

### Proposals for Regulations on Local Place Plans

1.	<p><b>Do you agree with the proposal that community bodies should have regard to any Locality Plan that is in place for the area under consideration when preparing their Local Place Plan?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer (particularly if you do not agree)</b></p>	<p>Yes</p> <p>The Council is of the view that the relationship between Locality Plans and Local Place Plans should have regard to each other when one or the other is being prepared or reviewed. This relationship should be set out in regulations and clarified in guidance. It is suggested that this would be the same as the mechanism that requires Local Development Plans and Local Place Plans to have regard to each other at each subsequent review.</p>
2.	<p><b>Do you consider that community bodies should have to have regard to other additional matters beyond the Locality Plan when preparing their Local Place Plan?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer, giving examples (particularly if you agree)</b></p>	<p>Yes</p> <p>The Council is of the view that Local Place Plans should have regard to the Local Outcome Improvement Plan in all instances, as well as, any relevant Locality Plan where there is one, and this should be set out in regulations. These plans, the Local Outcome Improvement Plan and Locality Plan in addition to the Local Development Plan, should be sufficient to capture the range of other plans that will have informed their preparation. As above, it is believed that this requirement should go both ways, so Local Outcome Improvement Plans and Locality Plans should have regard to existing Local Place Plans when they are being prepared and reviewed.</p> <p>While we feel it would be good practice to respond to the range of other plans prepared by the Council, such as the Local Housing Strategy, Climate Strategy or Economic Strategy, it is considered that the Local Development Plan, Local Outcome Improvement Plan and Locality Plan will have sufficiently captured these and there is a benefit to having as straight-forward a process as possible. We would suggest that the relationship between these plans and other statutory plans should be set out within the guidance.</p>

		<p>In Alexandria, where we have been piloting an approach to community plan making, there have been links between the Community Action Network undertaking their neighbourhood plan and consultants preparing a masterplan for the town centre on the behalf of the Council.</p> <p>This alignment of processes is helping to generate a shared vision for the town going forward and has enabled the two plans to be consulted at the same time. While it is suggested that the requirement within regulations should be fairly limited, the benefits of linking in with and working with other plans should be highlighted within guidance. Also if we are to encourage the community to prepare Local Place Plans the process and linking to other documents must be as simple as possible for all.</p>
3.	<p><b>Do you agree with the proposal that an LPP should contain a statement setting out the community's proposals plus a map of the area, setting out the LPP boundary?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer (particularly if you do not agree)</b></p>	<p>Yes</p> <p>While the Council agrees that the above must be included within a Local Place Plan, it is of the view that this is not enough. We would seek that the regulations require that a Local Place Plan includes the boundaries of the sites for which the Local Place Plan sets out detailed proposals. The use of a map should be a key document in the Local Place Plan and should be a way of expressing the communities ideas and vision for the area.</p>
4.	<p><b>Do you think a requirement for the community body to engage and seek the views of people to assist in the preparation of an LPP should be set out in law?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer</b></p>	<p>Yes</p> <p>It is agreed that while consultation is common practice and good practice, it should be required by regulations. Our experience is that the people who volunteer for community groups are not always fully representative of the whole community. Our approach is also backed up with a framework in our Local Development Plan 2, which sets out the Council's expectation for wide ranging consultation among other things.</p>

		<p>We have therefore encouraged and supported the groups we are working with for our pilots to engage with the wider community. Therefore, this should be a statutory requirement within the regulations if Local Place Plans are to be successful and be representative of the community as a whole.</p>
5.	<p><b>If a requirement to seek the views of people is put into law, what should any minimum requirement be?</b></p>	<p>The Council suggests that legal requirements should allow a range of approaches, which are tailored, to the community in which the plan is being prepared. While there are a number of different consultation approaches and techniques which could be highlighted within guidance those which are specified in law should be kept to a minimum. The Council would be supportive of regulations requiring the community group to demonstrate that they have sought to undertake an inclusive engagement process when preparing the Local Place Plan. The Local Place Plan therefore should include a section within it or accompanying statement on how they have carried out the engagement/consultation with the community. In terms of the Council's equality duty, we would need this evidence when preparing an Equality Impact Assessment to validate the Local Place Plan.</p>
6.	<p><b>Do you agree with the proposal that there should be a minimum statutory requirement on the community body to consult the community once a draft LPP has been prepared and before submitting an LPP?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer (particularly if you do not agree)</b></p>	<p>Yes</p> <p>Yes, as above, there needs to be consultation as a minimum if the Local Place Plan is to be credible and this should be clearly defined in regulations. Good practice should be highlighted in guidance.</p>
7.	<p><b>If a requirement to consult across the community on the content of a draft LPP is to</b></p>	<p>The Council suggests that minimum requirements could be aligned with processes, which existed for Supplementary Guidance prior to the new</p>

