

**PERTH AND KINROSS COUNCIL****Environment, Enterprise and Infrastructure Committee****14 JUNE 2017****Scottish Government's Consultation on the Future of the  
Scottish Planning System****Report by Director (Environment)**

This report outlines the key recommendations contained in the Scottish Government's consultation on the future of the Scottish planning system which is entitled 'Places, people and planning'. Overall, many positive proposals have been put forward which will lead to improvements to the Scottish planning system.

Generally, the package is supported. There is, however, concern that much of the detail and practicalities require to be fleshed out and the resources identified to deliver the improvements.

Responses were required by 4 April 2017 and the report outlines the key responses to the consultation submitted by Officers following discussion at the Planning Policy and Practice Member/Officer Working Group. The Committee is asked to endorse the proposals and the comments submitted.

**1. BACKGROUND / MAIN ISSUES**

- 1.1 In 2015, the Scottish Government commissioned an independent review of the Scottish Planning System. At its meeting of 20 January 2016, the Environment, Enterprise and Infrastructure Committee considered a report on the Council's response to the initial consultation on the review (Report No. 16/16 refers). The independent panel appointed subsequently published 'Empowering planning to deliver great places' in May 2016. The report contained 48 recommendations, grouped into 6 themes:
1. Strong and flexible development plans
  2. The delivery of more high quality homes
  3. An infrastructure first approach to planning and development
  4. Efficient and transparent development management
  5. Stronger leadership, smarter resourcing and sharing of skills
  6. Collaboration rather than conflict – inclusion and empowerment
- 1.2 The report can be viewed at the following link:  
<http://www.gov.scot/Topics/Built-Environment/planning/Review-of-Planning>
- 1.3 After consideration of the Independent Review findings, the Scottish Government published 'Places, people and planning - A consultation on the future of the Scottish planning system' in January 2017. The consultation report notes that:

“Planning should be central to the delivery of great places and a force for positive change. Scotland’s economy needs a planning system which is open for business, innovative and internationally respected. Our people need a planning system that helps to improve their lives by making them better places and supporting the delivery of good quality homes.”

- 1.4 The document sets out 20 proposals in four key areas for change:
1. **Making plans for the future** - this sets out proposals to ensure Scotland’s planning system leads and inspires by making clear plans for the future. To achieve this, proposals are put forward to simplify and strengthen the Development Plans system.
  2. **People make the system work** – this sets out proposals to empower people to have more influence on the future of their places.
  3. **Building more homes and delivering infrastructure** – the Government wants the planning system to deliver more homes and create better places and inspire developers to invest.
  4. **Stronger leadership and smarter resourcing** – the proposals aim to reduce bureaucracy and improve resources so the planning system can focus on creating great places.
- 1.5 It should be noted that, although the Independent Review contained 48 recommendations, many of the proposals put forward in the Scottish Government consultation encompass more than one of the initial recommendations. The consultation report can be viewed by using the following link: <https://consult.scotland.gov.uk/planning-architecture/a-consultation-on-the-future-of-planning/>
- 1.6 Officers from Planning and Development have been attending a variety of workshops and discussion groups with colleagues across Scotland. In addition, Community Councils and developers were invited to two briefing/discussion groups. The purpose of these briefings was to alert stakeholders to the consultation and to gain feedback on their views on the proposals to help inform the Council’s response. Both events were well attended and attendees commended the Council for its initiative in setting up the events.
- 1.7 The consultation was open until 4 April 2017. Due to the timing of the release of the report, it was not possible to present a report to the Enterprise and Infrastructure Committee prior to the deadline for submissions. A report was presented on the draft response prepared by officers to a meeting of the Planning Policy and Practice Member/Officer Working Group held on 27 March 2017. The response from members was supportive. The full submission from Perth & Kinross Council can be viewed at the following link: [https://consult.scotland.gov.uk/planning-architecture/a-consultation-on-the-future-of-planning/consultation/view\\_respondent?uuld=7065737](https://consult.scotland.gov.uk/planning-architecture/a-consultation-on-the-future-of-planning/consultation/view_respondent?uuld=7065737)

## 2. PROPOSALS

- 2.1 The following section sets out the Scottish Government's 20 proposals for change to the Scottish planning system under the four key areas of change. The proposals and associated responses are discussed. The formal response to the key questions raised in the consultation documents was an expanded version of the responses outlined in this report.

### **Key Area 1. Making plans for the future**

#### **Proposal 1 : Aligning community planning and spatial planning**

- 2.2 **Response:** *This is fully supported although alignment is a two-way process and requires the support of all the Community Planning partner organisations.*

#### **Proposal 2 : Regional partnership working.**

- 2.3 The Scottish Government believe that "strategic development plans should be removed from the system so that strategic planners can support more proactive regional partnership working". It is also proposed that an enhanced National Planning Framework (NPF) will set out regional strategic planning priorities.

- 2.4 **Response:** *The removal of the Strategic Development Plan from the system is supported as is the concept of regional partnership working. The Tay Cities Deal bid document already highlights a willingness on the part of the TAYplan authorities to follow this concept. It is, however, important that assurances are obtained that the National Planning Framework (NPF) regional priorities will be both a bottom up and top down partnership approach, as the local knowledge available for the regional partnership will be essential to an effective and deliverable development plan strategy.*

#### **Proposal 3: Improving national spatial planning and policy.**

- 2.5 The National Planning Framework (NPF) can be developed further to better reflect regional priorities. The Scottish Government also propose to ensure that the National Planning Framework (NPF) brings together wider Scottish Government policies and strategies across all sectors, including, but not limited to, the Scottish Planning Policy (SPP), Energy Strategy, Climate Change Plan and Scottish Climate Change Adaptation Programme, Land Use Strategy, Digital Strategy, National Marine Plan and the national policy on architecture, 'Creating Places'.

- 2.6 **Response:** *Proposals to put the NPF and SPP on a stronger statutory basis are welcomed and this will allow the Development Plan to focus on the vision for the area and on site specific proposals. The above commitments are welcomed although consideration should be given to taking this one step further by integrating the various strategies, where possible, into the NPF, providing Scotland with a cross-cutting spatial planning document.*

## **Proposal 4 : Stronger local development plans.**

- 2.7 Specific proposals include:
- a. Replacing the Main Issues Report (MIR) with a Draft Plan
  - b. Extending the review period from 5 to 10 years and setting out triggers for updating plans
  - c. Removing the provision for statutory supplementary guidance
  - d. The Scottish Government recognise that the Development Plan examination procedures need revised and suggest more decisions could be made locally.
  - e. The most fundamental proposal is to 'front load' the examination process by introducing a gatecheck process prior to the publication of the Draft Plan. The proposal is that the Draft Plan would be submitted to the Reporters, who would ensure that it fulfilled the following criteria:
    - Sets out the engagement arrangements
    - Is aligned with the community plan
    - Clear outcomes are defined
    - The amount of housing land is agreed
    - The required environmental assessments are completed
    - An audit of existing infrastructure levels and required interventions has been prepared
- 2.8 ***Response:*** *The extended review period and the agreement over triggers for a review are positive steps to free up time to concentrate on the delivery of sites as advocated elsewhere in the consultation document. The removal of statutory supplementary guidance is not supported. It is acknowledged that, with the introduction of the 2006 Act, there was a tendency for an extensive range of supplementary guidance to be produced. This should be curtailed and guidance should concentrate on key areas where the level of specialist detail is required to give clarity.*
- 2.9 *The current requirement for the planning authority to adopt the Reporter's recommendations has caused concern with both the public and local elected members, particularly where it related to minor and local issues. A revision of the requirement to adopt the Reporter's recommendations for local issues which do not affect the overall strategy would be welcomed. However, it is suggested that, for matters which impact on the delivery of the overall development plan strategy, the requirement to adhere to the spirit of the Reporter's recommendations should be retained.*
- 2.10 *In addition, greater clarity into how the gate check process will work is required before meaningful comment can be given.*

