

**GWSF comments on the Scottish Government’s Planning White Paper**

**March 2017**

The Forum, which represents 68 community controlled housing associations in Glasgow and the west of Scotland, welcomes the opportunity to respond to the White Paper. Generally we have restricted our comments to those areas which appear to have the greatest relevance, or potential relevance, to community controlled housing associations.

**Proposal 1 – Introduction of a statutory link between the development plan and community planning**

The White Paper says that such a link could be achieved by ensuring that development plans take account of the work of Community Planning Partnerships. GWSF believes that whilst this is well intentioned, it would have little actual impact in practice, as our experience of the community planning process is that it is very difficult for genuinely community-based interests to have real influence within a forum which is predominantly a gathering of the main statutory authorities.

Some of the White Paper’s subsequent proposals about how communities can better influence the development plan appear to have greater potential and we comment on these below.

**Proposal 6 – Giving people an opportunity to plan their own place**

We note with interest the proposal to give communities (via ‘community bodies’) powers to create their own ‘local place plans’ and for these plans to be used as a framework for development within local development plans. Whilst it is not necessarily easy to see how this proposal would fit comfortably into the overall, top down planning process, GWSF welcomes it in principle.

Realistically, we think that community controlled housing association may often be the vehicle through which such new powers for the community might be facilitated, particularly as the reach of many CCHAs goes well beyond the local tenants and owners to whom it provides a direct service.

We welcome the statement that in introducing this new power it is not the intention to promote unreasonable protectionism, and that local place plans should help deliver development and not unfairly put pressure on other communities to take on a greater share of development.

We welcome the intention to use the same definition of ‘community body’ as can be found in recent community empowerment and land reform legislation. Indeed, a key indicator of the likely success of the proposed new power to create a local place plan will be the early experience community bodies have of their rights under this existing legislation, most notably on issues such as asset transfer: it seems likely that local authorities which embrace community empowerment and land reform legislation will do likewise with a new community right to create a local place plan.

We welcome the recognition that further support will be needed to help communities with the greatest levels of need to become more involved in shaping the future of their community. Support which goes directly to communities and community bodies is the best use of resources, as opposed to being channelled through statutory authorities.

GWSF looks forward to inputting into further thinking on this proposal.

**Proposal 7 – Getting more people involved in planning**

We welcome the White Paper’s intention to resist the call for a new right for children and young people to be consulted on the local development plan. ‘Belt and braces’ legislation does not have to be the answer to everything. The Paper acknowledges that planning authorities can get better at involving children and younger people, but whenever legislation is seen as the answer it will inevitably spawn a raft of new processes and procedures, each with timescales and templates etc., adding the need for more resources and yet more time into what is already perceived as a grinding, cumbersome process (the Paper itself observes that development plans are often considered to be out of date by the time they are adopted).

**Proposal 11 – Closing the gap between planning consent and delivery of homes**

We welcome the intention to close the gap between the numbers of planning consents which are granted and the actual number of homes built. The proposed requirement that all major applications for housing are accompanied by appropriate information on the development viability is welcome in principle. Developers will face challenges over issues such as the right infrastructure being in place, but we recognise that when a site is not being progressed this just adds pressure for land to be released elsewhere.

We welcome the paper’s commitment to continue to support local communities to take advantage of opportunities to take ownership of land, including through the Scottish Land Fund.

We note the reference to exploring how best the intended Compulsory Sale Orders legislation could complement existing tools to tackle the problem of abandoned buildings and land. Ministers will need a decisive approach to tackling the issue of sites being held in the hope of improved market conditions, and we look forward to the intended consultation on whether a development land tax approach should be adopted.

**Proposal 13 – Embedding an infrastructure first approach**

We welcome the White Paper’s recognition of the critical importance of infrastructure in ensuring that the right homes are delivered in the right places. GWSF is not qualified to comment on whether this should be addressed through a new national infrastructure agency, and we note the intention to establish instead a national infrastructure and development delivery group, more about which we look forward to hearing in the coming months.