



Local Place Plans for Planners

Exploring the tensions between policy intent and reality on the ground

Paul Ede, Social Enterprise Manager, Planning Aid Scotland

29 May 2024



Introduction

Who we are



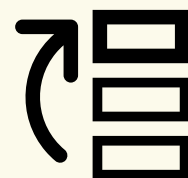
Vision

An inclusive society with **communities at the heart of decision-making** about their places



Mission

To help people navigate the **planning system** and shape the future of their places



Priorities

Our strategic priorities 2022-2025:

- To advocate for **inclusive participation**
- To mainstream **community-led planning**
- To address the **climate emergency**
- To develop as a learning organisation

What we do

i What we do

We have been helping communities across Scotland to participate in the planning system for over 30 years

Over the last 10 years, we have directly supported over 20 community-led plans and Local Place Plan

3 Ways we can help

- **Planning advice** – for individuals, communities and business start-ups
- **Skills training** – trusted delivery partner for communities, elected members, planning professionals and public bodies
- **Community-led plans** – supporting local groups to build capacity, deliver engagement processes and prepare their own plans

Local Place Plans



Free resources

Access our free guide to preparing Local Place Plans

+ additional resources on project management and mapping to support the LPP process



www.pas.org.uk/resources



Further support

- Local Place Plan Programme – support your communities to join our next capacity building cohort
- Planning Aid Scotland can partner with your local authority to deliver a capacity building programme for community groups across the authority area



Centre for Best Practice

A suite of training
modules

	Introductory session
1	Introduction to Local Place Plans
	Getting Started
2	Pathways into your LPP: converting a CAP to an LPP
3	Getting started: introduction to project managing a Local Place Plan
	Undertaking Engagement
4	Engaging with your community: facilitation skills
5	Working together: dealing with conflict
6	Engaging with your community: using the Place Standard
7	Engaging with your community: planning your engagement strategy
8	Engaging with your community: running online events
9	Tools and techniques: how to develop a climate ready Local Place Plan
	Dealing with data
10	Data analysis
11	Prioritisation
	Preparing the plan
12-14	Making policy connections to NPF4 (up to 3 sessions)
15	Preparing the plan: writing
16	Preparing the plan: map making

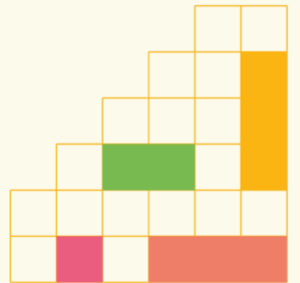
Setting the scene

Local Place Plans: Knotty issues



- Development Planning
- Development Management

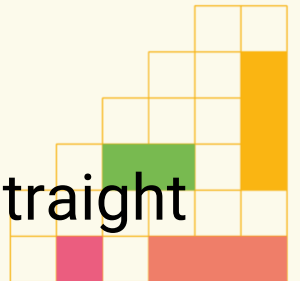
- Also
 - Community Planning and Community Education
 - Corporate
 - Private Sector



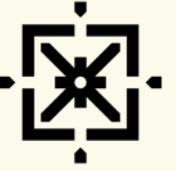
Caveats



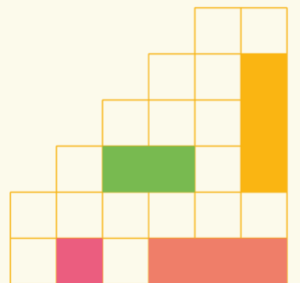
- We are all learning
- It's not for anyone from PAS to tell LA planners what to do!
 - Acknowledge private sector planners, academics and guests from SG
 - Acknowledge the complexities of resource and stakeholder management for LAs
 - Acknowledge that Local Authorities wrestling with regional implications of national legislation creating statutory rights at neighbourhood scale.
- We have a certain perspective that interacts with PAs across the country and think we may be able to offer something useful
- This training is designed to complement not compete with the excellent Learning Cohort that Anthony McGuinness has developed.
 - Training and Cohort go well together – input and processing
 - Possibility for further training sessions later.
- Assumption everyone here knows the basics, so we will just be jumping straight in.



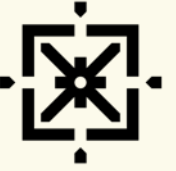
Outline



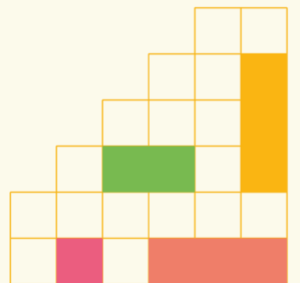
- Four x 15-minute sessions with Q&A between and a break in the middle
- Session 1 - Institutional wants and Community needs
- Session 2 - Housing
- Session 3 - LPP Materiality & Assessment
- Session 4 - The Politics of LPPs
- Slides will be sent round afterwards



Learning Outcomes



1. A breakdown of planning policy implications for planning services
2. Collaborative working and links to Community Action Plans
3. Promoting LLPs to communities
4. Managing community expectations
5. Real-time examples of how LPPs are working across the country.
6. Discussion on interpretations of the intent of circular 1/2022



Session 1

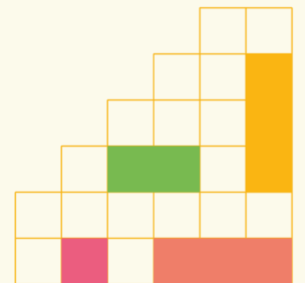
Institutional wants and Community needs



Inserting additional requirements for LPPs

Various
Council Areas

- LPPs designed to be light touch, community-led documents articulating a community position on spatial planning.
- But:
 - Some template LPP guidance documents imply that an action plan and delivery plan are requirements for validation.
 - Guidelines for LPPs have been linked to the Borderlands investment deal in Borders and suggest significant additional elements are required.
 - Experiment to merge APP and LPP for Nairnshire into an LPP+
- What are the pros and cons?
 - Iatrogenesis (Ivan Illich) – unintended consequences of institutional intervention on community empowerment
 - Do we fully risk-assess this?





