



# **NATIONAL PLANNING IMPROVEMENT FRAMEWORK**

## **IMPROVEMENT ACTION PLAN 2024**

**Inverclyde Council**

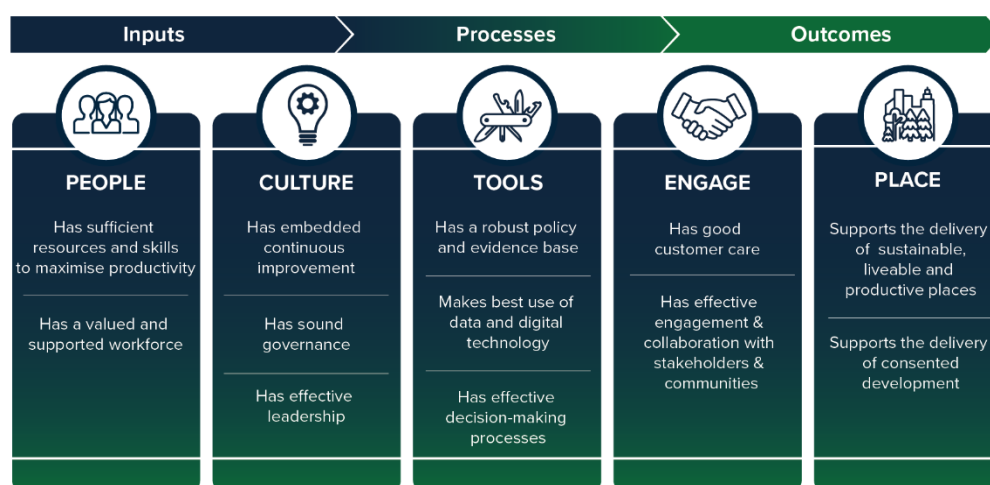
<b>Planning Authority:</b>	<b>Inverclyde Council</b>
<b>Document Lead Officer:</b>	<b>Daniel Henderson</b>
<b>Email (Preferred):</b>	<b><a href="mailto:daniel.henderson@inverclyde.gov.uk">daniel.henderson@inverclyde.gov.uk</a></b>
<b>Phone number:</b>	<b>07385 015961</b>

## Introduction

The Planning (Scotland) Act 2019 introduced new statutory reporting for planning authorities. This mandatory requirement means that we must prepare a report that will assess our performance and identify actions for improvement. The process for preparing the National Planning Improvement Framework is set out in the diagram below.







The new National Planning Improvement Framework was developed 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, with 2 or 3 key attributes sitting under each theme.



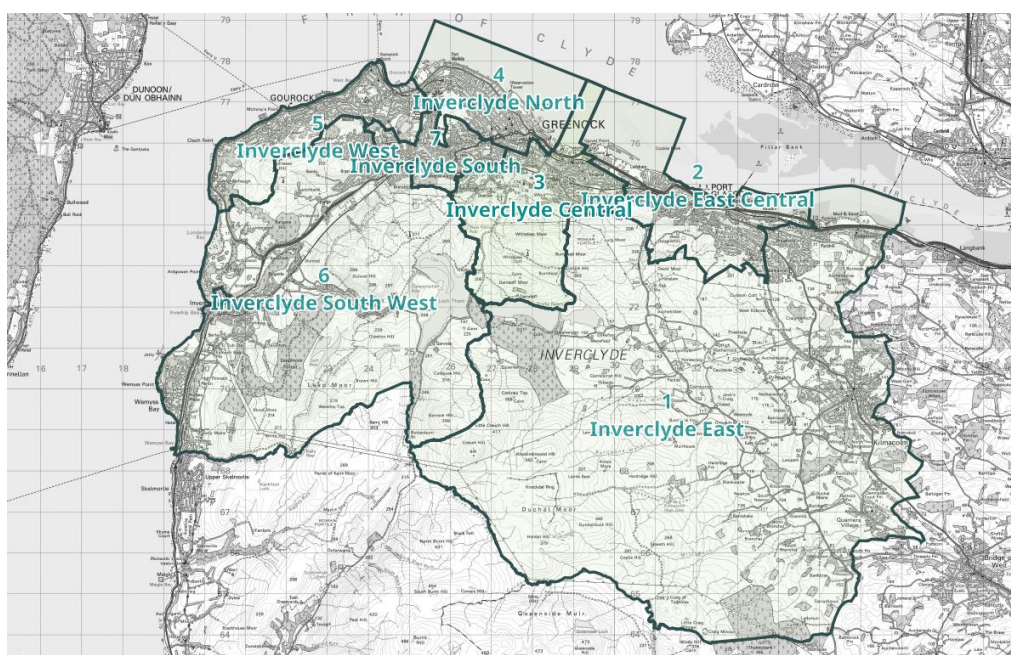
Further information on each theme and attribute is provided in the relevant section in the document below. For each attribute we are required to provide narrative on how the authority feels we are performing against the criteria set out by the National Planning

