

Glasgow and the Clyde Valley Strategic Development Planning Authority

**To: Glasgow and the Clyde Valley Strategic Development Planning Authority
Joint Committee**

On: 12th March 2018

**Report by
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Planning (Scotland) Bill Update

1. Summary

- 1.1 The purpose of this report is to update the Joint Committee on the Planning (Scotland) Bill and the ongoing considerations of its implications on the role and remit of the Joint Committee.

2. Recommendations

- 2.1 It is recommended that the Joint Committee
- note the report;
 - instruct the Strategic Development Plan Manager and Steering Group Chair to continue discussions with the Scottish Government and Glasgow City Region to consider the implications of the Planning (Scotland) Bill as they relate to the role and remit of the Joint Committee; and,
 - request further update reports on these matters.

3. Planning (Scotland) Bill Update

- 3.1 The Planning (Scotland) Bill was introduced to the Scottish Parliament by the Cabinet Secretary for Communities, Social Security and Equalities on 4th December 2017. The Bill was accompanied by Explanatory Notes, a Policy Memorandum and a Financial Memorandum published on 5th December 2017.
- 3.2 The Bill is currently undergoing a Parliamentary scrutiny phase led by the Scottish Parliament's Local Government and Communities Committee in terms of the Bill itself and the Finance and Constitution Committee in terms of the Financial Memorandum.
- 3.3 Clydeplan have submitted views, as agreed with the Joint Committee Convener, Vice Convenor and Steering Group Chair, to the Local Government and Communities Committee (Appendix 1) and in terms of the Financial Memorandum to the Finance and Constitution Committee (Appendix 2).
- 3.4 The Clydeplan Manager has been invited to give oral evidence to the Local Government and Communities Committee at a session on 7th March 2018.
- 3.5 It is anticipated that the Bill will be enacted by the Scottish Parliament in September 2018.

4. Potential Implications for Clydeplan Joint Committee

- 4.1 The Bill is proposing two major changes to the operation of the development plan system in Scotland which will have significant implications to the role, remit and governance of the Joint Committee, namely,
- the removal of the statutory requirement to prepare Strategic Development Plans; and,
 - a requirement on planning authorities to provide information on six defined matters to assist the Scottish Ministers in their preparation of the National Planning Framework.
- 4.2 These six defined matters are the same as those currently set out for a Strategic Development Plan in terms of Section 7(4) of the Planning etc. (Scotland) Act 2006 and are as follows
- (a) the principal physical, economic, social and environmental characteristics of the area;
 - (b) the principal purposes for which land in the area is used;
 - (c) the size, composition and distribution of the population of the area;
 - (d) the infrastructure of the area (including communications, transport and drainage systems and systems for the supply of water and energy);
 - (e) how that infrastructure is used;
 - (f) any change which the planning authority or authorities think may occur in relation to any of the matters mentioned in paragraphs (a) to (e), and,
 - (g) such other matters as are prescribed.
- 4.3 The four Strategic Development Planning Authorities (SDPAs) have met with Scottish Government planning officials, including the Chief Planner, to discuss the implications of the Planning Bill for the SDPAs and how they can support the development of National Planning Framework 4 which is due for publication by the end of 2020.
- 4.4 The Scottish Government are keen to continue discussions with the SDPAs however as the Planning Bill is still going through its formal scrutiny processes they are at this stage unable to give any clear direction in terms of their approach to the development of National Planning Framework 4 nor any indication of the specific supporting information they will be looking for.
- 4.5 Further meetings with Scottish Government are planned over the next few months.

5. Glasgow City Regional Partnership

- 5.1 The direction of the Planning Review, and also the Skills and Enterprise Review, is a move towards the creation of 'regional partnerships' covering the whole of Scotland, which in the case of the West of Scotland is the proposed Glasgow City Regional Partnership.
- 5.2 The Glasgow City Regional Partnership will seek to align the structures developed to support the Glasgow City Region City Deal with the delivery of the priorities of the Glasgow City Region Economic Strategy and Action Plan.

