

Response ID ANON-YU7P-G14A-2

Submitted to **Rural Assets Strategy Consultation**

Submitted on **2019-04-26 09:34:37**

Guiding Principles

Do you think these principles are appropriate for the rural assets strategy?

Yes

Please give reasons for your answer.:

In the guiding principle 1 the inclusion of the value of place as well as natural resources and asset value would be a useful addition. The inclusion of the 'place-principle' in particular would be appropriate here. It embodies a more joined-up, collaborative, and participative approach to services, land and buildings, across all sectors within a place, enabling better outcomes. Through collaboration, stakeholders responsible for providing services and looking after assets can support communities to achieve inclusive growth while contributing to wider social, environmental and economic benefits.

To some extent principles 1, 3 and 5 overlap and could be rationalised. One dealing with inclusive growth and one on environmental sustainability may suffice. Likewise 4 and 6 could be condensed into one principle. Working with communities to make decisions centred on the 'best long-term public interest' may more clearly lay out intentions than 'increasing value to society'.

From the principles listed above, please choose the three you think are the highest priority and rank them 1 (very high priority) to 3 (lower priority).

From the principles listed above, please choose the three you think are the highest priority and rank them 1 (very high priority) to 3 (lower priority). - 1. We will make decisions based on the value (financial and non-financial) that we can add to assets and natural resources.:

1

From the principles listed above, please choose the three you think are the highest priority and rank them 1 (very high priority) to 3 (lower priority). - 2. We will seek to ensure each type of asset we manage is financially sustainable and we act responsibly to ensure appropriate returns in line with the requirements of the Scottish Crown Estate Act.:

From the principles listed above, please choose the three you think are the highest priority and rank them 1 (very high priority) to 3 (lower priority). - 3. Our decisions regarding our financial investments are driven by the contribution they make to inclusive sustainable development, helping to unlock economic potential, as well as the sustainability of Crown Estate Scotland as a business.:

From the principles listed above, please choose the three you think are the highest priority and rank them 1 (very high priority) to 3 (lower priority). - 4. We will work with communities and stakeholders to increase empowerment and resilience.:

3

From the principles listed above, please choose the three you think are the highest priority and rank them 1 (very high priority) to 3 (lower priority). - 5. The long-term environmental sustainability of the assets in our care is a priority, including the protection, enhancement and quality of natural capital.:

2

From the principles listed above, please choose the three you think are the highest priority and rank them 1 (very high priority) to 3 (lower priority). - 6. We will manage, invest and divest so that the Scottish Crown Estate evolves in a way that increases its value to society.:

Please identify any additional guiding principles you think Crown Estate Scotland should include in the rural strategy.

Please identify any additional guiding principles you think Crown Estate Scotland should include in the rural strategy.:

It is important to stress that all the above principles are important and achieving a collective balance must be the objective of any strategy.

Strategic priorities and considerations

Above we outline some of what we consider to be strategic considerations. What do you think are the key external considerations that should be addressed by the rural assets strategy?

Above we outline some of what we consider to be strategic considerations. What do you think are the key external considerations that should be addressed by the rural assets strategy? :

In the consultation document it is stated that- "the strategy will be distinct from local authorities' local development plans. This is not a spatial or sector specific exercise, it does not relate directly to regulatory compliance and/or planning consents, which are not within our remit."

Whilst RTPi Scotland understands that the strategy should not be a sectoral plan, we would like to highlight that almost any decision on active land and property management will have spatial implications and in order to drive inclusive sustainable development these must be considered. Too many policy approaches and funding decisions are uncoordinated and do not take into account the impact they have on communities. Place based approaches can help to minimise waste, duplication and contradictions. Given this we must think about how its decisions play out across places and how it can break down silo-based approaches to funding, policy and delivery. The need for collaboration to unlock inclusive growth is an intent clearly expressed in the forward of this strategy. RTPi Scotland believes that a planning system, if used to its full potential can guide, promote and regulate land and property development to serve the public interest. This includes providing the strategic vision and consensus building needed to deliver infrastructure to rural communities whilst integrating public service delivery - a

key aim of this strategy.

Therefore we believe the strategy should propose a framework by which Crown Estate Scotland (CES) decision making process can support and be supported by local development plans, community plans, Local Place Plans, Single Outcome Agreements, investment plans, locality planning and infrastructure delivery. Whilst reference is made to the Land Use Strategy, there are a range of other key national and regional strategies which this strategy should align with, including -

- Strategic planning through emerging regional strategies
- National Planning Framework 4 (NPF4)
- Regional Economic Partnerships
- City-Region Deals
- Infrastructure Investment Plan
- National Transport Strategy
- National Economic Strategy
- National Energy Strategy
- Historic Environment Strategy
- Fairer Scotland Action Plan
- National Waste Management Plan
- Regional Transport Partnerships

What should the main objectives be for this strategy? In answering this, please consider, who should benefit from Crown Estate Scotland managing rural assets?