Not just proposing site allocations

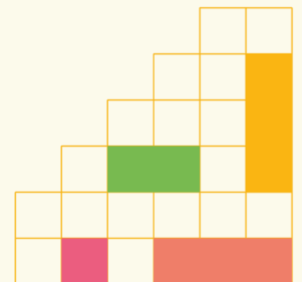
Dirleton CA
Design Guide

1	2022 LOCAL PLACE PLANS
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33. One of the key aspects of the Local Place Plan will be the potential influence it has on shaping future **local planning policies** for the area.

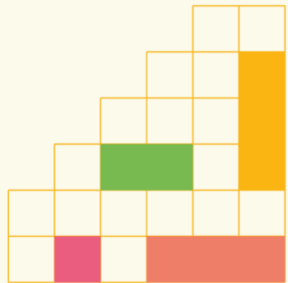
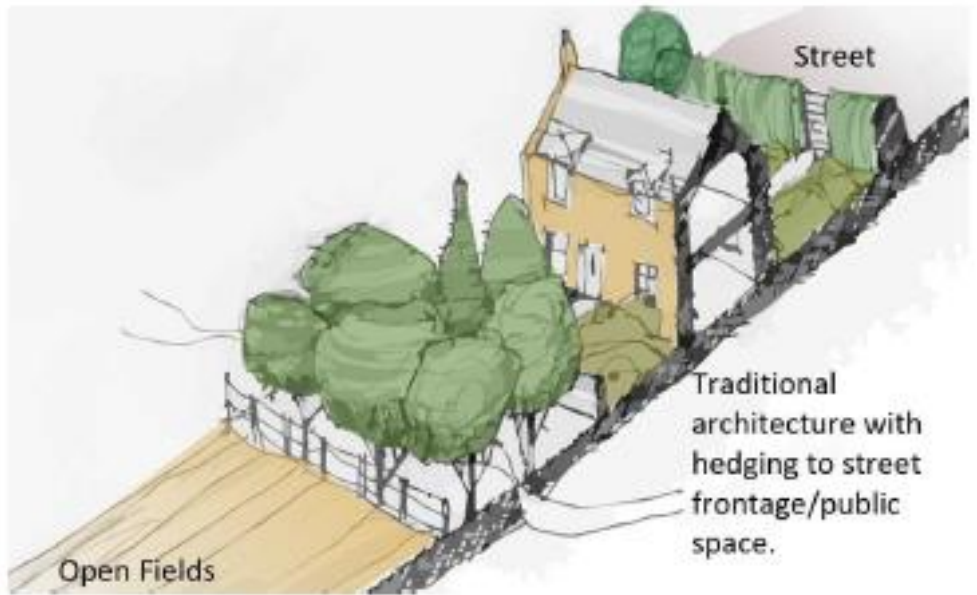
34. By having regard to the Local Development Plan, the Community Body will have already considered the local policies contained in the Local Development Plan which are relevant to the Local Place Plan area. It may have come to an initial view as to the issues and areas where the community wants to influence **local planning policies** and **development opportunities**. This view may be supplemented by engagement with the wider community.

- How do we feel as planners when faced with the idea that a wide variety of local planning policy proposals could be submitted?

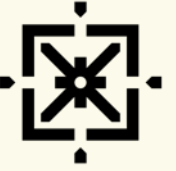


Key Characteristics	Guide Elements
Simple building shapes	The building envelope should be kept simple and Scottish
Relatively small scale. Scale also defines Dirleton's heritage. Most homes are either single or 1.5 storey and are not high roofed	New builds must maintain the indigenous scale of its neighbours and the rest of the village
Front gardens are a sociable 'way of life' for residents and a fundamental part of the village's appearance and heritage	A design that incorporates a front garden
Hedging, stone walls or fencing are a fundamental part of the village-scape	Avoid tall boarded fences
Green spaces define the special quality of Dirleton	If further housing development is planned, it should be developed around new treed green spaces
Homogenous wall finishes are part of the village's intrinsic character	Either local stone or wet dash render
Traditionally sloped roofs finished with natural slate or pantiles	Roof pitches should reflect those in the historic centre of the village
Scottish Detailing	Gables/verges are tabled or crow stepped. Chimneys are another feature that give detail and visual consistency Coping or the finish should be taken to underside of slates or tiles. Create chimneys that can be used to disguise, for example, SWVPs or vents Use half-round guttering, preferably metal
Correct window proportions and placement are vital	Traditionally proportioned timber windows and delicate dormer windows Window surrounds are common
Flat roofs should be discouraged	Simple, pitched roof porches and extensions are widespread
Garage styles	The advent of electric cars means that people are seeking new garages for plug-in vehicles. Garage fronts should be behind building lines. Pitched roofs and stained timber finishes should be encouraged (to harmonise with gardens)

