

Citizen Participation and Public Petitions Committee

2nd Meeting, 2021 (Session 6), Wednesday, 1
September 2021

PE1864: Increase the ability of communities
to influence planning decisions for onshore
windfarms

Note by the Clerk

Petitioners	Aileen Jackson on behalf of Scotland Against Spin
Petition summary	<p>Calling on the Scottish Parliament to urge the Scottish Government to increase the ability of communities to influence planning decisions for onshore windfarms by—</p> <ul style="list-style-type: none">• adopting English planning legislation for the determination of onshore wind farm developments;• empowering local authorities to ensure local communities are given sufficient professional help to engage in the planning process; and• appointing an independent advocate to ensure that local participants are not bullied and intimidated during public inquiries.
Webpage	petitions.parliament.scot/petitions/PE1864

Introduction

1. This is a new petition that has been under consideration since 24 March 2021.
2. A SPICe briefing has been prepared to inform the Committee's consideration of the petition and can be found at **Annexe A**.

3. While not a formal requirement, petitioners have the option to collect signatures and comments on their petition. On this occasion, the petitioner elected not to collect this information.
4. In Session 5, the Public Petitions Committee agreed to seek advanced views from the Scottish Government on all new petitions before they are formally considered. The Committee has received a response from the Scottish Government and this is included at **Annexe B** of this paper.
5. The petitioner has provided two written submissions, which are included at **Annexe C** of this paper. More than 100 written submissions have been received in support of the petition. Links to these submissions are included at **Annexe D**.

Scottish Government submission

6. In its written submission, the Scottish Government states that it is currently reviewing Scotland's national planning policies and expects to publish a draft National Planning Framework 4 (NPF4) in autumn 2021.
7. The Scottish Government explains that it consulted on the NPF4 [position statement](#) when it was published in November 2020 and sought early views on NPF4 from January to April 2020. It highlights that it will also carry out extensive public consultation following publication of NPF4.
8. The Scottish Government highlights that in preparing NPF4, it is considering priority policy changes to support a spatial strategy for net-zero. This includes strengthening its support for re-powering and expanding existing wind farms.
9. Decisions on planning applications regarding onshore windfarms are made by Scottish Ministers or the relevant local authority, depending on the capacity of the windfarm. Should the relevant planning authority object to the proposed development, there is a statutory requirement to hold a public inquiry.
10. In its submission, the Scottish Government challenges the petition's assertion that, following a public inquiry, consent is granted in the majority of cases.
11. It highlights that since 1 January 2016, Reporters have made recommendations on 17 proposals. In 11 cases, the reporter recommended refusal of permission. Of these 11, Ministers agreed with the recommendation on 10 occasions. In 6 cases the Reporter recommended that permission be granted, and Ministers agreed on each occasion.
12. The petition raises concerns about the costs of appeals, particularly if a Reporter decides that it should involve a hearing or a public local inquiry. In response, the Scottish Government asserts that Reporters adopt a proportionate approach to obtaining the required information.
13. The Scottish Government highlights that since 1 January 2016, the Planning and Environmental Appeals Division has dealt with 89 planning appeals relating to

wind turbine/farm proposals. Reporters have held 6 inquiries and 9 hearings to hear evidence. The remaining 74 have been dealt with by a combination of written submissions and site inspections.

14. With regard to concerns raised regarding live streaming or archiving video footage of hearings and inquiries, the Scottish Government explains that this practice was suggested by Planning Democracy to allow people to—
 - observe proceedings that they would otherwise be unable to attend; and
 - familiarise themselves with the process before participating in a hearing or inquiry.

15. In its submission, the Scottish Government states that detailed careful questioning and cross examination play an important part of the inquiry process. It does highlight, however, that the Reporter will assist parties who are having difficulty in giving their evidence, and will intervene if there is any bullying or badgering of witnesses.

16. In terms of community engagement with the planning system, the Scottish Government notes that the Planning (Scotland) Act 2019 contains provisions designed to enhance the engagement of communities throughout the Scottish planning system. These enhancements include—
 - improving the process of preparing local development plans; and
 - involving communities in influencing the future of their places.

17. It also highlights the Scottish Government's [recent consultation](#) on draft guidance on the role that mediation may be able to play in reducing conflict between parties.

