

**PLANNING AND ACCESS COMMITTEE**

**MEETING: Monday 27<sup>th</sup> March 2017**

<b>SUBMITTED BY:</b>	<b>Head of Planning &amp; Rural Development</b>
<b>SUBJECT:</b>	<b>Places, people and planning: A consultation on the future of the Scottish planning system</b>

<b>LEAD OFFICER:</b>	Name: Susan Brooks and Bob Cook
	Tel: 01389 722615/ 2631
	E-mail: <a href="mailto:susan.brooks@lochlomond-trossachs.org">susan.brooks@lochlomond-trossachs.org</a> <a href="mailto:bob.cook@lochlomond-trossachs.org">bob.cook@lochlomond-trossachs.org</a>

**1 SUMMARY AND REASON FOR PRESENTATION**

- 1.1 This paper provides an overview of 'Places, people and planning' - the current Scottish Government consultation on the future of the Scottish planning system and provides the recommended response to this from the National Park Authority Planning and Access Committee.

**2 RECOMMENDATION**

**That Members:**

- (a) Approve the recommended response, based on the content in section 4, to the proposals outlined in the consultation on the future of the Scottish planning system, and**
- (b) Delegate authority to the Head of Planning and Rural Development to respond to the more detailed technical questions contained in the consultation, framed within the context of the response recommended in (a) above.**

**3 BACKGROUND**

Context and process for the review

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- 3.1 In September 2015, Scottish Ministers appointed an independent panel to review the Scottish planning system. The panel were tasked with providing a 'root and branch' review, and encouraged to explore game-changing ideas for radical reform of the system. The review focussed on six key themes: development planning, housing delivery, infrastructure, development management, community engagement and leadership, resources and skills. An officer response was provided on behalf of the National Park Authority in December 2015.
- 3.2 The report of the panel, "[Empowering Planning to Deliver Great Places](#)" was published on 31<sup>st</sup> May 2016. The Scottish Government response to this confirmed a commitment to 'ambitious and inclusive' planning reform with strong support expressed to the six outcomes proposed by the review: *strong and flexible development plans, delivery of more high quality homes, an infrastructure first approach to planning and development, efficient and transparent development management, stronger leadership, smarter resourcing and sharing of skills and collaboration rather than conflict – inclusion and empowerment.*
- 3.3 Since then the Scottish Government has been working with a wide range of stakeholders, including community representatives, public and private sectors, to explore potential changes to the planning system. Ministers signalled in their Programme for Government that a Planning Bill would be brought forward early in the Parliamentary Session (2017). To enable that, consultation on the key components of the legislation has been scheduled from 10th January to 4th April 2017.
- 3.4 The consultation presents the Government's proposals for change and provides an opportunity for people to help shape the future of the planning system in Scotland. Following completion of the consultation period analysis of the responses will be undertaken and published within 12 weeks of the consultation closing. The analysis will help inform the drafting and production of a draft Planning Bill which is to be introduced to Parliament in Year 2 of the Parliamentary Programme (2017). During the time of the consultation closing and the introduction of the bill there will be further engagement with key stakeholders to finalise the detailed proposals for inclusion in the bill.

### Scope of the Review : 4 key areas for change

- 3.5 The review focusses on 4 key areas of change:
  - (1) **Making Plans for the Future** – *'We want Scotland's planning system to lead and inspire change by making clear plans for the future. To achieve this, we can simplify and strengthen development planning.'*
  - (2) **People Make the System Work** – *'We want Scotland's planning system to empower people to have more influence on the future of their places. To achieve this, we can improve the way we involve people in the planning process.'*
  - (3) **Building More Homes and Delivering Infrastructure** – *'We want Scotland's planning system to help deliver more high quality homes and create better places where people can live healthy lives and developers are inspired to invest. To achieve this, planning can actively enable and co-ordinate development.'*
  - (4) **Stronger Leadership and Smarter Resourcing** – *'We want to reduce bureaucracy and improve resources so Scotland's planning system can focus on creating great places. To achieve this we can remove processes that do not add value, and strengthen leadership, resources and skills.'*

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- 3.6 These four key areas of change are supported by 20 proposals set out in the review. The consultation seeks feedback on whether the proposed package of reforms will deliver on each of the key areas of change and also asks more detailed technical questions in relation to specific proposals. The Government also wants to hear from any planning authorities, developers or communities who would wish to explore how some of the proposals set out in the review could work in practice.