- 5.3 Currently the Glasgow City Region has eight subject based portfolios each led by one of the eight constituent city region local authorities. These portfolios have been established to support the delivery of the City Region Economic Strategy and Action Plan.
- 5.4 Discussions are also ongoing about the establishment of an Intelligence Hub to support the City Regions portfolios and related activities.
- 5.5 Clydeplan currently participates in five of these portfolios, namely, Enterprise, Land Use and Sustainability, Infrastructure and Assets, Transport and Connectivity and Housing and Equalities.
- 5.6 In the context of these portfolios and the Glasgow City Region Economic Strategy Action Plan there are a number of proposed strategies and plans which potentially have a spatial dimension which will support the preparation of a regional land use spatial strategy (Action 11.4) these include:
- Strategic Transport Plan (Action 9.2);
 - Digital Connectivity Strategy (Action 9.3);
 - Tourism and Visitor Marketing Strategy (Action 4.4);
 - Infrastructure Investment Plan (Action 8.2); and,
 - Regional Housing Strategy and Investment Plan (Action 11.3).
- 5.7 In this context Clydeplan can be seen as a resource which can help support:
- the delivery of a number of the above Actions contained within the Economic Strategy Action Plan;
 - the development of National Planning Framework 4 and the identification of regional priorities;
 - the potential development of a City Region Intelligence Hub; and,
 - the ongoing development of the local authority Local Development Plans.
- 5.8 As mentioned earlier, discussions are currently ongoing between Clydeplan and both the Glasgow City Region and Scottish Government to consider the implications of the Planning Review on the role and remit of the Joint Committee, the development of the Glasgow City Regional Partnership, and the requirement on planning authorities to provide information to assist the Scottish Ministers in their preparation of National Planning Framework 4.
- 5.9 These discussions include amongst other matters:
- the existing statutory duty to prepare a strategic development plan;
 - transitional arrangements to the new planning system;
 - emerging structure, staffing and governance of the Glasgow City Regional Partnership, including the proposed Intelligence Hub;
 - role of the Clydeplan Core team staff as a potential resource to support the Glasgow City Regional Partnership;
 - support for the development of National Planning Framework 4;
 - the development of a workplan to support the delivery regional spatial strategy (Economic Strategy Action Plan Action 11.4);
 - implications for the Glasgow and the Clyde Valley Green Network Partnership and Climate Ready Clyde.

Appendix 1 - Planning Bill Clydeplan Response to Local Government and Communities Committee submitted 1st February 2018

Clydeplan Response to the Scottish Parliament's Local Government and Communities Committee call for written evidence on the Planning (Scotland) Bill

Question 3

Do the proposals in the Bill create a sufficiently robust structure to maintain planning at a regional level following the ending of Strategic Development Plans and, if not, what needs to be done to improve regional planning?

1. Introduction

- 1.1 Clydeplan is the operating name for the Strategic Development Planning Authority for the Glasgow city region, Scotland's only metropolitan city region. It covers the eight local authorities of East Dunbartonshire, East Renfrewshire, Glasgow City, Inverclyde, North Lanarkshire, Renfrewshire, South Lanarkshire and West Dunbartonshire which represents one third of Scotland population and a third of its GVA.
- 1.2 Clydeplan would wish to respond to Question 3 as set out by the Local Government and Communities Committee.
- 1.3 Whilst Clydeplan wishes to continue to engage positively with the review of the Scottish planning system, it cannot comment on the Bill without firstly setting out the reasons why it disagrees with Section 2, the proposal to remove the statutory basis for regional land use planning. This is then followed by comment on the improvements required to support regional land use planning and related activities.

2. Planning (Scotland) Bill Section 2

- 2.1 The preference of Clydeplan is that a statutory form of spatial planning for Scotland's city regions is retained and therefore Clydeplan does not agree with Section 2 of the proposed Planning (Scotland) Bill which seeks to remove the requirement to prepare a Strategic Development Plan along with its related governance processes.
- 2.2 For over 70 years strategic planning has been central to the regeneration and economic revitalisation of the Glasgow city region through periods of significant structural economic change. The two Strategic Development Plans which have been developed and prepared by Clydeplan have been delivered on time and on budget. Both Strategic Development Plans have been robustly scrutinised through an independent examination process before final approval by Scottish Ministers. As such they have formed a credible and effective component of the development planning system, guiding and steering Local Development Plans and decision making which reflects the success of Clydeplan's joint working ethos and the commitment of the constituent local authorities and wider stakeholders.

