



NATIONAL PLANNING IMPROVEMENT FRAMEWORK

Performance Assessment Report

Cohort 3

March 2025

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PLANNING AUTHORITY DETAILS

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PROFILE OF LOCH LOMOND AND THE TROSSACHS NATIONAL PARK

Loch Lomond and The Trossachs National Park Authority is an executive [non-departmental public body](#) (also known as an NDPB). The National Parks (Scotland) Act 2000 sets out our responsibilities including statutory planning and access functions. Our four local authorities (which the Park overlaps, West Dunbartonshire, Stirling, Argyll and Bute, and Perth and Kinross) provide other key services such as education, roads, housing, building services and parks / open space and we work closely with them.

As a [Planning Authority](#), we are responsible for deciding all planning applications in the National Park area. This includes everything from small scale household developments to proposals for larger housing and tourism proposals, listed building alterations and advertisements. We also offer a pre-application advice service and monitor compliance with planning approvals and conditions. Planning in National Parks is different to all other areas of Scotland. Planning policy and decisions must contribute to achieving the four statutory aims of National Parks:

- to conserve and enhance the natural and cultural heritage of the area
- to promote sustainable use of the natural resources of the area
- to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public, and
- to promote sustainable economic and social development of the area's communities.

These aims are to be pursued together. However, if it appears that there is conflict between the first aim, the conservation and enhancement of the natural and cultural heritage, and any of the others, we must give greater weight to the first aim (Section 9(6) of the National Parks (Scotland) Act 2000). This is often referred to as the 'Sandford Principle.'

The Place Directorate is the wider service area that includes our statutory planning service. This comprises Development Management, Communities and Place Planning, Place Projects and Sustainable Tourism Teams. The Development Management Team is responsible for the assessment of applications for development, monitoring and enforcement. The Communities

and Place Planning Team is primarily responsible for the preparation of the Local Development Plan and associated planning guidance. As well as promoting community wealth building. The Place Projects Team is responsible for delivering physical place making projects within the National Park with a focus on visitor infrastructure. The role of the Tourism Team is to spearhead initiatives that support the National Park's vision to become a thriving, nature-positive, and carbon-negative destination - working with a spectrum of stakeholders and partners, from local communities, businesses, national organisations and public agencies to implement forward-thinking solutions and fostering successful tourism business activity within a greener economy.

Outwith the Place Directorate, but within the National Park Authority, specialist advice to the planning service is provided by access and recreation advisers and landscape and ecology advisers – within the Environment and Visitor Services Directorate.

CONTEXT

The Planning (Scotland) Act 2019 introduced new statutory reporting for planning authorities. This mandatory requirement means that planning authorities must prepare a report annually that will assess performance and identify actions for improvement. This Performance Assessment report and the associated Improvement Action Plan will be published and submitted to Ministers.

This report is, however, set against the backdrop of 12 previous, annual Planning Performance Framework (PPF) reports prepared by the National Park. The PPF, introduced in 2012, was developed by Heads of Planning Scotland (HOPS), in conjunction with the Scottish Government. These reports sought to capture key elements of a ‘high-performing planning service’ and comprised a mix of qualitative and quantitative performance measures that provides a toolkit of indicators. It offered a balanced measurement of the overall quality of each planning service and was very useful in assisting recording and promoting continuous improvement. PPF 12 was the last report produced under the previous system and can be found [here](#). This new National Planning Improvement Framework - a pilot for this year (covering the reporting period 2023/24) - was developed by the new National Planning Improvement Champion with stakeholders from a range of perspectives and interests in planning. It focusses around five themes that have been identified as being key to a high performing planning authority. Within these five themes there are 12 attributes. These are:

Theme: People

1. Has sufficient resources and skills to maximise productivity.
2. Has a valued and supported workforce.

Theme: Culture

3. Has embedded continuous improvement.
4. Has sound governance.
5. Has effective leadership.

Theme: Tools

6. Has robust policy and evidence base.
7. Makes best use of digital technology.
8. Has effective decision-making processes.

Theme: Engage

9. Has good customer care.
10. Has effective engagement & collaboration with stakeholders and communities.

Theme: Place

11. Supports the delivery of sustainable, liveable and productive places.
12. Supports the delivery of consented development.

The matrix below has been provided by the Improvement Service to be applied when determining the score we have given to each attribute.

 PRIORITISE	 REVIEW	 DEVELOP	 BUILD UPON	 CONSOLIDATE
No progress	Making limited progress	Making fair progress	Making good progress	Making excellent progress
5	4	3	2	1
Prioritise fundamental review and revisit approach taken. Engage with NPI Learn from others	Review ambition Review approach taken Inform NPI Learn from others	Increase ambition in targets Review and improve implementation	Increase ambition in targets Share learning with others	Share learning with others

Peer Review Workshop

This report has been developed through a self-assessment undertaken by the Planning Authority and the improvement actions have been tested through a Peer Review Workshop which took place on 2nd April. The Peer Review session was facilitated by the Improvement Service and was attended by representatives from LLTNPA Planning Service, the Planning and Access Committee Chair and a range of key stakeholders including:

- Our Peer Review partners at Moray Council
- Luss and Arden Community Council
- St. Fillans Community Council
- Local Roads Authority
- Internal Advisor
- Nature Scot
- Land Owner
- Planning Consultant/agent
- Improvement Service

The Peer Review provided a valuable opportunity for open discussion on the proposed improvement actions, enabling stakeholders to offer feedback, suggest amendments, and identify additional areas for improvement. As a result, several actions and associated timescales have been revised; these changes are clearly noted throughout the report.

Importantly, the session also revealed areas of shared interest with Moray Council, highlighting opportunities for collaboration and the exchange of best practice.



A high performing planning authority needs to have the right number of people to do the work expected of it with the right skills set. It also needs to have a strategy to ensure that it retains and recruits the right staff in the future. It supports staff to upskill and to be prepared for changes in policy, legislation, and new circumstances.

ATTRIBUTE 1: THIS PLANNING AUTHORITY HAS SUFFICIENT RESOURCES AND SKILLS TO MAXIMISE PRODUCTIVITY

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have the sufficient level of staff to carry out all activities within the required timeframes?
- Does the planning authority have the ability to carry out all activities within the required timeframes with its current budget?
- Does the planning authority have the ability to carry out all activities within the required timeframes with its current income?
- Does the planning authority received responses from consultees within the prescribed timescale when assessing planning applications?
- Does the planning authority have the ability to access the appropriate advice, expertise, evidence and data it requires?

Narrative

Staffing Context

In addition to delivering our core statutory functions within Development Management and Place Planning, the Place Projects Team has a central role in the delivery of improved visitor infrastructure across the National Park to help in achieving the National Park Aims and to maximise National Park assets for wider public and local benefit.

Our budget covers staffing and operational matters – support systems to the service as well as policy development. We track income and expenditure, and our annual planning fee income is noted on page 12 of this paper. Whilst our fee income is not specifically ring fenced to the planning service, our income levels are a factor when making decisions on requirements for

additional resourcing. Budgets are set centrally through the 'grant in aid' provision to our operating expenditure from Scottish Government - as part of our overall funding.

