

## Appendix A

### "PLACES, PEOPLE AND PLANNING" – POSITION STATEMENT JUNE 2017 CONSULTATION RESPONSE BY SCOTTISH BORDERS COUNCIL

#### Consultation Questions

1. Do you have any views on the proposals contained within the position statement? There is no need to restate views already expressed in relation to Places, People and Planning as these have been, and will continue to be, taken into account as we move towards finalising the actions to be taken.

SBC response:

In general, the proposed changes are welcomed. It is considered that, subject to further detailed consideration of a number of issues highlighted in our main consultation response, these changes should provide a leaner, more flexible and proactive planning system in Scotland that engages better with its communities and is more able to deliver good quality places.

Scottish Government is to be commended on the extensive consultation and engagement it has undertaken through the planning review and the open and inclusive way that the Planning and Architecture Division has handled the process.

SBC has already provided a full and detailed response to the consultation document published in January 2017 and would expect that those views will continue to be considered and taken into account as the review moves forward to the production of the Planning Bill, secondary legislation and guidance. It is pleasing to note that many of the options suggested in our earlier responses have been incorporated into the proposals. There are tensions between the proposals to encourage localism and public engagement and the proposals that have a potentially centralising effect and it will not be until these are developed further that their implications will be fully understood.

It is perhaps not unexpected that there are a number of matters which are not yet resolved within the Position Statement and which will require further deliberation, research and input from stakeholders as we move towards the legislative phase. There are also a number of other matters in terms of working relationships, culture change, skills, and most importantly some elements of infrastructure delivery that fall out with the legislative framework of planning but which are equally important to the delivery of positive change. The momentum already created for shared and partnership working with all sectors/stakeholders through the review must be harnessed and developed by Scottish Government.

Whilst not wishing to re-visit issues in detail, there is still concern about some issues, namely, (a) how the potential tensions between the regional/strategic planning are resolved with the new enhanced National Planning Framework, particularly in terms of housing land. There also needs to be clarity on roles, duties, responsibilities and obligations established between government and regional partnerships; (b) how Place Plans interact with the Local Development Plan. We agree that they can help influence the Development Plan and enable

greater community engagement in the making places but there must be clear guidance on what they “are and are not”. The potential capacity and resource issue they raise needs to be resolved. The Statutory Development Plan must continue to take precedence and; (c ) we still have doubts about the use of SPZ’s for housing without significant re-branding and availability of budgets for delivery.

It is felt that the statement gives a clear route of travel which includes many of the measures we advocated in our submissions. The “devil” as always will be “in the detail” and we would look for government to continue the inclusive process so that we can continue to contribute to the realisation of a modern planning system in Scotland.

With the caveats mentioned above, we are supportive of the options set out in the Position Statement.

2. What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report? (Please give details of additional relevant sources)

SBC response:

We are content with the scope and accuracy of the SEA.

3. What are your views on the predicted environmental effects as set out in the Environmental Report?

SBC response:

We agree with the predicted effects.

4. What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

SBC response:

We are content with the terms of the SEA carried out by Scottish Government.