Dirleton Design Guide



An LPP Proposal Typology

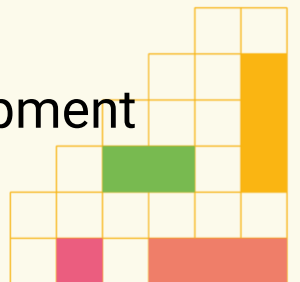


• Development Proposals

- Development by Community Groups
- Development by Locally owned (land-based) businesses.
- Development that depends on public sector for delivery.
 - Infrastructure

• Regulatory Proposals

- Proposals to designate land or assets for protection
- Proposals to guide design
- Proposals to acknowledge local landmarks/important sites
- Proposals to guide future development by commercial actors
- Proposals to regulate housing type/tenure
- Proposals to loosen existing constraints (Householder)
- Proposals to amend existing development plan policies (wording or spatially)



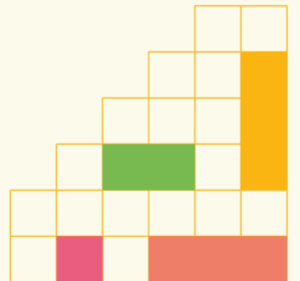


The question of delivery

	LPP	CAP
Designated a material consideration in the planning system	✓	x
Requires certain process elements by law	✓	x
Includes a spatial vision for your area	✓	x
Output: list of policy proposals	✓	x
Is consulted for LDP formation or planning application assessment	“must”	“may”
Output: delivery plan. Word “delivery” not mentioned in the 2022 LPP Circular	x	✓
Can address issues beyond use and development of land	x	✓

Issues

- Call for sites did not function on this basis: new mindset required
- To what extent can *deliverability* be an assessment criteria?
- How to assess regulatory policy proposals not just proposals for development?
- LPPs are expressly allowed to articulate dissent from the Development Plan with regulatory policy proposals
 - They must provide justification if they do so.
 - But will they?
- Additional work!
- Tension between the universal and the particular
 - “consistency.”



