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# SURF RESPONSE TO SCOTTISH GOVERNMENT CONSULTATION ON LOCAL PLACE PLAN REGULATIONS

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## About this Paper

This is SURF's submission to the 2021 Scottish Government consultation on proposed regulations concerning the preparation, content, submission and registration of Local Place Plans.

The response summarises cross-sector SURF network views, gathered from a June 2021 digital consultation event with 37 participants, consultations towards the 2021 SURF Manifesto for Community Regeneration, and outcomes from other thematic SURF events and activities in 2018-21.

## Background to Local Place Plans

Local Place Plans are described by the Scottish Government as:

*"...community led plans providing proposals for the development and use of land... these plans will set out a community's aspirations for its future development."*<sup>1</sup>

Local Place Plans emerged on the back of a 2016 Scottish National Party Manifesto commitment to reform the spatial planning system in Scotland.<sup>2</sup> Following a 2017 Scottish Government planning system consultation, Local Place Plans featured prominently in the Planning (Scotland) Bill, which was introduced to the Scottish Parliament in December 2017.<sup>3</sup> The Bill detailed plans for community groups to be given a new opportunity, formally recognised in the planning system, to influence the future development of their local places.<sup>4</sup>

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<sup>1</sup> The Scottish Government, 2021, *Local Place Plans - Proposals for Regulations: Consultation*: Scottish Government, Edinburgh. Available at: <https://www.gov.scot/publications/proposals-regulations-local-place-plans-consultation/>

<sup>2</sup> The Scottish National Party, 2016, *Re-Elect: SNP Manifesto 2016*: Scottish National Party, Edinburgh. Available at: [https://d3n8a8pro7vhm.cloudfront.net/thesnp/pages/5540/attachments/original/1461753756/SNP\\_Manifesto2016-accessible.pdf?1461753756](https://d3n8a8pro7vhm.cloudfront.net/thesnp/pages/5540/attachments/original/1461753756/SNP_Manifesto2016-accessible.pdf?1461753756)

<sup>3</sup> The Scottish Government, 2017, *A Consultation on the Future of the Scottish Planning System: Results*. Scottish Government, Edinburgh. Available at: <https://consult.gov.scot/planning-architecture/a-consultation-on-the-future-of-planning/>

<sup>4</sup> Scottish Parliament, 2017, *Planning (Scotland) Bill [As Introduced]*: Scottish Parliament, Edinburgh. Available at: <https://www.parliament.scot/-/media/files/legislation/bills/previous-bills/planning-scotland-bill/introduced/planning-scotland-bill-as-introduced.pdf>

Local Place Plans subsequently became a formal provision of the Planning (Scotland) Act of 2019.<sup>5</sup> In 2020, the Scottish Government commissioned Nick Wright Planning and the Scottish Community Development Centre to produce a 'How To' guide to help community groups in Scotland understand what Local Place Plans are, and how they can be prepared, developed and utilised.<sup>6</sup> An accompanying research review was published in early 2021.<sup>7</sup>

The Scottish Government opened a three-month consultation on proposed regulations for Local Place Plans in March 2021. The consultation paper requests views on rules and guidelines, proposed by the Scottish Government, that set out how Local Plans will operate in practice. Among other aspects, the proposed regulations cover: the public and stakeholder engagement duties expected in Local Place Plan development; alignment and integration with other parts of the planning system; and the process for maintaining Local Place Plans on planning authority registers.<sup>1</sup>

SURF's responses to the 18 questions in the consultation paper follow.

## SURF's Consultation Response

*1. Do you agree with the proposal that community bodies should have regard to any Locality Plan that is in place for the area under consideration when preparing their Local Place Plan? • Yes • No • No view  
Please comment on your answer (particularly if you do not agree)*

**Yes.** It would generally be helpful for a community group to be aware of the content of any Locality Plan covering the same geography, in part or full, as a prospective Local Place Plan. This awareness would add value in a number of areas, including providing contextual knowledge on ongoing Locality Plan preparatory work and activity, illuminating points of potential harmony and conflict that can be built on or addressed through dialogue with local partner agencies, and creating an opportunity for a local community to reflect on whether issues identified in the Locality Plan maintain relevance.