There has been a significant change in legislation and policy following the adoption of National Planning Framework 4 (NPF4) with a particular focus on bio-diversity enhancement and climate change. LLTNPA is uniquely placed to deliver on NPF4 Policy 3 (Biodiversity) with the aid of in-house advisers with specialist skills in landscape, ecology and trees and woodlands. A new internal consulting procedure has been implemented. This is a triaging process during the validation stage of planning applications to ensure the correct specialist and level of advice is sought at the earliest stage of the planning process. Undoubtedly, however, the increased requirement for bio-diversity enhancement and climate change considerations and scrutiny of applications has led to increased determination times – the quality of decision-making remains of utmost importance. The service also has an 'on-call' arrangement with Argyll and Bute Council for built heritage advice. External specialist legal support has also been procured and is utilised for complex planning applications, conclusion of S75s and to fulfil the role of legal clerk at Planning and Access Committee meetings and Local Review Body meetings.

Within the Place Planning Team, a long-term sickness absence along with competing demands from major planning and infrastructure casework has contributed to some delays in the programme for the preparation of our new style Local Development Plan but sharing of resources with the Development Management Team and other transferrable skills across the wider organization has recently assisted in keeping things moving towards adjusted deadlines.

Staff Profile

The level of staff resource within the Development Management Team is currently healthy. There is one vacant post within the Place Planning Team, following the creation of an additional post to help with the Local Development Plan workload, which is currently being recruited. Innovative recruitment strategies have been implemented. In a previous recruitment program, a general advertisement for those interested in roles at the National Park successfully attracted two new planners into the team. A copy of the Place Directorate staff structure is provided in Appendix 1.

Most professional staff in the Service are MRTPI or eligible for membership.

<i>RTPI Staff</i>	<i>Headcount</i>
<i>Chartered Members</i>	<i>12</i>
<i>Licentiate RTPI Members</i>	<i>2</i>
<i>Affiliate Member</i>	<i>1</i>
<i>Total</i>	<i>15</i>

Workload Profile

Headline Indicators - Decision-making timescales - Average Number of Weeks to Decision			2023-24	2022-23
Major developments			n/a	54.3 weeks
Local developments (non-householder)			12.9 weeks	13.2 weeks
Householder developments			12.0 weeks	9.3 weeks
Decision-making timescales (based on ‘all applications’ timescales)				
Timescales	2023-24	2022-23	2021-22	2020-21
Overall				
Major developments	n/a – one app with processing agreement	54.3 weeks	n/a – no applications	66.4 weeks
Local developments (non-householder) <ul style="list-style-type: none">Local: less than 2 monthsLocal: more than 2 months	12.9 weeks 6.7 weeks 15.9 weeks	13.2 weeks 6.4 weeks 16.7 weeks	16.3 weeks	22.2 weeks
Householder developments <ul style="list-style-type: none">Local: less than 2 monthsLocal: more than 2 months	12.0 weeks 6.7 weeks 13.8 weeks	9.3 weeks 6.0 weeks 13.1 weeks	9.1 weeks	16.3 weeks
Housing Developments				
Major	n/a – no applications	n/a – no applications	n/a – no applications	66.4 weeks
Local housing developments <ul style="list-style-type: none">Local: less than 2 monthsLocal: more than 2 months	15.5 weeks 7.9 weeks 17.2 weeks	20.7 weeks 7.7 weeks 24.0 weeks	18.6 weeks 6.6 weeks 21.9 weeks	25.9 weeks 7.1 weeks 27.6 weeks
Business and Industry				
Major	n/a – one app with processing agreement	n/a – no applications	n/a – no applications	n/a – no applications
Local business and industry developments <ul style="list-style-type: none">Local: less than 2 months	16.7 weeks 7.0 weeks 21.6 weeks	12.5 weeks 6.1 weeks 15.4 weeks	16 weeks 7 weeks 18.8 weeks	23.6 weeks n/a 23.6 weeks

<ul style="list-style-type: none"> Local: more than 2 months 				
EIA Developments	n/a – no applications	54.3 weeks (The Major Application was also EIA)	40.1 weeks	30.3 weeks
Other Consents	11.9 weeks	9.8 weeks	10.7 weeks	11.7 weeks
Planning legal agreements <ul style="list-style-type: none"> Major: average time Local: average time 	n/a – no applications 16.0 weeks	n/a – no applications 27.7 weeks	n/a – no applications 38.6 weeks	66.4 weeks 49.1 weeks

Total Pre-applications enquiries received by financial year

	2022/23	2023/2024	2024/2025
April	24	14	20
May	32	30	20
June	18	25	17
July	17	28	15
August	10	28	16
September	15	23	16
October	9	22	23
November	23	23	22
December	14	18	17
January	23	31	16
February	13	24	29
March	36	22	0
	234	288	211

Total Applications Received per month 2023/24

2023/24	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	TOTAL
TOTAL	24	43	35	36	52	37	41	23	26	27	26	20	390

For our own improvement action we have highlighted that a focus on straight forward householder and small-scale local applications can improve our determination timescales relative to the Scottish average. From the peer review workshop, it was nevertheless noted there was a desire that this was not at the expense of small-scale business applications taking longer to determine. We would reassure that this would not be the case and we strive to determine all applications without delay unless there was a reason such as a delayed consultation response or required a more complex planning assessment.

Planning fee income for the past few years has been as follows:

Year	Total
2021/22	£162,547
2022/23	£468,950
2023/24	£201,728
2024 to current	£197,661

The variation in income year to year arises principally in relation the number of more significant – or major - applications received in each year. Typically, we only receive of the order of one or two ‘major’ applications per year – and this can have a significant effect, proportionately, on the level of fee income per year.

We continue to provide free of charge pre-application services – this is further described under attribute 2.

External Consultees

LLTNPA is heavily reliant on external consultees from the four Local Authorities which cover the National Park Area, primarily in relation to advice on roads, flood and environmental health matters. The timescales for receiving external consultations are not within the control of the Authority and these vary depending on the organisation, their staffing/resource and complexity of each planning case.

ATTRIBUTE 2: THE PLANNING AUTHORITY HAS A VALUED AND SUPPORTED WORKFORCE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have a workforce planning strategy in place?
- Does the planning authority have the ability to support staff development and upskilling and send staff on relevant courses?
- Does the planning authority have a deliverable commitment to support staff health and wellbeing?

Narrative

Workforce Planning

The Authority has generally been successful in recruiting into planning roles. Difficulties in recruitment 2022/2023 (noted in PPF 12) were overcome with the re-structuring of the Development Management Team and the introduction of Senior Planner roles and a Planning Support Co-ordinator. Senior Planners oversee the work of Planning Officers and Assistants and have delegated Authority to sign off planning reports. Three Senior Planners were in post from August 2023. The Planning Support Co-ordinator has line management responsibility for three planning support staff. The new structure provides for progression opportunities within both teams. Overall, staff turnover within the Planning Service remains low with most staff having been with the service for more than 5 years.

Staff Development and CPD

Staff have attended a variety of courses and development opportunities throughout the year, and these have included RTPI Event: Sustainability and resilience through planning - building adaptability to future challenges; SSEN Transmission presentation to LLTNPA Planners; Brodies Planning Caselaw event; Improvement Service - Shaping Places for Wellbeing Series; HOPS event - The Role of Environmental Clerk of Works.

In addition, staff in the Place Directorate have attended a team building Away Day in Arrochar and Tarbet. Place Projects team gave an overview of a key tourism site to be developed by the National Park and other initiatives and developments in the area.

National Park staff also hold several 'Lunch and Learn' sessions throughout the year and these have included: Park Partnership Plan: Creating a Sustainable, Low Carbon Destination; Enabling a Green Economy and Restoring Nature.

Staff Health and Wellbeing

LLTNPA has invested significant time and resource to staff health and wellbeing. Initiatives within the Park Authority to support staff health and wellbeing include the formation of a wellbeing and hybrid working hub – a central point to access information related to mental and physical health as well as useful information on working successfully from home. An Employee Assistance Programme is also provided. Importantly, since 2023, the Park has invested in the services of a life coaching and wellness expert who has provided online and in-person programmes which are available to all staff. In addition, all staff can take part in up to three volunteer days per year. This can include working on projects outdoors in the National Park including projects such as rhododendron removal, tree planting, path works etc.

Improvement Action Plan (People theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
1. The planning authority has sufficient resources and skills to maximise productivity	2
2. The planning authority has a valued and supported workforce	2

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
Continue to focus on reducing application determination times with a particular focus on householder applications and straight forward local applications where limited additional value can be added to the proposal through the planning process. This can improve the overall performance of the Planning Service by reducing the average determination time and focusing resources and	Development Management Manager.	Short term	1	Staff Time

staff time on applications which can deliver the outcomes of NPF4.				
Develop an ongoing review of Personal Development Plans (PDP's) to support individual staff needs and training requirements across the service. The preparation of these can be used to develop a formal training plan for the service and identify areas where internal knowledge/best practice can be shared among officers and where external expertise is required. As well as giving consideration of a clear progression route from Graduate to Officer and support through the RTPi APC process	Communities and Place Manager and Development Management Manager with support of senior planner	Short term	1	Staff time



A high performing planning authority has a positive culture through ensuring it has sound governance, effective leadership and a commitment to continuous improvement. The authority has an identified chief planner, who is supported by a strong leadership group to advise on decision-making, policy and operational management.

ATTRIBUTE 3: THIS PLANNING AUTHORITY HAS EMBEDDED CONTINUOUS IMPROVEMENT

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Has the planning authority undertaken an annual assessment of its performance and acted upon areas previously identified as in need of improvement?
- Has the planning authority achieved recognition at relevant awards or through performance accreditation frameworks?
- Has the planning authority engaged in peer review, good practice exchange or improvement activities?
- Has the planning authority addressed any complaints upheld by the Scottish Public Services Ombudsman and have evidence of this and that it has learned from valid cases?

Narrative

Assessment against previous PPF

The most recent PPF report (PPF12 as linked earlier in this report) set out several improvement areas as outlined in the table below. This outlines the work to undertake an annualised approach to assessing and improving performance.

No.	Area for Improvement	Planned Action
1.	Planning application determination times - phase III	Implement a restructure of the Development Management Team – which, through enhanced management capacity, support to other staff and efficiencies, will deliver reduced determination times.

		Continue to develop and implement enhanced caseload management and reporting tools to enable monitoring of determination times on a monthly basis.
2.	Deliver planning / governance efficiencies	<p>Prepare our first Planning Fee Charter (covering discretionary charging and exceptions).</p> <p>Deliver LDP Act requirements. –</p> <p>Local Review Body Member training and develop options for an independent Planning Advisor to become involved in hearings when necessary.</p> <p>Scheme of Delegation Review.</p>
3.	Progress towards Digital Transformation	<p>Active participation in the Scottish Government’s development and trialling of the forthcoming Digital Planning platform.</p> <p>Skilling up on new developments in our in-house software (e.g. Microsoft 365, Sharepoint) to maximise efficiencies</p>
4.	Local Place Plan requirements	<p>Prepare and implement a procedure to disseminate Local Place Plans internally amongst staff, to Board Members and with partner organisations.</p> <p>Establish a monitoring programme to collect data that will inform Scottish Ministers’ 7-year Review of the impacts of Local Place Plan as required by the Planning (Scotland) Act 2019.</p>

Progress on these areas is provided below:

1. Planning Application Determination Timeframes: Reducing determination timescales remains a key area for continuous improvement. Several updates to internal processes have been implemented, as outlined below. However, an effective process or system is still needed to consistently monitor timescales and the progression of applications. Due to limitations within our existing systems, progress in this area has been paused. Nevertheless, the Park Authority has recently secured a new post in the IT side of the business - specialist ‘Power Apps’ developer. With their expertise, we hope to develop a dashboard that integrates with the Uniform system, enabling real-time tracking of all pending applications and facilitating more effective caseload monitoring.

2. Deliver planning / governance efficiencies: Work on progressing the Fee Charter has been delayed due to the priority of establishing the DM team restructure. Significant resource also had to be directed to the assessment and determination of the high profile 'Lomond Banks' major application. This work continues to be an improvement action which should be progressed this year. The Scheme of Delegation review has been undertaken - and is referenced under attribute 4. The engagement of a Planning advisor to the LRB has still to be actioned – currently the meetings are advised by a legal clerk only
3. Progress towards Digital Transformation: The Scottish Governments Digital Planning Programme's has been paused, however the Planning Service has been one of three partners working with the Scottish Government on the development and implementation of a new Planning and Building Standards Pay Solution. The service will offer improved functionality for both customers and planning authorities, including additional payment options and enhanced refund and reconciliation processes. Testing of the system has been ongoing throughout 2024 with planning and GIS staff members contributing to the process. Staff members continue to familiarize themselves with the use of new systems in 'Sharepoint' and MS365.
4. Local Place Plan requirements: This is discussed under Attribute 10.

Improvement Activities

The Planning Service is committed to continuously evolving to meet the changing needs of the organization while addressing resourcing challenges. Our goal is to deliver an efficient, high-quality service by optimizing the use of available staff resources. With this in mind, we have made the following updates to our internal work processes

Validation – Several enhancements to the validation procedure have been introduced to help reduce this resource intensive area of work currently undertaken by the planning assistants. Officers now have input to the validation process by reviewing the submitted documents, site constraints, selecting relevant consultees and reviewing proposal descriptions. This process encourages early review of casework files by officers and helps to streamline the validation process by reducing double handling of documents by planning assistants and officers. Our internal validation procedure has been updated to improve efficiency, but nevertheless there remains the issue that legislation on validation requires only a very minimal submission and this requires action - particularly to reflect if information is requested or required at pre application stage then that should be legally provided before the application becomes valid. This is outwith the control of the planning authority but is noted as an aspirational improvement action for others as it continues to impede performance. There is also a recognition of an improvement

action for professional agents to provide comprehensive application packages to speed up decision making. This is a reminder that our performance is dependent on the quality of information submitted.

External consultations – The resource required in responding to external consultations has been noted in Attribute 1. This expanding area of work has highlighted the need for a comprehensive information management system and an internal consultation process to ensure that responses are properly documented and addressed—similar to the process for handling planning applications. A new procedure has been introduced and is currently in the trial phase.

Internal advice – With the goal of reducing application timescales and optimising internal advisor time, a new procedure has been introduced to minimize written responses and foster more verbal communication between planners and specialist advisors. This approach aims to deliver quick responses for straightforward cases and swiftly identify when additional information is needed, and a written response is required. The process is carried out through a triage system, similar to the one implemented by SEPA to streamline responses. The new procedure is still in the trial phase and will be updated and adjusted as necessary.

Updating Officer Delegated Report templates – We have traditionally used one template for all our delegated reporting needs and officers edited this as appropriate to each application type. We have now introduced a greater range of boiler plate report templates. These are now more concise and include standardised format and text bespoke to application types to reduce officer time spent on editing and to bring greater uniformity to the outputs. We have:

1. Introduced a separate Householder Report Template for householder applications which reduces the boiler-plate text to reflect only the relevant policy and issues associated with these types of applications.
2. Introduced new report templates for certificate of lawful use/development (CLUD) (existing and proposed) applications which omits irrelevant sections (neighbour consultations/policy/EIA/HRA etc.)
3. Updated our Pre-application Letter template to reflect advice on fees in response to the imminent changes to the ePlanning portal payment system.

We are further investigating how to improve our Planning Committee report template to make this easier to use and to reduce formatting needs.

S50 certificate applications process – These (licencing related) applications were traditionally handled outside of Uniform and our IDOX systems relying on use of an Access database to generate the certificate and to record the applications. Processing was undertaken by officers

on an ad-hoc basis. With the introduction of Microsoft365, Access has become redundant, so we have now moved this process into Uniform and IDOX which also allows us to allocate each application to officers through the workflow function. This ensures that Section50 applications arriving through our website application facility are now directly entered into our systems and are more efficiently handled which helps to speed up their processing.

Tree Preservation Order Review – The Planning Service is undergoing a review of TPO's with the specialist advice of the Trees and Woodland Adviser to ensure all of our orders are legally compliant and up to date. The updated scheme of delegation, noted in attribute 4, allows for efficient updating and creation of new orders at officer level.

Peer review/ good practice - The Service Manager attends the HOPS development management sub committee meetings regularly which is attended by representatives of Scottish Local Authorities and the National Parks to discuss topical matters and share best practice. This platform offers the opportunity for peer review and exchange of good practice.

Complaints

The Planning Authority has had no Scottish Public Service Ombudsman complaints within the reporting period.

The Planning Authority has an effective complaints system and process, utilising the Park Authority's wider policy and procedure. Stage one complaints are dealt with by the internal teams and responses sent from managers with a turnaround time of 5 working days. If any complaints are escalated to Stage 2, these are dealt with by the Information Manager or Governance & Information advisor, with a turnaround time of 20 working days, allowing time for investigative work. Details of how to appeal to the Ombudsman are given to all complainants to use if they are dissatisfied with the response. During the complaints process, we analyse for any trends, keep on top of changes to legislation and exchange information in-house to adopt best practice.

ATTRIBUTE 4: THE PLANNING AUTHORITY HAS SOUND GOVERNANCE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have an effective scheme of delegation in place?
- Have all councillors who exercise a planning function undergone statutory training and is there evidence of ongoing training for members?
- Have more than x % of officer recommendations have been overturned by councillors at committee or Local Review Body.

Narrative

The Planning Service has an effective scheme of delegation in place. The scheme of delegation was reviewed, updated and approved by the National Park Authority Board in June 2024. The review focused on ensuring statutory compliance, improving the efficient operation of Committee and the Scheme of Delegation, the updating of job titles and reflecting the practice of the Planning and Access Committee and Local Review Body. On 1st April 2024, the Planning (Scotland) Act 2019 (Commencement No. 12 and Saving Provisions) Regulations 2024 came into force, requiring the appointment of a Chief Planning Officer for the National Park Authority. This was considered in the review of the documents - the Park Authority's Director of Place role already reflected the guidance in respect of planning and the statutory guidance on Chief Planning Officers. The Park Authority's Director of Place, was confirmed to assume the duties and additional title of Chief Planning Officer to satisfy this requirement. The updated scheme of delegation includes delegated authority for the provision of Tree Preservation Orders where no valid objections have been made. Such applications will no longer automatically go to Committee under the updated Scheme thus making the process more efficient and consistent with the approach to planning applications - where straightforward cases are delegated decisions. Overall, the scheme of delegation is designed to be proportionate to balance efficient decision making for non-contentious cases and ensuring committee members have an input into significant and contentious cases, thereby utilizing our resources most efficiently. In 2023/24, 98.5% of applications were delegated.

All Planning and Access Committee members have undergone internal training on the planning system and role of the Planning and Access Committee. In addition to this, all members of the Park Authority Board have received Major Planning Application training from our external legal partners. We have an ongoing programme of training for committee members to respond to specific topic areas or challenges arising.

In terms of the percentage of overturns of officer recommendations at LRB and Committee, these are considered to be very low. In 2023/24, there were only 3 LRB's received. Of these, 1 was overturned (this was decided in 24/25).

In terms of the percentage of overturns of officer recommendations at Committee, 6 applications were presented to Committee in the 2022/23 reporting period. Committee members agreed with the officer's recommendation in all cases.

ATTRIBUTE 5: THE PLANNING AUTHORITY HAS EFFECTIVE LEADERSHIP

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have an identified Chief Planning Officer in place?
- Does the Chief Planning Officer advise on corporate decision making and policy within the broader organisation?
- Is the planning authority's Chief Planning Officer a member of the Royal Town Planning Institute?
- Does the Chief Planning Officer advise and support external bodies through engagement in organisations' committees, advisory groups or working groups?
- Does the planning authority have a strong leadership team that supports a culture of continuous improvement?

Narrative

The planning authority's Chief Planning Officer is Stuart Mearns (Director of Place). Stuart has full RTPI Membership. Stuart is part of the National Park Authority's Executive Team which has the overall responsibility for the delivery of the Park Authority's Services, Statutory functions, duties and compliance along with the leadership of the organisation. The team meet regularly as a group with the CEO and focus on all aspects of corporate decision making. The Chief Planner role therefore includes operational delivery, policy and Executive corporate decision making. Each of the Executive team engage regularly with Board Members – who provide strategic oversight of the organisation - and particularly with the chairs of the range of Committees that operate as part of the Park's governance structure.

There is a strong programme of engagement from the Executive Team with staff – including engagement with team and project meetings along with a quarterly all staff meeting led by the CEO.

External engagement and representing the organisation is a key part of the Chief Planner's role. This is to support the effective operation and delivery of statutory planning services through engagement with Key Agencies and Council Service Leads whilst also ensuring good communications with industry and community or partner forums.

Examples of recent activity include around joint Masterplanning work for growth areas in Callander, engagement with SEPA on major casework in respect of flood risk and the regulation and monitoring of a minerals permission where the operator stopped mining and production placing the site into a care and maintenance phase.

In order to support the realisation of planning outcomes and support community led activities Stuart has provided advice and attendance through the life cycle of the 'Callander Partnership'. Strathard Strategic Partnership and the Destination Group of tourism businesses are further examples of external engagement.

The leadership team of the planning authority comprises the Chief Planner along with the Manager of Development Management and the Communities and Place Planning Manager as the core Senior Manager team. Along with the Directorates Managers for Sustainable Tourism and Place Projects there are weekly business meetings to ensure timely decision making and co-ordination of service delivery. This includes consideration of any emerging staff or resourcing issues as well as systems or operational activity that requires a management response. Current workload pressures are reviewed and projects or programme updates are regularly discussed.

Improvement Action Plan (Culture theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
3. This Planning Authority has embedded continuous improvement	3
4. This Planning Authority has sound governance	1
5. This Planning Authority has effective leadership	1

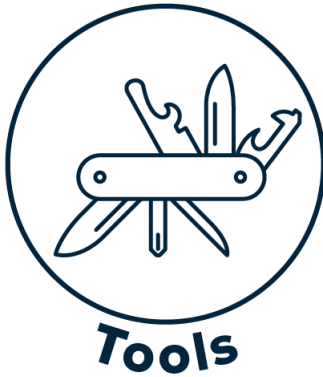
Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
<p>Develop an effective monitoring system to allow real time tracking of applications to facilitate more effective caseload monitoring and to identify areas where applications are being stalled.</p> <p>Consideration will be given to the development of a system that integrates with the Uniform system, enabling real-time tracking of all pending applications.</p>		High	3	<p>Staff time.</p> <p>IT specialist time</p> <p>GIS specialist time</p>

This will allow monitoring of casework and any 'blockages' to be identified and resolved.				
<p>Produce a Fee Charter to include discretionary fee charging. This should include consideration of charging for pre-application advice services, discharge of conditions and reduction in planning fees for community development trusts etc.*</p> <p>The outcome of this is that the planning service can potentially recover more fees helping to cover the costs associated with assessing, determining and monitoring applications.</p>		High	1	DM Staff time
Review of validation requirements at national level to require the submission of information noted at pre-application stage and overall increase in quality requirements for planning application submission.	Improvement Service	High	1	Improvement Service Staff Planning Authorities and agents as stakeholders

The outcome of this could be that staff time on invalid applications is reduced and performance is enhanced.				
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*Note – There was good discussion at the Peer Review Workshop particularly around charging for condition discharge. Our peer partner, Moray Council, have already implemented this and further discussions with them will be undertaken as part of this improvement action. An agent who also attended the workshop highlighted a desire for condition information to be made public on discharge of conditions and the general consensus that charging for condition discharge is reasonable. Further consideration will be given to this as part of our review process.



A high performing planning authority needs to have an effective local development plan and other strategies in place to provide a vision for the future of the area. It needs to be able to set and deliver on policy ambitions and priorities by clearly informing decision making and providing certainty and predictability for communities, developers and investment. The authority's development management systems need to be effective in making the right decisions about development and be efficient as possible in doing this. The planning authority makes best use of digital technology and how it manages and uses data.

ATTRIBUTE 6: THE PLANNING AUTHORITY HAS A ROBUST POLICY AND EVIDENCE BASE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have an up to date Local Development Plan in place and/ or is on track to adoption?
- Does the planning authority have an up to date Regional Spatial Strategy in place/ or on track to adoption?
- Has the planning authority's Local Development Plan Evidence Report been approved by the Department of Planning and Environmental Appeals and/ or on track for approval?
- Has the application of the Local Development Plan's policies been found to be deficient at appeal or judicial review?

Narrative

LIVE Park, the Loch Lomond and the Trossachs National Park's current Local Development Plan was adopted in 2017 outlining a vision for development over the next 20 years, alongside a spatial strategy guiding land use and development and supplementary planning guidance. The timescales for updating our Local Development Plan were revised to align with the adoption of amended planning legislation and associated regulations and National Planning Framework 4, setting out the Scottish Government's programme for Planning Reform and expectations for the new style of Local Development Plans.

Following the conclusion of the new regulatory framework for development plans we have built on our early preparation for our next Local Development Plan and are currently drafting our

Evidence Report. We have consulted key agencies on the scope and content of our evidence and will be consulting wider stakeholder groups during May and June. Following Board Approval in September the Evidence Report will be published and submitted to Scottish Ministers for the 'gate check' assessment in Autumn 2025. Our Development Plan Scheme will be updated and published in early April 2025 which will outline our current milestones and timeline for the preparation of our next Local Development Plan, as well as who we will engage with and the methods we will employ.

As we prepare the Evidence Report and Local Development Plan, we will continue a dialogue between all key agencies, stakeholders, sectors of the community across the National Park and will continue to encourage harder to reach groups to get involved, including young people, gypsies and travellers, disabled people, families with children and people in full time employment. Social media has proved particularly helpful in this regard, alongside the more traditional forms of engagement.

The National Park Partnership Plan guides how all of those with a role to play in looking after the National Park will work together to manage the National Park and achieve a shared vision for the area. Following the approval of the National Park Partnership Plan for 2024 – 2029 in December 2023 by the National Park Authority, the Scottish Ministers issued their formal approval and it was published in May 2024.

The Planning (Scotland) Act 2019 introduces a new type of plan called a Regional Spatial Strategy which is a long-term spatial strategy for an area for strategic development. The part of the Planning (Scotland) Act 2019 that requires Regional Spatial Strategies to be prepared and adopted is not yet in force, however it is intended that this National Park Partnership Plan 2024 – 2029 will become the draft Regional Spatial Strategy for the purposes of public consultation and further procedure.

ATTRIBUTE 7: THE PLANNING AUTHORITY MAKES BEST USE OF DATA AND DIGITAL TECHNOLOGY

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Has the planning authority encouraged and promoted planning applications to be submitted through the e-development portal?
- Does the planning authority have a data governance strategy in place for the management of planning data?
- Does the planning authority have the ability to use interactive web-mapping, GIS and spatial data?

Narrative

ePlanning

The planning service looks to direct all applicants to the ePlanning Scotland Portal. In 2023/24, 90% of applications received were submitted through the portal. The Planning Authority continues to accept paper applications to ensure full accessibility to the planning process for all. Paper documents are scanned into the system to align with our paperless processes. We also encourage agents to submit updated documents through the portal to reduce officer and administrative support time in documenting additional information received.

At this time, all non-material variation applications, pre-application enquiries, condition discharge applications are received by email with applicants completing a pdf form which is attached to the email. The Planning Service is looking to streamline this process and utilize new digital technology to allow applicants to complete online forms. This could make the process more efficient for both our customers and reduce administration time.

From our Peer Review Workshop, there was discussion around the value of a digital programme being led at a National level, with specific focus on the potential of AI in planning and regret of the cancellation of the Scottish Government Digital Planning platform. There is an awareness that planning authorities are experimenting with the use of AI however a National approach could reduce overall staff time to develop an overarching policy and approach.

Data Management

The Planning Service has a retention schedule in place which is linked to IDOX DMS to manage planning data. A document naming convention is in place which requires all users to identify

documents which are to be retained in perpetuity and those which have varying retention periods. We continue to work through a significant backlog of information – this task requires the manual checking of historic files to update documents to align with the naming convention. On completion of the review of backlog information, we can then set the system to actively remove information after the relevant retention period. Staff resource requires to be programmed to complete the backlog review.