### Recommended response for the National Park Authority

4. It is not considered necessary that the National Park Authority responds to each of the technical questions related to all the proposals contained in the consultation. Some of the proposed changes are particularly relevant to more strategic/ regional planning matters and to major housing and infrastructure developments within urban areas and at regional scale. It is therefore recommended that the Authority's response focusses on matters most pertinent to the National Park and rural planning issues. A summary of the key changes proposed in the review is provided in the following sections along with the recommended response of the National Park Authority.

#### 4.1 Key changes and recommended response

##### (a) Making plans for the future

The independent panel found strong support for maintaining a plan-led system. Plans should be clear visions that set out how places can grow and flourish and this section of the review aims to simplify the existing system of development plans to make sure that they focus on delivering outcomes rather than following lengthy and complicated procedures. It also seeks to build more effective opportunities for people to influence their places by encouraging a wider range of interests and stakeholders to foster a shared ownership and responsibility to prepare, promote and deliver development plans.

This section contains 5 proposals:

- Proposal 1 - Aligning community planning and spatial planning. This introduces a statutory requirement for development plans to take account of wider community planning, to be supported through future guidance.

*Recommended Response: The aim of involving people more in preparing development plans is supported and encouraged in order to foster a wider shared sense of ownership of plans and their delivery.*

*Experience of using charrettes and working directly with communities to prepare their own local community action plans within the National Park has achieved measurable success in helping to integrate community and spatial planning; these mechanisms encouraged more people to get involved in planning, created and directly shaped the place making vision in the local development plan as well as helped built local capacity and momentum within the community and wider stakeholders to drive forward delivery. Tools such as this and use of the Place Standard tool need to be fully integrated with Community Planning to ensure genuine partnership working, shared ownership and strong alignment between community and local development planning.*

*Within Loch Lomond and The Trossachs National Park there are four Community Planning Partnerships, each comprising various sub-groups. Operationally, careful consideration is needed in regards to resourcing these and there is a strong role for National Park Plan's to provide the coordination and links at strategic level between Park Authority's and wider Community Planning objectives.*

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*The creation of a statutory link between the development plan and community planning is supported in principle. However, the success of this will be dependent on the performance and operation of the Community Planning Partnership itself and the integration of partners represented on this, including communities and planners.*

*It is considered that Proposal 1: Aligning community and spatial planning, is strongly linked to Proposals 6 (Giving people an opportunity to plan their own place), 7 (Getting people more involved in planning) and 8 (Improving public trust).*

- Proposal 2 - Regional partnership working. This concerns the removal of strategic development plans and replacing these with regional partnership working.

*This proposal is considered to have less direct impact on the National Park. Therefore no response is recommended to this proposal.*

- Proposal 3 - Improving national spatial planning and policy. The National Planning Framework (NPF) can be developed further to better reflect regional priorities. National planning policies can be used to make local development planning simpler and more consistent.

*Recommended response: The review seeks to strengthen and give a stronger statutory status to the NPF and Scottish Planning Policy (SPP). In doing so, this would give more weight to these in decision making, meaning that local development plans could be more focussed on spatial place based strategy, reducing the need for often detailed and repetitive policies. It is agreed that NPF and SPP could be given more weight in decision making and that this change would reduce the need for many of the policies contained in the local development plan, thereby helping it to be more focussed and spatial. However, within National Parks there is also a statutory duty to deliver the Park's four aims (as set out in the National Parks (Scotland) Act 2000) and in some instances there may be a need to depart from national guidance contained in SPP to achieve this. The Planning Bill should make provision for this.*

- Proposal 4 - Stronger local development plans. The plan period should be extended from five to ten years. Main Issues Reports and supplementary guidance should be removed to make plans more accessible for people. A new 'gatecheck' would help improve plan examinations by dealing with significant issues at an earlier stage.