Improvement team. This is accompanied by a score using the scoring system below – where a score of 5 is making no progress at all and a score of 1 is making excellent progress.

 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

Where we have identified scores of 5 to 2 where we are required to identify at least one improvement action relevant to the attribute to help further improve the quality of the planning service. Where we have scored 1 or 2 in the assessment, we are required to provide good practice case studies so that this can be shared across local authority networks. The case studies will be prepared by the planning authority once the scoring for each attribute is confirmed, considering the feedback received from stakeholders during the Peer Review Workshop.

## Introduction to Inverclyde



Data from the 2022 census indicates that the current population of Inverclyde is estimated to be 78,340 people across an area of 158 km<sup>2</sup>.

Inverclyde has the advantage of having many urbanised areas along the coastal reaches of the River Clyde and is accessible to the relatively undeveloped countryside and upland

moors of the Regional Park. An area of unrivalled scenic beauty, Inverclyde has breathtaking views north to the Argyll Hills and southern Highlands.

Five conservation areas and 235 Listed Buildings indicate the quality and variety in the built environment of Inverclyde, identified for their architectural and/or historic character. These attractions, including museums, galleries, stately homes and castles, celebrate Inverclyde's maritime and industrial past.

The Inverclyde area benefits from excellent transport and infrastructure, with the M8 motorway just 2.5 km from Inverclyde's eastern boundary giving direct access to Glasgow and the rest of Scotland's transport network, and to England. Glasgow International Airport is a short 20-to-30-minute drive from the centre of Inverclyde, whilst extensive rail and ferry terminals provide connections to Glasgow, and to the North Ayrshire coast, with onward ferry links to Argyll and Bute.

The largest settlement within Inverclyde is the town of Greenock, which benefits from a deep-water port and shipping container terminal. Ocean Terminal in Greenock, opened in August 2023, is a successful road-sea freight interchange of international significance, and a port of call for the world's largest cruise ships. Both the port and shipping container terminal are a key source of economic growth for the area and a large source of employment. The local area also boasts a rich history from its industrial ship building past, an industry which still exists today in the Port Glasgow area of Inverclyde providing employment to many of the area's citizens.



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: The Planning Authority has sufficient resources and skills to**

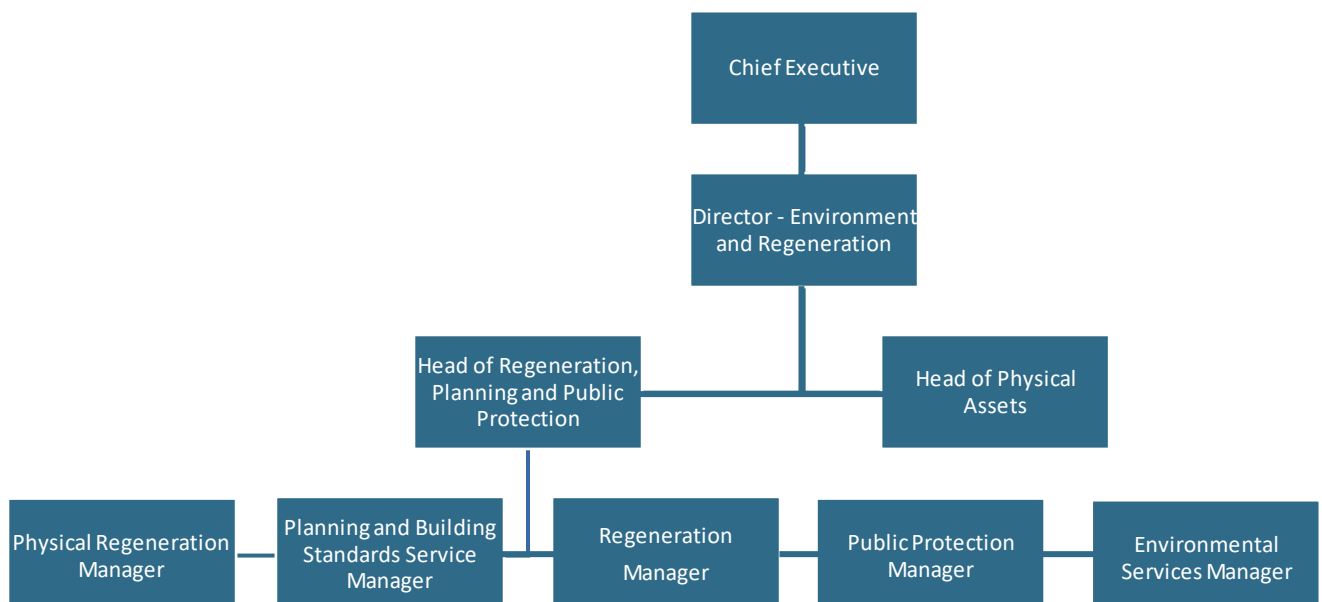
### **1.1 Staffing and Structure**

***Does the planning authority have the sufficient level of staff to carry out all activities within the required timeframes?***

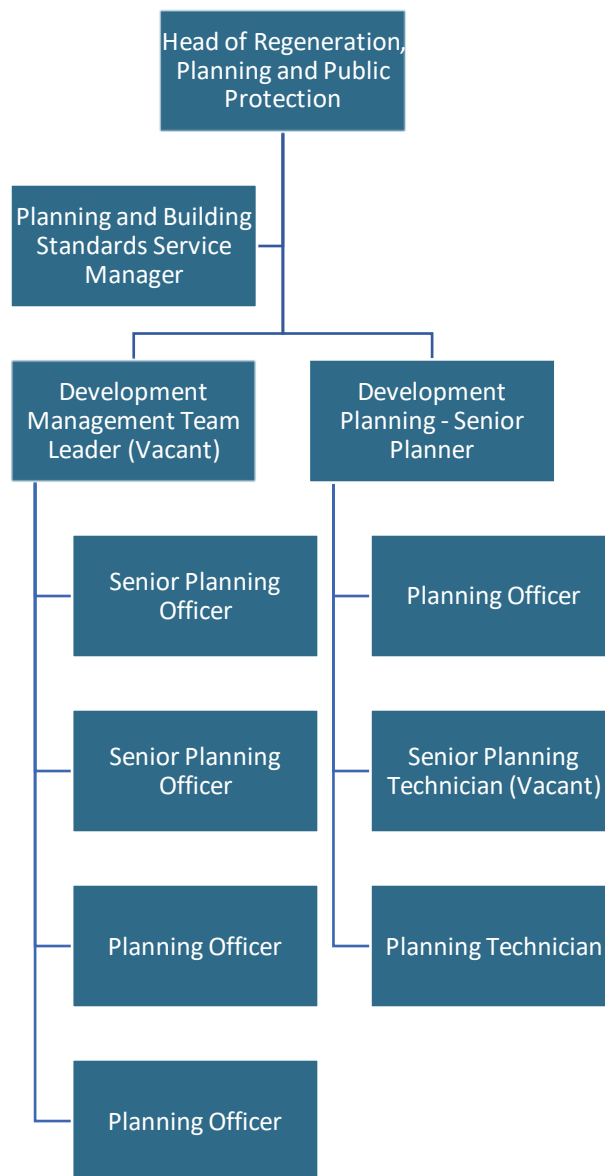
The Planning service within Inverclyde Council sits within the Environment and Regeneration Directorate. Reporting to the Director of Environment and Regeneration, the Head of Regeneration, Planning and Public Protection has remit for the following services.

- Public Protection – Environmental Health, Housing, Trading Standards
- Regeneration – Town Centres, Employability, Business Support, Commercial Property
- Physical Regeneration – City Deal projects, Levelling Up Fund project activity
- Environmental – Waste Services, Open Spaces
- Planning – Development Management, Development Planning, Building Standards, Enforcement

With remit for the Planning service, the Head of Regeneration, Planning and Public Protection is currently the Council's Chief Planning Officer.



In relation to the day-to-day business operations and performance of the Planning Service, the Planning and Building Standards Service Manager has remit for the daily operations of each respective service.



### Development Management

The Development Management team are currently led by the Development Management Team Leader (1.0 FTE) who has responsibility for the allocation of planning applications, monitoring of workloads and performance and is also responsible for the approval of delegated decisions. Reporting to the Development Management Team Leader is two Senior Planning Officers (2.0 FTE) who are responsible for any major applications, enforcement or applications with greater complexities. The Development Management team is further complimented by two Planning Officers (2.0 FTE) who are responsible for the assessment of planning applications, notably householder applications. Supporting the Development Management Team is a Planning Technician (1.0 FTE).

## Development Planning

The Development Planning team are currently led by the Planning and Building Standards Service Manager. The Development Planning service are responsible for all elements of planning policy, notably the progression of the new Local Development Plan (LDP4). Additional duties include acting as planning advisor to the Local Review Body, formation and development of Planning Application Advice Notes (PAANs). The Development Planning team currently consists of a part-time Senior Planning Officer (0.6 FTE), a Planning Officer (1.0 FTE) and a Senior Planning Technician (1.0 FTE). The delivery of policy work through the Development Planning service is supported by cross service working with relevant service areas, whilst an ear marked reserve provides resource for expert/specialist support where necessary through the appointment of external consultants.

## Enforcement

The Inverclyde Council Planning service currently has no dedicated Enforcement team or Enforcement Officers. Enforcement investigations are currently undertaken by the Development Management Team due to the proportionately smaller number of enforcement cases which are reported within the Local Authority area. At present, there is currently no business justification for a dedicated enforcement resource.

Management	Tier 1	Tier 2	Tier 3	Tier 4
Head of Planning Service			1	

Job Title	Post count	FTE	Vacant Posts
Head of Regeneration, Planning and Public Protection	1	1.0	0
Planning and Building Standards Manger	1	1.0	0
Development Management Team Leader	0	1.0	1
Senior Planning Officer	3	2.6	0
Planning Officer	3	3.0	0
Senior Planning Technician	0	1.0	1
Planning Technician	1	1.0	0

Staff Age Profile	Number
61 and over	1
56 – 60	1
50 – 55	0
40 – 49	4
30 – 39	2
25 – 29	1
16 – 24	0
Total	9

RTPI Chartered Staff	% of RTPI staff where membership is desirable
6	66%

### **1.2 Planning Budget**

***Does the planning authority have the ability to carry out all activities within the required timeframes with its current budget?***

The budget and resource for the Planning service is managed as part of the total budget resource for the Planning and Building Standards Services. This represents a total resource of £1.028m, with £837,750 allocated to employee costs. The allocation and use of the resource over both the Planning and Building Standards services allows a flexibility to move resource as necessary to support the delivery of a particular team or project based on current priorities.

### **1.3 Planning Fee Income**

***Does the planning authority have the ability to carry out all activities within the required timeframes with its current income?***

Fee incomes for the Development Management service in the previous three financial years is as follow.

- 2021-21 - £176,794.12
- 2022-23 - £233,662.29
- 2023-24 - £260,774.00



The fee income for the Planning and Building Standards Services is monitored and reported on a monthly basis. Fee income is reviewed and analysed using fee income reporting from previous financial years to identify projections for fee income throughout the financial year.

#### **1.4 Consultee Responses**

***Does the planning authority receive responses from consultees within the prescribed timescale?***

With the introduction of the new National Planning Framework 4, the ongoing work to deliver a new Local Development Plan and with aspirations to delivery high quality Development Management and Development Planning services, it is essential that the Inverclyde Council planning service utilise expert opinion and advice from both internal and external consultees.

The processing of applications through the Development Management team relies on the fluent and timely responses from consultees. For most planning applications, internal consultees include the Council's Public Protection Team (Environmental Health), Roads, Licensing, Building Standards and many other Council services. It is acknowledged that, the performance of the Development Management Team is reliant on the sound management and governance of other service areas. Periodically, there have been isolated examples of other service areas being understaffed or with unforeseen circumstances which place demands on existing workloads.

On occasion, responses from internal consultees have failed to meet the locally agreed timescales. During the 2023/24 year, there have been instances of delayed consultee responses, and these have been identified through the following means.

- Acknowledgement response from consultee
- Escalation from Development Management Officer(s)
- Communication from applicant

As a result of the examples of delayed responses from consultees, several actions have been undertaken to minimise any failures which may occur and identify solutions and introduce preventative measures to ensure that consultee responses are being closely monitored and managed. Some of the new preventative measures which have been introduced include.

- ✓ Officer Escalation. Where it is brought to the attention of a case officer that a consultee response has failed to respond within agreed timescales, an email escalating this is sent to the Development Management Team Leader and Planning and Building Standards Service Manager for possible intervention.
- ✓ Senior Management Team. Highlighted by occasional delays in consultee responses, the Environment and Regeneration senior management team meet on a two-weekly basis, with a standing item on *Team Updates*, where Service Managers are obliged to report staffing or other resource challenges impacting on performance.

- ✓ Lessons Learned – Review Meetings. In light of a recent planning application receiving a non-determination notice, caused by a delay with a consultation response, Service Managers and lead officers met to discuss why this had happened and what lessons could be learned. Outcomes from this exercise included a revised procedure and process for sharing of technical information to create a more fluent assessment.

### **1.5 Access to Appropriate Advice, Expertise, Evidence and Data**

***Does the planning authority have the ability to access the appropriate advice, expertise, evidence and data it requires?***

The Inverclyde Council Planning service consists of 11 total staff, with two posts currently vacant. The planning authority is therefore required to maximise engagement and discussion with neighbouring and regional planning authorities to both share and obtain knowledge, appropriate advice and expertise where necessary.

The collection of data and sharing of evidence is most prominent with internal stakeholders, with effective cross cutting with colleagues in Legal, Roads, Environmental Health, Housing, Trading Standards, Building Standards, Licensing and Economic Development. The sharing of information with each respective service areas enable competent and factual responses to be provided to planning applications, whilst internal engagement benefits the growth of policy development and implementation of current policy. The Chief Planning Officer, Service Manager and Development Management Team Leader share responsibilities for representations of the service, which include attending meetings at Heads of Planning Scotland (HOPS), Glasgow City Region (GCR) / Regional Spatial Strategy (RSS) meetings with Clydeplan and meeting with the Scottish Government. Representation aims to maximise and increase opportunities for Inverclyde Councils planning service and to represent outward looking views and the best interests of Inverclyde Council.

Within the Development Planning Team, the role of the Senior Planning Technician is to monitor and update digital data required for the delivery of the planning function. Our Corporate GIS system used by Inverclyde Council is Cadcorp SIS, which is centrally managed by the Council's ICT service who also manage additional data products such as Ordnance Survey. Digital data is currently being developed as part of the production of our Local Development Plan (LDP4), whilst continuous monitoring of digital data is required for a variety of audits, surveys and assessments.

## **Attribute 2: The Planning Authority has a valued and supported workforce**

### **2.1 Workforce Strategy**

***Does the planning authority have a workforce planning strategy in place?***

In March 2024, the introduction of the fifth People and Organisational Development (PODs) strategy for 2024-27 was introduced at Inverclyde Council. This sets out a number of key workforce and organisational development priorities across the following four key themes:

- Organisational Development (Planning for the Future)
- Employee Skills Development, Leadership, Succession Planning (Employees our most Valuable Resource)
- Employer of Choice (Continuous Improvement)
- Fairness & Equality (Promoting Equality, Dignity & Respect)

It is a strategy key to building the workforce needed to deliver services and aids future actions by taking account of key challenges and opportunities faced for workforce development and planning. It supports the development and implementation of a number of workforce initiatives to overcome the challenges.

A key area continues to be recruitment and retention of staff and is one of the areas underpinned in the PODs strategy. As faced by many other local authorities, Inverclyde Council has experienced challenges in relation to staff retention and turnover due to staff pursuing new and alternative options with other regional public and private sector employers. The Council has therefore identified new approaches to maximise recruitment, including enhanced digital advertising through radio and television advertising. This has included partnership working with SOLACE to recruit to senior management and senior officer positions. A successful example of this approach included the recruitment of the Head of Regeneration, Planning and Public Protection in March 2024.