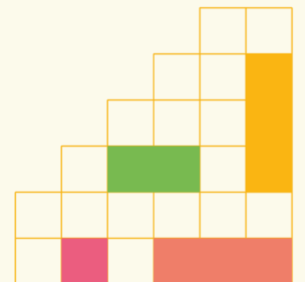


Articulating the LPP submission deadline

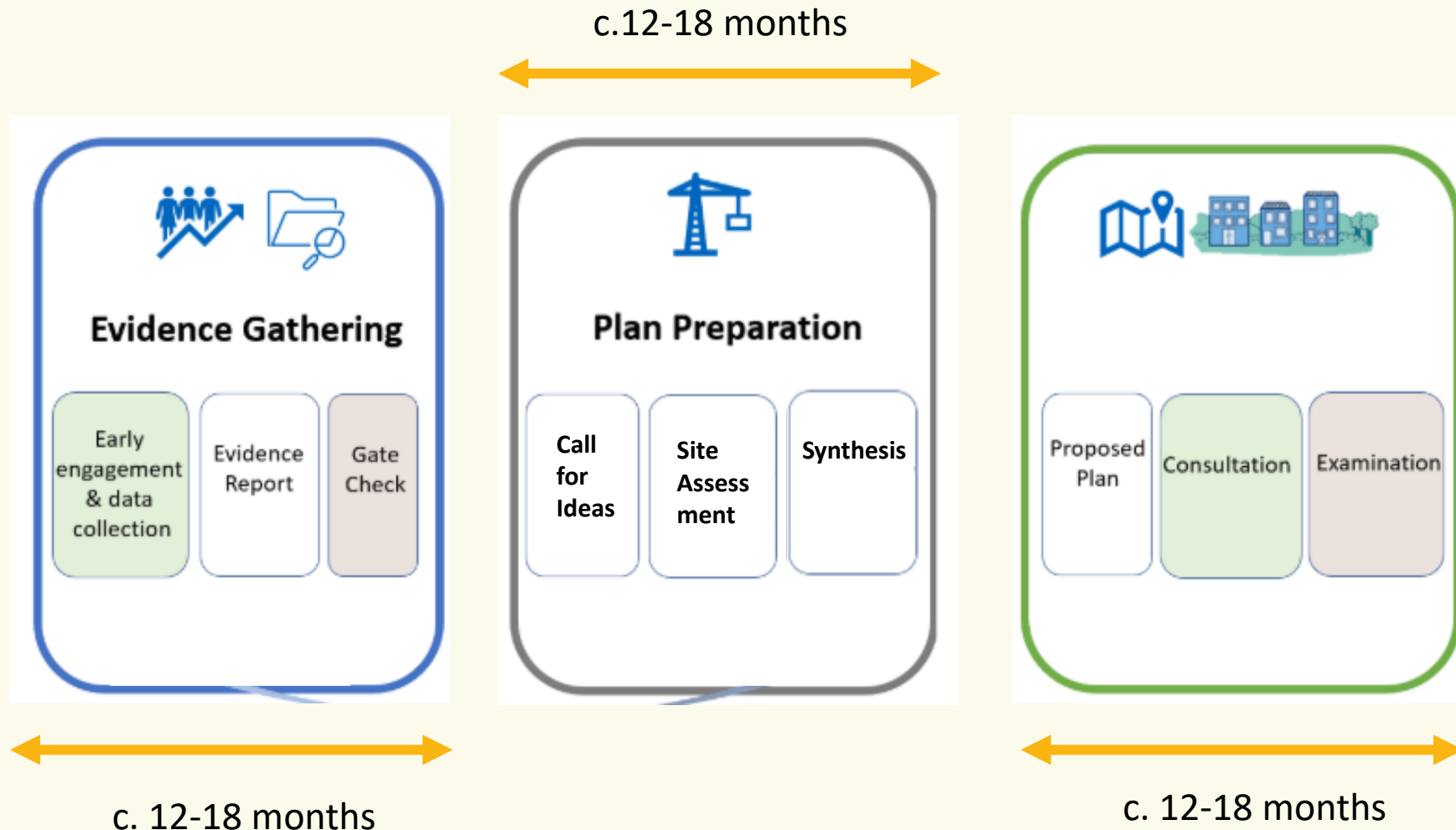
Newport &
Wormit

North
Berwick

- Implications of a moving target
 - In one council area:
 - January 2023 deadline too early – reject opportunity.
 - Deadline shifted to June 2024.
 - Has institutional context undermined the goal of the policy and disempowered communities?
- LPP Submission Deadline
 - LPP deadline means submission or validation?

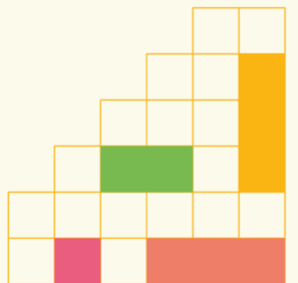


When has your council set the deadline for LPP submission?



1. Before Evidence Report
2. Before Gate Check
3. Before Call for Ideas
4. After Call for Ideas at a later point during Plan Preparation
5. Other

Why did you set the deadline at
the point you did?



But Deadline in ‘Call for LPPs’ Indicative Only



Local development planning guidance May 2023

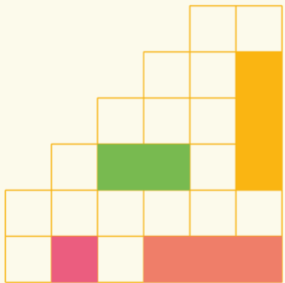
It is anticipated that LPPs will be prepared, validated and registered in time to inform the Evidence Report because the Evidence Report must set out how communities have been invited to prepare LPPs and the assistance provided to them.

[section 16B\(3\)\(d\)](#)

9. The date by which LPPs are to be prepared is for information. LPPs **have to be** taken into account in the preparation of LPPs **whenever** they are registered.

Return to earlier example:

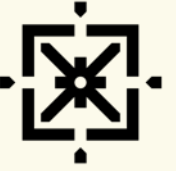
- Could an LPP be submitted during Call for Ideas up to Dec 2024?
- Could an LPP be submitted in Spring 2025, with still 7-9 months to go before Proposed Plan goes before committee?



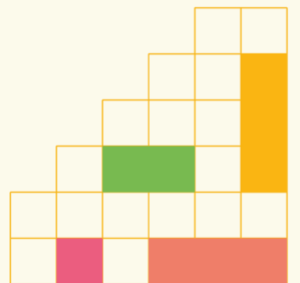
When is the final deadline for submission?



How to articulate the real deadline?



- Goals
 - Honour policy
 - Honour communities – relational/workload impact
 - Enable maximum participation
 - Manage LA resource
- Any reason to not set indicative deadline at least at the end of Call for Ideas?
- Gradated submission deadlines with clear implications at each stage? Or hand-waving?





An argument for deadline post Evidence Report

North
Berwick

The Evidence Report must also set out the following:

- how the authority have **invited** local communities to prepare LPPs, and what **assistance** they have provided

[section 16B\(3\)\(d\)](#)

Local development planning guidance May 2023

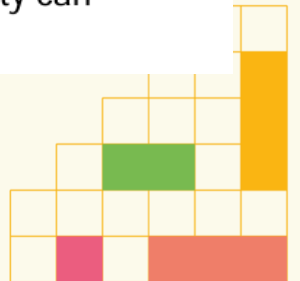
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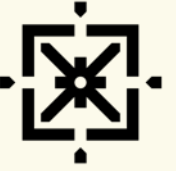
7. To meet requirements for reporting on the invitation and assistance to prepare LPPs within the Evidence Report, **it is suggested that the date by which LPPs should be prepared is timed to be in advance of the finalisation of the Evidence Report and in advance of the Gate Check.** Whilst this focuses activity into the early phase of LDP preparation it means that the planning authority can properly consider all the information received through the LPPs.

34. In the future Evidence Reports and publicly available data sets may assist communities in responding to the issues in their area.

Why not now?