18. The submission states that although the Scottish Government does not provide an advocacy service for communities, it does provide financial assistance to Planning Aid Scotland (PAS). PAS use this to provide a free advice service on planning and environmental matters for communities and the public at large, through its professional planner volunteers.

19. The Committee has received more than 100 submissions in support of the petition. There are a number of issues which are raised consistently across these submissions such as—
 - Those seeking to challenge developments at application stage and subsequently during an appeal or public inquiry feel overwhelmed by the volume of information and the process;
 - Support for local communities is minimal. Although advice is available from organisations such as PAS, that advice is general, and organisations lack the capacity to assist all communities who need it.

- Local authorities and key stakeholders also seem overwhelmed by the volume of applications, so what chance do individuals or community councils have to respond effectively to all of the proposals.
- The cumulative impact of windfarms, on not only the environment, but also on the ability of individuals and organisations such as community councils to repeatedly respond to applications;
- Inadequate internet access in some rural areas limits the ability of residents to—
 - download the large files of data involved, and
 - participate in virtual proceedings, which have been necessary owing to Covid restrictions.
- Local communities are struggling to respond to proposals and when they do, they often feel that their contribution to the process is not being heard.

20. The petitioner has provided two written submissions to—

- outline her own personal experience, and
- respond to the Scottish Government’s submission provided by the Chief Planner, on behalf of Scotland Against Spin.

Petitioner submission

21. In her first submission, PE1864/AA, the petitioner states that, in common with many other contributors, her local authority and the local community councils have all been overwhelmed by the volume of planning applications for wind farms.

22. She states that her local authority, East Renfrewshire, now has the highest density of turbines in Scotland.

23. The petitioner highlights the costs involved in challenging planning applications not only financial but also in terms of the time and expertise required to absorb the significant volumes of information provided by wind farm developers.

24. The petitioner believes that it is easier for developers to obtain planning permission in Scotland compared to England.

25. She highlights the disparity in planning application fees between Scotland and England. In Scotland, fees ranging from £125,000 for a 50 – 100 megawatt wind farm, to £280,000 for a wind farm which will generate 300 megawatts or more. By contrast, in England, there is a flat fee of £300,000 for any onshore development.

26. In England an area of proposed wind farm development must be identified as suitable with the Development Plan. Applications must also demonstrate community support in order for planning permission to be granted.
27. In the petitioner's most recent submission, PE1864/II, on behalf of Scotland Against Spin, she responds to the points made by the Chief Planner in the Scottish Government's submission (PE1864/A).
28. Scotland Against Spin agrees that everyone should benefit from renewable energy. It argues, however, that Scotland's rural communities are burdened with the "adverse effects from producing that energy".
29. The submission states that the current mechanisms for communities to engage in the planning process can at best be described as perfunctory, with their concerns side-lined. At worst, those opposing wind farms can be subjected to aggressive questioning and their issues belittled.
30. Scotland Against Spin is concerned that developers are not taking their responsibilities to engage and consult with local communities seriously, describing efforts as often no more than 'tick box' exercises.
31. While the organisation notes the help provided by Planning Aid Scotland (PAS), in line with several other submissions, it highlights PAS' lack of resources to help scrutinise the volume of complex documents involved in wind farm applications. It further notes that PAS does not have an advocacy role.
32. Beyond the action called for in the petition, Scotland Against Spin suggests several measures which, it believes, would bridge the gap between the way the planning system should work, as described in the Scottish Government's submission, and the experience of local communities engaging with it.
33. These measures are—
 - "Advertise for, and constitute a Panel of contributory lawyers. Appointments would be for a maximum of two years.
 - Make required public consultation meaningful, with accurate and detailed information, with required/recorded public comment.
 - Impose Independent scrutiny by a legally qualified person of the content and manner of the public consultation exercise in each case, producing an independent report as part of the Environmental Report.
 - Where requested, provide informed advocacy/legal assistance to community groups to help prepare for and participate in public inquiries or hearings."
34. Scotland Against Spin suggests that these changes could be financed by an increase in planning application fees.