### **Proposal 5 : Making plans that deliver.**

- 2.11 The Scottish Government believes that “there is a need to 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.” The clear message from the consultation document and Scottish Planning Policy is that if a site is allocated in the development plan, it should not be refused on matters of principle at the planning application stage.
- 2.12 Delivery programmes would be a more significant part of the Development Plan. We would want to see a stronger requirement for local authority-wide involvement in them, as well as other stakeholders with an interest in their delivery. We would expect delivery programmes to be detailed and practical.
- 2.13 **Response:** *This is supported and the Council’s Main Issues Report (MIR) for Local Development Plan 2 (LDP2) contained a proposal to require developers to provide delivery statements. Making this a national requirement would remove the need for a specific policy in the Perth and Kinross Council LDP and also emphasise the need for developer co-operation.*

### **Key Area 2 : People Make the System Work**

**The Scottish Government want Scotland’s planning system to empower people to decide the future of their places.**

### **Proposal 6 : Giving people an opportunity to plan their own place.**

- 2.14 Communities should be given a new right to come together and prepare local place plans. We believe these plans should form part of the statutory local development plan.
- 2.15 **Response:** *The concept of community involvement in developing their place plan is generally supported. The consultation document does not, however, give sufficient detail to understand the practicalities of how a local place plan will be prepared and resourced.*

### **Proposal 7 : Getting more people involved in planning.**

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

- 2.17 **Response:** *This proposal is strongly supported. Indeed, Perth and Kinross Council has been at the forefront in its attempts to engage young people in the planning process. Working together with TAYplan, PAS (formerly Planning Aid for Scotland) or directly with schools, officers have invested a significant amount of time and resources to working with young people. This is an important area of work as, not only does it encourage young people to have a say in the planning process, it trains and encourages young people to play a greater role in civic society, hopefully providing the community councillors of the future. As pointed out in the consultation document, it is the young people of today who will be living in the homes, places of work and recreational facilities planned for in the Development Plans currently under discussion. It is, therefore, important that they feel they have been part of shaping their future.*

#### **Proposal 8 : Improving public trust.**

- 2.18 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 improve planning enforcement.
- 2.19 **Response:** *Scottish Planning Policy should make it explicit that pre-application consultation with communities must be conducted to a satisfactory standard. In addition, a clear failure to deliver an effective process may be a valid reason for the planning authority to refuse an application.*
- 2.20 It is suggested by the Scottish Government that enforcement powers may be enhanced.
- 2.21 **Response:** *There is significant scope to improve trust in the planning system by strengthening enforcement powers. It is agreed that fees for retrospective applications should be significantly higher than the equivalent normal fee. This would discourage developers from being tempted to start developments without gaining approval prior to carrying the work out.*

#### **Proposal 9 : Keeping decisions local – rights of appeal.**

- 2.22 More review decisions should be made by local authorities rather than centrally.
- 2.23 **Response:** *Only the major and most contentious applications go before our elected members and it is therefore unlikely there would be scope to see delegation extended much further. However, limited revisions to the hierarchy regulations may allow some additional delegation to occur and, as a result, the potential to reduce the number of appeals determined by the Scottish Ministers.*
- 2.24 It is suggested in the consultation that fees for appeals and reviews may be considered.

- 2.25 **Response:** *Applicants have a right to seek an appeal or review. However, while that should not in principle be discouraged, there is a cost involved for the planning authority and, where relevant, the Scottish Government. It may, therefore, be worth considering a system whereby the suggested appeal/review fee is refunded if the applicant is successful.*
- 2.26 It is suggested by the Scottish Government that training of elected members involved in a planning committee or local review body should be mandatory.
- 2.27 **Response:** *Such training should be mandatory.*
- 2.28 It is suggested that Ministers, rather than Reporters, should make decisions more often.
- 2.29 **Response:** *There is nothing wrong with such a move, provided this does not delay the process.*