What should the main objectives be for this strategy? In answering this, please consider, who should benefit from Crown Estate Scotland managing rural assets?:

To make decisions on assets which maximise the positive outcomes for rural communities through inclusive growth whilst enhancing local landscape, heritage and biodiversity

Agricultural Assets

Should Crown Estate Scotland continue to be a significant provider of agricultural tenancies, whatever the cost, or should there be a rebalancing of the assets for financial sustainability?

Don't know

If yes, please explain your answer.:

No comment

Assuming Crown Estate Scotland continues to be a long-term manager of let agricultural land, what should be the priorities that a future strategy should address?

: Assuming Crown Estate Scotland continues to be a long-term manager of let agricultural land, what should be the priorities that a future strategy should address?:

No comment

How can Crown Estate Scotland best fund the extensive capital investment requirements on the agricultural estate without reducing public benefit investment in other sectors?

How can Crown Estate Scotland best fund the extensive capital investment requirements on the agricultural estate without reducing public benefit investment in other sectors? :

No comment

How should a future strategy inform decisions regarding which assets might be sold and which should be retained in the longer-term?

How should a future strategy inform decisions regarding which assets might be sold and which should be retained in the longer-term?:

Ultimately decisions should be made with regard to the best long-term public interest. To achieve this any decision making process must be integrated with the wider spatial vision for localities and in collaboration with key stakeholders.

Community Engagement and Involvement

What do you consider to be the key opportunities to involve local communities in the work of Crown Estate Scotland?

What do you consider to be the key opportunities to involve local communities in the work of Crown Estate Scotland? :

Whilst there are many options for CES to involve local communities, this should be done in an integrated manner with existing and emerging forms of public participation. RTPi Scotland recognises and supports the need for communities to have greater influence in the local decision making process. Empowering communities by strengthening their voices in decisions about public services is central to the Community Empowerment (Scotland) Act 2015 and one of the key goals behind the genesis of the Scotland (Planning) Bill. RTPi Scotland wants a frontloaded and proactive planning system which allows for community engagement at the early stages of the planning process.

It is useful to note the exemplary work which currently exists, and continues to be produced, involving communities within the planning system to shape local decision making. For example, on the Isle of Rum, a Community Trust has worked with Highland Council to prepare a community land use plan, seeking to reverse the population decline in the area. Many stakeholders, such as Scottish Natural Heritage, engaged in a collaboration coproduction process facilitated by PAS (Planning Aid Scotland). The Isle of Rum Community Land Use Plan has been adopted by the Highland Council as supplementary guidance. As a result planning decisions on the isle to recognise the implications of plan and furthermore the Trust is also now frequently consulted on new planning applications. The planning profession is incredibly committed to supporting community engagement in the planning system, with around 20% of the profession in Scotland volunteering for Planning Aid Scotland (PAS).

The Place Standard Tool and Charrettes

The Place Standard Tool has been jointly designed by NHS Health Scotland, the Scottish Government and Architecture & Design Scotland and allows to assess places based on 14 questions which are answered on a 1 to 7 scoring system. This tool enables discussions around a place to be structured and can outline the strengths and weaknesses of a place. This tool is now also available online and as an app which allows communities and individuals to assess a place anywhere at any time. The tool should be regarded as a conversation starter which can inform the plan making process. However in does not in itself allow communities to influence decision making.

In 2011/2012 Charrettes were introduced by the Scottish Government and defined as “an interactive design process, in which the public and stakeholders work directly with a specialised design team to generate a community vision, masterplan and action plan”. This process can take places over several weeks. Since 2011, 48 charrettes have been funded by the Scottish Government and additional funding was released for the 2016/2017 period. Moving forward, outcomes from Charrettes and Place Standards Tools could contribute towards the evidence base by which Local Places Plans (LPPs) are drafted.

Community Planning and Local Place Plans

Community planning brings together public bodies and communities to improve public services by establishing Community Planning Partnerships, Local Improvement Outcome Plans and Locality Plans. Currently in the Planning (Bill) Scotland provisions have been retained for LPPs. These community led plans will be recognised and supported in the community planning and spatial planning systems. RTPI Scotland believes that linking community planning and Local Place Plans with spatial planning will improve community’s access to information and therefore capability of producing robust, informed plans. Community plans will then be able to inform local development plans and regional strategies and associated delivery programmes, and vice versa. Ultimately LPP will allow communities to direct land uses. It is therefore important for landowners to get involved in the allocation of land and delivery of LPP. The opportunity to share key engagement stages during the preparation of community and development plans so that they are seen by the public as one process was identified in RTPI research on linking community planning and spatial planning. This proposal would position community participation in spatial planning more sustainably as it would be integrated with action to involve communities in a range of plans and initiatives affecting their places including the CES strategy.

