

28 June 2018

Dear Sir/ Madam

We are organisations who have an important role to play in the planning system. We see the Planning Bill as an opportunity to put communities at the heart of planning through ensuring that they are engaged early and meaningfully. Our vision is for a system that is inclusive, respected, ambitious, holistic, and that works in the long term public interest. We want to empower communities so that they are able to influence how their place changes over time with a planning system that fosters participation, collaboration and co-production from the very beginning.

We believe that the Planning Bill provides us with the opportunity to do this. Introducing well-resourced Local Place Plans, prepared by communities, can foster a transparent dialogue about planning at the very local level. The bill can usher in new ways of involving young people and ensure communities are at the heart of creating development plans. This will help us to move away from the current situation where the main motivation for people to engage with the planning system is to say what they don't want, to a positive conversation between all with a stake in an area.

Introducing a third party or 'equal' right of appeal will not support these ambitions. We believe:

- it will lead to more local decisions being made by government at a time when we want to give communities more say over the places where they live.
- it will open the door for competing commercial interests to frustrate development and potentially to pit one part of a community against another.
- it will clog up the planning system at a time when planning departments are under severe resourcing pressures.
- it will undermine democratically elected planning authorities' responsibility to ensure planning decisions are taken locally in the public interest.
- it will weaken constructive early engagement.
- it will further widen inequality in our communities by disproportionately favouring those with the capacity, time and resources to pursue an appeal.
- it could mean that seldom-heard voices in the planning system may be further marginalised.

We are also firmly of the view that 'equalising' appeal rights by removing or reducing the current applicant right of appeal would be a mistake.

Enhancing public trust in planning must be a top priority and should be done through a positive and proactive approach to supporting communities to engage with the planning system. Not with a new right of appeal that only entrenches confrontation.

Yours faithfully

Fraser Carlin, Convenor, Royal Town Planning Institute Scotland
Iain McDiarmid, Chair, Heads of Planning Scotland
Tammy Swift-Adams, Director of Planning, Homes for Scotland
Sara Thiam, Regional Director, Institution of Civil Engineers Scotland
Stewart Henderson, President, Royal Incorporation of Architects in Scotland
Gail Hunter, Regional Director - Scotland, Royal Institution of Chartered Surveyors
Graham Boyack, Director, Scottish Mediation
David Melhuish, Director, Scottish Property Federation
Phil Prentice, Chief Officer, Scotland's Towns Partnership
Petra Biberbach, Chief Executive, PAS