### **Key Area 3: Building More Homes and Delivering Infrastructure**

**The Scottish Government 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.**

#### **Proposal 10 : Being clear about how much housing land is required.**

- 2.30 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.
- 2.31 **Response:** *The Scottish Government agree with the independent panel that there is too great a focus on debating precise numbers rather than delivering development and creating good quality places to live. This statement is supported, as is the indication that the National Planning Framework will give more guidance on regional housing targets. However, there are no concrete proposals which will deliver this aim. Furthermore, it fails to recognise that increasing house building rates is not solely a function of the planning system. While planning authorities can identify effective land, and local authorities and other infrastructure providers can service sites, housing delivery is largely dependent upon private sector developers. They, and their customers, are dependent on the economy and available finance. There is an urgent need to change the perception that the failure of the construction industry to deliver housing targets is down to a lack of effective housing land supply. Where there is a healthy supply of housing land, there is no correlation between increased supply and increased building rates. While it is acknowledged that a lack of supply can constrain delivery rates, this is not the case in Perth & Kinross.*

**Proposal 11 : Closing the gap between planning consent and delivery of homes.**

- 2.32 The Scottish Government want to see Planning Authorities taking a more proactive role in site delivery, particularly where a site is not progressing. It highlights the use of land assembly powers (CPO) and potentially delivering or enabling the site themselves. Alternatively, the approach could be deallocating sites and identifying additional land elsewhere.
- 2.33 **Response:** *While the need for Planning Authorities to take an active involvement in site assembly is supported, there is little discussion on the resource implications and risk councils would need to accept. Such work is resource intensive. In addition, there may be a need for enhanced commercial skill sets to be developed or acquired by local authorities.*
- 2.34 *Acquiring, servicing and potentially delivering developments will require significant capital investment. Although this may be recouped through developer contributions, a levy system or the Land Value Capture Model, the return period is often fluid and considerable. This presents councils with a level of risk which may be difficult to accept, due to the risk on the revenue budget through interest payments, if returns do not materialise in the expected time period. This needs to be de-risked by the Scottish Government.*

**Proposal 12 : Releasing more 'development ready' land**

- 2.35 Plans should take a more strategic and flexible approach to identifying land for housing.
- 2.36 **Response:** *Perth and Kinross Council has already adopted a long term strategic approach to housing land with all 5 Housing Market Areas within the LDP identifying strategic sites which will be delivering housing land well beyond the plan period. This proposal is therefore supported.*

**Proposal 13 : Embedding an infrastructure first approach.**

- 2.37 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.
- 2.38 **Response:** *It is unfortunate that the focus for the infrastructure discussion is in relation to housing development. The planning system is tasked with delivering the sustainable economic growth of Scotland in line with the Scottish Government's key priorities. The focus on the planning review needs to shift to the delivery of infrastructure required to deliver the Development Plan strategy for all development, not just housing infrastructure.*

- 2.39 The consultation document acknowledges, in particular, the difficulties in regulating the private sector infrastructure providers. The proposed solution is to establish a national infrastructure and development delivery group, comprising appropriate representation from the Scottish Government and its agencies, public and private sector infrastructure providers and the Scottish Futures Trust.
- 2.40 **Response:** *While this is a step forward, it lacks teeth and fails to address the issues surrounding private sector infrastructure providers and their regulators.*

**Proposal 14 : A more transparent approach to funding infrastructure.**

- 2.41 The Scottish Government 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.
- 2.42 **Response:** *The consultation document indicated the Scottish Government proposes that the Planning Bill will introduce an enabling power to create a new infrastructure levy for Scotland. The move towards a locally based infrastructure levy is a significant step forward and one which has long been advocated by Perth and Kinross Council. The current legal framework for seeking developer contributions requires the Planning Authority to demonstrate that the infrastructure is required for the specific development, not that it is required to deliver the overall strategy of the Local Development Plan. This places significant additional work on the Planning Authority, both when justifying the policy and when having individual discussions on specific developments. It can also lead to a greater degree of uncertainty for developers i.e. for the Council's current primary education policy, this is assessed annually and catchments where contributions are required may vary from year to year. In addition, the viability of a development within a catchment not requiring a contribution will attract a higher land value for the landowner, while in an area where a contribution is required, this may tip the balance and render a site non-viable. By spreading the contributions equitably across all relevant development, this will add certainty and reduce the contributions levels.*