How can we remove barriers to communities being able to input into decision-making?

How can we remove barriers to communities being able to input into decision-making?:

The process by which engagement in planning is conducted has been refined and improved markedly over recent years with the use of engagement tools and processes such as Charrettes and the Place Standard Tool. However one of the main challenges is to attract people to attend engagement events, considering the time constrained and busy lives many people live. This can lead to an unrepresentative demographic of attendees who are able to attend meetings. There is an increasing trend to capture a wider range of community views involved through the use of technologies. Edinburgh City Council, for example, have recently markedly increased their use of online consultations through a ‘consultation hub’ website, where the public can, quickly and efficiently submit their views on a variety of topics. Regardless of the methodology, community engagement is a very resource intensive process. Ensuring appropriate resourcing is key to sustaining meaningful public participation.

It is also essential to recognise and understand the importance, and integrity of, the decision making professional planners exercise in negotiating the use of land for the long term best public interest. This is particularly important in the context of decision making for infrastructure of strategic importance, such as waste incinerators, which can prove unpopular in the local context yet are critical for the effective functioning of society.

RTPI has published a guide on effective community involvement and community engagement - <https://www.rtpi.org.uk/media/6313/Guidelines-on-effective-community-involvement.pdf>

Forestry

Should Crown Estate Scotland seek to be a long-term investor / manager of new commercial forest areas or are other bodies (such as Forestry and Land Scotland) better placed to manage forests in the public interest?

Don't know

Please explain your answer. :

No comment

What are the key factors / priorities that should be taken into account in the management of Scottish Crown Estate woodland and forest assets?

What are the key factors / priorities that should be taken into account in the management of Scottish Crown Estate woodlands and forests?:

Any relevant landscape restoration projects, such as the Central Scotland Green Network which is a national development within the National Planning Framework.

Should a different approach be taken to invest in new woodlands on the Estate to help integrate forestry into wider land use? E.g. through the sale of existing woodland to support investment in new planting elsewhere.

Don't know

Please explain your answer.:

No comment

Residential Property

What factors should be taken into account when we decide to retain, sell and / or buy residential property assets?

What factors should be taken into account when we decide to retain, sell and / or buy residential property assets?:

Decision making should be made in context of the place principle which states that: "All those responsible for providing services and looking after assets in a place need to work and plan together, and with local communities, to improve the lives of people, support inclusive growth and create more successful places". Therefore any outputs of community engagement, community planning or the Local Development Plan process should be considered. This will help deliver collective ambition and integrate resources.

What are the key factors that should be taken into account in the strategy regarding the future residential portfolio?

What are the key factors that should be taken into account in the strategy regarding the future residential portfolio?:

Key factors when developing any future residential portfolio strategies will be addressing rural housing affordability, service provision, sustainability and connectivity. Any future residential profile strategy needs to be aligned and integrated with other national and regional strategies as discussed in Q4.

Minerals

Are there any specific issues relating to mineral workings on the Scottish Crown Estate that should be addressed in a future strategy?

Are there any specific issues relating to mineral workings on the Scottish Crown Estate that should be addressed in a future strategy?:

Scottish Planning Policy recognises that mineral resources should be safeguarded and that there is need to address restoration of past minerals extraction sites in and around the Central Belt. Scottish Planning Policy also states that landowners and developers should come forward during the Local Development Plan stage to promote such areas. Impacts of mineral works can have on communities and the historic and natural environment are also to be assessed. The RTPI recently submitted a consultation response to the proposed UK Mineral Strategy (<https://www.rtpi.org.uk/media/2319911/RTPI%20-%20response%20to%20proposed%20UK%20Minerals%20Strategy.pdf>) which outlined the need for a stronger connection between planning for housing, infrastructure and minerals.

Should Crown Estate Scotland actively seek mineral development opportunities (e.g sand and gravel extraction) where these exist within the current portfolio and elsewhere, through the purchase of new sites?

Don't know

Please explain your answer.:

No comment

Built Development / Rural Development

What should the priorities be for built development on the existing rural assets?

