

Email to: SEDconsultation@gov.scot

12 September 2017

Dear Sir/Madam,

Consultation on a Socio-Economic Duty in Scotland

The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 2,100 members in Scotland and a worldwide membership of over 24,000. We:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members, and therefore the majority of the planning workforce, to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places in Scotland; and
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

General Observations

RTPI Scotland welcomes the opportunity to comment on this consultation regarding the implementation of a Socio-Economic Duty in Scotland, a measure which in principle we support. In particular we support the Scottish Government's intention to introduce equalities powers in the interests of advancing its ambition to make Scotland a fairer place. RTPI Scotland also welcomes the recognition in the consultation of the impact that decisions about place have on people. In 2016 the RTPI published [*Poverty, place and inequality*](#), research which demonstrates how place-based approaches can contribute to tackling inequalities. This research highlights how peoples' environments can impact on their opportunities and behaviours, therefore leading to or reinforcing other causes of poverty and inequality. Taken in the context of the proposed Socio-Economic Duty this research highlights the careful thought needed to ensure that strategic decision making that impacts on place is closely tied to other approaches to reducing inequalities.

RTPI Scotland wishes to draw attention to ensuring that in its implementation the duty will complement and not complicate the existing statutory requirements of the planning system. This is especially in relation to the statutory requirement for planning authorities to 'function

with the objective of contributing to sustainable development' as per the Town and Country Planning (Scotland) Act 1997. Further, RTPI Scotland has some practical concerns about how the duty will be exercised in decision making.

It is also important to emphasise the important connections between the implementation of a Socio-Economic Duty and the ongoing review of the Scottish planning system, which aims to better harness planning to influence investment and policy, supporting development outcomes which target reduced inequalities.

Existing duties in planning

RTPI Scotland believes that planning has a significant role to play in more closely coordinating place-based strategies and activities that target reductions in poverty and inequality. The Scottish Government's Independent Advisor on Poverty and Inequality has too acknowledged the importance of place for fairer outcomes. In her July 2017 report to the First Minister, *The life chances of young people in Scotland*, she outlines why quality neighbourhoods are vital for poverty reduction, and that strengthening local authorities is required to ensure this is addressed. A number of duties and policies already exist to support public authorities in discharging these duties.

The Town and Country Planning (Scotland) Act 1997 requires planning authorities to exercise their function with the objective of contributing to sustainable development. This statutory requirement cascades down to Scottish Planning Policy, in which sustainable outcomes are a principle policy goal, encompassing economic, environmental and social dimensions. Paragraph 29 of Scottish Planning Policy outlines the principles that guide the delivery of sustainable development. While these principles encompass social issues, reducing inequalities is not explicitly included. The scheduled review of Scottish Planning Policy due in 2019 could be an opportunity for the principles of sustainable development to be extended to narrowing inequalities.

The Planning etc. (Scotland) Act 2006 requires, in the development of strategic plans and local plans, the economic and social characteristics of a district to be considered in development management decision making. These existing legislative requirements in the planning system overlap with many of the ambitions of a proposed Socio-Economic Duty, given that reducing inequality constitutes part of creating development which is sustainable.

As acknowledged in the consultation document the Community Empowerment (Scotland) Act 2015, requires community planning partnerships to act with a view to reducing inequalities of outcomes unless they consider it inappropriate to do so.

The planning review and the Socio-Economic Duty

RTPI Scotland shares the Government's ambition for the review; to position planning as a corporate and collaborative service that supports and influences investment and policy across local and national government. Planning is located at the interface between many different investment and decision-making functions, and is therefore well placed to coordinate activities and ensure that public investments work effectively together to minimise inequalities. RTPI Scotland therefore urges the Scottish Government to ensure that the opportunities of the introduction of a Socio-Economic Duty are maximised by linking the new duty to the changes in how decisions about place are made due to be brought about through the planning review.

It is proposed that the Socio-Economic Duty apply to 'decisions of a strategic nature'. This will impact on several of the changes to the planning system proposed by the Scottish

Government in its *Places, People and Planning* consultation paper, and subsequent Position Statement. This includes proposals to:

- remove statutory Strategic Development Plans and replace them with more flexible Regional Partnership working arrangements
- Create a statutory, reciprocal link between community planning, which is required to work to reduce inequalities, and spatial planning
- Introduce an early 'gatecheck' to the development plans preparation process
- Introduce a 'strengthened' National Planning Framework
- Strengthen community involvement in planning decision-making, including by introducing Local Place Plans, which would give communities an opportunity to prepare development plans for their areas

We urge the Scottish Government to ensure that in refining the detail of these reforms, how they will operate alongside the socio-economic duty will be taken into consideration,

Finally, as ever RTPI Scotland highlights that without proper resourcing of the public authorities charged with discharging statutory duties, we cannot expect to see a change in outcomes. RTPI Scotland analysis of data in the Planning Performance Framework shows that between 2009 and 2015 23% of planning roles were lost from planning authorities, while 32.5% of planning budgets was lost over the equivalent time period. These figures illustrate clearly the reported trend that local government has fewer planners, working harder. Only 63% of the cost of processing planning applications is recovered by local authorities, and in 2016 0.57% of total local authority budgets was spent on planning services. We have already described the important role that planning has to play in reducing inequalities; the planning service at the local, regional and national level must be adequately equipped to fulfil this role.

I trust that you will find these comments helpful. If you would like to discuss any aspect, or require clarification of any points raised, please contact me on 0131 229 9628 or by email to kate.houghton@rtpi.org.uk.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Houghton', written in a cursive style.

Kate Houghton
Policy and Practice Officer