

Agenda Item	9
Report No	PLA 08/17

## HIGHLAND COUNCIL

**Committee:** Places Committee

**Date:** 15 June 2017

**Report Title:** Review of the Scottish Planning System

**Report By:** Director of Development & Infrastructure

### 1 Purpose/Executive Summary

1.1 This report presents, for homologation, the Highland Council's response to the Scottish Government consultation on the review of the planning system, 'Places, People and Planning'. The comments are being presented for homologation as the consultation period ended on 4 April 2017 during the purdah period for the Council elections. The Scottish Government is scheduled to publish a position statement responding to the comments submitted later in June with a Planning Bill expected towards the end of 2017 or the start of 2018.

### 2 Recommendations

2.1 Members are asked to:

- homologate the comments enclosed at **Appendix 1** as the Council's views on the review of the planning system in Scotland for consideration by Scottish Government; and
- provide any comments or feedback to inform future stages of the review and any emerging legislation.

### 3 Background

3.1 On 10 January 2017 the Scottish Government published a [review of the planning system entitled “Places, People and Planning”](#) with a consultation running until 4 April 2017. This followed an [independent review](#) of the planning system published in May 2016 which was carried out by a panel commissioned by Scottish Ministers. Officers from the Highland Council have been involved in various stages of the review leading up to the publication of the consultation document and have therefore had the opportunity to help shape elements of the recommendations that emerged.

### 4 “Places, People and Planning”

4.1 The review document sets out the Scottish Government’s proposals for strengthening the planning system, people’s input to it, and also how it is resourced to support sustainable economic growth. The document explores these issues through four themes:

- **Making plans for the future** - which focuses on simplifying and strengthening the development planning process;
- **People make the system work** - which seeks to empower people to get involved in the planning system;
- **Building more homes and delivering infrastructure** - which highlights the role of the planning system in coordinating and delivering development; and
- **Stronger leadership and smarter resourcing** – which aims to remove bureaucracy and improve the resources required to create great places.

4.2 For each theme the review document sets out a series of proposals and recommendations along with questions seeking comment on the merits. The Council’s full response for homologation is enclosed at **Appendix 1** and is summarised in Section 5 below.

4.3 The Scottish Government is scheduled to publish a position statement responding to the comments submitted later in June this year with a Planning Bill expected towards the end of 2017 or the start of 2018. Officers are expected to have a chance to input to these future stages and Members are therefore asked for any feedback to contribute towards these discussions alongside the homologation of the Council’s response.

### 5 Highland Council response

5.1 A copy of the response submitted by Highland Council officers is enclosed at **Appendix 1**. The main points raised are summarised below following the structure of the Planning Review document.

5.2 Making plans for the future:

- a) the need to make the development plan process less dominated by administration and more focussed on coordinating and enabling;
- b) Scottish Government should seek to ensure that the relationship between community planning and development planning is two-way and the Council’s outcome based approach to Development Plans could help ensure alignment between these plans;
- c) proposition for a framework that would strengthen the relationship between community planning and land use planning and simplify the interaction between the various plan outputs (LOIP, Locality Plans, LDP and Local Place Plans) that will all have an influence on the future of places;
- d) at the national level requirements should be set for such partnership arrangements across Scotland to better improve regional and, where necessary, cross-boundary

- coordination of infrastructure and development delivery;
- e) support for strengthening the role of Scottish Planning Policy and National Planning Framework;
- f) further clarity required on each stage of the Local Development Plan process, including the requirements for engagement and collaboration in advance of the Draft Plan, and how Supplementary Guidance and Development Briefs can be prepared alongside the LDP; and
- g) the concept of an LDP gatecheck could reduce the number of issues that need to be subject to Examination later in the process.

### 5.3 People make the system work:

- a) the ability for communities to prepare Local Place Plans should be placed within a community planning context not just within the planning system, with a closer-interrelationship between the two;
- b) to ensure people are more involved in shaping their place communities should consolidate the amount of consultation undertaken and feed this into any relevant plans including community plans.
- c) agreement that pre-application consultation requirements should be reviewed and simplified, including consideration of the applicant's response to input from communities; and
- d) agree that enforcement arrangements should be improved, including the penalties.

### 5.4 Building more homes and delivering infrastructure:

- a) concern that a longer term housing target would be unrealistic and fail to take sufficient account of changing local and national circumstances;
- b) to provide greater certainty on the sites that can be delivered during the lifetime of a plan, evidence on the viability of sites should be sought during the preparation of the LDP;
- c) consideration should be given to measures to prevent landowners not bringing sites forward once permission or allocation has been secured;
- d) there should be more support and funding for infrastructure from central government;
- e) consideration should be given to sites that remain undelivered being removed from the plan;
- f) there should be a statutory requirement for existing agencies to co-operate and co-ordinate infrastructure provision;
- g) call to ensure that Highland is not disadvantaged in terms of infrastructure negotiations being outwith the regional partnership arrangements - geography and dispersal of communities in Highland adds greater weight to the need for infrastructure; and
- h) the concept of an infrastructure levy should be explored to ensure the impact of development can be fully managed and mitigated.

### 5.5 Stronger leadership and smarter resourcing:

- a) suggestion to allow Members to concentrate on larger scale developments by allowing all small householder applications to be delegated to officers, with referral to Review Bodies as necessary;
- b) outcomes from planning in terms of how places are changing could be more clearly recorded and presented through the Action Programme / Delivery Programme. In the future they could also reflect how Local Place Plans and Locality Plans are being implemented;
- c) planning fees should be based on a sliding scale proportionate to the size of the development, with additional fees for discharge of conditions and 'completion' (to minimise the need for enforcement);

- d) to reduce the cost of advertising applications by relaxing the need to advertise particular types of development and instead point to the Council's website;
- e) suggestion to extend permitted development rights to cover certain types of development; and
- f) there are significant opportunities to use technology and online mapping to support improved communication and engagement through planning, and the evidence base that supports decisions.

