

Fiona Simpson
Scottish Government Planning Review Team

Barbara Cummins for KAG
Director of Heritage
Longmore House
Salisbury Place
Edinburgh
EH9 1SH

4 April 2017

Dear Fiona

**Joint statement on behalf of the Key Agencies Group
Places, people and planning: a consultation on the future of the Scottish
planning system**

This letter is a joint approach on behalf of Architecture and Design Scotland, Historic Environment Scotland, Scottish Natural Heritage, the Scottish Environment Protection Agency, Sport Scotland and Scottish Water. You will be aware that we also work collectively with Forestry Commission Scotland, Scottish Enterprise, Transport Scotland and Visit Scotland as the Key Agencies Group (KAG).

The KAG have been pleased to make contributions to the evidence submitted to inform the review and the working groups and stakeholder groups that have followed. We welcome the opportunity to shape the future of the planning system in Scotland and are keen to offer our further support to deliver Ministers' aspirations. We were particularly pleased that you were able to come with your colleague Helen Wood to our round table discussion at the Holyrood Park Education Centre on 16th February. We were pleased to get your feedback on our ideas and where we might focus our efforts to best support the process going forward.

The KAG is committed to working with Scottish Government, local authority partners and others to continue to shape the planning system in Scotland and to promote our objectives as part of that process.

We have highlighted below some of the areas where the Key Agencies intend to work together to make the new system a success:

- **National policy:** We consider there is an opportunity here for us to collectively develop a set of standard policies that would apply nationally. While we recognise the need for local policies on some issues, this would allow local plans to focus more on place rather than policies.
- **Guidance:** We agree that important plan content should be included in the body of the plan rather than in Supplementary guidance. We think there is

opportunity for key agencies to work together to streamline national planning guidance (e.g. PANs, circulars and other guidance) and that this will support the objective to simplify the policy landscape at a local level.

- **Skills and leadership:** KAG want to help to identify how we can support skills development for all those involved in the planning system to support delivery of high quality outcomes. We have started to engage with the Improvement Service to understand how we might work together more closely to mutually benefit from this.
- **Communities:** The focus on community involvement in place-making is likely to generate more demands on our staff to get involved in the planning system 'upstream'. There are obvious benefits in this, but we will have to manage our resources carefully. As Local Place Planning develops, we will ensure our role is clearly articulated to others and explain where our focus is directed.
- **Fees:** A recent consultation on charging for planning applications by local authorities seeks to move towards full cost recovery for consents. In line with this, SEPA, SNH and HES intend to develop thinking on the issue of charging and explore the opportunities for service improvement. We propose to commission joint research into how agencies in other parts of the UK manage this process and the possible benefits of key agency charging in a Scottish context.

We reiterate our support for the process and would welcome the opportunity to provide input and resources to progress the proposals further. If you would like to make any request of the KAG either to meet or to support particular work areas then please contact us through Alison Baisden at alison.baisden@hes.scot.

Yours sincerely,

Barbara Cummins | Historic Environment Scotland
On behalf of the Key Agencies group:

Architecture and Design Scotland
Historic Environment Scotland
Scottish Natural Heritage
The Scottish Environment Protection Agency
Sport Scotland
Scottish Water