Action

35. The Committee is invited to consider what action it wishes to take on this petition.

Clerk to the Committee

SPICe**The Information Centre**
An t-Ionad Fiosrachaidh**Briefing for the Citizen Participation and Public Petitions
Committee****Petition Number:** [PE1864](#)**Main Petitioner:** Aileen Jackson on behalf of Scotland Against Spin**Subject:** Increase the ability of communities to influence planning decisions for onshore windfarms

Calling on the Scottish Parliament to urge the Scottish Government to increase the ability of communities to influence planning decisions for onshore windfarms by—

- adopting English planning legislation for the determination of onshore wind farm developments;
- empowering local authorities to ensure local communities are given sufficient professional help to engage in the planning process; and
- appointing an independent advocate to ensure that local participants are not bullied and intimidated during public inquiries.

Background

Two separate approval systems control the development of onshore electricity generating stations, including wind farms, in Scotland. The system that applies depends on the generating capacity of the proposed development.

Proposals for large scale electricity generating stations are considered and authorised by Scottish Ministers under the provisions set out in Section 36 of the Electricity Act 1989, i.e. all generating stations with an installed capacity above the following thresholds:

- In excess of 50 megawatts (MW) for onshore wind farms, power stations that are not wholly or mainly driven by water (such as coal/gas fired or nuclear plant) and hydroelectric generating stations
- In excess of 1 MW for offshore wind farms and generating stations wholly or mainly driven by water, such as wave or tidal generating stations, but not including hydroelectric generating stations.

Where the capacity of a proposed land-based station lies below these thresholds then the application for consent must be made to the relevant

planning authority, which will consider the proposal under the provisions of the Town and Country Planning (Scotland) Act 1997.

These approval processes apply to new developments and modifications to existing developments. More information can be found in the SPICe briefing [Electricity Generating Stations: Planning and Approval](#).

England: Until 2016 the approval processes for onshore wind farms in England were fairly similar to those in Scotland. Wind farm developments with a capacity above 50MW were treated as Nationally Significant Infrastructure Projects (NSIPs). They were considered and authorised by the appropriate Secretary of State under the provisions of the Planning Act 2008. Applications for wind farms with a capacity of less than 50MW were considered and approved by the Local Planning Authority (LPA) under the English planning system.

The Energy Act 2016 together with the Infrastructure Planning (Onshore Wind Generating Stations) Order 2016 changed this position. This legislation removed onshore wind farms of over 50MW in size from the NSIP regime and returned the decision-making powers to LPAs. More information on the English planning procedures can be found in the House of Commons Library briefing [Planning for onshore wind](#).

Anyone who participates in the planning appeal process or appears before a public inquiry held as part of the approval process under the Electricity Act 1989, is normally expected to cover their own expenses. [Guidance produced by the DPEA](#), which administers both processes, states:

“The appeal procedures support you being able to make your case to the reporter by yourself. If you employ a professional agent though, such as a planning consultant, architect or lawyer, you will normally have to cover their fees at your own cost.”

Scottish Government Action

The Scottish Government is undertaking significant reform of the planning system, the legislative elements of which are set out in the Planning (Scotland) Act 2019. However, the changes proposed by the petitioners do not form part of this programme of change.

Scottish Parliament Action

The Scottish Parliament has not taken any substantive action on this issue.

Key Organisations and relevant links

- **Scottish Government:** Responsible for planning legislation, national planning policy and guidance. Scottish Ministers are the decision maker for certain planning appeals and applications made under the Electricity Act 1989.

- **[Heads of Planning Scotland](#)**: Represents senior planning officers from Scottish local authorities, national parks and regional planning bodies.
- **[Royal Town Planning Institute](#)**: Planning professional body.
- **[Scottish Renewables](#)**: Renewable industry representative body.
- **[Planning Democracy](#)**: Campaign group supporting greater community involvement in plan making and planning decisions.
- **[Planning Aid for Scotland](#)**: NGO which provides information and support to individuals and communities on planning issues.

Alan Rehfisch
Senior Researcher
May 2021

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Published by the Scottish Parliament Information Centre (SPICe), an office of the Scottish Parliamentary Corporate Body, The Scottish Parliament, Edinburgh, EH99 1SP

Scottish Government submission of 1 June 2021

PE1864/A

Thank you for your e-mail of 12 May 2021 requesting the Scottish Government's views on those actions called for in Petition 'PE01864' by Aileen Jackson, on behalf of Scotland against Spin, concerning the ability of communities to influence planning decisions for onshore windfarms.