## **6 Implications**

- 6.1 Resource – the enclosed draft response highlights any issues over the potential implications for resourcing of planning services.
- 6.2 Legal – none at this stage.
- 6.3 Community (Equality, Poverty and Rural) – None at this stage however the recommendations indicate an opportunity for people to take a stronger lead in preparing plans for their community.
- 6.4 Climate Change/Carbon Clever - none
- 6.5 Risk – None at this stage but there will need to be ongoing awareness of and input to the review process by the Council to influence the outcome of the review and to plan for any implications that the future Planning Bill might have.
- 6.6 Gaelic – none

Designation: Director of Development and Infrastructure

Date: 26 May 2017

Author: Scott Dalgarno, Development Plans Manager

## Response ID ANON-86WF-76PJ-J

Submitted to **A consultation on the future of the Scottish Planning System**

Submitted on **2017-04-04 16:48:00**

### About You

#### What is your name?

**Name:**

Scott Dalgarno

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#### Are you responding as an individual or an organisation?

Organisation

#### What is your organisation?

**Organisation:**

The Highland Council

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

Publish response only (without 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

### Making plans for the future

#### Key Question Do you agree that our proposed package of reforms will improve development planning?

Yes

#### Please explain your answer.:

Yes, however, for the package of measures proposed to improve development planning they would need to bring about a transition from an administrative-intensive function to a coordinated approach to enabling and delivering development, with greater ownership and governance through community planning partners. We believe that any changes should allow the development planning function to focus on the areas of greatest anticipated change, with a clearer policy framework at the national level leading to simpler decision making at the local level.

At this stage it is too difficult to tell whether the package of measures will achieve these aims. The potential time savings of certain proposals need to be weighed against any new or additional responsibilities for development planners. For example, the principle of Local Place Plans is supported but they need to be repositioned within the context of community planning arrangements in order to avoid a significant burden on development planning officers.

#### 1 Do you agree that local development plans should be required to take account of community planning?

Yes

#### Do you agree that local development plans should be required to take account of community planning?:

Whilst we agree with the principle that development plans should take account of community planning, the question posed is too simplistic in that the relationship between community planning and development planning should be two-way and community plans should equally be required to take account of development plans. We believe that Community Planning Partnerships (CPPs) need to be better focussed on the wider role of the planning system and the reciprocal benefits it can provide in supporting community planning priorities and vice-versa. However, Development Planners should be formally embedded within the process of preparing community plans (LOIP and Locality Plans). Equally, the Development Plan needs to be placed on a formal footing within CPPs in order to ensure that partners and Council services take greater ownership of its preparation, implementation and monitoring. This should also mean that capital programmes of Council and Community Planning Partners are better aligned to enable the delivery of development and infrastructure to support new growth.

Highland Council has been striving to ensure that our emerging Local Development Plans align with community planning principles, priorities and outcomes. Our outcome-based approach to development planning has involved taking consideration of all relevant partner priorities and outcomes, along with national and local policies, and distilling these down to a small number of headline outcomes that act as the Vision statement for the Development Plan, which any development or investment or activity should contribute towards.

In addition, for two years now the Community Planning Partnership (CPP) in Highland has been scrutinising the Council's Development Plans at key stages. We also intend to refer Action Programmes to the CPP. This is intended to ensure that CPP partners buy into the development plan and can jointly lead its implementation.

To introduce this approach on a formal basis we would agree with the proposition made by Heads of Planning Scotland for fundamental changes at the national level to the framework within which community plans (LOIP, Locality Plans), the development plan and the proposed Local Place Plans (LPPs) will operate. Such changes would provide greater clarity on the role each plan plays, as well as partners' roles in preparing them, along with a duty for community planning partnerships to ensure alignment and compatibility between each plan. The diagram in the attachment below (under Q1) illustrates how these plans might relate to each other.

Wherever possible the timescales for preparing such plans should be better aligned. There is also a major opportunity to simplify and consolidate the arrangements for consultation and evidence gathering for these plans, where under current arrangements such exercises are typically carried out independent of each other. With a transparent approach to sharing information, background evidence and local intelligence, all plans can be prepared with a common understanding. The outputs from such consultation can then be directed towards the most appropriate channel.

The combined effect of such an approach would be greater collaboration in preparing community and land use plans and shared ownership in delivering them. Enabling and empowering communities to do more for themselves would in turn free up development plans to focus on the areas where coordination is required the most to bring partners together to deliver development and infrastructure, using the Action Programme as a manual for delivery. The requirements for community planning partners should then also extend to aligning their asset strategies and funding programmes with the LDP and Action Programme and Community Planning priorities.

Further details on this approach and in particular the potential role and benefits of the Local Place Plan is set out in our response to Proposal 6.

## **2 Do you agree that strategic development plans should be replaced by improved regional partnership working?**

Not Answered

### **Do you agree that strategic development plans should be replaced by improved regional partnership working?:**

As an authority that sits outwith the regional governance arrangements of the SDPA areas, Highland has no firm view on their potential replacement with regional partnerships. However, we believe that improved partnership working is a priority across all local authority areas. Irrespective of future governance arrangements, the priority is for partners at any level of regional or local government to be required to engage and collaborate in the preparation of the LDP and align funding programmes to coordinate its delivery.

### **2a How can planning add greatest value at a regional scale?**

#### **How can planning add greatest value at a regional scale?:**

To deliver the approach set out in our response to Question 2, we believe that spatial planning and sustainability considerations should be better considered within community planning decisions. At the national level requirements should be set for such partnership arrangements across Scotland to better improve regional and, where necessary, cross-boundary coordination of infrastructure and development delivery. This might also help to coordinate evidence gathering, influencing significant challenges such as climate change, environmental quality, health and infrastructure investment, and finally to avoid situations where decisions made are at odds with national or local policy on land use planning.

### **2(b) Which activities should be carried out at the national and regional levels?**

**Which activities should be carried out at the national and regional levels?:**

### **2(c) Should regional activities take the form of duties or discretionary powers?**

Not Answered

#### **Should regional activities take the form of duties or discretionary powers?:**

In order for spatial and sustainability considerations to be taken into consideration within wider community planning activities, regional and local partnership working must be placed on a statutory footing.

### **2(d) What is your view on the scale and geography of regional partnerships?**

#### **What is your view on the scale and geography of regional partnerships?:**

As above, we consider that regional partnership arrangements should apply to all areas of Scotland and the scale and geography of areas covered should be agreed by relevant planning authorities. For the coordination of more strategic infrastructure it may be worthwhile for multiple authorities to work together whereas other issues could be handled by partners within a single authority area.