*Recommended Response: The proposed changes to local development plans are supported. Within the National Park context it is considered that a ten year plan cycle is more appropriate than five. The vision and strategy set out in the current local development plan, adopted December 2016, has been prepared for a ten year period and is considered to provide robust and clear directional spatial strategy to direct development over this timeframe. Focussed effort is required over the next ten years, from planners, the community and other stakeholders to work together and progress development delivery with early actions being progressed in several communities already (supported by momentum established during plan preparation stage via charrettes).*

*There is unlikely to be an appetite to begin the process to engage, consult and prepare a new plan in the short term from the majority of communities within the National Park, or wider stakeholders, however under the current legislation it is most likely that the Park Authority will be required to begin work on a new local development plan next year (2018) to meet the current 5 year cycle. It is therefore requested that allowance is included as part of any transitional arrangements under the new Planning Bill for recently adopted*

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*plans, which are demonstrated as being robust and fit for purpose to be allowed to continue, rather than there being an automatic requirement to prepare new Plans under new legislation.*

*The changes to the examination process are supported. The 'gatecheck' will be a crucial early stage in the plan preparation process. As well as speeding up the plan preparation process and reducing the financial cost to some planning authorities, this relates particularly to the aim of empowering and supporting communities to foster more shared ownership of the Plan. If local communities are to be involved in developing proposals for change it is essential that they understand and feel ownership of the technical evidence base, requiring planners to work more closely and directly with communities in this regard. This could involve complex information, requiring a skill set amongst planners to be able to communicate and explain technical data if required. This applies particularly to the evidence base upon which Place Plans are to be prepared (establishing housing needs and the housing land supply requirement).*

- Proposal 5 – making plans that deliver. Strengthen the commitment that comes from allocating development land in the plan, and improve the use of delivery programmes to help ensure that planned development happens on the ground.

*Recommended Response: Within the National Park context where a site is allocated for a particular use then this should ensure certainty and confidence in development delivery. Action programmes – to be replaced by stronger 'delivery programmes' that will form part of the development plan - will be key tools in this regard, being used to track, promote and coordinate development. The requirement for land owners and developers to provide more upfront information at site assessment stage in the plan preparation process, including economic and market information, would assist in creating greater confidence in the deliverability of the Plan. Where new sites arise, that have not been included in the Plan, there should be a requirement for developers to engage with communities through stronger measures for public involvement on sites. Not doing so would undermine the principle of involving local people in preparing plans and lead to mistrust in the system.*

### (b) People make the system work

This section acknowledges the community empowerment movement across Scotland and that people should have a stronger say in the decisions that affect them and their communities. Change is needed to move from informing/consulting to actively involving people in planning and this section contains four proposals to get more people engaged in planning.

- Proposal 6 – Giving people an opportunity to plan their own place. Communities should be given a new right to come together and prepare local place plans. We believe these places should form part of the statutory development plan.

*Recommended response: This is supported. Detailed consideration is required to ensure that this works in practice and that the proposed changes genuinely result in more people feeling empowered to influence and shape future change in their community. Communities will need to be supported in preparing these plans, by planners working directly with them. This is dependent on building successful and trusted working relationships and planners will need to be able to facilitate discussion, mediate where necessary and explain/distil technical information.*

*It is noted that guidance and further research is proposed to help explore options for local plan plans in more detail. The National Park Authority would welcome further*

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*engagement on this and is very well placed to pilot 'place plans' as it is already has a strong foundation and experience of directly supporting local communities to prepare their own local action plans. These, along with a series of charrettes, have directly informed the place based focus in the recently adopted local development plan and helped create a wider shared sense of ownership. An option going forward under new legislation might be for support to be targeted at communities that to date have not undertaken any form of local community or place planning and for this to help inform future local development plan focus.*

*We are currently reviewing the role of community action plans and charrettes within the context of development and community/locality planning and their potential alignment with tools such as the Place Standard. We are also looking at how place plans can more strongly link with wider catchment scale land use management plans. Currently one community in Strathard is actively linking community action planning with wider ecosystems services approaches, successfully involving the community in decisions affecting land management and planning at a wider landscape scale, rather than just the immediate confines of the 'settlement'.*

*Communities need to have good organisational capacity to successfully become more involved in preparing plans and decision making. They also need to be inclusive and representative of the whole community. Community Councils differ significantly in terms of how they function and operate, including working relationships with other local community groups such as local community trusts. The success of this aspect of the review will be dependent on adequate support and resources being given to establishing and maintaining capacity within communities.*

*For Place Plans to work, there also needs to be a strong link with the 'gatecheck' stage early in the preparation of the local development plan in order that communities understand the evidence base and agree on detailed matters when preparing plans.*

- Proposal 7 – Getting more people involved in planning. A wider range of people should be encouraged and inspired to get involved in planning. In particular, we would like to introduce measures that enable children and young people to have a stronger voice in decisions about the future of their places.

*Recommended response: This is supported. Our experience of engaging children and young people in charrettes has demonstrated a strong will, enthusiasm and energy from young people to think about place and the needs of everyone involved in it. We have found working with young people at local high schools to be particularly effective in engaging on specific place based projects and have also worked with secondary schools to prepare case study material for use as part of the curriculum.*

- Proposal 8 – Improving public trust. Pre-application consultation can be improved, and there should be greater community involvement where proposals are not supported in the development plan. We also propose to discourage repeat applications and improving planning enforcement.

*Recommended response: This proposal covers a range of work areas and is supported in principle. In terms of the ambition to achieve more effective engagement on planning applications, the consultation focuses upon whether the current process of statutory pre-application consultation for major applications could be made fuller and more meaningful. In a National Park context we do not receive high numbers of 'major' applications – typically 3 or 4 a year. The statutory pre-application (PAC) process only applies to these cases. However, our current practice is always to encourage applicants to go further than*

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*the statutory minimum requirements in terms of engagement – i.e. to arrange more than one public event, establish a website, engage innovative use of social media. This will be highlighted in the NP response. Another suggestion will be that legislation enable more scope for individual authorities to determine when significant 'local' applications should reasonably be subject to a more formal pre-application process. Currently we actively engage in voluntary pre-application advice on all types of development proposals and encourage applicants towards voluntary community engagement on more complex or contentious 'local' applications.*

*The consultation also picks up on a point raised by the independent review panel that particular areas of Development Management work can cause public frustration. These include retrospective applications and the current provision in legislation to allow a repeat application to be submitted with no fee payable. Making changes in these areas it is hoped would encourage a focus on a 'right first time' approach from developers. This also ties into proposals for increased fees for applications and the resourcing of the planning service that emerge through Section 4 of the consultation.*

*Enforcement is also flagged as an area where public confidence is low. An independent study commissioned by the Scottish Government in this area (Planning Enforcement in Scotland: research into the use of existing powers, barriers and scope for improvement, Dec 16) concluded that mistrust of the system is a problem. The study acknowledges that so much of the work currently undertaken to resolve breaches of planning control is undertaken through flexible, informal means – by co-operation and agreement - rather than punitive action and, as a consequence, the influence of the system can be challenging to record and report upon. These conclusions are consistent with the National Park experience. We are confident that our approach to enforcement is effective in the vast majority of cases but, by virtue of seeking to resolve informally (with formal action or prosecution always as a last resort), there are challenges in capturing the effectiveness of the system. This experience will be shared in the National Park response to the consultation and a review of the options to strengthen the tools at our disposal is supported.*

- Proposal 9: Keeping decisions local – rights of appeal. We believe that more review decisions should be made by local authorities rather than centrally. We also want to ensure that the system is sufficiently flexible to reflect the distinctive challenges and opportunities in different parts of Scotland.

*Recommended response: The ambition for more local decision making is supported in principle. The Local Review process is recognised to have become successfully embedded and supports local decision making. Views are sought on the scope to expand the range of planning applications which may be subject to the Local Review Appeal process. Acknowledging this direction, the importance of Member training to the ongoing quality of decision making is something that will be emphasised in the NP response to the consultation. The consultation narrative makes a connection for this area of work to the options to better resource the planning service (section 4) the possibility to charge a fee associated with the submission of an appeal is proposed. This is supported.*

*This section also comments on the issue of 'third party rights of appeal' – which a number of respondents to the review continue to push for. The narrative in the consultation paper sets out the government position that such a process would work against early and worthwhile public engagement. It would encourage individuals to intervene only at the end of the process and risk delaying development. The introduction of third party rights of appeal is therefore not proposed as part of the consultation.*

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### (c) Building more homes and delivering infrastructure

This section emphasises the high priority attached to supporting the delivery of homes. Planning can assist by ensuring enough land is available for development but can go further by actively enabling development. Infrastructure has a critical role to play in supporting housing delivery.

- Proposal 10 – Being clear about how much housing land is required. Planning should take a more strategic view of the land required for housing development. Clearer national and regional aspirations for new homes are proposed to support this.