There is a reasonable expectation that established community groups will already be aware of, and have had the opportunity to contribute to the development of, Locality Plans in their area. This proposal is usefully flexible in allowing for the possibility that a Local Place Plan may wish to disregard or challenge the content of the existing Locality Plan, or address different priorities.

While SURF members generally agreed regard for Locality Plans, Local Development Plans and other relevant area-based plans would be helpful, several challenges were raised about how this would work in practice. For example, a community group lacking in confidence, experience and/or skills may not know how to find if a Locality Plan exists, or understand some of the content, particularly where professional and technical language is frequently used.

In addition, the process of reviewing and discussing Locality Plan content adds time – which community volunteers often report lacking in the context of family, work and social commitments – to the development process. It also increases the complexity, adding a further step to the numerous others that are proposed, which may discourage Local Place Plan development.

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<sup>5</sup> UK Government, 2019, Planning (Scotland) Act 2019: The National Archives, London. Available at: <https://www.legislation.gov.uk/asp/2019/13/contents/enacted>

<sup>6</sup> Allan, D. & Wright, N., 2021, How-To Guide: Local Place Plans: The Scottish Government, Edinburgh. Available at: <https://www.transformingplanning.scot/media/2236/draft-how-to-guide-pdf-format.pdf>

<sup>7</sup> Allan, D. & Wright, N., 2021, How-To Guide: Local Place Plans – Literature Review and Final Report: The Scottish Government, Edinburgh. Available at: <https://www.gov.scot/publications/local-place-plans-guide-literature-review-final-report/>

A further resource challenge concerns the wider regional infrastructure investments that may be required to progress or support a particular Local Place Plan objective. SURF members commonly draw attention to new developments that they feel are created without adequate supporting physical and social infrastructure, creating longer term problems, and this challenge is likely to apply to new developments, such as housing, called for in Local Place Plans.

2. Do you consider that community bodies should have to have regard to other additional matters beyond the Locality Plan when preparing their Local Place Plan? • Yes • No • No view Please comment on your answer, giving examples (particularly if you agree)

**Yes.** Other important strategic plans would be useful sources for community groups to review as they prepare Local Place Plans. The content of these additional plans and strategies would add value to the understanding of potential areas of alignment and disagreement in issues covered by Local Place Plan consultations; and may eliminate the need for a Local Place Plan to prioritise demands, such as additional provision of affordable housing, cycle lanes or green spaces, that are already being addressed by existing commitments and actions.

By way of an example, SURF, along with other partners including the Scottish Community Development Centre, supported the development of a 2020-2030 Community Action Plan in the town of Langholm in Dumfries and Galloway. This Action Plan, led by Langholm Alliance, an umbrella body with a Board drawn from local community groups, was informed by a number of other strategies, including ones produced by Dumfries and Galloway Council, NHS Dumfries and Galloway, SWestrans, South of Scotland Economic Partnership, and the Borderlands Inclusive Growth Deal.<sup>8</sup>

It would be ideal for a community group preparing a Local Place Plan to undertake a desk-based survey of other relevant plans for the area, such as Community Planning Partnership Local Outcome Improvement Plans and Community Charrette recommendation reports. SURF network reservations around capacity, time and complexity, raised in our response to question one, are also relevant here.