### **2(e) What role and responsibilities should Scottish Government, agencies, partners and stakeholders have within regional partnership working?**

#### **What role and responsibilities should Scottish Government, agencies, partners and stakeholders have within regional partnership working?:**

We would refer to our response to Proposal 1 which describes our view of how partners should work together across all authorities in Scotland both within and outwith regional partnerships.

## **3 Should the National Planning Framework, Scottish Planning Policy or both be given more weight in decision making?**

**Should the National Planning Framework, Scottish Planning Policy or both be given more weight in decision making?:**

- It is not necessarily a question of whether more weight should be given to NPF and SPP, as they may already be material considerations in the determination of a planning application and could therefore be accorded significant weight. However, we would agree that it would be helpful if statute were to accord them with specific status in the determination of planning applications, thereby helping to ensure consistent consideration of them – especially if they are to be relied on more in the future as a direct guide to development proposals rather than just to development plans.
- If certain new policies in SPP are intended to replace equivalent policies in Local Development Plans then it will be essential to have more extensive public/stakeholder engagement in the development of SPP and effective scrutiny of it.
- We support the aim to make NPF a more directional document bringing together wider Scottish Government policies and strategies and providing a framework for the alignment of resources.
- Given the role proposed for regional partnerships to input to the NPF, we wish to ensure that the Highlands are given a strong and effective opportunity to input and would be concerned if we were disadvantaged in any way by the proposals.
  
- Given the proposal to have certain matters covered by national policy rather than local policy, if the intention is to minimise the range and instances of local variations being included in LDPs then it is essential that there is effective engagement of planning authorities and other parties in the preparation of the national policies and both transparent and detailed consideration of the views expressed.
- Regarding that idea that LDPs could still include policies where required to identify departures from SPP justified on distinctive local circumstances, would the scope for doing so therefore be subject to any limitations or tests? Once local policy is adopted, would it wholly replace (locally) the relevant SPP one or would they both have to be considered and weighed up when considering planning applications? Setting out a clearly understood protocol that the local policy would prevail would seem to be both sensible and necessary.
- At what stage would consistency of LDPs with the NPF be independently tested and confirmed, bearing in mind that the LDP needs to be sufficiently far advanced to enable this to be done effectively?
- NPF needs to be clearer on what it terms National Development.

**4 Do you agree with our proposals to simplify the preparation of development plans?**

Not Answered

**Do you agree with our proposals to simplify the preparation of development plans?:**

- “Empowering planning to deliver great places” (the report of the independent review of the Scottish planning system, May 2016) included diagram 1.2 showing the proposed LDP preparation process. Whilst we are keen that planning move more to being about delivery and less about process, Scottish Government does need to clearly explain what the process would be if the current proposals in the White Paper were to be carried forward. In particular, in replacing the MIR with a Draft Plan it is not clear how, or indeed whether, subsequent changes to the plan would be consulted on eg – as a deposit (or proposed) plan. We would suggest that there would need to be some opportunity to make representations. Presumably this ties in with the idea of retaining an Examination as a subsequent step. As part of carrying forward the review of the planning system beyond this White Paper, Scottish Government should consider publishing in due course more detailed proposals for Development Planning and provide an opportunity for interested parties, including planning authorities, to comment before the changes to the system are finalised.

**3(a) Do you agree with our proposals to update the way in which the National Planning Framework is prepared?**

Yes

**Do you agree with our proposals to update the way in which the National Planning Framework is prepared?:**

- Broadly we agree with the proposals – more comprehensive engagement in and scrutiny of the preparation of NPF will be vital given the enhanced role proposed for it.

**4(a) Should the plan review cycle be lengthened to 10 years?**

Yes

**Should the plan review cycle be lengthened to 10 years?:**

Yes potential merits in doing so, although this will depend on the plan remaining flexible and dynamic where necessary, including what can be reviewed during its lifetime, and whether Supplementary Guidance can be prepared to refine/update policy details. Also depends on role of Action Programme. Political turnover might mean ownership of plan is made difficult. The need to engage every 10 years could mean communities and partners will find it difficult to sustain their buy-in and ownership of the plan throughout its lifetime. Resource implications of preparing everything at 10 year stage – will need to strike a careful balance that allows Local Authorities to update place-based plans in the context of policies updated less often to reflect NPF.

- The proposal to drop the Main Issues Report (MIR) in favour of a Draft Plan is noted. Inevitably each has its advantages but we doubt whether the proposal would bring any cost or time saving, as the required level of engagement will not change and may even be more onerous than at present ahead of the Draft Plan stage. Draft Plans used to be criticised by some who felt that the planning authority must have already made its mind up on the contents of the Plan (because it looked like a fixed plan), even though the Draft was clearly being consulted on. The introduction of MIR’s helped address that, so if a Draft Plan replaces it then how can we convince people and demonstrate that consultation on it is ‘genuine’?

**4(b) Should there be scope to review the plan between review cycles?**

Yes

**Should there be scope to review the plan between review cycles?:**

Yes – and critically there should be scope to limit the extent of that review, i.e. to update just parts of the Plan. If necessary the scope of the review could be

subject to an independent 'check' at the outset, for example in association with the preparation/updating of the Development Plan Scheme.

- We suggest for consideration that potential triggers for updating a Plan before 10 years might include (amongst others): an updated/new NPF/SPP; an updated/new Housing Needs and Demands Assessment; an annual audit indicating that the effective housing sites total has fallen below 'x' year's requirement Plan-wide; an annual audit indicating that the effectiveness of the housing land supply for main settlements is such that the forecast total delivery over the plan period has fallen below 'y' % of the housing land requirement; regionally significant but unforeseen employment change occurring more than three years before the normal scheduled review.

#### **4(c) Should we remove supplementary guidance?**

No

##### **Should we remove supplementary guidance?:**

No – Supplementary Guidance should be retained; it works well if the guiding principles are clearly set out in the parent LDP. If Supplementary Guidance were removed, limited information from it would be taken into the Development Plan (LDP). If the remainder were therefore non-statutory, planning authorities would be faced with a battle to ensure that sufficient weight is given to that in decision-making, as many would regard it as having been 'downgraded' if it suited them to do so. That would not be helpful to a plan-led system trying to focus on delivering the plan.

Removal of supplementary guidance may not necessarily make plans more accessible – it could just make them larger and much less user-friendly documents. Supplementary guidance is useful since it expands on and explains policies more fully making it easier to interpret.

