Planning Ambitions: Findings from the Call for Ideas on Planning Performance

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Aims

In October 2023 the National Planning Improvement Champion (NPIC) launched an open call for ideas[1] asking stakeholders for their thoughts on what a high-performing planning system should look like and what impacts it should aspire to attain. An important driver for this was the need to establish a new planning performance assessment and improvement framework, building upon the current Planning Performance Frameworks.[2] It was also hoped that it would provide a snapshot of the challenges and opportunities facing the planning system in Scotland.

This paper summarises the findings of the engagement and explains how they have helped to develop a new National Planning Improvement Framework (NPIF) which is to be piloted by planning authorities in 2024/25. It does not cover every point made in the submissions and discussion but, rather, attempts to pull out the key discussion points, concerns and ideas.

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1   Call for ideas on planning system ambitions | Improvement Service
2   Planning Performance Framework – HOPS (hopscotland.org.uk)

Headline findings

A number of high level findings from the engagement exercises arose.

▶ **There is no overall agreement on what successful planning looks like.**
Private sector respondents tend to prioritise speedy decisions on planning
applications, or at least more certainty in the timescales for decision-making.
Public, third and community sector organisations are more inclined to
identify good placemaking, quality design and the need to tackle the climate
emergency as the important ambitions of planning. The importance of an
outcomes-based approach is seen as important by many with the delivery of
the outcomes promoted by the NPF4 being key to this.

▶ **The reduced resources available to planning authorities and statutory
consultees is seen as key issue by almost everyone who responded.** There
were strong calls across sectors to ensure that there are enough planners in
planning authorities, to support upskilling and for income generated through
planning fees to be reinvested to support planning services. The importance
of ensuring a strong pipeline of people entering the profession and the
retention of existing planners is another strong message.

▶ **There is only some limited support for financially penalising planning
authorities** who do not demonstrate what was deemed as acceptable
performance. However, developers and applicants point to the need to ensure
that increased planning application fees result in tangible improvements to
the quality of service provided.

▶ **Many applicants and community representatives highlight the need
for a better user experience and customer care**, stating that they would
like planning authorities to engage more proactively and collaboratively.
Communication and accessibility to planning staff are seen as particularly
important, as is the need for good pre-application discussions.

▶ **Planning authorities say that the quality of submissions is impacting on their
ability to process applications quickly.** They said that this is having an impact
from the start of the process given that a significant numbers of planning
applications cannot be validated as they are not completed accurately or do
not provide all necessary documentation.

▶ **A number of respondents, and in particular applicants but also community
focussed bodies, say that there is a need for more consistency across
planning authorities** in terms of processes and decision making. There is a
call for more standardised approaches to be introduced and for an exploration
of how shared services could support a more joined up approach.

- **The importance of effective leadership** that promotes a 'can do' and solutions-focused culture and provides confidence, certainty and consistency across planning authorities is highlighted.

- **The transition towards using the new National Planning Framework 4 (NPF4) and a perceived lack of clarity on some its policies** is seen by many as an immediate issue that is impacting on confidence in decision making. Several issues have been raised regarding the perceived consequences of specific policies contained in the document, particularly from housebuilders. Several responses highlight the resource consequences of new approaches arising from the document and the need for new skills and knowledge. There is widespread agreement that the delivery of NPF4's outcomes was an important measure of the success of planning.

- **Uncertainties that can occur from the involvement of planning committees in planning decisions** is cited as an issue by some respondents, particularly applicants and community bodies. There is a strong message from users of the planning services that elected members need to be fully up to speed on their roles, responsibilities and powers and that ongoing training is crucial to this.

- A number of specific examples are given by applicants on the **perceived over-complexity of some procedures and processes in development management**. They also mention the need for proportionate approaches regarding information required to support planning applications, section 75 agreements and conditions.

- **The issue of a 'them and us' culture in planning** is a strong theme that is highlighted by those working in public, private, third and academic sectors. Concerns are raised about sometimes poor relationships but there is an almost universal feeling that there is a need to change the culture and to work collaboratively across sectors.

- **The image of planners and planning** is seen as a key challenge. There is a desire to stop 'planner bashing' and change perceptions of the profession so that it is more respected and trusted, seen as having integrity in been positive, constructive and problem solving. Many feel that there is a need to support and protect planners and to build morale in planning authorities.

Context

The Planning (Scotland) Act 2019[3] introduced new provisions to measure planning authorities' performance and how to support planning services to improve.

Statutory annual reporting has been introduced:

▶ planning authorities are to prepare a report on the performance of their functions which is to be submitted to Ministers and published annually.

▶ Ministers are to publish regulations on the form and content of the report, process to prepare it and how it is to be published.

A National Planning Improvement Champion has been established to:

▶ monitor the performance of planning authorities.

▶ provide advice to planning authorities, and to such other persons as the champion considers appropriate, in relation to what steps might be taken to improve their performance.

In taking this forward the National Planning Improvement Champion (NPIC) took up role in September 2023 with objectives to:

▶ establish a national planning improvement framework and reporting process that supports planning authorities to identify areas for improvement and to work with them to tackle these.

▶ identify strategic challenges facing the planning system and work with stakeholders to address them.

▶ work with others to develop approaches to identify, share and support people and organisations to implement good practice.
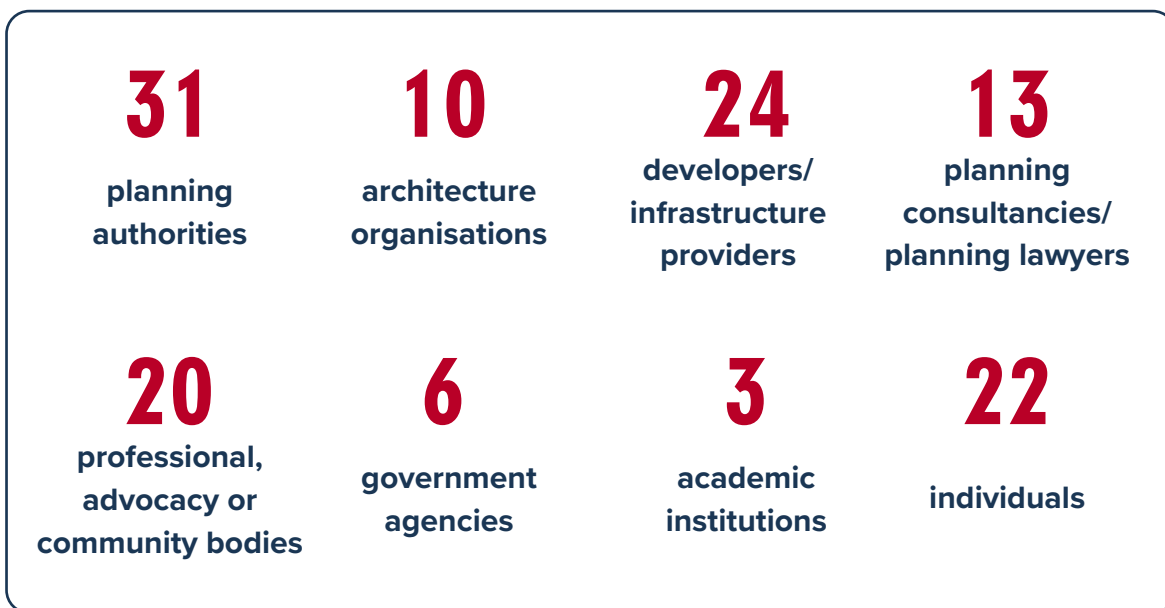
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3   Planning (Scotland) Act 2019 (legislation.gov.uk)

Call for ideas and engagement

A 'call for ideas' was issued by the NPIC in October 2023. It asked for stakeholders' views on what a high-performing planning system should look like and what impact it should have. It ran for six weeks. The aim was to inform the creation of a new National Planning Improvement Framework and provide an evidence base on the challenges and ambitions of the planning system in Scotland. The 'call for ideas' asked three questions:

▶ What are the outcomes we need the planning system to deliver to have impact?

▶ What makes a high-performing planning authority?

▶ How can we measure this?

Alongside this an engagement programme took place with a series of one-to-one discussions with key stakeholders whilst four workshops were organised to enable a 'deep dive' on the questions outlined in the call for ideas. In total 129 organisations or individuals engaged in the discussion comprising a wide mix of interests in the planning system:

31	**10**	**24**	**13**
planning authorities	architecture organisations	developers/ infrastructure providers	planning consultancies/ planning lawyers
20	**6**	**3**	**22**
professional, advocacy or community bodies	government agencies	academic institutions	individuals

The work was also informed and supported by the High Level Group on Planning Performance (HLG).[4] This is co-chaired by the Minister for Local Government Empowerment and Planning and the Chair of the COSLA (Convention of Scottish Local Authorities) Environment and Economy Committee. It involves representatives from Heads of Planning Scotland (HOPS); the Society of Local Authority Chief Executives (SOLACE); the Key Agencies Group (KAG); the Society of Lawyers and Administrators in Scotland

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4   Planning performance: high level group - gov.scot (www.gov.scot)

(SOLAR); and the Royal Town Planning Institute Scotland (RTPI Scotland). The HLG also has an Applicants Stakeholder Group that feeds into it. This has members from Scottish Property Federation, Homes for Scotland, Scottish Renewables, Scottish Tourism Alliance, Scottish Land and Estates, Federation of Small Businesses, Scottish Planning Consultants Forum and the Confederation of British Industry.

Findings

The call for ideas and broader engagement has helped to provide an outline of the issues that stakeholders feel currently impact upon the performance of planning authorities. The mix of interests involved means that there is not universal agreement, however many of the opinions are held across sectors and organisations. It is also clear that there was a consensus on a need for a more collaborative approach to be taken to addressing these challenges and to work more closely generally.

What are the outcomes we need the planning system to deliver to have impact?

An Outcomes-based Approach

The call for ideas and broader engagement asked for views on the outcomes that the planning system should be seeking to achieve. It is clear that there is strong support for any performance and improvement framework to be contextualised and linked to achieving outcomes, for example:

> *"One way to improve the planning system with a focus on outcomes is to adopt an outcomes-based approach, which is a way of thinking and working that starts with the end in mind, and defines and measures success in terms of the outcomes that matter to the stakeholders and the society. An outcomes-based approach can help to clarify the purpose and vision of the planning system and align it with the national (National Planning Framework 4) and local priorities and objectives (set out in newly adopted Local Development Plans); Engage and involve the stakeholders and the public in defining and co-producing the outcomes and the means to achieve them; Design and deliver the planning activities and interventions that are most effective and efficient in contributing to the outcomes; Monitor and evaluate the progress and impact of the planning system and learn from the feedback and evidence; Communicate and demonstrate the value and benefits of the planning system and its outcomes."* **(Developer/Infrastructure provider)**

Many of those who engaged in the call for ideas outlined how and why outcomes were important aspirations that should be integrated into the planning system by being embedded into policy making and decision-making processes. For example, it was suggested that:

> *"Planning is delivering for the public good and therefore has to balance the demand for land against the needs to ensure positive outcomes for social cohesion (human and habitat), health and wellbeing (human and habitat), economy, environment and biodiversity in one place."* **(Individual)**

It was indicated by some that the planning system is too 'caught up' on planning as a process rather than outcomes and that performance reporting can help to drive change in this. It was considered that this will also help to integrate planning to work with other systems, though this needs professionals to adapt quickly and agilely to be prepared for it. To support this there were calls for shared starting points for all with a stake and/ or role in delivering outcomes, for clarity of policy and for a recognition of the dependencies across organisations, disciplines, sectors, and levels.

The challenges

The difficulty of measuring outcomes and planning's impact was highlighted by some respondents, especially in relation to the long-term nature of decisions and policies, and a lack of certainty in attribution. One contributor said:

> *"What we need is an understanding both within and outside the planning system that it takes time for planning to have a real impact, and that while these outcomes can deliver positive impacts they are effectively piecemeal, step by step, often over a long period of time and the impact can only be observed, measured, felt and quantified 5, 10, 50 years or more later."* **(Planning authority)**

The contested nature of planning is also seen as a challenge. Planning generally functions within a space where there can be different perspectives and aspirations on how to best use land in the long-term public interest. It is not surprising therefore that there is no overall agreement on what successful planning looks like. Private sector respondents tended to focus on the need for speedy decisions on planning application, or at least more certainty in the timescales for decision-making. Public, third and community sector organisations were more inclined to identify the good placemaking, quality design and the need to tackle the climate emergency as the important ambitions of planning.

The ownership and responsibility for delivering outcomes was discussed by a number of people:

> "*Outcomes can be expressed at different levels, such as strategic, operational, or individual, and can cover various dimensions, such as social, economic, or environmental. Outcomes can also be distinguished from outputs, which are the products or services that are delivered by the planning system, such as plans, policies, or decisions.* **(Developer/ Infrastructure provider)**

It was also pointed out that although outcomes may be different for different players and sectors working in the planning system:

> *"…essentially who achieves the outcomes doesn't matter, it is around delivering on the agreed national outcomes."* **(Planning authority)**

Several organisations said that measuring the success of outcomes needs to consider the needs of different people and groups. They discussed the need to promote greater understanding of 'privilege', the need to have measures that embed inclusivity and have more diverse representation in local governance and consultation processes. It was pointed out that in the Planning (Scotland) Act 2019 specific provisions requiring planning authorities to seek the views of disabled people, gypsy/ travellers and children and young people, as well as those of the wider public, during Local Development Plan preparation.

There is strong agreement that the planning system needs to be transparent and more effective in engaging communities.

It was also stated that there is a need to recognise the geographical differences across all areas of Scotland, be that rural, urban, remote or island communities, who may have different needs, aspirations and circumstances. This raised the challenge for planning authorities to balance their area's contributions to national targets with having autonomy to meet local needs.

There is a feeling that planning is still misunderstood by many and there is need to de-myth, de-mystify and debunk some narratives around it and look to better show its value to communities, politicians and the private sector to highlight the role it can play in achieving outcomes.

Frameworks, targets and aspirations

A range of frameworks, targets and aspirations were mentioned as important contexts that should be considered when taking an outcomes-based approach to planning performance.

The point was made that there was a need to reinforce rather than reinvent existing outcomes already set out in existing legislation, policy, frameworks and guidance including The Planning (Scotland) Act 2019, the National Performance Framework and associated National Outcomes, National Planning Framework 4, the UN Sustainable Development Goals and a number of national targets. The need to articulate the golden thread flowing through these was seen as vital.

Planning Acts

Respondents to the call for ideas highlighted the importance of framing success within the purpose of planning as introduced in the Planning (Scotland) Act 2019 "to manage the development and use of land in the long-term public interest". It is considered that the purpose places the long-term public interest as the principal outcome of the planning system. One respondent further pointed out that this new purpose does not sit in isolation and that Section 3ZA(2) of the amended Town and Country Planning (Scotland) Act 1997 states that anything which "contributes to sustainable development or achieves the national outcomes…is considered as being in the long-term public interest".

The six outcomes for planning contained in the 2019 Act were also highlighted:

▶ meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people

▶ improving the health and wellbeing of people living in Scotland

▶ increasing the population of rural areas of Scotland

▶ improving equality and eliminating discrimination

▶ meeting any targets relating to the reduction of emissions of greenhouse gases, within the meaning of the Climate Change (Scotland) Act 2009, contained in or set by virtue of that Act

▶ securing positive effects for biodiversity

National Planning Framework 4

A large number of responses felt that, given its centrality to the Scottish planning system, the delivery of NPF4[5] should be key to measuring the success of planning. For example:

> *"National Planning Framework 4 sets clear drivers as to the outcomes of the planning system, through its intent, outcomes and policies. The climate and nature crisis are the two significant issues the planning system needs to be able to tackle."* **(Planning authority)**

5   National Planning Framework 4 - gov.scot (www.gov.scot)

> **"** *"The planning system has the potential to contribute towards all of the National Outcomes both directly and indirectly as a result of its role in shaping places. This is recognised within Scotland's Fourth National Planning Framework, which describes the planning system as a delivery mechanism for both Scotland's National Outcomes as well as the UN SDGs. The spatial principles, cross-cutting outcomes, and National Planning Policies are the ways in which NPF4 seeks to support delivery of the National Outcomes and UN SDGs and, consequently, to achieve the purpose of planning set out in the Act."* **(Professional/ advocacy/ community body)**

NPF4 sets out the need to plan future places in line with six overarching spatial principles:

- ▶ **Just transition.** We will empower people to shape their places and ensure the transition to net zero is fair and inclusive.

- ▶ **Conserving and recycling assets.** We will make productive use of existing buildings, places, infrastructure and services, locking in carbon, minimising waste, and building a circular economy.

- ▶ **Local living.** We will support local liveability and improve community health and wellbeing by ensuring people can easily access services, greenspace, learning, work and leisure locally.

- ▶ **Compact urban growth.** We will limit urban expansion so we can optimise the use of land to provide services and resources, including carbon storage, flood risk management, blue and green infrastructure and biodiversity.

- ▶ **Rebalanced development.** We will target development to create opportunities for communities and investment in areas of past decline and manage development sustainably in areas of high demand.

- ▶ **Rural revitalisation.** We will encourage sustainable development in rural areas, recognising the need to grow and support urban and rural communities together.

Scottish Government's National Outcomes and United Nations Sustainable Development Goals

The National Outcomes[6] cover a broad range of ambitions spanning across the social, economic, environmental, and cultural spectrums. A number of respondents and workshop attendees are of the view that the planning system has the potential to contribute towards all the National Outcomes both directly and indirectly because of its role in shaping places. This is recognised within

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6   National Outcomes | National Performance Framework

NPF4 describes the planning system as a delivery mechanism for both Scotland's National Outcomes as well as the United Nations Sustainable Development Goals (SDGs).[7] It was considered that the spatial principles, cross-cutting outcomes, and National Planning Policies are the ways in which NPF4 seeks to support delivery of the National Outcomes and UN SDGs and, consequently, to achieve the purpose of planning set out in the Act. The spatial principles are:

▶ **sustainable places**, where we reduce emissions, restore and better connect biodiversity

▶ **liveable places**, where we can all live better, healthier lives

▶ **productive places**, where we have a greener, fairer and more inclusive wellbeing economy.

National Targets and Policy Imperatives

Other national targets and aspirations have been mentioned as important to framing the outcomes planning should contribute to.

It was highlighted that the planning system has a critical role in helping Scotland to achieve net zero emissions by 2045 in line with legally binding targets:[8]

> "*The planning system has an integral role to play in the transition to Net Zero. It needs to function efficiently to facilitate the delivery of national renewable energy targets and key Government commitments such as the Onshore Wind Sector Deal.*" **(Developer/Infrastructure provider)**

Developers highlighted that in supporting this the planning system needs to function efficiently to facilitate the delivery of national renewable energy targets and key Government commitments such as the Onshore Wind Sector Deal.[9] Many from the energy sector, and beyond, discussed the importance of the Scottish Government's Energy Strategy and Just Transition Plan[10] as an enabler of greater home grown, zero carbon energy deployment to deliver Scotland's and the UK's decarbonisation targets and energy security ambition.

The need to prioritise biodiversity was raised by a number of respondents, many of whom highlighted how NPF4 had put tackling the nature crisis front and centre.

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7   THE 17 GOALS | Sustainable Development (un.org)
8   Reducing greenhouse gas emissions - Climate change - gov.scot (www.gov.scot)
9   Onshore wind sector deal - gov.scot (www.gov.scot)
10 Draft Energy Strategy and Just Transition Plan - gov.scot (www.gov.scot)

> *"Need to ensure that [the] new framework emphasises the new prioritises elements of NPF4 - climate and biodiversity recovery (such as) Zero carbon places; Nature positive places - biodiversity is enhanced and better connected; Emissions from development are minimised; Places are more resilient to climate change impacts; Rebalanced development; Rural revitalisation"* **(Professional/ advocacy/ community group)**

There was a strong message from the housing sector about the importance of planning supporting the delivery of more homes across all tenures.

> *"In order to deliver on the vision within National Planning Framework 4 (NPF4) and ensure that a plan-led system delivered the homes that Scotland needs as well as provides developers and their funders with the certainty needed to invest and create jobs"* **(Developer/ Infrastructure provider)**

Reference was made to the Scottish Government strategy Housing to 2040[11] which says "…overall we need to have many more homes than ever before and, no matter whether we live in a rural or urban location or whether in a small flat or large family house, we all need somewhere to call home". The importance of the policy intent of the government's Quality Homes policy was highlighted to "encourage, promote and facilitate the delivery of more high quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland".

The role of national targets was highlighted with one respondent saying that:

> *"Scottish Government's targets for delivering renewable energy and affordable housing were instrumental to securing approvals for the delivery of this essential infrastructure. Target setting for the Scottish planning system needs to be defined in terms of development output."* **(Developer/ Infrastructure provider)**

As part of this, the Infrastructure First approach was seen as a vital component and in line with the recommendations of the Infrastructure Commission for Scotland.

There was a call for ambitious targets to be set to encourage reuse of materials and stimulate the circular economy with buildings designed to last using materials with low embodied carbon.

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11   Housing to 2040 - gov.scot (www.gov.scot)

What makes a high-performing planning authority?

The second question posed in the call for ideas asked for thoughts on the key elements of a high-performing planning authority. This question aimed to inform the development of a range of indicators that could be used by planning authorities to assess their performance and identify areas for improvement.

Defining and using attributes

As a starting point it was generally agreed that identifying the attributes of a high performing planning authority is a useful means of measuring performance. Those engaged in the call for ideas discussion felt that it can help to pinpoint key choke points and can be used to identify key issues facing the system. The importance of using assessment to identify and stimulate transformational improvement action in performance is seen to be a crucial aspect of the process.

However, it is considered that the measures need to be clear, simple, straightforward and uncomplicated. It is also suggested that they comprise a mix of inputs, processes and outcomes.

There is consensus that it is not one thing that defines a high performing planning authority, but rather a range of factors including, for example, customer care, speed of processing applications and the quality of places delivered through planning decisions and policy. There were differences of opinion however on priorities.

It was generally agreed that identifying attributes as a means of assessment should also recognise the dependencies that planning authorities have in delivering their services and who therefore could have an impact upon performance. These include statutory consultees, key agencies, elected members, applicants and communities. Given this, the concept of using the assessment process to help trigger conversations between planning authorities and their key stakeholders is something that has been welcomed. It is felt that this can help take a more collaborative approach to planning.

The key areas identified through the engagement can be grouped into 5 areas of activity, each containing what are considered as attributes of a high performing planning authority:

▶ **People** – does the planning authority have sufficient resources and skills to maximise productivity and a valued and supported workforce?

▶ **Culture** – has the planning authority embedded continuous improvement; does it have sound governance; and does it have effective leadership?

▶ **Tools** – does the planning authority have a robust policy and evidence base? Does it make the most of data and digital technology? Does it have effective decision-making processes?

▶ **Engage** - does the planning authority have good customer care and effective engagement and collaboration with stakeholders and communities?

▶ **Place** – does the planning authority lead and collaborate to deliver positive outcomes and does it facilitate the delivery of development?

Each of these is discussed in turn below.

People

An overwhelmingly strong message from the call for ideas engagement is that planning authority performance is dependent upon them having the resources they require. Statistics quoted from RTPI Scotland research published in 2022[12] showed that:

▶ gross expenditure to planning authorities has diminished in real terms by 38% since 2010

▶ there have been 25% staffing cuts in planning departments since 2010

▶ planning application fees only cover 66% of their processing costs

▶ there are 91 new and unfunded duties in the Planning (Scotland) Act which could cost between £12.1m and £59.1m over 10 years.

▶ around 8% of staff in planning authorities are under 30, with an estimated demand of around 700 planners over the next 15 years.

It was further highlighted in RTPI Scotland research published in December 2023[13] that planning expenditure has continued to decline, being the only local authority service to see a reduction in funding on a national level between 2021-2022 and that the national planning department workforce is at its lowest level in five years, and on a gradual trend of decline, having fallen 23% between 2013 and 2022.

The reduced resources available to planning authorities – and their key dependencies such as statutory consultees – was identified as a key issue affecting planning service performance by all sectors. There is seen to a resource deficit in terms of numbers and experience. Virtually all of those engaged in the call for ideas mention that the acute reductions in planning staff and budget have been detrimental to performance. An example of this is:

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12   RTPI | Resourcing the Planning Service: Key Trends and Findings 2022
13   RTPI | Resourcing the Planning Service (RTPI Scotland Research briefing)

> **"** *"...the planning system is under resourced and expected to deliver too much complex and controversial work in unrealistic timescales. This leads to low morale and difficulties in retaining and recruiting staff to fill the key planning functions. This challenge is not restricted to planning authorities. The statutory agencies also face the same challenges, and this is affecting their ability to deliver their role within the planning system."* **(Professional/ advocacy/ community group)**

This has led to calls that planning authorities need to retain, and where possible grow, staff through resource management planning. The point was also made about the need to continuously upskill staff to ensure that they have the skills and knowledge needed to work in a changing context, especially in relation to the new NPF4. A particular issue of loss of experienced staff is highlighted as a concern.

It is stated that factors seen as impacting on the continued strength of, and attracting new and talented individuals to, the planning profession include reduced capacity due to challenges around the recruitment and retention of staff, uncompetitive salaries, lack of training and professional and specialised development opportunities within local planning authorities, and, public misinformation leading to complaints and criticisms that can often become vitriolic and personal. This is unanimously seen as unhelpful and that there is an imperative to work collaboratively across sectors to support staff and to tackle the challenges recognising the need for respect, integrity and trust. For example, respondents called for:

> **"** *"An overall greater level of respect for Planners and faith in the planning system from all who use the system."* **(Developer/ Infrastructure provider)**

The RTPI "It Takes Planners &"[14] campaign was mentioned by several organisations and workshops as a useful means of raising this as an issue and way of addressing the challenges it brings.

There are also calls for joint working and developing shared services across planning authorities to ensure that they can acquire specialist services during a tight resourcing period:

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14   It takes planners and you | Planning your world

> "Ready access to technical expertise. There is significant variation in the availability and quality of technical knowledge held across LPAs. A central pooled resource of planners and specialist experts, which LPAs, the ECU and other statutory bodies could access, could provide a solution. **(Developer/ infrastructure provider)**

The image of planners and planning is seen as a key challenge regarding this. There is a desire to change perceptions of the profession so that it is more respected and trusted and seen as having integrity in being positive, constructive and problem solving. Many feel that there is a need to support and protect planners and to build morale in planning authorities.

Culture

The need for a culture change and embedding of continuous improvement in planning authorities is highlighted by several applicants and community organisations. Several aspects of the quality of service have been raised and a number mentioned the need for value for money. There is only some limited support for financially penalising planning authorities who do not demonstrate what was deemed as acceptable performance, however, developers and applicants point to the need to ensure that increased planning application fees result in tangible improvements to the quality of service provided.

> "There needs to be a demonstration about what level of resourcing represents value for money and improves determination timescales and decisions on proposals... It is essential that in-depth understanding is reached as the level of resources needed to operate a high performing planning authority given the scale of cutbacks experienced in the planning service to date." **(Planning consultant/lawyer)**

There were strong calls across sectors to ensure that income generated through planning application and discretionary fees to be automatically reinvested to support planning.

> "Planning authorities do not have access to the full fee revenue raised from planning applications. Planning fees have increased significantly in recent years and the development industry feels it does not receive value for the money they spend on fees on the service. Insufficient resources available to deliver affects training, staff retention and morale." **(Developer/ Infrastructure provider)**

> **"F**ees have increased sharply in recent years, with no associated upturn in performance. Without ring-fencing any fee increase, the home building sector is unlikely to support it, and any argument put forward that uplifts in fees would see uplifts in performance would have no merit." **(Professional/ advocacy/community group)**

As part of the broader approach to improvement, many applicants highlight the importance of effective leadership that promotes a 'can do' and solutions-focused culture and provides confidence, certainty and consistency across planning authorities.

> *"Strong leadership is key to a high performing planning authority... we believe Chief Planning Officers need to have to achieve the required impact on the planning system, its position at the corporate table of local authorities, enhanced planning authority performance, and cross-departmental and cross-sectoral interaction and integration to achieve a joined-up, collaborative and participative approach to services and delivery."* **(Professional/ advocacy/ community group)**

The appointment or clear identification of dedicated Chief Planning Officers to help promote good or more effective leadership was seen as important in supporting this, with recognition that:

> *"A high performing planning authority would be fully integrated with other departments, recognising the wider impact of policy decisions."* **(Architectural organisation)**

There was discussion in workshops about the need to improve and learn from good practice and how this could be helped by more effective bench marking and joint working across the 34 planning authorities to identify challenges, good practice and innovation. It is felt that this could support planning authorities to have collective impact and take a place leadership role to support the implementation of the Place Principle. The new Local Development Plan process is seen to create opportunities for joined up working across planning authorities and with others such as key agencies.

Uncertainties that can occur from the involvement of planning committees in planning decisions is cited as an issue by some respondents, particularly applicants and community bodies. There is a strong message from users of the

planning services that elected members need to be fully up to speed on their roles, responsibilities and powers and that ongoing training is crucial to this. There were calls for mandatory training for councillors.

> " *"Mandatory elected member training should strengthen the relationship between senior officers and councillors. This will improve the relationship and trust between members and senior officers and hopefully result in less refusals against officer recommendation."* **(Developer/Infrastructure provider)**

As part of this there was a call for planning officers to build active relationships with elected members to ensure members are always informed, briefed of statutory processes and regulations and if they change over time.

Tools

The time taken to assess and issue decisions on planning applications is a major area of concern emphasised by developers and applicants. They call for:

> " *"…improvement in currently unacceptable determination timescales which are resulting in increased costs and extended build programmes, impacting housing delivery and business growth"* **(Developer/Infrastructure provider)**

> " *"A planning authority which delivers transparent, consistent and evidence-based decisions, which are arrived at in an efficient and timely manner would be considered as high performing. These decisions should be made adhering to pre-determined timeframes."* **(Developer/ Infrastructure Developer)**

The idea of revisiting and assessing determination periods is floated as means of assessing performance by some developers.

Although they tend to prioritise speedy decisions on planning applications many developers appreciate that resourcing issues are a factor on decision making times and call for or as a minimum more certainty in the timescales for decision-making.

However, planning authorities say that the quality of submissions is impacting on their ability to process applications quickly. They say that this is having an impact from the start of the process given that a significant numbers of planning

applications cannot be validated as they are not competed accurately or do not provide all necessary documentation:

> "Level of invalid applications at point of receipt (approx. 50%) is unsustainable and authorities are dealing with failure demand – national validation standards to be implemented with key assessments submitted at validation as well as automation through digital programme." **(Planning authority)**

In contrast to points made by applicants and developers a number of organisations, including community bodies, advocacy groups and planning authorities argue that speed of decision making should not be the primary measure of a successful planning authority:

> "Planning applications should not be based on speed but outcomes and impact" **(Planning authority)**

Some respondents, and in particular applicants but also community focused bodies, said that there is a need for more consistency across planning authorities, in terms of processes and decision making. There was a call for more standardised approaches to be introduced and for an exploration of how shared services could support a more joined up service.

> "…consistency of approach in decision making, efficient and reasonable decision-making timescales, transparency with developers and communication are the key qualities of a high-performing planning authority." **(Developer/Infrastructure provider)**

Having up-to-date and effective development plans is seen by many as a key performance measure. It is recognised that there is work to be done.

> "In order to deliver on the vision within National Planning Framework 4 (NPF4) and ensure that a plan-led system delivered the homes that Scotland needs as well as provides developers and their funders with the certainty needed to invest and create jobs it is important that the new suite of Local Development Plans (LDPs) come forward in a timely manner." **(Developer/ Infrastructure provider)**

The value of implementing the plan-led system and the primacy of the development plan is seen as key to many. They highlighted the importance of an up-to-date local development plan and other appropriate spatial strategies to provide certainty for developers, communities and investors.

> *"A high performing planning authority upholds a plan led system by monitoring e.g. How many approvals run contrary to the development plan for example."* **(Professional/ advocacy/community group)**

The transition towards using the new National Planning Framework 4 (NPF4) and perceived lack of clarity on some its policies is seen by many as an immediate issue that is impacting on confidence in decision making. Several issues have been raised regarding the perceived consequences of specific policies contained in the document, particularly from housebuilders. A number of responses highlight the resource consequences of new approaches arising from the document and the need for new skills and knowledge. There is widespread agreement that the delivery of NPF4's outcomes was an important measure of the success of planning.

Many respondents highlighted that digital planning can be a gamechanger in the effectiveness and efficiency of development management and development planning. It is felt that this can help in terms of service design, supporting collaboration, managing the processing of applications, drafting of policy, improving access to important evidence through spatial data and enhancing stakeholder and community engagement. These points were made by both planning authorities and the users of the planning service:

> *"...the systems we use and the way of presenting information need to be updated and become more innovative and engaging. Better use of GIS systems, virtual reality, augmented reality, scenario building and forecasting can all help us to understand current context, future context and ways to make our places more sustainable, liveable and productive."* **(Planning authority)**

> *"...software technologies embedded into the EPlanning Portal similar to project performance software used by many architects. A live dashboard would provide a snapshot of whether the application is being determined within the agreed timescale, applicant information outstanding, consultee responses awaited, conditions to be discharged etc"* **(Architectural organisation)**

It was noted however that this will require capital investment and upskilling within planning authorities with ambitions including:

> "*Ensuring Planners are now all digitally articulate and are able to use AI to assist their decision making... equipping Planners with the right levels of information to empower them to make the right decisions that take account of local circumstances and make them more productive.*" **(Planning authority)**

Engage

Many applicants and community representatives highlight the need for a better user experience and customer care where planning authorities engage more proactively and collaboratively. Communication and accessibility to planning staff are seen as particularly important as is the need for good pre-application discussions. For example:

> "*...the highest performing planning authorities are those who are willing to communicate, speak directly, to potential applicants before an application is submitted and during the application process. They also understand, or seek to, the particular challenges facing community organisations when engaging in the planning system. Many are volunteer led, with no previous experience of the system, yet are looking to deliver projects that epitomise what the planning system should be trying to do in terms of ensuring the long-term sustainable use of land.* **(Professional/Advocacy/Community body)**

Many advocate for a more collaborative and proactive approach between communities and planning authorities.

> "*A high performing planning system recognises communities as active partners in planning. This approach can transform how planning is done and redefines relationships between planners, elected members and communities.*" **(Professional/Advocacy/Community group)**

As part of this some groups have urged a change in the language used around planning so that it is more inclusive.

> *"We would like to see changes in the language used within the planning system to be more inclusive."* **(Professional/Advocacy/Community body)**

The need for more proactive engagement with specific underrepresented groups, and a better recognition of their perspectives is highlighted. There is a call to build on and support the communication and understanding of feminist planning policy and the need to better understand 'privilege'. The obligations of legislation are also referenced:

> *"The 2019 Act defines specific provisions requiring planning authorities to seek the views of disabled people, Gypsy/Travellers and Children and Young People (as well as those of the wider public) during Local Development Plan preparation. It is important that these outcomes – in terms of stakeholder engagement – are recognised as a key outcome of the Scottish planning system"* **(Professional/Advocacy/Community body)**

One of the strongest points voiced by applicants and developers was that customer care and communication should be an important aspect of a well performing planning authority.

> *"A willingness for planning officers to engage, including a willingness to meet with applicants/prospective applicants to discuss issues, and also to facilitate similar discussions with internal consultees where relevant/appropriate in order to facilitate approval of applications."* **(Planning Consultant/Lawyer)**

> *"Communication is key, a case officer that has time to respond to and engage with the applicant and their design team will have much greater influence on the proposals. Local Planning Authorities must be better resourced and case officers encouraged to communicate appropriately and consistently.* **(Architectural organisation)**

Asking the users and customers of the planning system was seen as something that could be a useful measure of performance.

> *"A nation-wide customer satisfaction survey issued to customers and stakeholders. This would help planning authorities to benchmark their performance."* **(Developer/ infrastructure provider)**

Place

As outlined above an outcomes-based approach to assessing planning performance is seen as important. The significance of place and good placemaking was a strong discussion thread through workshops discussion and submissions from across sectors. Planning's role on this was seen as key.

> *"...town planners try to make towns, cities and the countryside attractive, safe and environment friendly. They are at the heart of discussions with local communities, businesses and politicians."* **(Individual)**

> *"The real and positive impact of the system will be getting the right development, in the right place, at the right time."* **(Planning authority)**

It is recognised that this relies on several outcomes, all of which are currently in place across a suite of policy, legislation and guidance including the NPF4, Planning Acts, the Place Standard, Designing Places and Design Streets. The spatial principles of NPF4 are seen as especially important:

▶ sustainable places, where we reduce emissions, restore and better connect biodiversity

▶ liveable places, where we can all live better, healthier lives

▶ productive places, where we have a greener, fairer and more inclusive wellbeing economy

A number of frameworks and strategies were mentioned as important in helping to define and measure the outcomes of good planning and placemaking. There are however different priorities identified on what should be prioritised including new housing, renewables, net zero, biodiversity, good placemaking and quality design with several respondents pointing to the need to achieve a balance and the importance of delivering the outcomes set out in NPF4 such as sustainable, liveable and successful places.

Another possible indicator proposed for planning authority performance has been its ability to facilitate and enable development on the ground. Several

specific examples are given by applicants on the perceived over-complexity of some procedures that can impact on the delivery of development. They include the need for proportionate approaches regarding information required to support planning applications, section 75 agreements and the imposition and discharging of conditions. Several applicants, developer and architects called for a situation where a planning authority

> "...avoids irrelevant conditions... which reflects that Council's understanding of the need to reduce unnecessary bureaucracy and delay."

It is suggested that:

> "Useful data for measuring LPAs performance which could be introduced could focus on implementing and monitoring statutory determination periods for discharging conditions. This is an area of great frustration for developers with there being major delays for the discharge of planning conditions, therefore preventing progression of developments. Crucially, there is no incentive for LPAs to prioritise discharging conditions at present." **(Professional/ Advocacy/ Community body)**

However, there were also calls for planning authorities to:

> "...provide full transparency around planning conditions that are discharged and to demonstrate full compliance with planning conditions. The local authority have proper processes and protocols in place to ensure compliance is achieved, including well resourced and trained enforcement teams." **(Professional/ advocacy/ community group)**

Several respondents pointed to issues affecting this including difficulties in securing legal agreements and challenges in financing necessary infrastructure which can lead to development being stalled, asking for workable developer contributions that make sites viable and Section 75 Agreements that are implementable rather than be contested.

Respondents from the housing sector have outlined how they feel that there is an issue in terms of land supply, proposing that a performance measure can be developed through exploring the effectiveness of Housing Land Audits, in supporting the delivery Local Housing Land Requirements.

How can we measure performance?

The third question in the call for ideas followed up from the discussion on what the attributes of a high performing planning authority are by asking how we measure this.

Complexities

Respondents often found it difficult to identify indicators and data sources that can be used to measure performance, though generally there was an agreement that there was need to better measure the outcomes that planning provided in terms of development on the ground.

> *"Measuring this will be tough. Measuring the outcomes of development takes a long time and is unhelpful if it is purely in retrospect. We need dynamic, (almost) real-time tools to be able to gauge projected outcomes at all stages of the development cycle – land appraisal, plan-making, PPP, detailed matters, construction phase, occupation phase."* **(Planning Authority)**

> *"...we also need to ensure that the measurements don't just stop at decision issued stage. We need to go back 1 year, 5 year, even 10 years after development implemented to see how things have panned out on the ground and how the users of the development are interacting with it and is it living up to the placemaking promises we thought we were going to get."* **(Planning Authority)**

The complexity of measuring performance is recognised as is the need to agree that there was no single measure that could tell the whole story. The breadth of measures was highlighted through, for example

> *"A nation-wide customer satisfaction survey issued to customers and stakeholders. This would help planning authorities to benchmark their performance; Development Management Determination Time Statistics, including Internal consultee/ adviser response times; (and) Expertise – What level of skills are there within planning teams (professional accreditation etc.) and levels of training provided"* ***(Developer/ Infrastructure provider)***

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> *"...the need to move away from assessments of effectiveness of planning authorities being based around the number of planning applications received, types of decision and the time taken etc to a more qualitative assessment and one that looks at impact measures, or perhaps a combination."* **(Architecture organisation)**

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> *"We also need to focus more on outcomes that make a real different on the ground such as the number of homes delivered, infrastructure investment, private expenditure unlocked, number of jobs created and also look at community perceptions on the places where they live, accessibility, wellbeing, affordability etc."* **(Planning authority)**

There are also calls for more direct measures based upon process and speed.

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> *"A high performing planning service could simply be measured against its DM processing times when set against the minor and major application determination timescales. Achieving the standard would allow Council's to reasonably justify whole cost recovery of DM services through application fees..."* **(Developer/Infrastructure provider)**

A few developers highlighted the importance of monitoring determination periods, the success of pre-application discussions, determination periods for discharging conditions, the number of appeals being assessed by the Department of Planning and Environmental Appeals each year that have committee decisions against planning officer recommendation and the currency of Local Development Plans.

In essence the feedback showed that any new assessment process should comprise a mix of qualitative and quantitative indicators, outcomes-focussed measures and customer and stakeholder perceptions.

Existing Metrics and Frameworks

A number of people highlighted the appropriateness of using existing metrics and frameworks. For example, the Place Principle[15] which has been adopted by Scottish Government and COSLA to support those responsible for providing services and looking after assets in a place to work and plan together, and with

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15   Place Principle: introduction - gov.scot (www.gov.scot)

local communities. The Place Standard[16] was mentioned in several submissions given that it can provide a framework to assess the qualities that can make a place attractive, or not, and helps to identify the assets of a place as well as areas where a place could improve. The Place and Wellbeing Outcomes[17] was another framework which was seen as relating to planning performance. These outcomes aim to focus decision-making and implementation on a common set of evidenced features that make every place.

Other methods and tools suggested included logic models, specific surveys, questionnaires, interviews, case studies, benchmarking and cost-benefit analysis.

Collaboration

Responses suggested that better use of digital technology would help to ensure a more effective, efficient and transparent monitoring.

It is clear from responses and discussion that planning performance is a shared endeavour where planning authorities, applicants, communities and others supporting the process can all have an impact. The need for collaboration and transparency are therefore important in taking forward any new assessment and improvement framework:

> *"…improving the planning system with a focus on outcomes is also a challenging and complex task, as it requires a clear and shared understanding of the outcomes and their measurement, a strong and supportive performance and capacity of the planning authorities, and a pragmatic and flexible approach to the methods and tools for the evaluation. Therefore, it is essential to adopt a collaborative and learning-oriented approach to improving the planning system with a focus on outcomes, and to involve and engage the planning stakeholders and the public in the process."* **(Developer/Infrastructure provider)**

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16   The Place Standard tool is a way of assessing places. | Our Place
17   Briefing: Place and Wellbeing Outcomes (improvementservice.org.uk)

Conclusions

The 'call for ideas' and broader engagement has provided an invaluable snapshot on what challenges face the planning profession in Scotland. It has also generated a wealth of information, opinion, evidence and thinking around key questions of what we want planning to achieve, what a high performing planning system looks like and how we can measure and monitor these. This deep dive into the issues, challenges and opportunities has been enormously useful in informing the development of a new National Planning Improvement Framework that will monitor planning authorities' performance to support them to identify areas for improvement.

A valuable theme throughout the engagement is a desire and an imperative to work collaboratively across sectors to tackle the challenges facing planning. Given this, the new national planning improvement framework will be based on a 'collaboration for action' concept. It will aim to better use planning authorities' self-assessment to inform and deliver an improvement action plan. It will also see the introduction of a new collaborative peer review process involving the National Planning Improvement Champion, other planning authorities and, for the first time, stakeholders.

The new framework also aims to better measure how planning authorities improve through incorporating indicators that better assess impacts, outcomes achieved, and the quality of the service provided, and, by recognising that planning authorities depend on others to deliver a good quality service. The framework is based upon what have been identified as the attributes of a high performing planning authority such as having the tools to do the job, effective engagement, having the people and resources needed, developing a positive culture, and, having ambitions to deliver quality placemaking.

The call for ideas exercise also provides an indication of the challenges identified by stakeholders in the planning system at that time and so provides a 'baseline' that can be used to assess what progress is being made regarding the issues identified. It will, therefore, be revisited over time to ascertain of progress had been made, or if action needs to be taken.

Thanks go to all who took part in the call for ideas, meetings and workshops that took place as part of this engagement. The experiences, learning and thinking that have been discussed through the process have been invaluable in helping to shape the way forward.

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