Scotland has prided itself on a positive policy framework around renewable energy, which has allowed us (at most recent estimates) to generate 97% of our electricity demand from renewables in 2020. However, our legal obligations around net zero, and the speed at which we are approaching a tipping point where the damage from climate change is irreversible, means that we must go further and go faster.

We are currently reviewing Scotland's national planning policies and expect to publish a draft National Planning Framework 4 this autumn. The National Planning Framework (NPF) is a long term plan for Scotland that sets out where development and infrastructure is needed to support sustainable and inclusive growth. The transition to net zero greenhouse gas emissions by 2045 is a key driver of this work and, as our [NPF4 position statement](#) published in November 2020 set out, we are currently considering priority policy changes to support a spatial strategy for net-zero, including strengthening our support for re-powering and expanding existing wind farms. NPF4 will bring the climate change agenda together with wider considerations including: the need to build resilient communities; support inclusive growth; and create better, greener places.

In addition to our consultation on the NPF4 position statement, we sought early views on NPF4 from January to April 2020. We were pleased to receive nearly 350 written responses to our call for ideas, as well as participation by 180 people at our Scotplan 2050 roadshow workshops. We also spoke to around 100 people who came to drop in sessions across the country. In Autumn 2021 we will lay a draft NPF4 in the Scottish Parliament, and we will carry out further extensive public consultation at that time.

The legislative framework

In Scotland, as you will be aware, any application to construct or operate an onshore windfarm with a capacity of over 50 megawatts (MW) requires the consent of Scottish Ministers under section 36 of [the Electricity Act 1989](#). Applications of 50MW or less are made to the relevant Planning Authority, of which applications which are above 20MW (but below 50MW), are subject to pre-application consultation with communities.

Where the relevant planning authority objects to the proposed development there is a statutory requirement to hold a public inquiry. A Reporter is appointed to examine

the proposed development and report with recommendations to Scottish Ministers who will make the final decision. It is for Ministers to decide whether or not to accept the reporters' recommendation.

It is important to note that the Electricity Act, under which the right to a public inquiry is confirmed, is not devolved to the Scottish Parliament. As such, whilst the Reporter will try and encourage parties involved in the examination to adopt a proportionate approach to obtaining the evidence (similar to the approach taken in planning appeals) they cannot insist on this. If a party involved requests a public inquiry to consider any part of the evidence, then an inquiry must be held.

The petition refers to decisions made following a public inquiry and suggests that a consent is granted in the majority of such cases. Since 1 January 2016 Reporters have reported on, and have made recommendations on, 17 proposals. In 11 such cases the reporter recommended refusal of permission, and Ministers agreed with this recommendation on 10 occasions. In 6 cases the Reporter recommended that permission be granted, and Ministers agreed on each occasion.

Turning to planning applications for proposals of 50MW or less, the right to appeal certain planning decisions to Scottish Ministers is an important part of the planning system. The petition raises concern that appeals can be very costly to the planning authority, particularly if a Reporter decides that the appeal should be determined by means of a hearing or public local inquiry. It should be noted that Reporters are responsible for deciding how an appeal should be considered and will adopt a proportionate approach to obtaining the information required, and will only hold a hearing or inquiry where absolutely necessary. Since 1 January 2016 DPEA has dealt with 89 planning appeals relating to wind turbine/farm proposals and reporters have held 6 inquiries and 9 hearings to hear evidence. All other cases have been dealt with by a combination of written submissions and site inspections.

With regard to concerns raised by the petitioners concerning live streaming and archived video footage of inquiries visible on the DPEA website, it is the case that most inquiries or hearings held by DPEA are either live streamed or recorded and made available for parties to view at a later time. This initiative, which was suggested by Planning Democracy, is designed to allow interested parties to view proceedings even if they cannot attend in person. It has also allowed parties who may be attending an inquiry or hearing for the first time to familiarise themselves with the process and what to expect.

You will appreciate that detailed careful questioning and cross examination play an important part of the inquiry process, as would be expected when parties are expressing different views on evidence on which the success or failure of a proposed development may turn. In addition to this, it is reasonable for a party to be questioned on their credentials in relation to the evidence they are giving. However, the bullying and badgering of witnesses is not acceptable, it happens exceedingly rarely and the Reporter will intervene if they think this is taking place. The Reporter will also take into account the experience of the parties involved in making any such decisions, and will assist parties who are having difficulty in giving their evidence. This is particularly so in the case of legally unrepresented lay witnesses who are unfamiliar with inquiry procedure.

