

PE2075/E: Prioritise local participation in planning decisions

Royal Town Planning Institute (RTPI) Scotland written submission, 18 December 2024

Many thanks for your letter and your patience in waiting for our response. Please accept our apologies for missing your earlier correspondence.

We have looked into the petition and the suggestions therein: defining local in so far as it applies to planning legislation; giving community councils decision-making powers relation to planning applications; and ensuring that the way in which decisions and planning applications are taken is compatible with the provisions and ethos of the Community Empowerment (Scotland) Act 2015.

The Institute is supportive of community engagement in the planning process, and we note the existing requirements for local planning authorities to inform Community Councils and the considerable volume of good practice guidance that exists about broader community engagement. Whilst we understand the petitioners are concerned with planning decisions, we would point out that the involvement of Community Councils and residents in the planning system is not confined to development management (planning applications). Engagement in the plan-making process, whether for a new development plan or a local place plan, is an important mechanism for communities to share their aspirations and shape future development. Community Councils have a role to play in statutory plan-making, and should consider this another way of influencing planning decisions in the longer-term.

We note the language and concerns about community engagement being a box-ticking exercise. We know from our members that guidance and policy principles can be interpreted very differently from place to place. Whilst there are examples of community engagement which is tokenistic and performative, there are also wonderful examples of very meaningful community engagement practices being carried out across Scotland. For example [Fraserburgh Beach Masterplan won RTPI awards](#) both in Scotland and in the national (UK) final, and [Live Life Morvern was overall winner of the Scottish Planning Innovation Award 2024](#). The outcomes of these award-winning projects demonstrate the additional value that comes from community engagement in plan-making.

Returning to the substance of the petition, RTPI Scotland does not support the definition of local within the planning system since the impacts and effects of a development may be felt at many different spatial scales, depending on the type of development and the local context. Defining local could result in some groups being or feeling excluded from participation, which we would not support – and we do not think that this would be the intention of the petitioners.

The role of Community Councils in the scrutiny of planning applications is well-established, but we do not see any justification for the relocation of decision-making powers from local authorities to Community Councils. This would have legal, administrative, training and resource implications. Whilst we recognise the frustration of the petitioners based on their experiences to date, that does not – in our view –

justify devolution of those powers away from the universal democratic structures of local government.

On the compatibility between planning decision making and the Community Empowerment (Scotland) Act 2015, we do not have any evidence that these are currently in tension or that there are any specific difficulties. The Institute supports evidence-based policy making, and is happy to support proposals to improve processes and practices where there is underpinning data.

Finally, we note from the transcript that the petitioners have been frustrated that consent for planning projects has been granted despite their objections, and their attempts to engage proactively in the system have yielded no results. We would encourage the Community Council to continue with this work and to persist with their efforts. Whilst it can feel very disheartening for consent to be granted on a project where a community has objected, those objections may shape conditions attached to the consent, and may shape subsequent pre-application discussions. Influence is not only to be measured in the number of applications that are refused.