What should the priorities be for built development on the existing rural assets?:

Four main priorities should be considered for development on existing rural assets:

- Diversifying and connecting rural economic development - Planning in rural areas is constantly needing to adapt to changing environmental and economic pressures. Enabling new, better-paid and diverse employment opportunities is a key part of any rural challenge. The future of agricultural support is uncertain in a post-Brexit economy which may increase pressure to diversify. Assistance needs to be given to rural communities to enable them not only to survive but thrive.
- Supply of affordable housing - In many rural areas of Scotland there are particular issues facing local communities in seeking to increase the supply of affordable housing to support the longer-term sustainability of smaller rural settlements.
- Service provision –has always been a challenge for rural areas. Evolving service provision to be more flexible will be important to address diverse needs and challenges of small communities spread across large geographical areas.
- Sustainability - increasing sustainability in the context of climate change whilst conserving and enhancing open countryside to ensure food security, environmental protection and access to nature for society.

Should Crown Estate Scotland actively seek new built development opportunities through the purchase of new areas of land?

Yes

Please explain your answer.:

CES should actively seek for development opportunities if they address the priorities as set out in Q23.

Should Crown Estate Scotland seek to promote/support the development of renewable energy schemes (wind, solar, hydro, biomass) on the Rural assets in line with relevant strategic planning guidance/priorities and working with relevant stakeholders?

Yes

If so, how high a priority should be given to renewable energy development in the future strategy?:

As identified as a priority in Q23, sustainability is a key challenge for rural communities and prioritising renewable energy developments will help to tackle this issue. According to Scottish Planning Policy the expansion of energy generation capacity should be supported, however the impacts on communities, landscape, heritage and biodiversity are also material considerations. Renewable energy developments should be prioritised and proposed where most suitable in accordance with guidance and policies. Communities and local planning authorities should be considered as key stakeholder as the buy in from both allows for swifter development. Scottish Government also supports the development of community owned renewable energy.

Countryside and Environment - Natural Resource Management

How should a rural strategy address the requirement to enhance and protect natural capital and promote more sustainable use of natural resources?

How should a rural strategy address the requirement to enhance and protect natural capital and promote more sustainable use of natural resources?:
Initial work must identify threats and opportunities to natural capital. For example, Scotland's Natural Capital Asset Index (NCAI) assesses the quality and quantity of our land-based habitats and their contributions to human wellbeing. By employing an ecosystems services approach to quantifying natural capital, decision making can benefit both people and the natural environment. This must be done in a strategic and coordinated manner, integrating the rural strategy with the land use strategy and spatial planning, with consideration made to, for example, planning designations.

What should be the key priority for the strategy in relation to biodiversity and wildlife management?

What should be the key priority for the strategy in relation to biodiversity and wildlife management?:

Any strategy needs developed with up-to-date and scientifically robust evidence, created in collaboration with key stakeholders. Any CES strategy should encourage projects to be rigorously assessed for their environmental impact, with an aim to enhance biodiversity.

Are there other strategic natural capital or environmental issues or opportunities that the strategy should address and if so, what are these?

Yes

Are there other strategic natural capital or environmental issues or opportunities that the strategy should address and if so what are these?:

The CES strategy should encourage decisions to be made which consider strategic issues that may affect a wider area, including

- functional ecological areas
- flood risk assessment;
- health assessment;
- air quality strategies;
- landscape and/or heritage sensitivity studies

How should the strategy prioritise investment in projects that enhance cultural and natural heritage infrastructure of most benefit to local communities and visitors to the Scottish Crown Estate?

How should the strategy prioritise investment in projects that enhance cultural and natural heritage infrastructure of most benefit to local communities and visitors to the Scottish Crown Estates?:

CES should be working with communities, local authorities and other stakeholders to understand the short and long priorities for investment in the localities. In certain scenarios there could be opportunities to align strategic investment for infrastructure with other key parties, helping achieve maximum benefit. The timing of investment should also be considered in relation to any anticipated growth in the area as set out by the Local Development Plan and in delivery programmes.

Future asset purchases

What should the priorities be for future acquisitions of property be and what benefits should Crown Estate Scotland focus on delivering in a future purchasing strategy?

What should the priorities be for future acquisitions of property be and what benefits should Crown Estate Scotland focus on delivering in a future purchasing strategy? :

See answer for Q23, "What should the priorities be for built development on the existing rural assets?"

Further comments

If you have any further comments or points that you think should be taken into account in the development of a rural assets strategy please state these below.

If you have any further comments or points that you think should be taken into account in the development of a rural assets strategy please state these below::

No further comment

About you

What is your name?

Name:

Robbie Calvert

What is your email address?

Email:

robbie.calvert@rtpi.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

RTPI Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

It is difficult to refer back to previous questions without clear numbering

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: