

Written Evidence re. Planning Review Panel Call for Evidence

From: The Grow Your Own Working Group

Introduction

The Grow Your Own Working Group (GYOWG) was formed in 2009 to take forward the recommendations in the Scottish Government's Food and Drink Policy, 'Recipe for Success', relating to growing your own food. Specifically:

- Ensuring that allotments and "grow your own" projects are strategically supported.
- Producing practical advice and best practice guidance that will appeal to public bodies, communities and individuals to help them develop local "grow your own" initiatives.

Membership of the GYOWG is open to any organisation interested in GYO

The GYOWG have undertaken various activities to take forward the recommendations, including organising events, responding to consultations, and supporting individual organisations through providing advice and practical guidance. Specifically in relation to Planning at both a strategic and local level the GYOWG have responded to the consultation on Permitted Development; NPF3 and SPP consultations; meet with Scottish Government planning officials; and, arranged training events for planning officers. We have generally experienced making progress with Planning to be the most difficult element of our work.

We welcome the chance to respond to this consultation and have highlighted the concerns that our members experience with the planning system.

Development Planning

Development plans should be developed with a strong emphasis on community empowerment, in line with the recent Community Empowerment Act and the principles that are outlined in the Act. In relation particularly to community growing, we would suggest that Food Growing Strategies, which are a statutory requirement in the Community Empowerment (Scotland) Act (S119), have status of Supplementary Planning Guidance to Development Plans, thereby helping to connect this legislation with the Planning framework. This would also help to secure land for allotments, community gardens and other forms of community growing. Masterplans for development or regeneration should also include land for food growing.

The GYOWG would also like to highlight how, even small scale improvements to greenspaces can have an impact on climate change mitigation and adaptation through local food growing and reducing flooding. Development Plans should have strong consideration of opportunities to work towards carbon reduction which encompass smaller and larger scale interventions.

Housing Delivery

Quality homes are more than just a building - the surroundings and fabric of the built environment around them also have an important role to play in quality of life. Community growing spaces can provide important greenspaces in housing developments, where people can enjoy the outdoors, take part in their local community and get to know their neighbours. Where new housing is being

planned, community growing spaces should be planned into the design from the outset, but with some flexibility to allow the communities to design and create the space as they would want it to be. We also would like to see greater use of brownfield sites instead of greenfield sites for housing development, and believe there is a key role to target public funding at these more tricky sites. These are more expensive sites and therefore not attractive to commercial developers, but the regeneration benefits, alongside the protection of greenfield sites from new development, should justify Scottish Government funding.

Streamlining Development Management

At present the approach to Development Management in relation to community gardening is quite inconsistent, and is often an unnecessary hurdle for many community growing groups. We would argue that features of community growing projects (such as small polytunnels, sheds etc) should be considered as permitted development. As items related to sustainable energy are considered permitted development (eg: solar panels), we would like to see items related to sustainable food should also be included, as part of our new recommendations.

Change of use to community gardens could also be considered as permitted development. For example, the Grove in Fountainbridge, Edinburgh was permitted development for a community garden on a derelict site which will be developed in the longer term. This demonstrates a common sense approach to the use of urban spaces that are often underused or awaiting development on a trajectory of several years. Some community gardens (meanwhile gardens/stalled spaces) are happy to have a space be made available for them for a short period of time. Temporary use of sites should not be considered to prejudice the planning prospects of any intended long-term use of a site.

There is a balance to be struck between increasing consistency within and across Local Planning Authorities with regard to development control. It is important to capture good decision making and share good practice in order to support good planning decisions and community groups to engage more readily with the planning system.

GYOWG also suggest that there should be a time bar and a mechanism to avoid repeated planning applications for land that a community is interested. Communities do not have the resources to fight continued planning applications.

Leadership, resources and skills

Planning plays an important role in the delivery of government policies including climate change, social justice, health, food and agriculture and local democracy. It is vital the planners are given the resources and skills to work with and for their communities. Genuine consultation and community engagement is an investment of time and resources, however, this early investment can balance out from the cost of mediation and poor planning decisions later down the line.

Planning supporting itself financially is important, and we support this. Any planning fee increases should be graduated and in line with performance monitoring. A balance needs to be struck between covering costs of an efficient and skilled planning service whilst ensuring that fees are not a barrier to development. We would like to highlight the difficulty that some community groups face when paying for Planning fees. It is our experience that community-led projects often stall at the

funding stage because many funders will not, fairly so, fund a project that doesn't have planning permission. This leaves the community group to front the cost of the planning fees, and can often lead to individuals covering this cost, or it not being covered at all. It is our view that this is an unnecessary barrier to the start of many projects. We would like to suggest that either a small grant fund could be made available to community groups for them to apply to cover the costs of planning fees at the outset of new projects, or that planning fees are waived when planning permission is required before external funding can be gained.

Consistency is required across local authority boundaries and we would welcome further sharing of good practice between professional planners and other professionals, especially examples of models of bringing community groups and planners together. We would also like to see appropriately skilled people being used to represent and guide communities on how to use their new land powers. This would allow them to fulfil potential from sites by interacting effectively with the planning system and others such as landowners, and also enabling informed negotiations between parties.

Community Engagement

Planners should be close to local communities, acting as champions in the process of delivering local objectives. Active community engagement, which has community empowerment as its driving principle, should be evident throughout the planning system in order to deliver better quality, longer-term outcomes. It should be seen as a positive and proactive step, not a reactive or retrospective step. If there is effective community engagement at the outset of the plans then community dissatisfaction should be reduced. As part of local democracy and the implementation of the Community Empowerment Act, a model for information channels, access to guidance and consultations to ensure true partnership working between local planners, community groups and land owners should be developed. Developing a shared vision for a locality through effective community engagement allows for the development of fit for purpose planning policies and land allocations. It is vital that efforts to engage with local communities engage all stakeholders in the area, and techniques for engagement are accessible and through a variety of means.