Reporters regularly find the evidence given by community groups and other unrepresented groups to be well presented and relevant to the case and, whilst their views do not always prevail, it is almost always relevant to the Reporter's considerations. The insight provided by such groups or individuals is often of great assistance to Reporters in gauging the likely acceptability or otherwise of local impacts.

Community engagement within the planning system

Finally, I should point out that the Planning (Scotland) Act 2019 contains a range of provisions designed to enhance the engagement of communities throughout the Scottish planning system.

The 2019 Act includes a number of measures intended to improve the process of preparing local development plans, and the involvement of communities in influencing the future of their places. In preparing their evidence report, the first stage in the local development plan, the planning authority must show how it has sought the views of "the public at large" and community councils, and how those views have been taken into account. There are also requirements to consult widely on the proposed plan before it is finalised. We want community engagement on local development plans to be more effective than it has been in the past.

Work is currently underway to develop guidance on effective community engagement in Local Development Plans, and the Act will require planning authorities to have regard to that guidance. Community bodies will also be able to prepare local place plans, setting out their views on how the area should develop, and these must be taken into account in the local development plan. A local place plan can include reference to assets which are particularly valued by the community, which may be open spaces as well as buildings or structures. We are currently consulting on proposals on regulations to support the delivery of local place plans.

The Scottish Government has recently consulted on draft guidance on the role that mediation may be able to play in reducing conflict between parties. We are currently considering the responses to the consultation in advance of publishing guidance in due course.

In addition, whilst not providing an advocacy service for communities, the Scottish Government provides financial assistance to PAS to provide a free advice service on planning and environmental matters for communities and the public at large, through its professional planner volunteers.

John McNairney
Chief Planner

Petitioner submission of 9 June 2021

PE1864/AA

My husband and I bought our smallholding in 1984 to accommodate our horses and bring up a family in the peace and quiet of the countryside. From 2009 onwards planning applications for wind turbines/farms started to overwhelm our local authority area of East Renfrewshire. The Council did not have the necessary expertise or manpower to cope and lacked the funds to employ expensive external consultants to scrutinise technical documents accompanying wind turbine applications.

Community Councils were in a very difficult situation. As volunteers, many with full time jobs, they had limited time to deal with the tsunami of applications or even understand what they were looking at or how to respond.

This resulted in our area having the highest density of turbines in Scotland. There is only room left for very small-scale projects. Developers have now spread into and are starting to overwhelm every other part of the country in a similar manner.

Personal circumstances

For many years, our community raised funds to pay for professional services in an effort to hold back the tide of wind farm development in the area, until there was nothing left to give. Even if applications were refused by the local authority, they were generally overturned by Reporters resulting in many residents losing heart and “throwing in the towel”.

The residents most affected by a proposal personally bore the brunt of the expense, paying for noise consultants, lawyers, landscape architects and planning consultants to represent them at Hearings/Inquiries in a bid to level the playing field against the developers. One resident also found it necessary to take legal action to protect their residential amenity.

Developers are now streaming into Scotland unabated due to the Scottish Government’s “open door” policy. Not only is it much easier to gain planning consent here but planning application fees are also still cheaper than in England which has a fee of £300,000 for any onshore

development irrespective of size.

PLANNING APPLICATION FEES IN SCOTLAND

50-100MW	125,000
100-200MW	180,000
200-300MW	180,000
300-500MW	280,000
500MW+	280,000

This, together with the more challenging requirements in England where an area of proposed development must be identified as suitable in the Development Plan (as it should be in all cases) and also have the backing of the Community before planning permission can be granted, makes it unlikely that there will be any relief for Scottish Communities in the foreseeable future unless we have a change in policy.

Why shouldn't we have the same rights as communities in England? The Scottish Government want us to have a greater say in the development of our own local areas but obviously not when it comes to wind farm developments. If they want us to be able to make informed decisions, then we also require the help to do that.

As explained in the Petition Statement, appeals would be less likely if we adopted England's system but in the event they did happen, we would still require our voices to be heard and that is a difficult task for many people who are not used to speaking in public and cannot afford representation. They are more likely to withdraw from the proceedings which in turn reduces participation in the planning process. The opposite to which the Scottish Government is trying to achieve.