The resources challenge is particularly significant in poorer communities in Scotland, as the Scottish Parliament's Local Government and Communities Committee recognised in a 2021 report on community empowerment:

*"We strongly believe that more must be done to empower community groups in more deprived areas to take advantage of the 2015 Act, to avoid it being a vehicle that 'empowers the empowered'. We heard evidence that resource might be part of the issue, and that some communities need more grassroots support to help unlock the potential of the 2015 Act."*<sup>9</sup>

The consultation document's clarification that, "there is no requirement for LPPs to be comprehensive", is helpful in communicating the freedom and flexibility community groups have with regard to the scale and coverage of Local Place Plans.<sup>1</sup> It is a further positive that the proposed

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<sup>8</sup> Langholm Alliance, 2019, Langholm Community Plan 2020-2030: Langholm Alliance, Langholm. Available at:

[https://issuu.com/langholmalliance/docs/langholm\\_action\\_plan\\_nov\\_2019](https://issuu.com/langholmalliance/docs/langholm_action_plan_nov_2019)

<sup>9</sup> Local Government and Communities Committee of the Scottish Parliament, 2021, : Scottish Parliament, Edinburgh. Available at: <https://digitalpublications.parliament.scot/Committees/Report/LGC/2021/2/26/1335d35f-ca3a-4a50-8d86-b4481ea2ba57>

regulations enable community groups to use their own judgement about which plans and strategies to review, and is not prescriptive with regard to specific examples.

*3. Do you agree with the proposal that an LPP should contain a statement setting out the community's proposals plus a map of the area, setting out the LPP boundary? • Yes • No • No view Please comment on your answer (particularly if you do not agree)*

**Yes.** As Local Place Plans cover a particular geography, it is vital that this geography is made clear and effectively communicated to all consultees and other stakeholders. This can reduce any scope for misunderstanding and help bring coherence to planning at the hyper-local level. The use of a covering statement will also be helpful in drawing attention to the main demands called for in the Local Place Plan, facilitating easy comprehension for a general reader, and supporting negotiations with partners.

One challenge that exists here is whether a community group has access to the skills, resources and permissions, that allow for creation or legal use of maps and diagrams. This is particularly applicable in the most deprived areas, which is SURF's key focal point, and where community volunteering levels tend to be lower, leading to an imbalance in skills and capacity across community groups.

There is a second challenge around demarcation and local democracy. A Local Place Plan for a single place may cover several issues, some relevant to a town centre, others to residential areas, and others yet to a rural hinterland, or nearby towns, or adjacent neighbourhoods. A clearly defined geographical boundary may lead a community group seeking to consult on some issues that exclude relevant local people that live outside it.

A related issue, general to all regeneration consultations within place boundaries, concerns whose views should be taken into account. Those who live there presently? Those who live elsewhere but work, train or study in the place? Those who grew up in the place and remain attached through family connections? Those who visit for business or leisure? A simple map does not necessarily help to answer these questions, and these complexities can be exacerbated in, for example, a high-density city neighbourhood with unclear or contested boundaries.

A further challenging point raised in SURF's consultation event, is that it is not uncommon for community views to be disregarded in the local decision-making processes on land use and development. There is an open question as to whether the formal nature of Local Place Plans as a 'material consideration' will make a meaningful difference, and some cynicism was evident during the consultation discussion.

*4. Do you think a requirement for the community body to engage and seek the views of people to assist in the preparation of an LPP should be set out in law? • Yes • No • No view Please comment on your answer*

**Yes.** A Local Place Plan that has not engaged meaningfully with local people, should not be regarded as a Local Place Plan in the planning system, as it will not be able to satisfy the purposes intended by Planning (Scotland) Act. The legal obligation would help avoid challenges such as multiple community groups in the same area producing competing Local Place Plans, none of which resemble the wider views of local people.

While community engagement is by its nature challenging, resource-intensive and time-consuming, it cannot be discarded or thought of as an optional element. It is completely fundamental to the aims

of enabling a community to set out its aspirations for the local area. It is the only route by which a Local Place Plan process can generate adequate influence, credibility and respect from external partners and stakeholders.

The SURF network believes an onerous engagement process has a great deal of value in minimising the scope for challenges emerging towards the authenticity or legitimacy of the issues, demands and challenges identified in the Local Place Plan. A legal requirement would add profile and weight to Local Place Plans, and clarify the obligation of the community group leading on the process.

