?

Pre-application discussions are an important stage in producing a quality application and can pre-empt many issues arising in terms of providing adequate information to inform planning decisions. We believe that any charge should not act to discourage these discussions in any way; therefore a discounted payment would appear more suitable.

It is imperative that planning departments are provided with a level of funding suitable for them to provide expertise and retain experienced staff. Increased and more varied planning charges could provide these resources, but would need to be ring-fenced within planning departments and not used to generate income for other Local Authority functions.

Q3. Are you supportive of the ways of working identified above? If so, is there a particular approach that you consider could make a difference to the performance of the planning system? If yes, which one and why?

However changes are envisioned, it is important that they are adequately resourced with planning staff and specialist staff with professional skills in landscape, historic environment, ecology and biodiversity issues. This situation is becoming particularly challenging with SNH reducing their direct input into planning casework and anticipated cuts in local authority services which threaten existing staff provision. It is essential that appropriate professional specialist staff are employed to deal with these issues.

We support the measures suggested for the sharing of best practice, and recommend that these are open to cross-sector influence, including a balance of NGO's and development professionals.

Q4. What do you consider constitutes a high performing planning system? In considering your response, please reflect on the roles and responsibilities of the various parties in the planning system including developers, planning authorities, key agencies as well as other stakeholders.

However the mechanics of a high performance planning system are achieved, it is imperative that the Scottish planning system delivers true sustainable land use that:-

- in decisions fully takes into all consideration all issues including landscape, historic environment, ecology and biodiversity;
- contributes significantly towards climate change mitigation and adaptation;
- delivers environmental objectives, social justice and economic stability; and
- is based on adaptable and resilient systems.

I hope the above comments are of assistance. However, please do not hesitate to contact me should you require any further information.

Yours sincerely

Christina Byrne
On behalf of Scottish Environment LINK Planning Task Force