We also note that paragraph 1.30 (Proposal 4: Stronger local development plans) proposes non-statutory supplementary guidance which seems to go against proposal to remove supplementary guidance (see 4, key changes).

#### **5 Do you agree that local development plan examinations should be retained?**

Not Answered

##### **Do you agree that local development plan examinations should be retained?:**

Under the current approach LDP Examinations provide an important, independent arbitration process at the end of the plan preparation process, when all objections and evidence are known. We recognise the value of this independent scrutiny. However, we are cautious about the ongoing cost, time and resources required to support the process, particularly the administrative elements, and would ask for Scottish Government to consider methods to streamline the examination, narrow the scope, and in doing so reduce the administrative burden to local authorities. For example, early scrutiny through a gatecheck should mean that the number of issues that require to be examined would reduce.

#### **5(a) Should an early gatecheck be added to the process?**

Not Answered

##### **Should an early gatecheck be added to the process?:**

Whilst we believe it to be a well-intentioned proposal, the Council are concerned that the early gatecheck as outlined in the White Paper risks the addition of cost, burden and time to the process without delivering all the potential benefits that could be achieved. If however the early gatecheck is included then Scottish Government are urged to ensure that more benefits are delivered, consider enabling the gatecheck to be undertaken by a benchmarking authority rather than DPEA and consider the possibility of making the gatecheck an optional part of the process (with the planning authority indicating in its Development Plan Scheme whether it intends to take up that option in respect of preparing a particular Development Plan). In applying this approach the need for local accountability needs to be balanced against the involvement of DPEA throughout the plan process.

#### **5(b) Who should be involved?**

##### **Who should be involved?:**

#### **5(c) What matters should the gatecheck look at?**

##### **What matters should the gatecheck look at?:**

#### **5(d) What matters should the final examination look at?**

##### **What matters should be the final examination look at?:**

#### **5(e) Could professional mediation support the process of allocating land?**

Not Answered

##### **Could professional mediation support the process of allocating land?:**

#### **6 Do you agree that an allocated site in a local development plan should not be afforded planning permission in principle?**

Yes

##### **Do you agree that an allocated site in a local development plan should not be afforded planning permission in principle?:**

We feel that this could be a missed opportunity. The previously considered idea that allocated sites be accorded Planning Permission in Principle appears to have



not been taken forward by Scottish Government due to the up front work required, yet in effect that work is proposed to be required up front to service Scottish Government's proposal for gatechecking of Development Plans. If the work is going to be required early on, and developers provide greater clarity on technical and viability issues, then that should be rewarded with Planning Permission in Principle for allocations confirmed in the adopted Plan. We also note that such an approach might provide a greater incentive for partners and communities to engage in the preparation of the LDP as the most effective way to shape future growth and development. However, the issue of timing of technical assessments and the capacity of certain developers/landowners to undertake such early work needs to be carefully considered to ensure that viable deliverable sites are not pushed out of the plan. Alongside, we consider that PPIP for sites outwith LDP should remain.

## **7 Do you agree that plans could be strengthened by the following measures:**

**(a) Setting out the information required to accompany proposed allocations? - (a) Setting out the information required to accompany proposed allocations?:**

Yes

**Setting out the information required to accompany proposed allocations:**

**(b) Requiring information on the feasibility of the site to be provided - (b) Requiring information on the feasibility of the site to be provided:**

**(b) Requiring information on the feasibility of the site to be provided:**

A requirement for robust evidence to be provided of site feasibility early in the process may be useful, but may also be too costly to achieve for more marginal sites and areas; such a requirement could ultimately disadvantage large parts of more rural authorities such as Highland.

**Increasing requirements for consultation for applications relating to non- allocated sites - (c) Increasing requirements for consultation for applications relating to non- allocated sites:**

**(c) Increasing requirements for consultation for applications relating to non- allocated sites:**

**Working with the key agencies so that where they agree to a site being included in the plan, they do not object to the principle of an application - (d) Working with the key agencies so that where they agree to a site being included in the plan, they do not object to the principle of an application:**

Yes

**(d) Working with the key agencies so that where they agree to a site being included in the plan, they do not object to the principle of an application:**

Whilst the prospect of not having objections from Key Agencies later on in the planning process is attractive, the Council has gone a long way to achieving that within the current system through positive consultation and negotiation which can often help find ways in which development can be accommodated despite constraints. We are concerned that Scottish Government's proposal may frustrate this; Key Agencies may opt to take a precautionary approach and hence firmly object more at the outset, in order then to be more likely to be able to readily 'sign up' to not objecting later in the process.

Need to ensure similar requirements are placed upon partners such as SEPA, Transport Scotland and Network Rail to better engage them in preparing and delivering future growth and development.

## **8 Do you agree that stronger delivery programmes could be used to drive delivery of development?**

Yes

**(a) What should they include?:**

Yes, we are supportive of the principle of making plans that deliver – this is in line with the Highland Council's aim to engage Council Services and partner organisations in the implementation of the LDP; however a challenge is how to convince non-planners of the importance of the delivery programme, and embedding it in how all relevant services and partners operate. We are aware of good practice examples across the country where the LDP is being used to intertwine the delivery of Council and partner services with the delivery of development and infrastructure. Our response to Q1 outlines the working arrangements that might support this partnership approach and better combine community planning and land use planning structures.

**If you wish to add a document to support your response, please add it here.**

**File upload component:**

170323 Diagrams for Proposals 1&6.docx was uploaded

## **People make the system work**

**Key Question Do you agree that our proposed package of reforms will increase community involvement in planning?**

Not Answered

**Please explain your answer.:**

## **9 Should communities be given an opportunity to prepare their own local place plans?**

Yes

**Should communities be given an opportunity to prepare their own local place plans?:**

BUT, the arrangements for preparing a Local Place Plan should sit within community planning arrangements not solely within the Development Plan framework.

Highland Council recognise and support the Scottish Government's aim to empower communities to do more to shape their future and Local Authorities are

already making significant effort to engage and collaborate with communities in development planning. In our response to Proposal 1 we agreed with the HOPS proposition for a framework that would strengthen the relationship between community planning and land use planning and simplify the interaction between the various plan outputs (LOIP, Locality Plans, LDP and Local Place Plans) that will all have an influence on the future of place. The diagram in the attachment to our submission (under question 9) shows the interrelationship of these plans under this approach.