*Recommended response: The independent panel found that planning must move away from debating overly complicated housing figures and focus more on enabling development. This is supported. The consultation seeks to introduce a more strategic and aspirational approach to establishing the number of homes required at a higher level earlier on in the plan preparation process. It states that national or regional targets within the National Planning Framework could help inform aspirations to help guide and inform planning for housing at local level. Housing Need and Demand Assessments (HNDA) are recommended as tools that can be used to help derive housing estimates under a range of scenarios.*

*It is not clear how this approach will work in rural areas and for rural communities. The consultation states that 'existing communities have a critical role to play in accepting that further development is necessary if we are to ensure that everyone has a home'. For rural communities to meaningfully engage in local development planning, and to successfully be empowered to prepare their own Place Plans, an understanding of housing needs at local level is essential to understanding and accepting the principle of further housing development.*

*In the National Park's experience, the HNDA process is suited to larger scale urban and regional areas with larger concentrations of population and well established and operational housing market areas. These tend to be 'thin' in rural areas and we have experienced difficulties in running the HNDA tool for the National Park area due to the smaller population levels involved.*

*To ensure that more housing is delivered within both urban and rural areas of Scotland there needs to be equal consideration given to determining housing needs in rural areas. Communities themselves could be empowered to help facilitate this through conducting local housing needs surveys, or supported to do so by the third sector and/or Community Planning Partnerships.*

- Proposal 11 – Closing the gap between planning consent and delivery of homes. We want planning authorities to take more steps to actively help deliver development. Land reform could help to achieve this.

*Recommended Response: We support the steps being taken to support housing delivery, particularly in rural areas, including more investment for housing through the Rural Housing Fund. We have prepared a more flexible and pro-active set of planning policies in our recently adopted Local Development Plan (adopted December 2016) to facilitate and encourage delivery of more affordable housing in the National Park, and to create more opportunities for affordable housing, such as affordable self-build, within the countryside. However, it is considered that the review could go further than proposed to help support the delivery of this planning policy by including a proposal specifically on*



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*rural housing and the delivery of this. We would welcome further discussion and involvement on this.*

*It is the delivery of affordable homes in rural areas, particularly accessible rural areas that is proving challenging. The accessible rural area of the National Park is evidenced as being one of the most expensive areas to buy a home in Scotland. Housing pressure is significantly high and includes demand from commuting, second, retirement and lifestyle change homes. By using planning policy to support affordable housing only in the accessible rural area the local development plan is able to influence and lower land values, thereby, in theory, enabling more households to access land at a more affordable value.*

*However, for this to work on practice, planning needs to be able to ensure that the house remains affordable once built, otherwise it could be used for example as a second or holiday home. The review could consider options for this, such as consideration of the merits of introducing a separate use class for second/holiday homes. This would reinforce the planning policy and have a greater influence on land value, making delivery of affordable housing in such areas more achievable. Without this, the market will continue to test the policy, look for 'ways round it' and slow down the planning process, ultimately undermining the original policy intent.*

- Proposal 12 – Releasing more 'development ready' land for housing. Plans should take a more strategic and flexible approach to identifying land for housing. Consents could be put in place for zoned housing land through greater use of Simplified Planning Zones.

*Recommended response: The principle of Simplified Planning Zones (to be re-named 'Ready Planned' or 'Consented Development Zones') is supported however it is difficult to envisage an instance within the National Park context where this would be applicable. Of the few sites where this approach could be considered, there are detailed site and planning considerations that would need to be fully addressed via a masterplan upfront in the process in consultation with other stakeholders. This would require developers to invest in this upfront in the process, rather than through planning fees later on.*

*The principle of Simplified Planning Zones (SPZ's) within, for example, town centres is supported. Examples of this being used elsewhere shows that it can help regenerate and re-vitalise town centres. The proposal to remove the blanket restriction for SPZ's in conservation areas is supported in principle however we would seek further engagement on how this would work in practice alongside managing the Conservation Area.*

- Proposal 13 – Embedding an infrastructure first approach. There is a need for better co-ordination of infrastructure planning at a national and regional level. This will require a stronger commitment to delivering development from all infrastructure providers.
- Proposal 14 – A more transparent approach to funding infrastructure. We believe that introducing powers for a new local levy to raise additional finance for infrastructure would be fairer and more effective. Improvements can also be made to Section 75 obligations.
- Proposal 15 – Innovative infrastructure planning. Infrastructure planning needs to look ahead so that it can deliver low carbon solutions, new digital technologies and the facilities that communities need.