SURF's consultation event on the Local Place Plan regulations highlighted a major question: where are the resources that will enable a community group to undertake a comprehensive engagement process? While some funding programmes and support mechanisms exist, SURF members felt they are patchy and are not adequate to support ambitions for the creation of 100 or more Local Place Plans per year in Scotland – which is around three per local authority region.

SURF members agree with the outcomes of a PAS survey on Local Place Plans in 2019, which concluded:

*“Communities require professional, practical and technical knowledge to prepare a plan. Funding hence plays a big role in the facilitation of the plan making process, particularly when securing professional expertise and assistance.”<sup>10</sup>*

The funding, training, mentoring, advice and development support required to support a community group delivering Local Place Plan is considerable. In the aforementioned Langholm Community Action Plan, significant support was provided by SURF, Scottish Community Development Centre, Scotland's Towns Partnership and South of Scotland Enterprise. Notably, Langholm is a town with several highly competent community groups with experience of community engagement; such support needs will be even greater in the many towns and neighbourhoods in Scotland that lack existing capacity.

Participants in SURF's 2021 Manifesto interviews expressed concern about the extent to which outcomes of Local Place Plans would be used to inform real-world decision-making. There were fears expressed that public bodies would not take Local Place Plans forward, leading the community groups viewing the first wave of Local Place Plans with interest to decide that it would not ultimately be worthwhile to create one of their own. There are concerns that the 'top-down' nature of spatial planning, as perceived by many cross-sector voices in the SURF network, will continue even if a large number of Local Place Plans are produced on the back of the proposals.<sup>11</sup>

*5. If a requirement to seek the views of people is put into law, what should any minimum requirement be?*

One suggestion is the use of the Community Right to Buy process as a template for minimum engagement requirements for Local Place Plans. A Community Right to Buy process generally

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<sup>10</sup> PAS – Building Active Citizenship, 2019, Local Place Plans: Communities Call for Greater Support to Create Success: PAS, Edinburgh. Available at: <https://www.pas.org.uk/news/local-place-plans-communities-call-for-greater-support-to-create-success/>

<sup>11</sup> SURF – Scotland's Regeneration Forum, 2021, 2021 SURF Manifesto for Community Regeneration: SURF, Glasgow. Available at: <https://www.surf.scot/wp-content/uploads/2021/03/2021-SURF-Manifesto-for-Community-Regeneration.pdf>

requires the backing of 10% of the local community as sufficient evidence of local buy-in, although Scottish Ministers can accept a lower proportion in some circumstances.<sup>12</sup>

SURF member feedback indicates that a minimum requirement of 10% is high enough to demonstrate widespread local demand for a community asset purchase, and low enough to be viable for most community groups. It appears reasonable to assume that demonstrating consultation with 10% of the local population will be sufficient for Local Place Plans, especially as many residents lack the time, confidence or willingness to engage with community led sessions. There are, however, some concerns that reaching the 10% threshold is harder in larger urban areas, in which securing support across a large geography is very challenging for even the highest capacity community groups.

There are a number of other challenges with balloting, including use of the electoral roll, which would exclude any local people that are not registered to vote at their current address, for any reason. The administrative burden and formal nature may also discourage some community groups from considering the undertaking.

A second suggestion is for the community group to develop a comprehensive engagement process informed by the Scottish Government's guidance document on Engaging Communities in Decisions Relating to Land, and the National Standards on Community Engagement. The guidance document recommends a process for formal community engagement with methods including written consultations and surveys, local meetings, and the provision of feedback to the community.<sup>13</sup> The National Standards, established in 2005 updated in 2016, set out principles for good practice on themes including communication, planning and inclusion.<sup>14</sup>

As with our response to question four, community groups undertaking a community engagement exercise of this scale will require resources to deliver it. The Scottish Government's impact assessment of the costs and benefits of Local Place Plans anticipates a considerable annual cost:

*“Based on the figures estimated thus far, the costs to communities of preparing LPPs is in the region of £1.4m per annum.”<sup>1</sup>*

SURF's consultations highlighted the reality that well-resourced professional organisations, including private businesses and local authorities, often fail to engage effectively with local communities. The wider community led regeneration policy agenda often assumes that a community group can achieve better results on a fraction of the resources, which is an area of concern that SURF has regularly raised with policy-makers in recent years.

