

Response ID ANON-KPY2-RQFC-J

Submitted to **Proposed Changes to Pre-Application Consultation Requirements in Planning**

Submitted on 2020-11-06 16:13:51

Introduction

Requirements on the Provision of Information on PAC Proposals

Q1 Do you agree with the proposal to require the PAC information, which is to be made available to the public, to be available both by electronic means and in 'hard copy' format?

Yes

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

In general HOPS support greater use of online methods of accessing this information but acknowledge there will be instances where hard copies should be available. In these cases we would recommend hard copies could be made available from the developer on request.

Public Events

Q2 Please give us details of your experience using online alternatives to public events during the COVID-19 emergency.

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for examples. HOPS have in this period moved all meetings and external engagement to online platforms.

Online events present an opportunity to reach some groups not normally engaged in planning processes. There are also beneficial resource implications for the developer, which may allow for better overall engagement on their part. Online events should be seen as an alternative option which can be used in the correct circumstances.

We would also consider the need to significantly enhance digital methods including the use of webinars and other forms of online public engagement. The presentation materials typically used in 'drop-in' type public events often do not provide members of the public with an adequate understanding of development proposals. More use of 3D modelling technology, for viewing remotely, would greatly assist. Traditional 2D photos, artist's impressions and architectural drawings can fail to convey essential spatial impacts.

Public Events (Continued)

Q3 Do you agree with the proposal to make a second physical public event a minimum requirement of PAC?

No view

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

There is certainly benefit to be gained from having multiple events in order to provide feedback and reach a wider audience. A seven-day minimum gap, along with many other aspects of second event very much depend on local circumstances.

Q4 Do you agree that a second physical public event required as part of PAC must include feedback to the public on their earlier engagement in PAC?

Yes

Please comment and explain your view:

HOPS believe should a second public event become a requirement it seems a reasonable request that feedback from previous engagement is made available.

Q5 Do you agree with the proposed minimum time period between the required public events in PAC?

No view

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

The proposed minimum time requirement may be suitable in some situations. It may however have a negative effect in some situations where a second minimum event is set up without enough time for the developer to properly process and disseminate information gathered in a previous event.

Q6 Do you agree with the proposed requirement for an additional newspaper notice for the second required public event?

No

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

HOPS question the benefit of making newspaper notices a mandatory requirement of advertising the PAC events. The reach of this manner of advertising is questionable compared to other methods planning authorities may choose to use. There is also additional cost associated with newspaper advertising which can be significant compared to the benefits it brings.

PAC Report - Content

Q7 Do you agree with the proposed list of required content for PAC reports?

Yes

Please comment and explain your view:

The proposed content seems a reasonable checklist of required items.

PAC Exemption - Who is making the application

Q8 Do you agree with the PAC exemption being limited to the same applicant who made the earlier application?

No

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

HOPS note there may be situations where the application being brought forward by a subsequent applicant is the same basic proposal as that previously consulted on.

PAC Exemption - The circumstances in which a second application is made

Q9 Do you agree with the circumstances regarding an 'earlier application' (withdrawn, refused etc.) in which a second application would be able to get exemption from PAC?

Yes

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

HOPS note that this is provided the second application is for a development essentially the same as previously consulted on.

PAC Exemption - Relationship between the proposals

Q10 Do you agree with the approach to linking the description of the proposal in the earlier application and that in the second application for the purposes of a PAC exemption?

No view

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

PAC Exemption - The Relationship with the Proposal of Application Notice

Q11 Do you agree that the exemption from PAC should be linked to the content of the PAN served in relation to PAC for the earlier application?

No view

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

PAC Exemption - Time Limit

Q12 Do you agree with the proposed time limit on exemptions from PAC?

Yes

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

HOPS support a proposed time limit in principle. Local circumstances may determine whether that 18 months limit is appropriate.

Timing and Transitional Arrangements

Q13 Do you agree with the proposed transitional arrangements for bringing into force the new PAC requirements, including the time limit for making applications to which PAC requirements apply?

No view

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

Pre-application Consultation with Disabled People

Q14 Please give us your views on the proposed approach to pre-application engagement with disabled people.

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

HOPS acknowledge the fact that involvement PAC stage has benefits and encourage guidance to assist planners in these matters.

PAC Guidance

Q15 Please tell us what issues you think should be covered in guidance for PAC.

Please comment and explain your view:

HOPS represent 34 planning authorities and defer to their individual responses for further clarity on the matter.

As stated above reference to good practice and access to exemplar projects would be highly beneficial in any guidance document.

Setting out reasonable expectation for developers and the public is a topic that should be covered in detail.

Impact Assessments

Q16 Please give us any views you have on the content of these partial BRIA and combined EQIA/CRWIA.

Please comment and explain your view:

No comment

Q17 Do you have or can you direct us to any information that would assist in finalising the BRIA and combined EQIA/ CRWIA?

Please comment and explain your view:

No comment

Q18 Please give us your views on the Island Communities Impact Assessment screening paper and our conclusion that a full assessment is not required.

Please comment and explain your view:

No comment

Q19 If you consider that a full Island Communities Impact Assessment is required, please suggest any information sources that could help inform that assessment.

Please comment and explain your view:

No comment

General Question

Q20 Please give us any general comments on the PAC proposals or related issues not covered by earlier questions.

Please comment and explain your view:

No further comment at this stage.

About you

What is your name?

Name:

Trevor Moffat

What is your email address?

Email:

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Heads of Planning Scotland (HOPS)

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

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

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.:

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

Slightly dissatisfied

Please enter comments here.:

Text formatting and the ability to upload support documents would be an appreciated addition to the platform.