*Recommended response: We support the acknowledgement of the need for integration between land use and transport planning to ensure connectedness, accessibility and active travel. It is highlighted that delivering infrastructure in a rural area can be more*

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*challenging and therefore the need to be proportionate in any approach to not disadvantage rural areas which typically already have higher development costs. We support the acknowledgement of the role of green infrastructure in supporting quality of life and sustaining the environment. It is agreed that planning should be fully committed to the principles of climate change mitigation and adaptation and that local development plans have a clear role to play in this regard. The requirement for the local development plan to contain a policy requiring new developments to install and operate low and zero-carbon generating technologies does in practice appear to be duplicating requirements sought by building standards and we would support the removal of this requirements.*

### (d) Stronger leadership and smarter resourcing

This section contains five proposals aimed at ‘reducing bureaucracy and improving resources so Scotland’s planning system can focus on creating great places’.

- Proposal 16: Developing skills to deliver outcomes. We will work with the profession to improve and broaden skills

*Recommended response: The consultation probes capacity of the profession to deliver outcomes in terms of its skills and resilience. The government’s commitment to work with HoPs and RTPI Scotland to look at how planning can improve its reputation as a visionary profession that creates great places is supported. Options to make better use of shared expertise across authorities are proposed and this is supported.*

- Proposal 17: Investing in a better service

*Recommended response: This section also looks at the resourcing of the planning service - with a particular emphasis to explore areas to increase fee income and how that will deliver improved performance. A separate consultation proposing the raising of the upper level fee ‘cap’ on major applications has already received wide support across Scottish Local Authorities and the National Parks and this will represent an important step toward cost recovery on these complex cases. The National Park response to the consultation will suggest that there is scope to look more broadly at the current fee structures to make them more responsive to the resourcing requirements. For example, to examine the potential for charging for much of the post-decision work (condition discharge and monitoring) that we focus on – and which is so important to secure the quality of development on the ground. The response will also suggest looking at the options for charging on pre-application responses. There are a number of other loopholes in the current fee regulations that are on occasion exploited by applicants or agents to minimise the fee that is payable and these will be highlighted in order to secure a fairer system. Support for change in these areas will be confirmed in the consultation response.*

- Proposal 18: A new approach to improving performance. We will continue work to strengthen the way in which performance is monitored, reported and improved.

*Recommended response: The consultation confirms the expectation that securing higher fees must deliver a much improved planning service. The Planning Performance Framework (PPF) remains the primary performance monitoring tool but the consultation proposes that improvements be developed to bring a stronger focus on the customer experience and that peer review with other authorities continues to be rolled out. The consultation recognises that the development industry, applicants and agents have an important role to play in meeting timescales. Options to capture the measure of planning’s influence on the quality of places will also be explored in order to avoid over reliance on determination timescales.*

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- Proposal 19: Making better use of resources. We will remove the need for planning consent from a wider range of developments. Targeted changes to development management will help ensure decisions are made more quickly and more transparently

*Recommended response: The overall ambition of this section is to achieve a simpler and more streamlined Development Management Service where the planner's input is focused on those areas that add value. This ambition is supported.*

*The consultation also looks at options for more efficient decision making and particularly the scope for a wider range of development to become 'permitted development' – removing the requirement for an application to be submitted in the first place. Procedural improvement are also examined, notably the current requirements for confirming a 'valid' planning application. Changes in these areas are supported but it should be noted that securing them would require a review of primary legislation.*

*In a National Park context there are limitations on the scope for significantly wider permitted development – National Parks as a sensitive landscape designation currently carry a range of exemptions from current permitted development provisions that apply elsewhere – i.e. telecom development. In responding to the consultation it would be encouraged (as a general direction of travel) that wider permitted development proposals be aligned with national goals around climate change adaptations but acknowledging that the detail of this can be challenging. Overall, the aspiration to reduce the number of applications - in order to focus on those where most value can be added by the planning process - is supported.*

- Proposal 20: Innovation, designing for the future and the digital transformation of the planning service

*Recommended response: The Scottish Government confirm their intention to spark further innovation and secure the digital transformation of the planning service. They propose to appoint a 'digital task force' to look at the opportunities. This is supported and expected to identify approaches to designing services that will result in efficiencies and improve customer experience. This performance focused proposal has links with proposal 17 in the context of securing the resourcing necessary to deliver a 'digital transformation'.*

## 5. CONCLUSION

- 5.1 The consultation provides an opportunity to help influence the future of planning in Scotland. Many of the proposals set out in the consultation paper reflect and build on the approach already being taken within the National Park. It is recommended that the National Park Authority expresses support for the main changes proposed in the consultation, whilst requesting the opportunity to be involved in further discussion and/or research to investigate how these will work in practice.