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<sup>12</sup> The Scottish Government, 2016, *Community Right to Buy: An Information Leaflet for Community Bodies, Landowners and Other Interested Parties for Applications Made on or After 15 April 2016*: The Scottish Government, Edinburgh. Available at: <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2016/02/community-right-buy-information-leaflet-community-bodies-land-owners-interested/documents/00492608-pdf/00492608-pdf/govscot%3Adocument/00492608.pdf>

<sup>13</sup> The Scottish Government, 2018, *Guidance on Engaging Communities in Decisions Relating to Land*: The Scottish Government, Edinburgh. Available at: <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2018/04/guidance-engaging-communities-decisions-relating-land/documents/00534291-pdf/00534291-pdf/govscot%3Adocument/00534291.pdf>

<sup>14</sup> Scottish Community Development Centre and Scottish Government, 2016, *The National Standards of Community Engagement*: Scottish Community Development Centre/VOiCE Scotland, Glasgow. Available at: <http://www.voicescotland.org.uk/>

SURF members also reported that the type, depth and frequency of engagement is a significant factor in quality. For example, a community group that engages with local people primarily through interactive public meetings over a long time frame, will be able to demonstrate much stronger evidence of local views compared to another that uses a one-off, short and perfunctory online survey. It is difficult to be prescriptive, but in associated communications and support elements, policy-makers could promote quality as well as quantity.

*6. Do you agree with the proposal that there should be a minimum statutory requirement on the community body to consult the community once a draft LPP has been prepared and before submitting an LPP? • Yes • No • No view Please comment on your answer (particularly if you do not agree)*

**Yes.** A further round of consultations on the final draft of a Local Place Plan would add value by clearly demonstrating, without doubt, that the priorities that appear in the draft, are consistent with the views of the local community. In many cases, an expression of approval may prove to be a formality if the draft closely aligns with the outcomes of extensive local consultations.

A final consultation prior to submission would help to reassure local authorities and other stakeholders that the local community has been made aware of, and expressed approval of, all of the proposed actions in the resulting Local Place Plan.

This clearly adds considerable pressure on the overall development process in time, resources and complexity. The outcomes could also result in prolonged disagreement over the proposed final priorities, which could be challenging to resolve. SURF is keenly aware of the realities of community politics, in which personality clashes, historical grievances and mistrust between community groups can hinder prospects for developing a common vision and agreeing on shared priorities. In such circumstances, some draft priorities that cannot ultimately be agreed may need to be removed altogether to produce a smaller and simpler final Local Place Plan that represents a consensus view.

Several SURF Local Place Plan consultation event participants and 2021 Manifesto consultees reported that there is a generally low awareness of Local Place Plans at the community level, which could create a barrier towards effective consultation on the final document, and in earlier engagement processes. The problem of ‘consultation fatigue’ – in which community members become dismayed by being continually asked for views on local challenges and opportunities, and witnessing no meaningful change on the back of these consultations – was also highlighted.

*7. If a requirement to consult across the community on the content of a draft LPP is to be put into law, what should any minimum requirement be?*

As with our response to question five, evidence of support from 10% of the local population is suggested as a fair and achievable target that demonstrates sufficient approval. This is based on common practice in the Community Right to Buy process.<sup>12</sup>

To reiterate, the 10% target is easier to achieve in, for example, a small rural village, than in a large town centre or city area, and as with Community Right to Buy, it would be logical to accept a smaller proportion in some circumstances.