	<p><b>be put into law, what should any minimum requirement be?</b></p>	<p>Planning Act. Notice of publication should be made with a date for submission of responses, copies of the draft Local Place Plan should be made available online and at a suitable accessible location.</p> <p>The Council would be supportive of a minimum requirement to consult local councillors, local schools and the Council; as well as, the Community Council and access forum where there is one. We would suggest that good practice of involving other local organisations, Tenants and Residents Associations, Land Owners/Developers and the Community Planning Partnership should be highlighted in the guidance.</p> <p>As detailed above, the Council suggests there should be a requirement in regulations to provide a statement of how the group has sought to have a wide ranging and inclusive engagement process as part of the request for validation of the Local Place Plan.</p> <p>The Council would be supportive of a requirement to share a consultation strategy for the Local Place Plan with the Council in advance of the consultation launch. This could result in a more collaborative process, which would allow the council and community to work together to identify the important groups to involve. The Council would seek clarity on how the associated costs arising from this process will be funded through existing resources.</p>
8.	<p><b>Do you agree with the proposal that the community body should seek the views of ward councillors when preparing the LPP?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer - particularly if you do not agree or have a view as to how</b></p>	<p>Yes</p> <p>The Council is supportive of this requirement; however, we would be satisfied with the requirement being drafted in such away that the onus is on communities to have taken reasonable steps to consult with the Ward Councillors, as this would allow that Councillors may not wish to give a view that may prejudice other decisions. The Council is of the view that consultation with the Community Council may be the best</p>

	<p><b>ward councillors' views should be taken into account or reported?</b></p>	<p>vehicle to achieve this where there is one established, and as above, we would support consultation with the community council being required by regulations where there is one established, this would be in addition to the requirement to seek the views of councillors as detailed above</p> <p>Alternative methods for engaging Councillors should be set out in guidance, for example in West Dunbartonshire, we have town centre forums in Alexandria and Dumbarton, which provide an opportunity for local traders, organisations, councillors and officers to discuss issues relevant to the area. This has provided a valuable opportunity for the Community Action Network in Alexandria to discuss their neighbourhood action plan with the wider community, in the absence of an active Community Council.</p>
9.	<p><b>Do you agree that, alongside the LPP itself, the community body should submit a statement on how it has complied with the legal requirements?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer (particularly if you do not agree)</b></p>	<p>Yes</p> <p>The Council would be supportive of this including a statement detailing how inclusive participation has been achieved, as detailed above.</p>
10.	<p><b>Do you agree the requirements planning authorities have to keep the register of local place plans should be aligned to the existing arrangements for registers?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer (particularly if you do not agree)</b></p>	<p>Yes</p>

11.	<p><b>Do you agree that the additional information provided by the community body alongside the LPP should be kept on the register of local place plans?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer (particularly if you do not agree)</b></p>	Yes
12.	<p><b>Please provide your views on the level and content of information to be placed on the register.</b></p>	The Council is of the view that the register should include the LPP and supporting documents, such as the statement of conformity with legal requirements and participation statement, or the equivalent; as well as the Council's responses to these and the request for validation.
13.	<p><b>Do you agree with the proposal that a planning authority may remove an LPP from the register once it has been taken into account in the LDP, and must do so when requested by the Community body that prepared it?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul> <p><b>Please comment on your answer (particularly if you do not agree)</b></p>	<p>The Council agrees that there should be required to remove a LPP from the register when requested to do so by the community body that prepared it. It should also be specified in regulations that a request for a new LPP to be put on the register for an area necessarily requires other LPPs for that area to be removed from the register.</p> <p>The Council believes that LPPs should however remain on the register until the LDP, which considers them, has been superseded. This would enable them to remain as a resource for the community, and sit alongside the LDP.</p>
14.	<p><b>Do you agree the requirements planning authorities have for making the map of local place plans available should be aligned to the existing arrangements for registers?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• No view</li> </ul>	Yes

	<b>Please comment on your answer (particularly if you do not agree)</b>	
15.	<b>Please give us any views you have on the content of these partial assessments.</b>	<p>It is considered that if there is relevance a full assessment should be undertaken and presented for comment.</p> <p>The Council notes, that the Business and Regulatory Impact Assessments identifies significant costs associated with the preparation of Local Place Plans and this reflects our own experience of providing resources to support communities to prepare plans for their areas. However, at present there is no clarity about where the additional resources which are required to deliver this new duty will come from.</p>
16.	<b>Do you have or can you direct us to any information that would assist in finalising these assessments?</b>	The Scottish Government and EHRC research on the uneven impact of Covid-19 is one example, which is relevant to the proposed regulations.
17.	<b>Please give us your views on the Fairer Scotland Duty and Strategic Environmental Assessment screening documents and our conclusion that full assessments are not required.</b>	The Council is of the view that full assessment is required; it is unclear how legislation on Local Place Plans can be considered to have no socio-economic impacts.
18.	<b>If you consider that full assessments are required, please suggest any information sources that could help inform these assessments?</b>	It is suggested that from <a href="#">Improvement Services</a> and <a href="#">EHRC</a> and <a href="#">Scottish Government</a> social renewal board report Race Action plan for Scotland , a fairer Scotland for disabled people reports provide evidence which could help inform these assessments.