For Local Place Plans in particular, we think this structure would better support communities by embedding LPPs within wider community partnership arrangements rather than simply being placed in the context of the development plan. Under this approach communities would be better supported and empowered to do more themselves, in collaboration with all community partners, whilst allowing the development plan to fulfil its statutory obligations but also taking input from communities on the priorities it should reflect.

The reference to 'One Engagement' relates to a consolidated approach to evidence gathering for the preparation of all of these plans that ultimately influence the future of 'place'. This approach consolidates engagement exercises currently undertaken separately and would provide significant time savings for staff involved, and clarity from the community perspective on the respective role of each plan and their role in contributing and/or delivering them.

**9(a) Should these plans inform, or be informed by, the development requirements specified in the statutory development plan?**

Not Answered

**Should these plans inform, or be informed by, the development requirements specified in the statutory development plan?:**

Both. The diagram in our attachment to this submission shows how the Local Place Plan, LOIP/Locality Plan and Development Plan could interrelate and support each other. An early draft Place Plan could influence matters to be addressed in the LDP, and in exchange the LDP would set place-making priorities and requirements that the Place Plan and any development or investment in that place should accord with.

**9(b) Does figure 1 cover all of the relevant considerations?**

Not Answered

**Does figure 1 cover all of the relevant considerations?:**

**10 Should local authorities be given a new duty to consult community councils on preparing the statutory development plan?**

Not Answered

**Should local authorities be given a new duty to consult community councils on preparing the statutory development plan?:**

Although not a fundamental change, there would be no harm in introducing this requirement as local authorities already work hard to engage Community Councils in preparing development plans.

**10(a) Should local authorities be required to involve communities in the preparation of the Development Plan Scheme?**

No

**Should local authorities be required to involve communities in the preparation of the development plan scheme?:**

The Development Plan Scheme already includes the participation statement which sets out how communities can expect to be involved. We believe it is unnecessary to introduce a formal requirement to consult on the relative priorities and timescales attached to various projects through the Development Plan Scheme.

**11 How can we ensure more people are involved?**

**How can we ensure more people are involved?:**

There is already a huge amount of work that Council do to ensure people are involved in the planning system. The ability to shape the future of places needn't necessarily involve greater involvement in the planning system in isolation. Instead, the suggested approach outlined in our response to Proposal 1 and 6 provides a structure for better engaging people in shaping the future of places and public services, whilst also empowering them to do more for themselves. Public sector organisations could get greater value from people's input by consolidating the amount of consultation activity and instead gather feedback on people's perception and experience of a place, and channel their feedback towards the most effective route (Local Place Plan, Locality Plan or Local Development Plan) with support from all partner organisations to help communities to coordinate delivery and implementation against the priorities identified.

**11(a) Should planning authorities be required to use methods to support children and young people in planning?**

Not Answered

**Should planning authorities be required to use methods to support children and young people in planning?:**

In light of our response to Q11 above the requirements to engage children and young people should rest on public sector as a whole, rather than the planning system in isolation. To support this approach there may be particular stages in the preparation of an LDP or Development Brief where tailored engagement could be targeted at children and young people alongside an open, public consultation. We are not convinced that such methods should be mandatory. Over the last few years the Highland Council has sought to tailor its engagement activity on LDPs to better involve children and young people as noted in paragraph 2.20 of the White Paper. This involved running a series of school events based around 4 simple questions on young people's thoughts on the future of their place in terms of the employment opportunities, services, facilities and other factors that might influence their future life choices. This work was embedded in the school curriculum for Higher Geography students. We would however caution that such engagement activity is resource intensive and if such an approach was introduced as a requirement it would need to be integrated alongside other consultation activity.

**12 Should requirements for pre-application consultation with communities be enhanced?**

Yes

**Please explain your answer.:**

We would agree that such requirements need to be reviewed and simplified. Two stages should be encouraged – with the second stage aimed at reviewing an applicant's response to any input from the community.

**12(a) What would be the most effective means of improving this part of the process?**

**Please explain your answer.:**

**12(b) Are there procedural aspects relating to pre-application consultation (PAC) that should be clarified?**

Not Answered

**Please explain your answer.:**

**12(c) Are the circumstances in which PAC is required still appropriate?**

Not Answered

**Please explain your answer.:**

Providing that site is in the Plan and provided PPIP status, the requirements for PAC should be removed.

**12(d) Should the period from the serving of the Proposal of Application Notice for PAC to the submission of the application have a maximum time-limit?**

Yes

**Please explain your answer.:**

The maximum limit should be 1 year.

**13 Do you agree that the provision for a second planning application to be made at no cost following a refusal should be removed?**

Yes

**Do you agree that the provision for a second planning application to be made at no cost following a refusal should be removed?:**

In principle yes, although there is a concern it may lead to unwillingness on an applicant's part to withdraw a scheme, as they may feel they have nothing to lose by continuing with the application, with no incentive to withdrawing an application. However, overall it is thought that the benefits outweigh the negative aspects as it will encourage applicants to get the scheme right in the first instance, discourage repeat applications and ensure and better reflect the cost of repeat applications and will ensure authorities receive.

**14 Should enforcement powers be strengthened by increasing penalties for non-compliance with enforcement action?**

Yes

**Should enforcement powers be strengthened by increasing penalties for non-compliance with enforcement action?:**

Yes. The suggestion for substantially increasing planning fees in cases where retrospective applications are made is welcomed in itself as it should help provide a disincentive to doing so.

This approach should not be done in isolation however. It is suggested that fixed penalties should be introduced as a quicker and more effective financial penalty to discourage minor offences. For example they could be utilised for the removal of the unauthorised advertisements across the countryside where landowners seek to gain financially by allowing unauthorised adverts to be displayed often on busy road verges or near roundabouts. In instances where served notices are ignored then a fine system for non compliance could be increased. In doing so at the very least it would drive enforcement cases to appeals/direct action or reports to the Crown Office and Procurators Fiscal Service.

**15 Should current appeal and review arrangements be revised:**

**(a) for more decisions to be made by local review bodies? - (a) for more decisions to be made by local review bodies?:**

Yes

**Should current appeal and review arrangements be revised?:**

Yes. This should be extended to include enforcement appeals, advertisement consent, listed building applications and high hedges. It is considered that the current arrangements for Major applications being referred to DPEA should remain as they are.