Also as stated in question five, an alternative to balloting is a robust programme of community engagement informed by Scottish Government guidelines and the National Standards of Community Engagement.<sup>13 14</sup>

8. Do you agree with the proposal that the community body should seek the views of ward councillors when preparing the LPP? • Yes • No • No view Please comment on your answer - particularly if you do not agree or have a view as to how ward councillors' views should be taken into account or reported?

**Yes.** It would be democratically correct for any Local Place Plan development process to make particular effort to seek the views of elected members in the geographical boundary of focus. An understanding of Councillors' views and positions on key issues would inform the wider consultation process, and draw out areas of consensus that elected members could potentially assist with as priority projects are developed in future.

The phrase "taken into account" is helpfully neutral and does not add any obligations to the community group with regard to elected member responses, nor give powers to elected members to, for example, veto any sections of the draft Local Place Plan they disagree with. This flexibility is welcome in ensuring the community group retains authority throughout the development process.

Planning authorities are legislatively required to seek the views of community councils in preparing local development plans. Where a community body other than a community council is taking the lead in preparing a local place plan it would seem fair and practical that the regulations require the community body to seek the views of active community councils within the defined area.

SURF consultees noted that Local Place Plans may have useful scope to act as a form of mediation between groups, such as local authorities, businesses and community groups, on areas of disagreement.

9. Do you agree that, alongside the LPP itself, the community body should submit a statement on how it has complied with the legal requirements? • Yes • No • No view Please comment on your answer (particularly if you do not agree)

**Yes.** This would help demonstrate the legality of the Local Place Plan, and reduce the scope for challenges to emerge later. Again, community groups will need resources, guidance and support to meet the compliance demands, and evidence this appropriately.

Such a statement would also seem necessary to meet the legislative requirement for a future review of Local Place Plans that includes:

*"a summary of the participation of people who engaged in preparing and submitting local place plans, either through a community body or through consultation".<sup>15</sup>*

10. Do you agree the requirements planning authorities have to keep the register of local place plans should be aligned to the existing arrangements for registers? • Yes • No • No view Please comment on your answer (particularly if you do not agree)

**Yes.** Alignment and integration of Local Place Plans with existing arrangements will have added value for accessibility and coordination. The commitment to provide a digital, publicly accessible national hub of Local Place Plans will be a valuable resource for all organisations involved with land

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<sup>15</sup> UK Government, 1997, *Town and Country Planning (Scotland) Act 1997*: The National Archives, London. Available at: <https://www.legislation.gov.uk/ukpga/1997/8/section/15B>



use planning in Scottish places, in addition to the general public, and those engaged in academic research.

*11. Do you agree that the additional information provided by the community body alongside the LPP should be kept on the register of local place plans? • Yes • No • No view Please comment on your answer (particularly if you do not agree)*

**Yes.** Relevant supporting materials, such as consultation survey reports, would be useful accompanying additions to the Local Place Plans register. These materials could add further weight to the demonstration of local support, and provide additional insights into particular issues and demands. In such cases, the community group leading on the Local Place Plan should demonstrate willingness for such materials to be included in the register, and ensure compliance with legal requirements.

*12. Please provide your views on the level and content of information to be placed on the register.*

It is difficult to be prescriptive on this, as the content available for a particular Local Place Plan is likely to vary widely, depending on factors such as local population and size of place, levels and depths of engagement, capacity for information recording and presentation, and the range of planning and development issues covered.

In SURF's experience, some existing community led action plans are large, in-depth documents, while others are short and simple, and supported by separate reports. In latter cases, supporting documents should be added to the register to ensure important information is made available alongside the Local Place Plan as submitted.

Maintaining registers involve a commitment of time and effort, and SURF members highlighted an additional resource challenge on the local government side of Local Place Plans. As Royal Town Planning Institute in Scotland research makes clear, planning departments in Scotland have been greatly reduced since the 2008 financial crash, while policy demands and workload pressures have risen:

*“The planning service is the one of the most severely affected of all local government services in terms of budgets with a reduction of 42% since 2009... the new Planning Act has introduced 91 unfunded duties which could cost between £12.1m and £59.1m over 10 years to implement”<sup>16</sup>*

The Local Place Plan consultation paper recognises that there will be significant costs, “in the region of £70,000 per annum”, for planning authorities to bear.<sup>1</sup> Considerations must be given to the adequate resourcing of Local Place Plan processes in the public sector, in addition to the community and voluntary sectors.