- 2.3 Clydeplan and its joint working process across its eight local authorities can therefore be seen as an exemplar for Scotland in how local authorities can effectively work together on strategic planning issues in support of delivering inclusive economic growth. This successful model should be enhanced as part of the Bill not potentially undermined. There could be a case for the Committee to make specific requirements for partnership working for both the Glasgow and Edinburgh city regions given their wider significance to the future economic growth of Scotland.
- 2.4 The Scottish Government's review of Strategic Development Plans in Scotland in 2014, by Kevin Murray Associates and the University of Glasgow, recognised that *"...the (Strategic Development Plan) system is still bedding in; it is not 'broken', nor is its potential yet fully optimised. A great amount has been achieved, often within very limited resources. However, much more could be achieved in terms of substance and outcomes, if some of the processes and practices could be made more effective"*. The report sets out suggestions for improving and strengthening Strategic Development Plans rather than removing them from the Development Plan hierarchy altogether.
- 2.5 In England the duty to cooperate between authorities has not been considered a sufficiently effective tool for addressing cross boundary regional issues and new measures are now being developed to enhance those duties. Meanwhile in Wales, in July 2015 the Planning (Wales) Act established a tier of regional planning making provision for the production of Strategic Development Plans, to tackle larger-than-local cross-boundary issues, such as housing supply and areas for economic growth and regeneration) for Cardiff, Swansea and the A55 corridor. The approach currently being taken by the Welsh Government is that based on the model of the Strategic Development Plan processes that currently exists in Scotland.
- 2.6 To remove Strategic Development Plans in Scotland would run counter to the prevailing best practice in planning internationally, particularly in Europe, where there has been a shift to planning at the scale of integrated functional regions reflecting housing markets, travel to work and economic catchments areas, in pursuit of the ambition to delivering sustainable economic growth.
- 2.7 Removing the statutory regional planning function from the existing local authority Joint Committee arrangements will place the responsibility for the identification allocation of regional uses and activities primarily in the hands of the lead Minister which may be perceived as Scottish Government centralisation and undermine the collaborative localised partnerships that have been working successfully up until now.

3. Improving Regional Planning

- 3.1 The Independent Panel undertaking the review of planning recommended that Strategic Development Planning is "repurposed", and whilst this is supported, the more substantive point is that the all levels of the development planning system and related activities require to be "repurposed", be it national, regional and local. To simply delete the existing tier of regional planning with little justification, without any clearly defined alternative and without considering the potential for adapting and improving on what already exists, seems ill considered.

- 3.2 An alternative approach would be to enhance and build upon the existing Strategic Development Plan processes taking advantage of their established governance and joint working structures. These existing structures and the role of the organisation, could be adapted to enable a greater focus on delivery and infrastructure to be developed.
- 3.3 The review of Strategic Development Planning undertaken in 2014, was a comprehensive and specific review undertaken by Kevin Murray Associates and the University of Glasgow with detailed and considered conclusions around how strategic planning could be improved. This work is commended to the scrutiny process and elements of the conclusions of that research are reflected in the following comments on how regional planning could be improved.

4. Retaining and Improving Existing Arrangements

- 4.1 It is agreed that change and improvement at all tiers of development planning is required, particularly to focus on delivery. This could, in part, be achieved by retaining and building upon the existing statutory Strategic Development Plan processes.
- 4.2 Alternative arrangements that have not been explored include moving to a 10 year preparation cycle to align with Local Development Plan and National Planning Framework preparation. This would have the benefit of both retaining the established joint working structures and practices in support of the preparation of the Strategic Development Plan and enhancing them around a focus on delivery.
- 4.3 Potential other improvements to existing regional planning arrangements, including the duties, powers and resources required are covered within the following.

5. Improving Regional Collaboration

- 5.1 The Bill proposes a new flexible duty for regional collaboration by two or more planning authorities to assist Scottish Ministers in preparing the National Planning Framework. This regional collaboration between the local authorities and the National Planning Framework currently exists within the existing established Strategic Development Plan processes.
- 5.2 If it is intended that regional collaboration goes beyond just what is proposed in terms of the Planning (Scotland) Bill into areas such as transport, education and skills and enterprise the new regional partnerships will require a clarity around their purpose, role and responsibilities, governance, accountability, and resourcing to ensure effective activities and democratic accountability. The experience, skills and resources of regional bodies such as Clydeplan with their established joint working processes around strategic planning should be seen as asset to any future regional partnership and this should be supported by the Planning (Scotland) Bill.

5.3 In this context there is the potential for a wide range of partners and partnerships. To ensure an effective role in supporting strategy development, delivery at a city region level and the development of an enhanced National Planning Framework, any form of regional partnership collaboration will require to be established with the following:

- a clear statutory duty placed upon local authorities to work together to consider matters they deem to be relevant in support of the Purpose of the Scottish Government and the National Planning Framework;
- a formal duty to co-operate on other public bodies in support of the work of the regional partnership;
- a clearly defined geography;
- a clear role and remit; and,
- a single governance structure with associated supporting dedicated resources.

5.4 The above are characteristics of regional partnerships that are currently established in statute including regional transport partnerships and marine planning partnerships. The Policy Memorandum states that strategic planning is essential and that removal of the mandatory detailed processes *“will leave planning better placed to actively engage with its wider context”*. However with no clarity around how that is to be achieved, and given the resource constrained times in which public services operate, some statutory prescription along with the ability to develop locally distinctive regional arrangements, would be more likely to result in the development of effective regional partnerships.

5.5 An appropriate duty might be a requirement on the local authorities to submit a joint proposal to establish a regional partnership along with a clear geography, structure and remit to be considered and endorsed by Scottish Ministers.

6. Aligning with Wider Policy Objectives

6.1 The approach to regional working should be framed under a number of general duties and powers relevant to spatial planning including:

- contributing to the achievement of the National Outcomes as set out by the Scottish Government;
- creating well-designed and sustainable places;
- contributing to inclusive economic development;
- addressing climate change duties and act in a manner that contributes to achievement of the carbon emissions targets;
- securing environmental protection and management;
- reducing inequality; and,
- improving health and well-being.

- 6.2 The above duties and powers would reflect the Scottish Government national outcomes and in particular consideration should be given to framing the Planning Bill under the delivery of the national outcomes, as set out in the Community Empowerment (Scotland) Act 2015, in order to encourage and support organisational alignment between planning and community planning. Indeed a key recommendation of the Kevin Murray Review was to align and integrate the Strategic Development Plan strategy and project components with the work of the respective Community Planning Partnerships and Single Outcome Agreements.

7. Improving Regional Planning Activities

- 7.1 Regional planning can add value through effective joint working and managing cross boundary issues, by setting out a spatial development strategy which supports inclusive economic growth whilst mitigating against adverse environmental impacts and ensuring the efficient use and development of infrastructure.
- 7.2 The range of activities that should be set out as specific to the regional role include:
- development of a regional land use spatial strategy which sets out regional priorities by addressing strategic planning issues in respect of housing, transport, flood risk management, climate change, and biodiversity and supporting the development of priorities for the National Planning Framework;
 - ensuring alignment of regional strategies including economic, transport and land use strategies;
 - supporting housing delivery;
 - supporting inclusive economic growth;
 - identifying strategic infrastructure interventions;
 - preparing delivery plans; and,
 - any other activities considered relevant to the planning of development in city regions.
- 7.3 The above activities should be delivery focussed, however, the extent to which the regional partnerships can have a direct influence on delivery will depend on their duties, powers and importantly resources.
- 7.4 There are therefore a number of areas where it is considered that regional planning requires to be enhanced in support of the collaborative approach envisaged by the Planning (Scotland) Bill, namely:
- streamlining the approach to housing assessment;
 - integration of the National Planning Framework/Strategic Development Plan and National Transport Strategy/Regional Transport Strategy into a single national/regional strategy;
 - integration of regional land use and transport planning which together should become the land use expression of city region economic strategies;

- development of an effective approach to delivery at the regional scale, including importantly infrastructure delivery, which will involve resourcing (ideally through direct funding), as well as duties and/or powers to influence the activities of infrastructure providers as required;
- building greater capacity, awareness and more effective behaviours in strategic planning particularly at the local authority political and corporate level as well as amongst professional leaders and the wider stakeholder community; and,
- boosting the existing skilled regional planning cohort which has seen the pool of skilled regional planning practitioners significantly diminished since the inception of the independent review panel process began over 2 years ago.

7.5 Additionally in support of any change to the planning system other public bodies and the Key Agencies will also require to have a duty to assist in any new process.

8 Resourcing Regional Planning

- 8.1 Previously the Strategic Development Plan Authorities have been resourced to prepare a Plan which of course does not in itself result in the focus on delivery and infrastructure sought by the planning review. For more effective delivery focussed regional planning, consideration must be given to the duties, powers and resources required.
- 8.2 The level of human resources available to the four SDPAs has significantly reduced since the commencement of the Planning Review, from 15 professional planners to a resource today of 7. Budgets are related directly to the salaries and related resources required to support the key activity of preparing the Strategic Development Plan itself. The current Strategic Development Plan process has no duties, powers or resources for direct delivery activities. The Kevin Murray Associates Review in 2014 concluded that *“Without the necessary resourcing, we expect that SDPAs will find it difficult to produce plans that will be properly fit for purpose.”*, and they recommended that the Scottish Government should consider the scope to provide an extra level of resource.
- 8.3 The skills required are also an issue for national and local development planning, as the agenda requires a movement away from plan making, thus freeing up time and resources to focus on delivery and infrastructure activities. Whilst this is wholly supported, there is an emerging requirement for the development of behaviours and activities within multi-disciplinary teams that many development planning planners currently do not have. This therefore requires further consideration if the outcome of delivery orientated development plans and activities is to be realised.