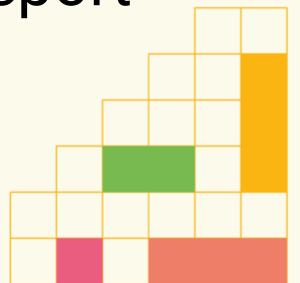


Evidence Reports informing LPPs – benefits

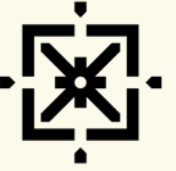


Analysis of Fife Council's Evidence Report:

- Place-based, easy to access for communities
- Explicit inclusion of community proposals in the Site Assessment criteria.
- Explicit indication of assessment of community wealth building potential.
- LPP deadline post-Evidence report publication to aid alignment
- Laid aside guidance that indicates LPP submission before Evidence Report

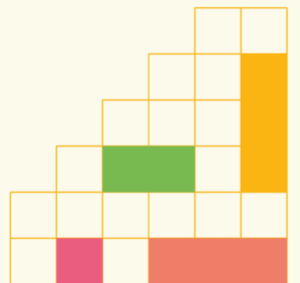


Wide angle lens



Reflecting on inclusion of Call for Sites clause in 2019 Planning Act:

- “Whilst this amendment adds some clarity it is still not clear whether the PA will have already determined what level of new development will be required for each of its plan sub-areas (*Evidence Report*).”
- “But even if the PA has resolved the issue of the broad scale and geography of development need to its own satisfaction it is quite likely that communities will be wary of committing fully to the process until the LDP has been satisfactorily ‘gatechecked’ by the external examiner. (*Gatecheck*)”
- Even after the LDP has been satisfactorily gatechecked, however, individual community councils may still not have sufficient information regarding development allocations to be able to prepare an LPP confident that it will comply with the approved strategy because of what I call the ‘geographical mismatch issue’”





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Questions?



Session 2

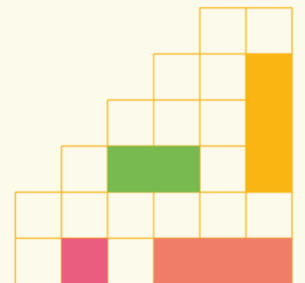
Housing



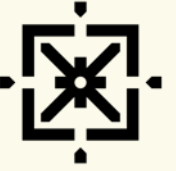
The problem of appropriate allocation

North
Berwick

- How can the NBLPP suggest housing sites when the only figures available are the MATHLR targets for East Lothian in NPF4?
 - No targets as yet for HMAs or SDAs
 - No access to Evidence Report
 - ER not gatechecked by Reporter
 - Indicative deadline for submission, even with extension, prior to end June committee submission
 - No targets at CC scale anyway.
 - Even if targets at HMA/SDA level, how would neighbouring CCs go about expressing goals for 'sharing out' such intermediate-level targets?

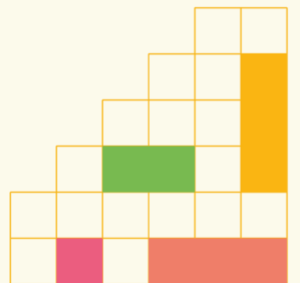


Statistics and Scales

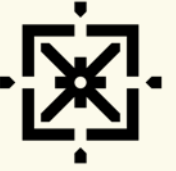


- Housing stats and targets are not available at Community Council level....at any point in the process.
- “The **appropriate allocation problem** arises because of the **geographic gap** between the relatively large LDP sub-areas (or whatever equivalent term is used by the particular PA) used as the basis for setting out the planning strategy and the relatively small community council areas (covering towns / villages) within which site specific LPPs are to be prepared.”

Walton W. [Can Local Place Plans Restore Community Confidence in the Planning System?](#) (online) px

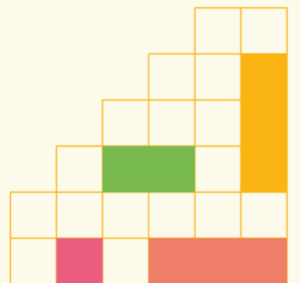


The Geographical Mismatch Issue

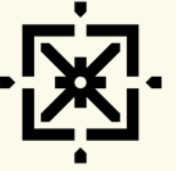


- “it is worth noting that none of the committee witnesses (during scrutiny) mentioned it in their evidence.”
- “Had they have investigated how the system operates south of the border they would have discovered that many LPAs use parish and town councils as the geographical units for expressing housing allocations so as to facilitate the preparation of Neighbourhood Plans. Where this is not the practise the Government encourages LPAs to set out indicative housing figures when asked to do so by neighbourhood planning bodies (1)” Walton p23

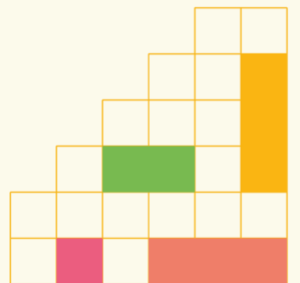
(1) Ministry of Housing, Communities and Local Government,
National Planning Policy Framework (DCLG 2019, para. 14).



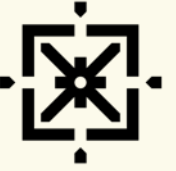
What can CCs actually say about housing needs?



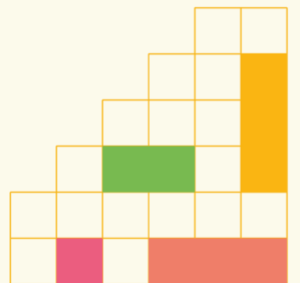
- We don't want CC's to develop a "nimby charter"
- But without this data it is exponentially more likely that they will...because they have no ability to do otherwise.



Five possible solutions



1. Require PAs to identify aggregate development allocations at settlement or CC scale...rather than larger sub-units
2. Require CCs to collaborate at scale defined by HMA or SDA areas
3. Produce a joint LPP covering two or more CC areas
4. LA offers resource and support to help CCs develop plans
5. LAs accept targets offered by CCs and include in Evidence Report (would require LPP to have statutory status).