*13. Do you agree with the proposal that a planning authority may remove an LPP from the register once it has been taken into account in the LDP, and must do so when requested by the community body that prepared it? • Yes • No • No view Please comment on your answer (particularly if you do not agree)*

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<sup>16</sup> RTPI Scotland, 2021, *Resourcing the Planning Service: Key Trends and Findings 2021*: RTPI Scotland, Edinburgh. Available at: <https://www.rtpi.org.uk/research/2021/june/resourcing-the-planning-service-key-trends-and-findings-2021/>

**Yes.** In the specific circumstances in which the community group that prepared the Local Place Plan requests its removal from the register, either because it has been incorporated into the Local Development Plan to the group's satisfaction, or it has become superseded by a new Local Place Plan, it would be logical for the planning authority to grant this request. The removal of old Local Place Plans would also reduce the potential for any confusion with an updated current iteration.

SURF consultees discussed whether a typical Local Place Plan would be in place for a long time, or subject to continual renewal as community demands and the local context evolves. There was agreement that it is important for the option of reviewing and replacing Local Place Plans to be made available to community groups. There are, of course, considerable resource implications for each fresh consultation process and update.

*14. Do you agree the requirements planning authorities have for making the map of local place plans available should be aligned to the existing arrangements for registers? • Yes • No • No view Please comment on your answer (particularly if you do not agree)*

**Yes.** As noted in the consultation paper, a central hub in which people can access information on Local Place Plans covering neighbouring geographies as well as their own, would be useful.

*15. Please give us any views you have on the content of these partial assessments.*

*16. Do you have or can you direct us to any information that would assist in finalising these assessments?*

The three impact assessments referred to in questions 15 and 16 provide some useful context and supporting information for the proposed regulations. We note the reference to community led action plans in Dunoon and Rothesay, produced with support from the SURF Alliance for Action, our place-based support and learning programme. Should it be useful towards completing the assessments, SURF would be happy to refer the authors to other high quality community led action plans that we are aware of.

*17. Please give us your views on the Fairer Scotland Duty and Strategic Environmental Assessment screening documents and our conclusion that full assessments are not required.*

*18. If you consider that full assessments are required, please suggest any information sources that could help inform these assessments?*

In its 2016 Manifesto for Community Regeneration, SURF called for the Scottish Government to:

*“Address the fundamental degenerative challenge of high and increasing economic inequalities by introducing a statutory duty for supporting socio-economic equity in all public policy.”<sup>17</sup>*

SURF was delighted when the Fairer Scotland Duty was subsequently legislated for in the fifth term of the Scottish Parliament. The enthusiasm, however, for public bodies to avoid such assessments as far as possible, while understandable in both the interpretation of 'strategic' decision-making and staff workload pressures, is disappointing.

Poverty and deprivation are barely mentioned in the 80+ page consultation paper, and SURF would encourage the Scottish Government to make all reasonable efforts to encourage and support Local

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<sup>17</sup> SURF – Scotland's Regeneration Forum, 2016, Planning Ahead for Regeneration: SURF's 2016 Manifesto: SURF, Glasgow. Available at: <https://www.surf.scot/wp-content/uploads/2014/12/SURF-2016-Manifesto-Final-Draft.pdf>

Place Plan processes to facilitate tangible physical, environmental, social and economic improvements in Scotland's poorer places.

SURF staff are happy to be contacted to elaborate on any aspect of this consultation response.

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*End of SURF's consultation response.*

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Further information on SURF policy consultation responses is available on our website: [www.surf.scot/consultations/](http://www.surf.scot/consultations/)

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