I believe that this petition ticks all the right boxes and could be easily financed through a rise in the planning application fees.

Petitioner submission of 11 June 2021

PE1864/II

The Chief Planner's response unfortunately does not address public concerns. Scotland Against Spin agrees that everyone should reap the benefits of renewable energy but the burden of the adverse effects from producing that energy is borne by Scotland's rural communities.

Legislative Framework

The Petition refers to appeal decisions for all wind turbine/farm applications and the rate at which the Scottish Government (SG) and Reporters overrule local decision making.

This is confirmed in a SG FOI response from 28 October 2020, ref. 202000095942, which shows that between **2015 and 2020**, of all 61 section 36 applications, that is for windfarms with more than 50MW capacity—

- 42 were approved (69%)
- 32 had been referred to a Public Inquiry (PLI); 16 of those were approved (50%)

SG [statistics](#) also show that, for the same period (**2015-2020**), 132 appeals were made, in relation to wind farms of 50MW or less. Of these, 76 were approved on appeal (58%).

Brodies LLP [analysed](#) information, obtained from the Scottish Government Energy Consents Unit website, on section 36 applications decided between **2012 and 2016**.

It shows that for those years the key findings were:

- 64% success rate for Section 36 applications over five years;
- 88% of applications succeeded where no PLI was held.

This shows a success rate of 64% which halves if there is an Inquiry. A PLI is automatic if there is objection from a Local Planning Authority

(LPA.)

Developers benefit from consultation with the planning authority, but there is no requirement to consult with the community.

Communities in England are reassured that a proposed development will only succeed if it is in an area identified as suitable in a local plan and the planning impacts identified by the local community have been addressed, with majority community support.

Scottish communities have no such comfort.

Community engagement with the planning system

SAS believes that aggressive questioning of community representatives, courtroom style cross examination, and the subordination of community interests is accepted practice. Whilst harsh questioning of public witnesses is not universal, such bullying is a deterrent to others taking part in the inquiry process.

As internet streaming has only occurred since 2017, it is unlikely the Chief Planner would be aware of prior unacceptable behaviour. Conversely, SAS members have experience spanning a decade.

Applicants' closing submissions frequently belittle valid local concerns, ignoring that these are the communities hosting the development.

Communities understand the SG's agenda.

This Petition is about how the receiving public is being treated on the road to net zero; that the rural public are generally unhappy exemplified by perfunctory consultation, being side lined in the planning process and being subject to hostility from developers and at public examinations. They are expected to provide the resource to allow net zero to be met but are the collateral damage, bearing the adverse impacts of the windfarm consent.

Consultation

In 2015, SAS successfully petitioned the SG to increase neighbour notification distance for wind turbine applications. That Petition resulted

in the issue of Good Practice Guidance on Public Engagement for sub 20MW turbine proposals. We believe that the spirit of this Guidance is largely ignored by developers, who continue to take a dismissive approach to public consultation.

We also believe that “Public Consultation Reports” are frequently so inadequate as to be beyond constructive criticism. Statutory windfarm pre-application public consultation is still a tick box exercise. Local Authorities have no power to enforce developers to engage lawfully and effectively with the public.

Covid-19 constraints have facilitated this tick box consultation practice in rural areas with inadequate broadband/internet. The resulting failure of public engagement ridicules the exercise, allowing developers to claim a lack of interest.

The charity Planning Aid Scotland (PAS) is very helpful, but being staffed by volunteers, does not have the resources to help scrutinise the vast number and thousands of pages of complex documents within a wind farm application. It does not have an advocacy role.

Many communities are so overwhelmed with applications that there is no time for effective scrutiny. The reality is that communities require expert help to enable them to participate in the planning process. This help must be accessible *pro bono*.

Unfortunately, there is a significant “reality gap” between the Chief Planner’s comments of the state of affairs he describes and the reality of engaging with windfarm consultations and in managing and effectively opposing such applications.

Four cost effective solutions are proposed.

Advertise for, and constitute a Panel of contributory lawyers. Appointments would be for a maximum of two years.

Make required public consultation meaningful, with accurate and detailed information, with required/recorded public comment.

Impose Independent scrutiny by a legally qualified person of the content and manner of the public consultation exercise in each case, producing an independent report as part of the Environmental Report.