9. Regional Partnerships Approach

- 9.1 Paragraph 36 of the Policy Memorandum to the Planning (Scotland) Bill states that robust regional and strategic planning is needed across the country and that removing the mandatory detailed processes will ensure time and cost savings for those authorities involved in the production and delivery of Strategic Development Plans and leave planning better placed to actively engage with its wider context.

- 9.2 In this context although it is not entirely clear at this stage it could reasonably be concluded that what is intended is that the regional planning role becomes a function of the emerging regional partnerships and City Deals currently being considered around the country.
- 9.3 However, the governance arrangements and activities that are emerging from these non-statutory partnerships are at a very embryonic stage in most cases. It could therefore take some time before these arrangements mature sufficiently to enable them to develop and fulfil an effective regional partnership role particularly in terms of identifying and agreeing regional spatial priorities. In the experience of Clydeplan, joint working arrangements take significant time, resource and goodwill to function effectively. Given the nature of the new approach being advocated this may significantly impact on the timeline for NPF4 which is due to be adopted in 2020.
- 9.4 Given this context it is difficult to see how the removal of the statutory regional tier of planning will assist the process of formation of effective regional partnerships. Indeed it is considered that the existing Strategic Development Planning Authorities for the four city regions could form the core of regional partnerships for land use planning rather than be disbanded. It would therefore seem more appropriate that consideration is given to utilising these existing arrangements to build upon and reinforce the emerging city region partnerships.
- 9.5 Given the now very limited pool of strategic planning experience that currently exists within the four Strategic Development Planning Authorities' dedicated teams, cost savings would likely be negligible. Indeed the proposed model for regional collaboration in terms of strategic planning would still require strategic planning expertise to contribute to both the collaborative work with Scottish Government on the National Planning Framework but also in terms of regional planning considerations within any regional partnership model.

10. Conclusion

- 10.1 Recognising the critical role city regions play in delivering inclusive economic growth by considering important cross boundary issues such as housing and transport and by creating high quality places where people wish to live, work, play and invest strategic land use planning has an important role in supporting the purpose of the Scottish Government.
- 10.2 Clydeplan considers that the joint working model that currently exists in relation to Strategic Development Plans in support of the delivery of Scotland's development planning system at the regional scale is not broken. An opportunity exists through the new Planning (Scotland) Bill to enhance this model with additional duties, powers and resources, rather than remove it from the Development Plan hierarchy altogether.
- 10.3 Should the current model be replaced, as is proposed, then it is critical that whatever it is replaced by, recognises the important role strategic planning has to play and this role should be firmly embedded in the new Planning (Scotland) Bill as a statutory function.
- 10.4 Consequently, for the reasons set out in this paper Clydeplan considers, given its long standing and successful history of strategic planning in the West of Scotland, that what is being proposed in the Planning (Scotland) Bill is not sufficiently robust to maintain effective land use planning at the regional level.

10.5 We commend the suggestions contained in this submission to the Local Government and Communities Committee for its consideration and would be happy to provide further evidence if required.

Appendix 2 - Clydeplan Response to Financial Memorandum the Finance and Constitution Committee submitted 26th January 2018

Clydeplan Response to the Scottish Parliament's Finance and Constitution Committee call for written evidence on the Planning (Scotland) Bill's Financial Memorandum