The Planning Service has access to the latest available OS Maps, aerial imagery and other third party and internal datasets through WebGIS (ESRI Enterprise). Planners use the mapping within Uniform to identify constraints on application sites and the forward planning tab is also populated with the site constraints. This allows for the quick review of constraints during the validation of planning applications to ensure the requisite consultees are consulted early in the process. Additionally, landscape character types are available within uniform.

Website and Social Media

The Planning Service is supported by the National Park communications team in engaging with key external audiences through a variety of digital channels. There is a dedicated section on our website for all Planning related content and a specific page covering major planning applications. Our website is managed via a CMS (content management system), WordPress and we can monitor usage and visitor engagement via Google Analytics. The NPA will be developing a new website in April 2025, with a 'Beta site' due to go live in March 2026. As part of this process, internal stakeholder research has been done to uncover how this new site can best provide users with an intuitive, easy-to-use, planning service. As part of this, insights were gathered to understand how digital tools can be used to streamline our service offering and ensure efficiencies for the planning team.

Through our Communications Team we can make use of the following:

- e-bulletins via Mailchimp to highlight relevant news stories, events, or content that might be of interest to audiences that engage with the planning service.
- social media (Facebook, Instagram and LinkedIn) which are managed and monitored using a digital tool called Sprout.
- media monitoring and distribution platform, 'Vuelio' which allows us to monitor and record press coverage and issue press releases to media.

These tools have proven helpful in the last year in managing public relations on a particularly high-profile planning application.

ATTRIBUTE 8: THE PLANNING AUTHORITY HAS EFFECTIVE AND EFFICIENT DECISION MAKING PROCESSES

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority planning have the ability to make decisions on planning applications within the required timeframes?
- Are less than x% of planning decisions overturned at appeal or judicial review?
- Does the planning authority have an up to date Enforcement Charter in place?
- Does the planning authority have the ability to resolve enforcement cases?

Narrative

The speed at which the National Park planning service determines applications falls slightly behind the Scottish average (as reported in the performance feedback from Scottish Government for the 1st April 23 to 31st March 2024 period). Note; the Scottish average for all 'Local' applications in this period was 11.6 weeks while the National Park figure was 12.5 weeks. This is attributable to number of factors, in particular the extended determination time of a small number of more complex or protracted cases has skewed the average time for determination overall – 'average time' being the basis of the current national statistics. However, we are taking steps to improve the average, particularly with an eye on the determination of straightforward cases without unnecessary delay - notably 'householder' applications where the National Park determination time is further behind the Scottish average.

We are assisted in making timeous decisions by an up-to-date Scheme of Delegation which enables more than 95% of all applications to be determined under delegated powers by the Appointed Officers (DM Manager and Senior Planners).

We had no applications appealed to the DPEA in the reporting period and in terms of 'Local Review' (LRB) decision, only 3 applications were determined via that route and one going contrary to the Officer decision – so a percentage based on a small number of cases come out at 33% overturned.

It is important to remember that aside from the determination of applications for planning permission, there has been a growing area of work for the Development Management Team to respond to external consultations. The most notable of these have been from the Scottish Government Energy Consent Unit (ECU) handling applications for larger scale windfarm proposals located out with, but close to, the boundary of the National Park – but also for

powerline upgrades (Section 36 applications) – many of which cross through the National Park. We have also recently responded to a consultation in relation to a Transport Scotland Roads Order for the upgrade and safety work at the A.83 ‘rest and be thankful’ and are anticipating a further proposal for the upgrade of the Sloy hydro-electric station to enable pumped storage (again a significant s.36 application from ECU). These can be significant pieces of work and – as noted elsewhere in this report - we have been making procedural adjustments to record and manage these cases using our IDOX Document Management System in a similar way to planning applications.

Planning Enforcement is another important part of the workload for DM officers. The Park does not have a dedicated ‘Enforcement Officer’ role but the responsibility is shared by all Planning Officers assisted by our Monitoring Officer. Our Monitoring Officer leads as the first point of contact for all post decision aspects of the service, checking compliance with conditions of a planning permission, but is also the initial interface with any potential breach of planning control. In line with our [Enforcement Charter](#), this role endeavours to resolve any issues through dialogue and negotiation whenever possible and formal action being a last resort. Only two formal Notices were served during the reporting period (23/24 see table below). Our Charter has been reviewed and updated regularly in line with the legislative requirement for a review every two years – however a further review is now due and this is recorded as an action in the programme for the year ahead.

Headline Indicators – Enforcement	2023-24	2022-23
Time since enforcement charter reviewed (months) <i>Requirement: review every 2 years</i>	24months	12 months ²
Complaints lodged and investigated	14	16
Number of breaches identified – no further actions taken	5	3
Cases closed	1	0
Notices Served	2	6
Direct Action	0	0
Reports to Procurator Fiscal	0	0
Prosecutions	0	0

Improvement Action Plan (Tools theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
6. The planning authority has a robust policy and evidence base	2
7. The planning authority makes best use of data and digital technology	3
8. The planning authority has effective and efficient decision making processes	2

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
Enforcement charter review and update	DM Manager	High	1	DM Staff Time
Collaboration with the NP Communications Team to consider how customers interact with the planning service and how we can best serve their requirements. Consideration will be given to the ability for applicants to submit other applications, (Non-material variations, condition discharge, pre-	DM Manager	Medium	3	Planning Support, GIS and Comms staff time

<p>application enquiries etc) via an online form.</p> <p>Website development project - easier to navigate planning information pages to respond to common enquiries, such as permitted development rights.</p>				
<p>Implementation of Retention Schedule. The outcome of this is to ensure that the Authority is operating with Data governance requirements.</p>		High	3	



A high performing planning authority should ensure a wide range of people are involved in shaping their future places. Engagement should be fair and inclusive, early, collaborative, meaningful and proportionate and should include difficult to reach groups. The authority should engage with a wide range of partners at a national, regional and local level to ensure a joined-up approach and that links are made across policies and programmes. The planning authority should demonstrate good customer care, transparency and effective communication.

ATTRIBUTE 9: THE PLANNING AUTHORITY HAS GOOD CUSTOMER CARE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have the ability to offer pre-application advice where it is requested?
- Has the planning authority held regular engagement events with developers and communities?
- Do the results from the customer and stakeholder survey show that customers are satisfied with the service offer by the planning authority?

Narrative

Pre-application service

Throughout 2023-24 we have continued to provide a responsive [free pre-application enquiry service](#). We have householder and non-householder enquiry forms on our website and guidance notes setting out the minimum requirements for information to handle an application and targeting a 20-day timescale to respond. We have not fully monitored the response time performance on our pre-application enquiries as yet and inevitably there are some enquiries where a response takes longer. In such instances officers endeavour to keep enquirers informed of progress and likely timeframes to respond.

In 2023/24, we responded in writing to 288 pre-application enquiries. To put this in perspective; the total number of planning applications received in 2023/24 was 390. Providing pre-application advice therefore is a significant part of the planning officers and assistants workload.

It remains our experience that early engagement with applicants at pre-application stage results in a smoother application process – and the avoidance of some applications being submitted that would have had little chance of approval – thereby avoiding abortive work.