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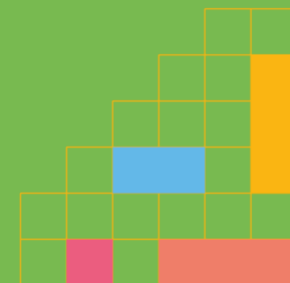
Discuss

Do we need to express housing allocations at CC scale, to facilitate the preparation of Local Place Plans?



Session 3

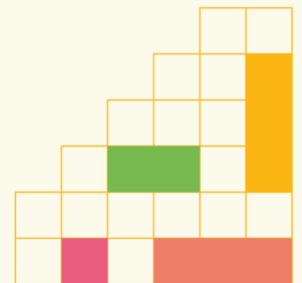
LPP Materiality & Assessment





Implications for community input: During as well after Proposed Plan development

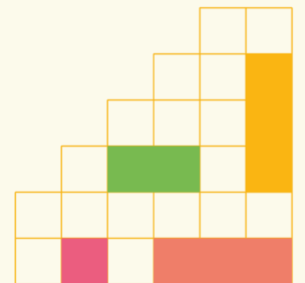
- How do you feel about community proposals needing to be assessed *as the Proposed Plan is being prepared*?
 - Implies that Community Proposals should be assessed with as much attentiveness, seriousness (and weight?) as Developer submissions during Call for Ideas.
 - Some planners have indicated that community groups would need to provide detailed feasibility and finance plans for such weight to be given. Do you agree?
- LA decision is final, but:
 - Communities will still be able to comment during Proposed Plan consultation period, *after* they have received PA assessment on their proposals.
- Will there be room for LA planner-led mediation between LPP and Developer proposals?
 - [Mediation circular 2/2022](#) opens up this possibility.
 - But at just 5 pages, practical advice for implementation is very thin.





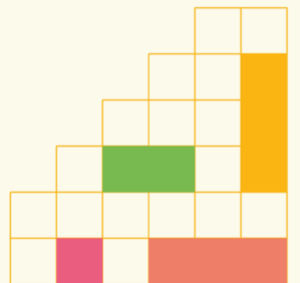
LPPs as a submission vehicle for developers?

- A loophole to game the system?
 - Some LA planners recoil a little at this thought.
- But what about community members with land-based businesses?
- Community Steering Groups for LPPs can and do include people in this position
 - Local businesses can help answer the delivery question asked by other community proposals.
- What's in it for the community?
 - Many communities would bite your hand off for such upstream transparency.
 - Potential for direct upstream mediation – front-loading without LA input.
- What's in it for the landowner?
 - Vehicle to fulfil goals of Landowner Rights and Responsibilities legislation
 - Test community appetite for proposals, remove if required.
 - Community support in LPP as material evidence in Call for Ideas submission.





- The CB is the final decision maker as to what is submitted.
 - They can choose what is allowed in the LPP.
 - And who is allowed to help them prepare it.
 - Seems unlikely that CBs would allow outside commercial operators to muscle in.
- I suspect developers in this position will also submit during the Call for Ideas.





What is the materiality of an LPP anyway?

2023 DM Procedures Circular – Annex A

includes Local Place Plans as a *potential* MC

LPPs can articulate proposals that *don't align* with the LDP

But must clearly justify why.

Weight of materiality for DM?

Up to DM planning officer to decide.

What if a policy or proposal in an LPP conflicts with the LDP?

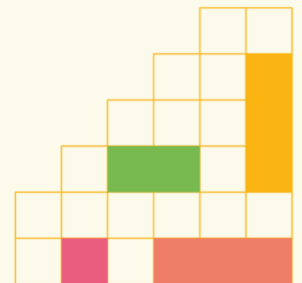
Unlikely that an LPP proposal alone will outweigh a statutory policy in the LDP.
But likely soon Planning Committees and Reporter will also have to take a view.

2023 DP Guidance

“25. The weight given to elements within an LPP is for the planning authority to decide in preparing the proposed LDP. It is the elements from the LPPs that are clearly spatial or about development that can be most influential for the preparation of the LDP spatial strategy.”

2019 Planning (Scotland) Act

Communities are granted a *statutory right* to develop an LPP.
Even though an LPP is not in and of itself a statutory document
Would a law court consider a document that an Act has granted a body a statutory right to produce as anything but a material consideration?
Best to always take into account in any RoH...*from point of validation/registration.*



Summary of Implications for DP



Development Planning

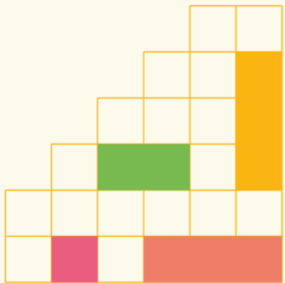
The community equivalent of a developer submission during Call for Ideas.
I advise communities to provide as much justification as they can in planning and evidential terms as developers do when they submit during Call for Sites.

LPPs assessed at same time and level as developer submissions, *not* after proposed plan formed.

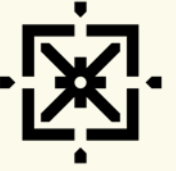
Must be accepted for assessment for inclusion in Proposed Plan at any reasonable point during Call for Ideas, regardless of indicative deadline set by Authority (see 2023 DP Guidance).

A response should be issued to communities as to why their proposal has or hasn't been included in the Proposed plan, possibly as part of the Proposed Plan committee report.

Communities will have an opportunity to comment on what has or hasn't been accepted during Proposed Plan consultation period.