Where requested, provide informed advocacy/legal assistance to

community groups to help prepare for and participate in public inquiries or hearings.

We believe that this Petition is simple and fair and could be financed through an increase of planning application fees which are still cheaper in Scotland than those in England.

The following submissions are circulated in connection with consideration of the petition at this meeting—

- [PE1864/A: Scottish Government submission of 1 June 2021](#)
- [PE1864/B: Alec Kidd submission of 2 June 2021](#)
- [PE1864/C: Christopher Shaw submission of 3 June 2021](#)
- [PE1864/D: Helen Braynis submission of 3 June 2021](#)
- [PE1864/E: Elaine Nisbet submission of 5 June 2021](#)
- [PE1864/F: Victoria Boyle submission of 3 June 2021](#)
- [PE1864/G: Iain Milligan submission of 4 June 2021](#)
- [PE1864/H: John Logan submission of 4 June 2021](#)
- [PE1864/I: Janet and Michael Holley submission of 4 June 2021](#)
- [PE1864/J: Tracey Smith submission of 4 June 2021](#)
- [PE1864/K: Matthew Reiss submission of 4 June 2021](#)
- [PE1864/L: Jerry Mulders submission of 4 June 2021](#)
- [PE1864/M: William Jackson submission of 5 June 2021](#)
- [PE1864/N: Caithness West Community Council submission of 7 June 2021](#)
- [PE1864/O: J W Ponton submission of 7 June 2021](#)
- [PE1864/P: George Herraghty submission of 7 June 2021](#)
- [PE1864/Q: Ian Miller submission of 7 June 2021](#)
- [PE1864/R: Greta Roberts submission of 7 June 2021](#)
- [PE1864/S: Sue Hall submission of 8 June 2021](#)
- [PE1864/T: June and Ed Hall submission of 9 June 2021](#)
- [PE1864/U: Alison Johnston submission of 9 June 2021](#)
- [PE1864/V: Andrew Chadderton submission of 9 June 2021](#)
- [PE1864/W: James Tanner submission of 9 June 2021](#)
- [PE1864/X: Amanda Rofe submission of 9 June 2021](#)
- [PE1864/Y: Howard and Grace Goldstein submission of 9 June 2021](#)
- [PE1864/Z: Trevor Procter submission of 9 June 2021](#)
- [PE1864/AA: Petitioner submission of 9 June 2021](#)
- [PE1864/BB: Moraig Lyall submission of 9 June 2021](#)
- [PE1864/CC: Angus Farquhar submission of 10 June 2021](#)
- [PE1864/DD: Brian Johnstone submission of 10 June 2021](#)
- [PE1864/EE: Elaine Procter submission of 10 June 2021](#)
- [PE1864/FF: Hazel Appleton submission of 10 June 2021](#)
- [PE1864/GG: Peter Dunn submission of 10 June 2021](#)
- [PE1864/HH: John Edmondson submission of 10 June 2021](#)
- [PE1864/II: Petitioner submission of 11 June 2021](#)
- [PE1864/JJ: Rosemary Milne submission of 11 June 2021](#)
- [PE1864/KK: Elinor Ross submission of 11 June 2021](#)
- [PE1864/LL: Alan Cairns submission of 11 June 2021](#)
- [PE1864/MM: Celia Hobbs submission of 11 June 2021](#)
- [PE1864/NN: Rachel Connor submission of 11 June 2021](#)
- [PE1864/OO: Brian Bell submission of 11 June 2021](#)
- [PE1864/PP: Ronald and Irene Bain submission of 11 June 2021](#)