**(b) to introduce fees for appeals and reviews? - (b) to introduce fees for appeals and reviews?:**

Yes

**(b) to introduce fees for appeals and reviews?:**

Yes. Currently applicants will seek to appeal decisions without considering alternative options or seeking to address the reasons for refusal, as there is no incentive for them to do so until they have pursued all available channels. Regrettably the increased in the number of reviews without a fee being sought has

placed a considerable strain on planning authorities and related services who provide support for the Planning Review body. The introduction of fees would reduce the number of reviews where the issues could be addressed by the submission of an amended application and would help fund the planning system more effectively.

**(c) for training of elected members involved in a Planning Committee or Local Review Body to be mandatory? - (c) for training of elected members involved in a Planning Committee or Local Review Body to be mandatory?:**

Yes

**(c) for training of elected members involved in a Planning Committee or Local Review Body to be mandatory?:**

Yes. The training should be mandatory to ensure that decisions made on planning applications are based on strong planning grounds linked to policy and/or planning principles, leaving the Council less susceptible to challenge and reduce the chances of delays in proposals that are consistent with the development plan. There needs to be a greater awareness and understanding of planning principles, the relevance of the development plan, national guidance, circulars, consultee comments etc as material planning considerations.

There is also potential for carrying out some form of examination to check knowledge of the principles of planning prior to sitting on a planning committee or review body. There is a precedent for this under Licensing Boards, who deal with liquor and gambling licenses where members are prevented from taking part in any Board proceedings unless they have passed an examination following training by an authorised body (an organisation called "Alcohol Focus Scotland"). In the case of Planning Authorities this could be done by the RTP1, Planning Aid Scotland or CoSLA.

**(d) do you agree that Ministers, rather than reporters, should make decisions more often? - (d) do you agree that Ministers, rather than reporters, should make decisions more often?:**

No

**(d) do you agree that Ministers, rather than reporters, should make decisions more often?:**

No. Reducing and refining the number of applications dealt with by the DPEA will mean only the more complex, major and more challenging applications will be considered, freeing up resources appropriately. Confidence for all is predicated on the basis that those most appropriately trained and qualified to deal with applications do so.

**16 What changes to the planning system are required to reflect the particular challenges and opportunities of island communities?**

**What changes to the planning system are required to reflect the particular challenges and opportunities of island communities?:**

There needs to be greater recognition that the "challenges and opportunities of island communities" are also shared by communities in other local authority areas such as Highland. Island authorities are being given special arrangements, but the characteristics of these areas, and the issues that are sought to be tackled here, are consistent with a number of coastal communities across Scotland.

## **Building more homes and delivering infrastructure**

**Key Question Will these proposals help to deliver more homes and the infrastructure we need?**

Not Answered

**Will these proposals help to deliver more homes and the infrastructure we need?:**

**17 Do you agree with the proposed improvements to defining how much housing land should be allocated in the development plan?**

Not Answered

**Do you agree with the proposed improvements to defining how much housing land should be allocated in the development plan?:**

Over recent years we have found that even a 5 year regional target has been an unrealistic view in such fast changing economic and political times. We are concerned that a longer term target set over 10 years would be even more unrealistic and fail to take sufficient account of changing local and national circumstances. There should be less focus on simply numbers and a need to take account of local circumstances and we refer in particular to paragraph 3.6 which acknowledges that targets would "have little practical effect" if it is not consistent...".

We support close linking between Local Housing Strategies and Local Development Plans – something that we already practice along with the creation of a simpler agreed "Robust and Credible" HNDA.

The provision of a Housing sites register should be in a very easy to use form driven from an interactive map, along with provision of a downloadable Scotland wide dataset.

**18 Should there be a requirement to provide evidence on the viability of major housing developments as part of information required to validate a planning application?**

No

**Should there be a requirement to provide evidence on the viability of major housing developments as part of information required to validate a planning application?:**

We believe this would be too onerous a requirement for the validation stage, and should instead be carried out during the preparation of the Development Plan to improve certainty over the sites that can be delivered during the lifetime of the plan.

**19 Do you agree that planning can help to diversify the ways we deliver homes?**

Not Answered

**Do you agree that planning can help to diversify the ways we deliver homes?:**

- There are a number of positive suggestions to help release land and obtain permission. However one of the main concerns is that in some cases parties are happy to obtain permission to allow an uplift in land value for collateral purposes and land bank a site but can be reluctant to release sites for housing to allow them to be developed.
- In conjunction with the measures detailed elsewhere we would ask that consideration be given to measures to prevent landowners not bringing sites forward once permission or allocation has been secured.

**19(a) What practical tools can be used to achieve this?**

**What practical tools can be used to achieve this?:**

1. Increased support and funding for an infrastructure fund to help facilitate and bring forward challenging sites.
2. Applicants should not be allowed to “renew” a permission - applications should instead be reassessed in their entirety each time.
3. Sites which are allocated but not bought forward in the development plan within a 5/10 year period should be removed. The introduction of a “use it or lose it” approach may help free up sites.
4. Linked to the above if a site is not bought forward within a prescribed time period then consideration be given to a first refusal to an affordable housing provider based on District Valuers valuation of the ground at affordable housing value
5. Alternatively consideration should be given to a land tax where sites which are allocated but not developed over 6 years (ie the lifetime of two planning permission or 2 development plans) but have seen an uplift in value should be taxed and the money raised for affordable housing
6. Review of Compulsory purchase order to allow more specific powers in areas of high demand and limited land availability for housing.

**20 What are your views on greater use of zoning to support housing delivery?**

**What are your views on greater use of zoning to support housing delivery?:**

**20(a) How can the procedures for Simplified Planning Zones be improved to allow for their wider use in Scotland?**

**How can the procedures for Simplified Planning Zones be improved to allow for their wider use in Scotland?:**

In our previous response we argued that not pursuing the idea of according Planning Permission in Principle to confirmed allocations in the Plan is a missed opportunity. Furthermore, much can be achieved by allocating large, mixed use allocations in the Plan – without necessarily having to establish an SPZ. LDP should be the lead mechanism for infrastructure delivery and quality of design/layout. Query whether SPZ would be needed – only potential would be for pump-priming for servicing and infrastructure delivery.

