

SURF Consultation Response: Effective Community Engagement in Local Development Planning Guidance

In September 2023, SURF responded to [this Scottish Government consultation](#) on the quality of draft guidance for planning authorities and community groups. The purpose of the guidance is to improve community engagement in the production of [local development plans](#), which cover local authority regions and national parks.

Local development plans specify planning and development priorities and restrictions across each region, and Scottish Ministers expect the public to be involved in their preparation. The production of draft guidance is one of a series of planning reforms emerging from the [Planning \(Scotland\) Act of 2019](#). As the consultation paper notes, the guidance is intended to address reported problems such as a general “lack of trust, respect and confidence in the [planning] system” and “a lack of clarity about the purpose of engagement”, which was uncovered by research towards the development of the Act.

The consultation set a series of questions for respondents: SURF’s response follows.

1. Do you agree that the purpose and scope of the guidance is clear?

Yes. The guidance generally meets the purpose of the 2019 Act in clarifying the importance of effective community engagement in local development planning. It sets out, in plain English, the value the guidance has to both planning authorities and local residents. It is consistent with the key principles that informed its development.

There is an open question as to what difference the guidance will make in practice, given current circumstances including restricted resources within planning authorities and limited awareness from the general public on the existence of local development plans, let alone how to get involved. In addition, there is a common complaint in the SURF network concerning a cluttered and overcomplicated policy landscape around planning and regeneration.

The authors may justifiably claim that these wider issues are beyond the scope of their remit in producing a guidance document. Nonetheless, the guidance can only make a meaningful difference in situations where it is adopted and implemented, and this appears unlikely at present without supportive measures and new resources.

2. Do you agree that the terms inform, consult, involve, collaborate and empower, as described in the table, are helpful terms to support understanding of different levels of engagement and the influence that results from it?

Yes. The definitions and language in this section are clear and useful. The articulation of varying levels of influence from each type of activity is important.

Planning authorities should, as a matter of course, demarcate between opportunities that merely “inform” a community of a decision already taken, and others that “consult” a community to gather information before a decision is made, and those that “empower” a community to make a decision.

The guidance has value in encouraging a consistent approach to language and communication. Community groups in the SURF network report that this consistency is often lacking in interactions with local governments and other authorities. Misuse of the phrase “community empowerment”, which is often applied to information sharing events, is a regular complaint articulated at SURF events.

3. Do you agree that the appropriate levels of engagement have been identified for the stages of local development plan preparation?

Yes, to some extent. The guidance provides practical examples of the type and level of engagement planning authorities should consider while drawing up a development plan from start to finish. The stage-by-stage detail is useful, as is the recognition that the guidance can't be overly prescriptive given the diversity of local circumstances across Scotland.

As stated previously, stretched planning authorities will struggle to deliver the appropriate levels of engagement. In [a 2022 research report](#), RTPi Scotland reported that a quarter of local authority planning staff have been cut in Scotland since 2009, and planning services have been reduced by 38%, while service demands have risen. This context makes it very challenging for planning authorities to follow the guidance in practice.

For example, to take just one section of the guidance, 2.4, on publishing an invitation to submit local place plans. Does a planning authority have the staff and budget available to support a comprehensive process that would ideally extend to a website, newsletter and social media campaign, direct contact with multiple groups and organisations, and posters in public buildings, in addition to following guidance for all other stages of the process, while dealing with existing obligations and commitments?

SURF's primary concern here is the lack of attention on poverty. There are a number of specific groups and types of organisations that planning authorities are rightly encouraged to include in engagement activity, including disabled people, families with young children, Showpeople and community councils.

While “communities impacted by socio-economic disadvantage” is mentioned once in section 1.6 in the “inform” list of the preparation stage, and the Fairer Scotland Duty is referenced in impact assessments, SURF would like to see planning authorities encouraged to engage with people with direct experience of poverty, and groups that include or represent them. The venn diagram of

people experiencing poverty and people with protected characteristics tends to have a large overlap area and there is good reason to promote greater attention on socioeconomic disadvantage.

4. Do you agree that the appropriate levels of engagement have been identified for the impact assessments?

No view. Previous SURF network discussions have drawn attention to concerns about the general value of impact assessments but we have no specific comments on the detail provided in this consultation.

5. Overall, is the approach set out in the guidance helpful?

Yes. The guidance is thoughtful and inclusive, and is in keeping with the spirit of the planning reforms that flow from the 2019 Act. Care has also been taken to align the approach with a myriad of relevant national strategies.

One practical element that could improve its impact at community level, would be an illustrated timeline that shows at which point community groups and individuals can engage with the local development plan process, from start to finish.

6. Do you have any views about the initial conclusions of the impact assessments that accompany and inform this guidance?

No view.

7. Thinking about the potential impacts of the guidance – will these help to advance equality of opportunity, eliminate unlawful discrimination, and foster good community relations, in particular for people with protected characteristics?

No view. Groups that represent people with protected characteristics are better placed to comment on this aspect.

8. Do you have evidence that can further inform the impact assessments that accompany this guidance, in particular in relation to the impact of the guidance on people with protected characteristics, businesses and costs to businesses?

No view.

9. Please provide any further comments on the guidance set out in this consultation.

A general summary of SURF's view is that the guidance is clear and helpful, and if implemented, will add value to the quality of local development planning through a more collaborative, democratic approach than previous iterations. We are chiefly concerned about deliverability in the current resources context.

The aspiration to reduce consultation fatigue by linking existing consultation processes is welcome. The guidance would benefit from more detail on how this would be achieved in practice, although we accept local circumstances vary greatly.

A final point is that SURF welcomes the influence of the Place Principle on the guidance, and its further promotion to planning authorities. This is an important concept with the potential to maximise the impact of planning and regeneration investments through enhanced joint working between partners.

End of SURF's response to the consultation on Effective Community Engagement in Local Development Planning Guidance

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Further SURF policy consultations are available from our website:

www.surf.scot/policy

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Supported by: Creative Scotland, Glasgow City Council, Historic Environment Scotland, Museums Galleries Scotland, Scottish Enterprise, the Scottish Government and Wheatley Group.