- [PE1864/QQ: Chris Fawcett submission of 11 June 2021](#)
- [PE1864/RR: Jane Dickson submission of 12 June 2021](#)
- [PE1864/SS: John Chapman submission of 12 June 2021](#)
- [PE1864/TT: Fiona Ainslie submission of 12 June 2021](#)
- [PE1864/UU: Alison Chapman submission of 12 June 2021](#)
- [PE1864/VV: Rowland Shallcross submission of 12 June 2021](#)
- [PE1864/WW: David Scott submission of 13 June 2021](#)
- [PE1864/XX: Patricia Brander submission of 13 June 2021](#)
- [PE1864/YY: Alison and Paul Garrod submission of 13 June 2021](#)
- [PE1864/ZZ: James Taylor submission of 13 June 2021](#)
- [PE1864/AAA: Bob Chicken submission of 13 June 2021](#)
- [PE1864/BBB: Simon Arnold submission of 13 June 2021](#)
- [PE1864/CCC: Norrie McLeod submission of 13 June 2021](#)
- [PE1864/DDD: Lorna McClean submission of 13 June 2021](#)
- [PE1864/EEE: Lyndsey Ward submission of 13 June 2021](#)
- [PE1864/FFF: Dr Guy Vernham submission of 13 June 2021](#)
- [PE1864/GGG: Elizabeth and Ian Richardson submission of 13 June 2021](#)
- [PE1864/HHH: Frank Hay submission of 13 June 2021](#)
- [PE1864/III: Mary Young submission of 13 June 2021](#)
- [PE1864/JJJ: Chris Walsh submission of 13 June 2021](#)
- [PE1864/KKK: Kathrin Haltiner submission of 14 June 2021](#)
- [PE1864/LLL: Stephen Mardon submission of 14 June 2021](#)
- [PE1864/MMM: Mrs S McKenzie submission of 14 June 2021](#)
- [PE1864/NNN: Moscow and Waterside Community Council submission of 14 June 2021](#)
- [PE1864/OOO: Margaret Addo submission of 14 June 2021](#)
- [PE1864/PPP: John Scott submission of 14 June 2021](#)
- [PE1864/QQQ: Jim Pratt submission of 14 June 2021](#)
- [PE1864/RRR: H Menhinick on behalf of Dailly Community Council submission of 14 June 2021](#)
- [PE1864/SSS: Gladys Speirs submission of 14 June 2021](#)
- [PE1864/TTT: Gilian Macpherson submission of 14 June 2021](#)
- [PE1864/UUU: Fiona Clubb submission of 14 June 2021](#)
- [PE1864/VVV: David Slater submission of 15 June 2021](#)
- [PE1864/WWW: Geraldine Hamilton submission of 16 June 2021](#)
- [PE1864/XXX: Celia Strain submission of 16 June 2021](#)
- [PE1864/YYY: Alistair Buckoke submission of 17 June 2021](#)
- [PE1864/ZZZ: Bruce Hobbs submission of 17 June 2021](#)
- [PE1864/AAAA: Joy Kendall submission of 22 June 2021](#)
- [PE1864/BBBB: Charmaine Dean and Stewart Baillie submission of 23 June 2021](#)
- [PE1864/CCCC: Tim Harrison submission of 23 June 2021](#)
- [PE1864/DDDD: Marion Lang submission of 27 June 2021](#)
- [PE1864/EEEE: Nigel A R Willis submission of 28 June 2021](#)
- [PE1864/FFFF: Keith and Margaret Mycock submission of 26 July 2021](#)
- [PE1864/GGGG: Sandra Cunliffe submission of 20 July 2021](#)
- [PE1864/HHHH: Roger Hissett submission of 26 July 2021](#)
- [PE1864/IIII: Brian Wade submission of 26 July 2021](#)
- [PE1864/JJJJ: Graham Lang submission of 27 July 2021](#)
- [PE1864/KKKK: Mr and Mrs Spratling submission of 28 July 2021](#)

- [PE1864/LLLL: Peter A Kew submission of 28 July 2021](#)
- [PE1864/MMMM: Ian Dippie submission of 28 July 2021](#)
- [PE1864/NNNN: Kim Terry submission of 3 August 2021](#)
- [PE1864/OOOO: Marion Milliner submission of 3 August 2021](#)
- [PE1864/PPPP: Joyce Miller submission of 3 August 2021](#)
- [PE1864/QQQQ: Aileen Jackson submission of 3 August 2021](#)
- [PE1864/RRRR: Hugh Ligat submission of 10 August 2021](#)
- [PE1864/SSSS: Chahna Sudevan submission of 10 August 2021](#)
- [PE1864/TTTT: Christopher Ford submission of 18 August 2021](#)
- [PE1864/UUUU: Carole Williams submission of 18 August 2021](#)
- [PE1864/VVVV: Corsock & Kirkpatrick Durham Community Council submission of 23 August 2021](#)
- [PE1864/WWWW: Sylvia Anderson submission of 24 August 2021](#)

All written submissions received on the petition can be viewed on the petition [webpage](#).