These figures do not include a number of additional planning enquiries prompted by the continuing Short Term Let Licensing regime that generated a significant number of planning enquiries which were handled separately and which prompted us to provide [more detailed, dedicated information](#) on our website.

Planning phone line

We continue to provide a planning enquiry line where members of the public and other stakeholders can contact us directly with general planning-related queries. These can range from questions about how the planning system works, how to get pre-application advice for development proposals and sites being marketed, through to how to submit an application or make a representation to one. We have a voicemail message service indicating the timeframe for response to receive enquiries when calls cannot be answered immediately.

Engagement

Community Council engagement – from time to time the Development Management manager has undertaken to meet with Community Council representatives to assist in understanding the operation of the planning system. Typically, this has been with relevant areas when local issues or particularly large or complex development proposals have arisen - requiring an increased level of knowledge and engagement. These have been well received, and it is our intention to undertake more of these meeting – across the Park - as a matter of course. Recently the team has met with representatives of Balloch and Haldane CC and St Fillans CC.

Customer and Stakeholder Survey

The National Planning Improvement Team conducted the first National Customer and Stakeholder Survey in November 2024. The survey aimed to capture feedback from those with experience working with planning authorities across Scotland over the past year. Participants were asked to respond in relation to the individual planning authority they interacted with and indicate the type of interaction they had and their background relating to this interaction. The following table provides a breakdown of the results of the national survey compared with the extracted results for LLTNPA. Nationally, 639 responses were received, LLTNPA received 27 responses (4.2%) – a good proportion given the relative scale and applications numbers of the Planning Service.

The Planning Service has exceeded national satisfaction levels across all criteria – a reflection of our continued commitment to provide an open, approachable and customer focussed planning service.

	Very satisfied/ satisfied %		Dissatisfied/ very dissatisfied %	
	National	LLTNPA	National	LLTNPA
Satisfaction with Time Taken	44.7	77.7	55.3	22.2
Overall Satisfaction	46.2	74.1	53.8	25.9
	Very Good / Good %		Poor / Very Poor %	
Standard of Communication	49.5	77.8	50.5	22.2
Quality of Information	54.4	77.8	45.7	22.2
Service Offered by Staff	51.3	74.1	48.6	25.9
Time taken to respond	45.6	74	54.5	25.9
	Strongly agree/ agree %		Disagree/ Strongly Disagree%	
Treated Fairly	55	77.8	45.1	22.2

ATTRIBUTE 10: THE PLANNING AUTHORITY HAS EFFECTIVE ENGAGEMENT AND COLLABORATION WITH STAKEHOLDERS AND COMMUNITIES

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have a community engagement strategy and infrastructure in place to ensure engagement is early, collaborative, meaningful and proportionate?
- Has the planning authority undertaken community engagement, for example consistent and effective use of the Place Standard Tool, to inform decision-making processes? Has the planning authority encouraged and promoted planning applications to be submitted through the e-development portal?
- Has the planning authority engaged with a good representation of the community including young people, gypsies and travellers, people with protected characteristics, including disability, race, age, sex and sexual orientation, and including people from a range of socio-economic backgrounds?
- Has the planning authority supported the production of Local Place Plans when requested?
- Do the results from the customer and stakeholder survey show that stakeholders are satisfied with their collaboration with the planning authority?

Narrative

Community Engagement

Our Development Plan Scheme sets out our indicative Participation Statement and Engagement for the next Local Development Plan. This aims to build on the extensive and multi-faceted engagement we undertook for our National Park Partnership Plan for 2024-29. As a result of this work, we have a sound understanding of the issues within the National Park and the views of most of the groups set out in the Planning (Scotland) Act 2019 – the public at large, children and young people, key agencies, community councils and disabled people. However further work is required with some additional stakeholder groups to elicit views and follow up engagement on more specific local development planning matters with other stakeholders.

Engagement will be informed by Scottish Government published guidance on Effective Community Engagement in Local Development Planning. The consultation draft was published in May 2023 and sets out the level of engagement expected at each stage of the plan making process. We will provide more information on each of these engagement techniques against key milestones as we prepare and finalise our project planning. As part of the engagement strategy, we will also be referring to the National Standards for Community Engagement

(VOICE) and will be developing our strategy using these guiding principles. The seven standards of community development will form the baseline of our engagement practices to ensure that we are approaching the consultation in a way that will best suit each of the stakeholder groups and will be inclusive and informative.

Through the Peer Review workshop, Community Council representatives noted concerns regarding the timescale proposed for the delivery of ‘planning awareness’ sessions for Community Councils as set out in the improvement actions for the ‘engage’ theme. It was also noted that wider engagement with several members of the community council would be preferable over a few individuals to reduce the personal burden on volunteers to then disseminate information. As a result, the timescale for this action has been amended to year 1 of the plan. Furthermore, Community Council engagement is planned for May and June as part of an eight week engagement phase of the Evidence Report for the new LDP. The Local Development Plan team will be available during this time to meet with any interested parties to gather their views and answer any questions relating to the Evidence Report or overarching process.

Place Standard Tool

Our practice in promoting and using tools such as the [Place Standard Tool](#) to positive effect in our work with communities is now well established. Many of the National Park’s communities have assessed the quality of their places through their Local Place Plans using the Place Standard tool. We have reported on this within previous PPFs. We continue to promote and use the following tools in this work:

- [Place Standard](#)
- [Place Standard: Versions for children and young people](#)
- [Our Place Scotland Place Standard tool with a Climate Lens tool](#)

The Place Standard Tool assessments from seven recently completed Local Place Plans by communities across different parts of the National Park were combined to inform our National Park Partnership Plan which was adopted in 2024. We work with 20 communities in total and will update this combined assessment when additional Local Place Plans are undertaken. Despite geographic differences, the results so far are very similar across communities and common concerns identified are issues around lack of public transport, available housing, jobs and rural services. All this work, and the adoption of Local Place Plans, is continuing to feed into our evidence base work for our Local Plan Review.

Representation

We will continue to build on the engagement methods undertaken as part of our NPPP to ensure that the engagement in our next Local Development Plan receives good representation and we are working with our Behaviour Management Manager to ensure good coverage of engagement and feedback to inform our next plan

Local Place Plans

In 2022, as required by the Planning (Scotland) Act 2019, the National Park Authority (NPA) invited communities in the National Park to prepare Local Place Plans (LPP). The Act requires LPPs to be *community-led* plans setting out proposals for the development and use of land and they will describe community aspirations for development. Once registered by the planning authority, they are to be taken into account when preparing the next local development plan (LDP). After piloting support for 3 communities to prepare LPPs in 2019-21, the NPA developed a set of LPP support resources; this has comprised:

- A [LPP website](#) was developed, which provided introductory information and encouraged the use of the Place Standard Tool.
- We offered and provided to every LPP Steering Group in-kind specialist advice on:
 - planning matters and provided Data Pack providing locality profile information
 - inclusive engagement techniques and standards.
 - Our GIS Team provided staff time to produce maps for LPPs, plus advice and materials to support communities to hold workshops and prepare their own maps if they preferred.
 - When requested, our Nature & Land Use Team provided advice and support to enable meaningful community discussion on wider land management and nature restoration issues, because our next LDP will act as a Regional Land Use Framework.
- Crucially, we provided funds to empower community leadership and control, which enabled them to commission their own technical and specialist support if they so wished.