**Proposal 15 : Innovative infrastructure planning**

- 2.43 Infrastructure planning needs to look ahead so that it can deliver low carbon solutions, new digital technologies and the facilities that communities need, including integrating land use and transport planning more closely.
- 2.44 **Response:** *The proposal to integrate land use and transport planning more closely is supported. The Council have already undertaken significant work aligning land use planning with transport planning, as part of the development plan process. This includes, for example, the work on the Cross Tay Link Road (CTLR). An approach that would support delivering a closer working relation at both strategic and local level would be supported, including working on strategic projects in collaboration with the regional partnerships and Transport Scotland.*

## **Key Area 4 : Stronger Leadership and Smarter Resourcing**

**The Scottish Government want to reduce bureaucracy and improve resources so Scotland's planning system can focus on creating great places.**

### **Proposal 16 : Developing skills to deliver outcomes**

- 2.45 The Scottish Government will work with the profession to improve and broaden skills.
- 2.46 **Response:** *The Royal Town Planning Institute (RTPI) and Heads of Planning Scotland (HoPS) should be supported and assisted by the Scottish Government to ensure its leadership is focused on the long-term delivery of sustainable economic development. The leadership of the RTPI and HoPS should also be encouraged to promote the involvement of young people in the planning profession; ensure the appropriate skills are developed within the profession; and encourage collaboration with other allied professions and related bodies, such as Royal Institution of Chartered Surveyors (RICS.)*

### **Proposal 17: Investing in a better service.**

- 2.47 There is a need to increase planning fees to ensure the planning service is better resourced.
- 2.48 **Response:** *Increasing planning fee limits will allow planning authorities to ensure adequate staff resources are made available. In addition, developing the skills of those involved in the decision-making process will produce a higher quality resource. By simplifying the planning system and concentrating on areas of the service which add value, the available resources can be more efficiently and effectively utilised.*

### **Proposal 18 : A new approach to improving performance.**

- 2.49 The Scottish Government will continue work to strengthen the way in which performance is monitored, reported and improved.
- 2.50 **Response:** *There should be more emphasis on peer review and customer feedback through surveys and forums.*

### **Proposal 19 Making better use of resources – efficient decision making.**

- 2.51 The Scottish Government propose to remove the need for planning consent from a wider range of developments. Targeted changes to development management will help to ensure decisions are made more quickly and more transparently.

2.52 **Response:** *Those parts of the General Permitted Development Order (GPDO) which cover digital telecommunications infrastructure have become overly complex and difficult to follow. They could be greatly simplified, with only those types of development likely to have significant impacts being excluded from 'permitted development'. There is also scope for simplifying the GPDO to remove the requirement for planning consent from development unlikely to have any significant impact beyond the site boundary, including:-*

1. *small scale renewable energy technologies,*
2. *for additional categories of domestic alterations or extensions, the wholesale restriction of permitted development rights for domestic development within conservation areas could be reviewed as there are often minor forms of such development which have very little impact, and requiring a planning application for them adds little value.*
3. *introduction of some permitted development rights within the curtilage of flatted properties, particularly if the development was of a minor nature.*
4. *scope for a review of industrial and commercial permitted development rights with an emphasis on identifying where current controls add little value and potential development impacts are minimal.*
5. *scope for the development of renewable energy technologies to benefit from expanded permitted development rights.*

2.53 *It has been suggested that within the agricultural sector, polytunnels and changes of use from agricultural buildings to housing could become permitted development. However, an extensive area of polytunnels has the potential to create significant visual impacts, while the opportunity to properly assess those planning issues associated with the creation of dwelling units is, in most cases, readily justifiable. A cautious approach is, therefore, suggested as regards such potential changes.*

2.54 *There is also strong justification for simplifying and updating both the Use Classes Order and, particularly, the Advertisement Regulations. The latter is overly complex and out-dated and takes time to follow correctly. It also needs to take account of new forms of advertising which have appeared over the past 33 years.*

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

2.55 There are many opportunities to make planning work better through the use of information technology. The planning service should continue to pioneer the digital transformation of public services.