Clydeplan would wish to respond to Questions 4 - 7 as set out by the Committee

1. Introduction

- 1.1 Clydeplan is the operating name for the Strategic Development Planning Authority for the Glasgow city region, Scotland's only metropolitan city region. It covers the local authorities of East Dunbartonshire, East Renfrewshire, Glasgow City, Inverclyde, North Lanarkshire, Renfrewshire, South Lanarkshire and West Dunbartonshire.
- 1.2 Clydeplan is one of four Strategic Development Planning Authorities set up under the current Planning etc. (Scotland) Act 2006. The others are Aberdeen City and Shire, SESplan and Tayplan.
- 1.3 Each Clydeplan Local Authority contributes £72,000 per annum (total per annum £576,000) towards the running costs of Clydeplan and the development of the Strategic Development Plan.
- 1.4 The current staffing model for the preparation of the Strategic Development Plan is set out in Planning Circular 2/2008 which states that *"...teams are likely to be small in size, drawing in expertise from constituent authorities and beyond"*.
- 1.5 Since the publication of the planning review and its recommendation to remove the requirement to prepare Strategic Development Plans there has been a dramatic reduction (60%) in the staffing levels of the four strategic planning teams with only Clydeplan currently having a manager formally in post.
- 1.6 The Clydeplan staff complement is 1 Manager, 1 Assistant Manager, 3 Strategic Planners, 1 Planning Analyst and 1.5 Administration staff.
- 1.7 Currently Aberdeen City and Shire has 1 dedicated Strategic Planner, SESplan has 1 Lead Officer and Tayplan have no dedicated Strategic Planning staff.

2. General Observations

- 2.1 Clydeplan is concerned with the lack of details on key elements of the Bill as they relate to future role of strategic planning within a non-statutory regional partnership model. It is considered though the cost of this new, Scotland wide approach should not be underestimated given the experience of the current Strategic Development Planning Authority joint working model.
- 2.2 Given the recent reduction in staffing levels, as set out in paragraph 1.4, local authorities are already making savings in respect of their commitment to regional planning and consequently the potential for future savings has been significantly reduced particularly for the other 3 Strategic Development Planning Authorities.
- 2.3 The erosion of the current regional planning skills base will also have potential cost implications for the emerging regional partnerships in terms meeting the requirements of Section 3AA of the Planning Bill, i.e. information to assist preparation of the National Planning Framework.

3. Clydeplan Response to Question 4 *If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details.*

- 3.1 Clydeplan considers that the financial implications in respect of its organisation have not been accurately reflected in terms of the SDP examination and publication costs. Costs in this respect of these two very specific elements of the Strategic Development Plan process are not significant. For Clydeplan these are in the region of £60,000 per the 4 stage plan cycle every 5 years - Main Issues Report, Proposed Plan, Examination and Approved Plan - £120,000 over a 10 year period.
- 3.2 The £2,239,000 figure set out in the Financial Memorandum Table 1 and paragraphs 36-40 seems disproportionately high in the context of just those two components, examination and publication.
- 3.3 The Strategic Development Planning Authority has only one statutory duty i.e. to produce the Strategic Development Plan. Given the proposal within the Planning Bill is to remove all the requirements relating to this duty Clydeplan considers that any financial considerations should be based on the whole life cost of the Plan preparation cycle.
- 3.4 The majority of the whole life funding relates to staff, property and IT (which accounts for around 90% of annual expenditure in the Clydeplan model) in support of all the specific plan preparation, publication and examination process elements.
- 3.5 The future arrangements and strategic planning skills requirements in the emerging regional partnerships in support of the National Planning Framework are at this stage unknown and therefore unquantifiable. There are currently no guarantees that the exiting Strategic Development Planning Authority staffing compliment will automatically be employed under the new regional partnership arrangements. Should the emerging regional partnerships choose to take on a non-statutory strategic planning function, the role and remit of any such function, is currently unknown.

4. Clydeplan Response to Question 5 *Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?*

- 4.1 As per Clydeplan's answer to Question 4.

5. Clydeplan Response to Question 6 *If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?*

- 5.1 Clydeplan considers that any future financial cost it is likely to incur will depend on the exact nature of the role regional land use planning will play within any future Glasgow city region regional partnership model however such roles and functions for the partnership in this context have yet to be agreed and costed.
- 5.2 If Clydeplan itself is to be wound down and no longer exist in the form of its formal Joint Committee and dedicated team then its financial reserves could be utilised to mitigate against the need to request for additional monies from the constituent local authorities. This may not be the same for the other three Strategic Development Planning Authorities.

6. ***Clydeplan Response to Question 7 Does the FM accurately reflect the margins of uncertainty associated with the Bill's estimated costs and with the timescales over which they would be expected to arise?***
- 6.1 Clydeplan considers that, given the absence of any clear costings in relation to the future arrangements for the emerging regional partnerships and the strategic planning skills requirements in support of the National Planning Framework, which at this stage are unknown and therefore unquantifiable, the level of uncertainty is such that it is questionable how accurate the Financial Memorandum is in this respect.