Since 2022 we have coordinated support to 18 LPP community steering groups, with 11 [Registered LPPs](#) and 7 LPPs being prepared at the time of writing - hopefully they will be registered in 2025-26. Only 2 communities decided not to prepare LPPs however LDP2 will engage directly with all communities. As well as an online register, hard copies of all registered LPPs are available to view at our HQ building and have been shared with Local Authority partners.

Improvement Action Plan (Engage theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
9. This planning authority has good customer care	2
10. The planning authority has effective engagement and collaboration with stakeholders and communities.	2

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
Organise an Agents and Architects Forum and seek feedback as to how best to engage with them going forward, and the frequency of such events and communication.* ¹	DM Manager	Medium	2	DM staff
'Planning awareness' sessions with Community Councils - linked with LDP engagement* ²	DM manager	High	1	DM and Place Planning staff

*¹ Feedback from the peer review workshop highlighted that agents forums focussing on a specific topic area tend to be the most useful, for example, a validation workshop.

*² The priority level and timescale have been updated to reflect the discussion at the Peer Review workshop.



A high performing planning authority should demonstrate place leadership by taking a collaborative place-based approach in line with the Place Principle. It should use the Place and Wellbeing Outcomes in decision-making processes, to achieve the three spatial principles outlined in NPF4: Sustainable places, where we reduce emissions, restore and better connect biodiversity; Liveable places, where we can all live better, healthier lives; and Productive places, where we have a greener, fairer and more inclusive wellbeing economy. The planning authority should seek to ensure that there are no impediments to delivering agreed development.

ATTRIBUTE 11: THE PLANNING AUTHORITY SUPPORTS THE DELIVERY OF SUSTAINABLE, LIVEABLE AND PRODUCTIVE PLACES

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Is the planning authority aware of the [Place and Wellbeing Outcomes](#), the evidence that sits behind them and is it using them in decision-making processes?
- Has the planning authority identified tools and approaches to delivering sustainable, liveable and productive places and is implementing them?

Narrative

The planning service is fully aware of the 'Place and Wellbeing' Outcomes. These are embedded within the policies of NPF4 but also within our National Park Partnership Plan and are therefore transferred into decision making on planning applications and will inform development of our Local Development Plan review and policies moving forward.

Members of the development management planning team have attended Improvement Service skills sessions on Shaping Places for Wellbeing and Decision Making and planners are encouraged to consider whether development proposals make a positive contribution to the various 'place and wellbeing' outcomes in their assessments, particularly when considering applications for larger-scale development proposals within the National Park. There is perhaps scope to make greater use of the [Place and Wellbeing Assessments Checklist](#) and embed this more formally into our development management processes and procedures.

ATTRIBUTE 12: THE PLANNING AUTHORITY SUPPORTS THE DELIVERY OF CONSENTED DEVELOPMENT

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Has the planning authority provided clear and proportionate expectations of Section 75 agreements and set these out in the LDP and pre-application discussions and they are concluded within 6 months of resolution to grant?
- Does the planning authority take a proportionate approach to imposing conditions?
- Does the planning authority have an ambitious local housing land requirement that exceeds the Minimum All Tenure Housing land requirements in NPF4 and is it on track to support delivery?
- Are the number of processing agreements the planning authority has agreed with applicants increasing?
- Does the planning authority have an effective delivery programme in place that supports the delivery of development on the ground?

Narrative

Section 75 legal agreements

We have adopted Planning Obligations Supplementary Guidance and Housing Planning Guidance to inform Section 75 agreements. Our policy for financial contributions only covers affordable housing since for other obligations (play, education) we rely on the four local authorities to advise the commuted sums on a case-by-case basis. This can sometimes make giving pre-application advice on planning obligations more difficult since local authority consultations tend to prioritise advice on planning applications. The average timescale from a 'minded to grant' decision to complete a Section 75 agreement remains more than 6 months (although we have completed one agreement this year in less than 4 months). Delays are often due to legal or title issues, however, to minimise planning delays we have implemented a routine monthly project meeting with our external legal team to prioritise and expedite legal agreements where we are able to do so. Our case officers are able to instruct and deal directly with our external legal team. We have engaged with developers on 'in-principle' Heads of Terms for larger schemes at the pre-application stage to provide greater certainty prior to application submission.

Planning Conditions

Our planners are aware of the advice in Planning Circular 4/1998: the use of conditions in planning permissions. Senior planners have oversight of the use of conditions through the review process which helps ensure consistency and their proper use. From the peer review workshop, there was further discussion on minimising the use of conditions and introducing fees for the discharge of conditions as noted under the improvement actions for the culture theme. This is a valuable further discussion area and opportunity to develop best practice - working with Moray Council who have successfully implemented a fee structure for discharge of conditions.

Processing Agreements

We offer Processing Agreements for major development proposals, since most applications within the National Park are for smaller scale developments which are not sufficiently complex to merit one. In our experience, where Processing Agreements have been used, although well intended, are not always an effective tool to speed up decision making or provide certainty to developers since delays encountered in the determination process are generally outwith the control of the planning authority (for example due to the need to resolve statutory objections). In most cases it suffices for both the planning authority and applicants to agree extensions of time where circumstances dictate.

Housing land requirements and delivery

We do not build houses but, as the organisation responsible for planning in the National Park, we try to make sure new buildings are of a type needed by people who live and work locally. This is to help address the projected decline in population in the National Park.

We do this through:

- Our Local Development Plan which sets a target of 75 new homes a year and allocates land for housing with housing policies designed to address the pressures of second homes and to encourage affordable homes to be built. This currently exceeds the MATHLR (housing land) requirements in NPF4. The current evidence in the preparation of our next Local Development Plan indicates that we will also exceed the MATHLR set out in NPF4
- Engaging and working with local communities to help identify local housing needs and supporting them in creating Local Place Plans.
- Working closely with local housing associations and the local councils in relation to housing need and being involved in the various Local Housing Strategies.

Housing land requirement

We work with key partners (landowners, agents, local communities, local authorities and key agencies) to help deliver on the current Local Development Plan's vision and strategy. The Action Programme lists the actions needed to facilitate development on each of the allocated sites and provides an up-to-date picture of progress. It is very much a working document with the aim of reviewing every 6 months. A separate interactive map is available. The Action Programme has not been updated recently. Instead, we have focussed on the next update being the required Delivery Programme, which we aim to publish in April 2025.

Improvement Action Plan (Place theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
11. The planning authority supports the delivery of sustainable, liveable and productive places	2
12. This planning authority supports the delivery of appropriate development	2

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
Implement recording of added value on applications to reach, or exceed, policy and guidance requirements to create an evidence base to assess performance against place and wellbeing outcomes - and biodiversity gains. This evidence base will then inform a monitoring and evaluation process to ensure these are being effectively embedded into decision making and review processes.*	DM manager	Medium	3	DM Staff – GIS staff

*This is another area of shared interest with Moray Council and where opportunities can be taken to share knowledge and best practice to record added value.

APPENDIX 1: PLACE DIRECTORATE STAFF STRUCTURE