- 2.56 **Response:** *It is agreed that the digital development programme has significantly transformed the planning service, together with the ability to view and comment on planning proposals through local authorities' individual online portals. It is also agreed that the development of 3D visualisations to assist in the consideration of planning proposals would be of assistance to all parties involved in the process.*
- 2.57 *The use of online tools for commenting on local development plan allocations would also be a useful addition. This would allow for comments on site boundaries or spatial allocations.*
- 2.58 *Another useful change would be the provision of a portal at national level, where customers could easily work out if planning permission was required for domestic and other common forms of development.*
- 2.59 *There is potential for national collaboration to provide a format for an electronic Development Plan. This would allow customers to navigate planning policy and other land use plans from a national level to local site specific proposals in one location.*

### 3. CONCLUSION AND RECOMMENDATION

- 3.1 Generally, the package is supported, subject to the detailed comments contained in this report. There is, however, concern that much of the detail and practicalities require to be fleshed out and resources identified to deliver the improvements.
- 3.2 It is recommended that the Committee:
- (i) Notes the officer response to proposals contained in the Scottish Government's consultation on planning reform.
  - (ii) Requests the Director (Environment) to bring back a further report on the planning review process when further details are known about the proposed reforms.

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## 1. IMPLICATIONS, ASSESSMENTS, CONSULTATION AND COMMUNICATION

<b>Strategic Implications</b>	<b>Yes / None</b>
Community Plan / Single Outcome Agreement	<b>Yes</b>
Corporate Plan	<b>None</b>
<b>Resource Implications</b>	
Financial	<b>None</b>
Workforce	<b>None</b>
Asset Management (land, property, IST)	<b>None</b>
<b>Assessments</b>	
Equality Impact Assessment	<b>None</b>
Strategic Environmental Assessment	<b>None</b>
Sustainability (community, economic, environmental)	<b>None</b>
Legal and Governance	<b>None</b>
Risk	<b>none</b>
<b>Consultation</b>	
Internal	<b>Yes</b>
External	<b>Yes</b>
<b>Communication</b>	
Communications Plan	<b>None</b>

### 1. Strategic Implications

#### Community Plan / Single Outcome Agreement

- 1.1 The report highlights Proposal 1 by the Scottish Government to improve the alignment of the Community Plan and the Development Plan.

#### Corporate Plan

- 1.2 N/A.

### 2. Resource Implications

#### Financial

- 2.1 There are no direct financial implications arising from the recommendations in this Report.

#### Workforce

- 2.2 N/A at this stage.

#### Asset Management (land, property, IT)

- 2.3 N/A.

### **3. Assessments**

3.1 Assessed as **not relevant** for the purposes of EqIA

#### Strategic Environmental Assessment

3.2 No further action is required as it does not qualify as a PPS as defined by the Act and is therefore exempt.

#### Sustainability

3.3 N/A.

#### Legal and Governance

3.4 N/A.

#### Risk

3.5 N/A.

### **4. Consultation**

#### Internal

4.1 The Head of Legal and Governance and the Planning Policy and Practice Member/Officer Working Group were consulted on the draft response prepared by officers and were largely supportive.

#### External

4.2 The Community Planning Partnership were briefed on the Planning Reform proposals. Community Councils and developers were invited to two briefing/discussion groups. The purpose of these briefings was to alert stakeholders to the consultation and to gain feedback on their views on the proposals to help inform the Council's response. Both events were well attended and attendees commended the Council for its initiative in setting up the events.

### **5. Communication**

5.1 N/A.

## **2. BACKGROUND PAPERS**

2.1 Scottish Planning System. 'Empowering planning to deliver great places' (Scottish Government May 2016) <http://www.gov.scot/Topics/Built-Environment/planning/Review-of-Planning>

- 2.2 Places, people and planning - A consultation on the future of the Scottish planning system (Scottish Government published January 2017)  
<https://consult.scotland.gov.uk/planning-architecture/a-consultation-on-the-future-of-planning/>

**3. APPENDICES**

- 3.1 None.