Summary of Implications for DM



Development Management

Treat LPPs as de facto material for DM assessment.
Map submitted LPPs as a constraint in Uniform.

Include proposals in any registered LPP relevant to any site- specific application in RoH as a material consideration, regardless of whether that proposal has (yet) been included in LDP, and whatever weight you assign to the applicable proposals.

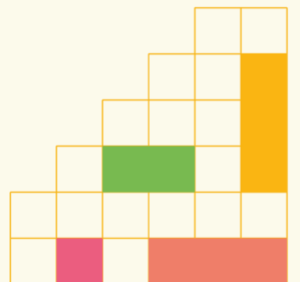
When might an LPP proposal outweigh a policy in the LDP? If...

- it aligns with NPF4 but not the current LDP
- cumulatively with other MCs overall weight warrants refusal against the Development Plan

What will Planning Committee do?

What will Reporters do?

Question: how to assess materiality of an LPP proposal when it may have a low evidence technical evidence base supporting it?

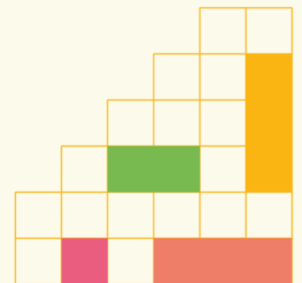




What is the materiality of a CAP anyway?

- CAPs are not defined in statute.
- 2023 DP Guidance:
 - CAPs *may* be taken into account for development of Proposed Plan

26. There could be other community-led plans within planning authority areas which do not comply with the new LPP legal requirements but nonetheless provide a community vision for the development and use of land. Should such community-led plans be submitted to the planning authority, the planning authority **may** give them **due weight** as expressions of the community's aspiration.



ANNEX A

DEFINING A MATERIAL CONSIDERATION

5. The range of considerations which might be considered material in planning terms is very wide and can only be determined in the context of each case. Examples of possible material considerations include:

3

2013

DEVELOPMENT MANAGEMENT PROCEDURES

- Scottish Government policy and UK Government policy on reserved matters;
- the National Planning Framework;
- Policy in the Scottish Planning Policy and Designing Streets
- Scottish Government planning advice and circulars;
- EU policy;
- a proposed strategic development plan, a proposed local development plan, or proposed supplementary guidance;
- guidance adopted by a Strategic Development Plan Authority or a planning authority that is not supplementary guidance adopted under section 22(1) of the 1997 Act;
- a National Park Plan;
- **community plans;**
- the environmental impact of the proposal;
- the design of the proposed development and its relationship to its surroundings;
- access, provision of infrastructure and planning history of the site;
- views of statutory and other consultees;
- legitimate public concern or support expressed on relevant planning matters.

3

2022

DEVELOPMENT MANAGEMENT PROCEDURES

- Scottish Government policy and UK Government policy on reserved matters;
- Scottish Government circulars, planning advice notes and chief planner letters;
- **Local Place Plans;**
- Planning policies which do not form part of the statutory development plan;
- National Park Plans;
- Draft policies which are proposed to form part of the statutory development plan;
- Environmental impacts of the proposed development;
- Design of the proposed development and its relationship to its surroundings;
- Infrastructure impacts of the proposed development;
- Planning history of the site;
- Views of statutory and other consultees; and
- Legitimate public concern or support expressed on relevant planning matters.



What is the planning status of a CAP?

- For DP:
 - *As existing*
 - *Or as submitted* during Call for Ideas?
 - If there is an LA register of CAPs, should PAs only take them into account if they are submitted?
- For DM
 - What does the replacement of “community plan” with “local place plan” in DM Procedures Circular mean for DM?



Why should a Community submit an LPP if they can submit a CAP?

- It's a great question!
 - Did SG consider this when developing the DP Guidance?
- Benefits
 - CAP can be submitted during Call for Ideas – unlike most indicative deadlines currently issues by Pas
 - No additional hoops to jump through
 - LA obliged to respond to all Call for Ideas submissions anyway
 - LA does the interpretation work
- Disbenefits
 - Potential lack of clarity – spatial and human proposals mixed together
 - Not registered publicly
 - Not a material consideration in DM (or is it? why wouldn't it be based on 2013 procedures?)
 - No statutory right to prepare...what is the legislative rather than policy status?

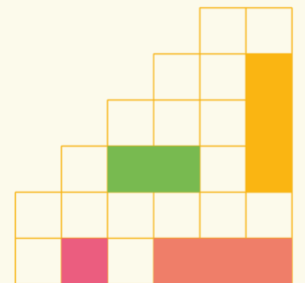


Assessment procedures

- Little guidance available as to how to actually come to a decision

27. Planning authorities should be clear in their reasoning for supporting or not supporting elements of LPPs in the spatial strategy. Planning authorities may wish to address this in their Committee Report on the Proposed Plan.

- Apply the site assessment criteria in your Evidence report, and ensure communities submitting LPPs know about these
 - Recognise that communities will likely not have resources at hand to submit feasibility studies or FRAs, unlike developers.
 - Will Planning Officers work harder to add value to LPP proposals?
- But what criteria will you use to assess *Regulatory Policy Proposals* in your Local Development Plans?





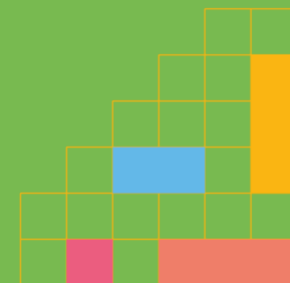
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Questions?