**20(b) What needs to be done to help resource them?**

**what needs to be done to help resource them?:**

**21 Do you agree that rather than introducing a new infrastructure agency, improved national co-ordination of development and infrastructure delivery in the shorter term would be more effective?**

No

**Do you agree that rather than introducing a new infrastructure agency, improved national co-ordination of development and infrastructure delivery in the shorter term would be more effective?:**

- A new agency is not required (the regional partnerships can do the job if allocated proportionate monies from Scottish Government) but a statutory requirement for existing agencies to co-operate and co-ordinate infrastructure provision via the regional partnerships is necessary. The current 2006 Planning Act key agency duty to “co-operate in the preparation of an action programme” is paying lip service and should be replaced with a duty spatially to co-ordinate capital programmes.
- Reminder that role of Regional partnership should apply to all LA areas not just SDPAs.
- We are concerned about being disadvantaged in terms of infrastructure negotiations. Geography and dispersal of communities in Highland adds greater weight to the need for infrastructure.
- Scottish Water and others should equally be required to engage in planning infrastructure and delivering new facilities to unlock development sites.

**22 Would the proposed arrangements for regional partnership working support better infrastructure planning and delivery?**

Not Answered

**Would the proposed arrangements for regional partnership working support better infrastructure planning and delivery?:**

Potentially, as long as Highland is covered by efficient and functional partnership framework. See above

**22(a) What actions or duties at this scale would help?**

**What actions or duties at this scale would help?:**

**23 Should the ability to modify or discharge Section 75 planning obligations (Section 75A) be restricted?**

Yes

**Should the ability to modify or discharge Section 75 planning obligations (Section 75A) be restricted?:**

Only in exceptional circumstances.

Not a huge problem in Highland and any new time limit would be arbitrary. However, the developer's ability to vary an existing agreement could be dependent upon specified tests such as a material change in circumstances since the original agreement was signed. A change in market demand circumstances or the developer's financial circumstances should not be material. A change in infrastructure funding would be material. Better still, obligations should have flexibility built in. Although "pause and review" clauses have been rejected in the courts it would be sensible to have clauses that are flexible to circumstances that are unknown or not known with sufficient certainty when the agreement is signed.

**24 Do you agree that future legislation should include new powers for an infrastructure levy?**

Yes

**If not, please explain why.:**

Yes this provides an opportunity to mitigate the cumulative impact of development or where infrastructure impacts are difficult to quantify.

**(a) At what scale should it be applied?:**

As wide a catchment as possible but it will have to be related to the area across which the deficiency is felt and across which its resolution would benefit people/development/households.

**(b) What type of development should it apply?:**

Every type of development that creates a new deficiency or magnifies an existing deficiency.

**(c) Who should be responsible for administering it?:**

Providing the regional partnership arrangements can be applied across all local authorities this multi-agency partnership would be the appropriate group to manage and administer this approach. We are currently exploring the introduction of a Development Delivery Team to lead the delivery of development and infrastructure in Highland which would seem like the most appropriate group to coordinate such activity.

**(d) What type of infrastructure should it be used for?:**

Potentially every public infrastructure or service but particularly suitable for wide catchment impacts such as coastal trails, trunk road networks, rural single track road networks and secondary schools where the cumulative impacts of diffuse small scale development proposals slip through the existing developer contributions net.

**25 Do you agree that Section 3F of the Town and Country Planning (Scotland) Act 1997, as introduced by Section 72 of the Climate Change (Scotland) Act 2009, should be removed?**

Yes

**Do you agree that Section 3F of the Town and Country Planning (Scotland) Act 1997, as introduced by Section 72 of the Climate Change (Scotland) Act 2009, should be removed?:**

Yes, Building Standards changes have picked up the issue already.

**Stronger leadership and smarter resourcing**

**Key Question Do you agree the measures set out here will improve the way that the planning service is resourced?**

Not Answered

**Do you agree the measures set out here will improve the way that the planning service is resourced?:**

**26 What measures can we take to improve leadership of the Scottish Planning profession?**

**What measures can we take to improve leadership of the Scottish Planning profession?:**

We consider that there should be Leadership training course(s) within the formalised structure of a recognised Management qualification for Planners.

**27 What are the priorities for developing skills in the planning profession?**

**What are the priorities for developing skills in the planning profession?:**

The development of skills should be undertaken following the undertaking of nationally benchmarked Training and Skills Audits for Planners and Support staff. This should include Performance and Change Management Assessments with structured training plans and competencies for staff. This could include media, finance and development appraisals, providing better presentation skills and a better awareness of commercial development pressures and finances.

**28 Are there ways in which we can support stronger multidisciplinary working between built environment professions?**

Not Answered

**Are there ways in which we can support stronger multidisciplinary working between built environment professions?:**

Suggest scope exists for better multidisciplinary teams with cross services and inter-agency working such as for Road Construction Consent. Licensing could also be incorporated into this due to the current inconsistency between granting of Licenses without first securing the necessary Planning Permissions. This would require legislative / procedural change.

**29 How can we better support planning authorities to improve their performance as well as the performance of others involved in the process?**

**How can we better support planning authorities to improve their performance as well as the performance of others involved in the process?:**

- Consideration could be given to streamlining the process of delegation in authorities such that small householder applications are dealt with by Officers under complete delegation, with referral to Review Bodies as necessary. This would remove applications from Planning Committees and thereby streamline the process. It would then allow Members to concentrate on larger scale developments – planning matters of consequence.
- Formalising a ‘Stop the Clock’ mechanism for applications, so that the processing time for an application truly reflects the actual time taken to process an application by the Planning Authority, excluding any delays by an applicant or agent.
- Cross reference should be made to other agencies involved in the preparation of Development Plans – our Community Planning Partners – so that they have buy-in to the Development Plan, including the monitoring of its key outcomes.

**30 Do you agree that we should focus more on monitoring outcomes from planning (e.g. how places have changed)?**

Yes

**(a) Do you have any ideas on how this could be achieved?:**

With reference to our response to Proposal 20 we believe the Action Programme / Delivery Programme provides an opportunity to more clearly record and present how places are changing alongside future proposals. We believe a map-based online tool would be the most effective means of communicating such information, based on the ESRI Storymap template.

In addition, if the arrangements set out in our response to Proposal 1 are taken forward Community Planning Partnerships could also take greater responsibility of tracking how Place Plans, Locality Plans and LDPs are helping to deliver against outcomes identified.