Session 4

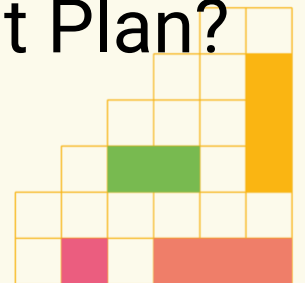
The Politics of LPPs





Politics of community expectations.

- Training, training, training
 - Older community leaders with out of date policy expectations
 - Build relationships and a community-leader learning cohort
- Pre-submission checks
 - Use this as a moment to calibrate expectations
 - Reinforce alignment requirements
 - Help communities to differentiate between CAP and LPP-type proposals
 - Spatial planning can only control certain things
- What happens when the Local Authority publishes their assessment of which LPP proposals will be carried into the Local Development Plan?
 - Will Proposed Plan consultation period become over-heated?
 - Fear of 'weaponising' LPPs in service of a public relations battle.

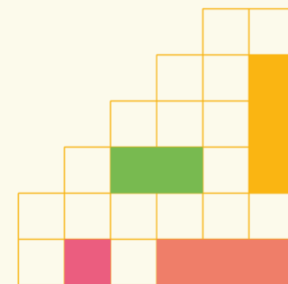


Politics of Planning Committee

- “the intention of the Scottish Government ... is that the LPP should be no more than a material consideration which PAs must have regard to when determining planning applications. It is likely that in many instances LPPs will, in effect, provide an alternative, competing vision to that set out in the parent LDP. In such instances their status will be tested when the PA has to determine an application where the policies in the two ‘competing’ plans are directly at odds with one another.”
- “it is possible that the PA (and possibly the Scottish Minister on any subsequent appeal) will exercise its discretion, and accept that local opinion should override the statutory LDP and refuse planning permission”
- “The law states that the application should be determined in line with the development plan (the LDP and the NPF) unless material considerations (the LPP and others) indicate otherwise.”

Walton W. [Can Local Place Plans Restore Community Confidence in the Planning System?](#) (online) p15

- Training councillors in the meaning and potential uses and weighting of LPPs.

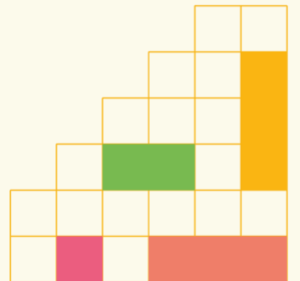




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Politics of Community Empowerment

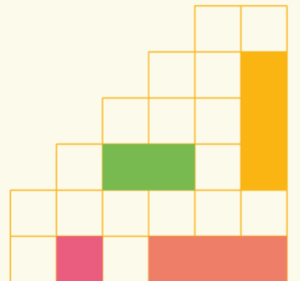
- Creating room for community power requires vulnerability and risk from agents of institutional power.
- Leadership and Public Service
 - Vulnerability and risk
 - Self-awareness and clarity of communication





Politics of Resource Management

- Huge variety of regional responses to promoting and supporting LPPs across different Local Authority Areas
 - Is there a temptation to do the statutory minimum in promoting or supporting LPPs because it generates more work during a time of constraint?

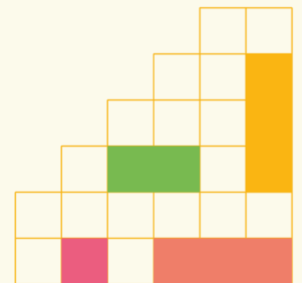




Corporate Politics

- How to integrate processes and data with Community Education colleagues?
- How will the granularity of data coming forward from LPPs and joint LPPs and CAPs be championed and integrated into all the other council departments?

There is clear crossover between Neighbourhood Action Plans, Community Action Plans and Local Place Plans. We understand that for communities looking to engage in improving their local area, there may be a confusion about which plans they need to engage with and the relationship between plans. Over time, we will explore options to combine these processes where possible to make local community planning easier.



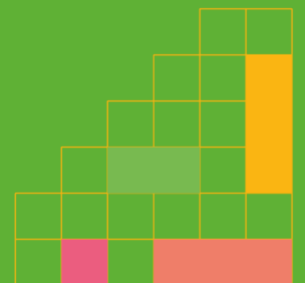


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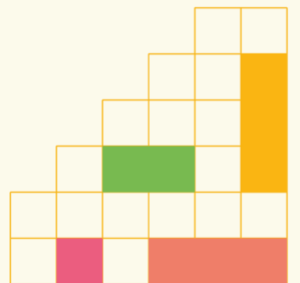
Recommendations



Recommendations



- Train Community Planning colleagues to train community groups.
 - Offer region-wide learning cohorts and introductory training, esp. on difference between an LPP and a CAP.
 - Offer dedicated training to your councillors, especially planning committee about LPPs
- Set out a submission deadline process that honours policy, communities *and* the LA.
- Set a deadline for LPP submission *after* the Evidence Report is made public...
 - And arguably after Gatecheck
- Consider preparing detailed housing stats by Community Council area and offering targets by area in your Evidence Report.
- Consider what you will do about existing CAPs and assessment.





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Thank you!

pas.org.uk | [@PAS_Tweets](https://twitter.com/PAS_Tweets)

*Continue the conversation:
Paul Ede: paul@pas.org.uk*