**31 Do you have any comments on our early proposals for restructuring of planning fees?**

**Do you have any comments on our early proposals for restructuring of planning fees?:**

- Suggest a sliding proportionate scale for developments of both minor householder developments, and also houses. This could be modelled on the costs per sqm, similar to Building Standards.
- Ability to waive fees for small applications – could also be addressed by further changes and consolidation of the Permitted Development rights.
- Removal of need to advertise particular types of proposals by ‘Advertising’ all applications on the Council website. It doesn’t cost the Council to ‘Advertise’ proposals on their website. No Advert in Local print media.
- Fee charging for discharge of conditions
- Fee charging for ‘completion’; make a ‘completion’ compulsory as for Building Standards, thereby tightening up the Enforcement process and providing greater public confidence in the Planning system.

**32 What types of development would be suitable for extended permitted development rights?**

**What types of development would be suitable for extended permitted development rights?:**

- Householders
- Change Use Classes Order
- Do not have changes from Agricultural Buildings to Houses as agricultural Prior Notifications or Permitted Development as too many complex matters – access, neighbour interest, foul drainage, impact on amenity and character of area – would not be managed. Potential increase in the number of speculative new agricultural buildings being erected for conversion to houses by landowners.
- Remove agricultural PD for sheds and make them subject to Planning Permission – large sheds have greater landscape impact than much smaller houses, yet the system spends more time assessing a small house than a large shed, which has potentially larger landscape/amenity/character/neighbour impacts.

**33 What targeted improvements should be made to further simplify and clarify development management procedures?**

**What targeted improvements should be made to further simplify and clarify development management procedures?:**

**33(a) Should we make provisions on the duration of planning permission in principle more flexible by introducing powers to amend the duration after permission has been granted?**

Not Answered

**How can existing provisions be simplified?:**

It is not considered necessary to amend this.

**33(b) Currently developers can apply for a new planning permission with different conditions to those attached to an existing permission for the same development. Can these procedures be improved?**

**Currently developers can apply for a new planning permission with different conditions to those attached to an existing permission for the same development. Can these procedures be improved?:**

The provisions of S42 applications are useful on occasion. The guidance should be clearer to ensure applicants are required to make it clearer what the Section 42 application is for, for the avoidance of doubt

**33(c) What changes, if any, would you like to see to arrangements for public consultation of applications for approvals of detail required by a condition on a planning permission in principle?**

**What changes, if any, would you like to see to arrangements for public consultation of applications for approvals of detail required by a condition on a planning permission in principle?:**

The current arrangements do not give rise to significant concerns

**33(d) Do you have any views on the requirements for pre-determination hearings and determination of applications by full council?**

**Do you have any views on the requirements for pre-determination hearings and determination of applications by full council?:**

The process should be simplified. The requirement for pre-determination hearings should only be applicable in exceptional cases when required. The requirement for consideration of application by full council represents an unnecessary level of involvement when there are existing planning committees in place who assess and determine such proposals.

**34 What scope is there for digitally enabling the transformation of the planning service around the user need?**

**What scope is there for digitally enabling the transformation of the planning service around the user need?:**

There are significant opportunities to use technology to support improved communication and engagement with planning activity. User needs for simplified access to information in easy to access and understand forms have been historically been delivered in a piecemeal fashion to varying levels of success.

Recent developments centralising development and data hosting including the Improvement Service Spatial Hub, One Scotland Mapping Agreement, ePlanning and cloud hosting maturing into the mainstream now offer opportunities we previously considered out of reach.

Delivering a map based output typically always offers easier interpretation by a wide user base when compared with the same information delivered in tabular form. With a focus upon "place" – the spatial context so important in developing communities needs to be the key in presenting this information to stakeholders.

Simple integrations, facilitated through mapping offering additional illustrations/diagrams/graphs/textual commentary, links and photographic/video/animation information allows higher quality engagement with the public and others.

Examples of South Ayrshire and Tennessee- <http://gis.south-ayrshire.gov.uk/ldp/> and <http://tlcgis.maps.arcgis.com/apps/MapJournal/index.html?appid=30a5688954cc4eefbb28072fdb128bad>

Using cloud hosted services alongside collaborative or joint procurements and centralised holdings of spatial data (Improvement Service Spatial Hub, SNH, FC etc.) – the usual barriers of 32 Local Authorities with widely different ICT implementations preventing best practice being delivered across Scotland are being broken down.

Development Plans consultations could be moved to a standardised system/approach similar to eplanning? Single login & location for planning, and development management plans consultations throughout the country. This could support standardised delivery of information about development sites, housing land hosted as a single exploitable dataset by Scottish Government/Improvement Service

There is an opportunity to deliver an online hosted 3D visualisation tool – offering interactive simplified 3D modelled views of proposals - testing options for site layouts. Such tools are very unlikely to be developed/purchased by an individual Planning Authority – but through a Scottish Govt/Improvement service led development/procurement – available to all Planning Authorities – the option to create views offering "As Is" and "To Be" views of development would be possible. Examples would be similar to CityEngine <http://www.esri.com/software/cityengine> and Sketchup <https://www.sketchup.com/>. The aim here is to allow both professional planners and the public (who often struggle to convert proposals into a visualisation of the location and impact of a development may be) alike to be better informed and engaged.

Finally, to assist the Development Management process we suggest that a national casework system could be introduced to support the sharing of good practice on particularly challenging issues or development types.

**Next steps**

**35 Do you think any of the proposals set out in this consultation will have an impact, positive or negative, on equalities as set out above.**

Not Answered

**If so, what impact do you think that will be?:**

**36 What implications (including potential costs) will there be for business and public sector delivery organisations from these proposals?**

**What implications (including potential costs) will there be for business and public sector delivery organisations from these proposals?:**

**37 Do you think any of these proposals will have an impact, positive or negative, on children's rights?**

Not Answered

**If so, what impact do you think that will be?:**

**38 Do you have any early views on whether these proposals will generate significant environmental effects? Please explain your answer.**

**Do you have any early views on whether these proposals will generate significant environmental effects? Please explain your answer.:**

**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?:**

Slightly satisfied



**Please enter comments here.:**

The document would be more user friendly if the questions posed were directly attributed to each proposal in the consultation paper.

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

Slightly satisfied

**Please enter comments here.:**

## INTERACTION BETWEEN COMMUNITY AND LAND USE PLANS