### **2.2 Development and Upskilling**

***Does the planning authority have the ability to support staff development and upskilling and send staff on relevant courses?***

In November 2024, Inverclyde Council's Corporate Management Team approved the formation of a training matrix for all employees to identify courses which are mandatory for all employees. This approach was taken to support employee personal and professional development and to ensure employees have the right skills and knowledge for their roles.

Mandatory training helps improve compliance with regulations and guidelines. This in turn contributes to protecting the organisation and its employees, reduces risk from legal action and avoids legal challenges which may result in sanctions or fines. For employees,

mandatory training can improve their awareness and compliance with organisational policies, procedures and required standards.

In 2023, Inverclyde Council's Policy & Resources Committee agreed the allocation of £100,000 via a one-off increase to 2023/24 non-HSCP turnover target to support the recruitment of university students and the retention and development of existing employees. This funding was continued into the budget for 2024/25, meaning that specific allocated upskilling funding is available for 'difficult to fill posts'. This funding is for existing Council employees to support them in undertaking professional qualifications or training, or for prospective Council employees who are planning to undertake professional training via a university course (e.g payment for post graduate fees for a student currently completing the final year of their degree). This is an opportunity targeted at upskilling existing employees and attracting new talent for difficult to fill posts.

The Council is also pursuing an opportunity to enrol as many staff as possible into a programme of study with the University West of Scotland (UWS). With funding support being provided by the Scottish Government, fully funded degree course training is being delivered by UWS in the Town Planning (BSc) Hns degree. Inverclyde Council has currently enrolled one candidate and will aim to enrol further suitable candidates, with a commencement date of February 2025 for part-time studies.

As a direct consequence of this, the planning service is currently pursuing funded training and development opportunities, notably to support staff through the RTPI's Assessment of Professional Competence.

### **2.3 Staff Health and Wellbeing**

***Does the planning authority have a deliverable commitment to support staff health and wellbeing?***

The staff within the Planning service of Inverclyde Council are highly valued. The workforce of the service are considered to be our most valuable asset which we aim to support, grow and empower. To ensure that staff are supported through a good work – life balance and ensure that staff are provided with a platform to communicate and express their views, a number of mechanisms are available to ensure that two-way dialogue available to staff members.

#### **Let's Talk – a Positive Conversation**

Effective April 2024, the Inverclyde Council have adopted a new policy for staff engagement and conversations, with the Council's new "Let's Talk – a Positive Conversation" approach to employee performance review. Positive Conversations are about managers and their employee(s) having regular, focused discussions on work related goals, feedback, development opportunities and support on both an individual and team level.

There are 3 defined stages of conversation:

- Individual Annual Conversation (mandatory)
- Regular 1-2-1 Check-in
- Team Check-in

Positive Conversations (PC) are about enabling relationship development, building motivation and engagement and creating value for employees of Inverclyde Council. Managers are required to complete a return to Human Resources annually to provide feedback on staff health and wellbeing and identify training requirements and needs across the Council.

Attribute	Score (1=Making excellent progress, 5= No progress)
1. The planning authority has sufficient resources and skills to maximise productivity	3
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
Undertake anonymous staff survey	D Henderson	High	Short	Digital
Follow corporate succession planning guidance and identify high risk posts requiring early development (e.g. Management/leadership posts)	D Henderson / N McIlvanney	Medium	Medium	HR/Learning and Development
Undertake effective recruitment to reinstate full staff complement	D Henderson	High	Short	HR/Finance
Review internal consultation processes to aid the fluent processing of planning applications.	D Henderson	High	Short	Roads/Public Protection/Building Standards/Licensing

Continue to develop cross service working to ensure that planning service delivery is efficient and customer orientated service.	D Henderson	Medium	Long	Environment and Regeneration Directorate
Review and optimise service structure utilising current and pending vacancies to build in agility and resilience to service delivery	D Henderson	High	Short	Allocated service budget
Introduce a new Graduate or Assistant Planner post into the Planning Service.	D Henderson	Low	Medium	HR
Encourage as many staff as possible to secure a planning degree and attain Membership of the Royal Town Planning Institute	D Henderson	High	Medium	HR



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**

#### **3.1 Annual Performance Assessment**

***Has the planning authority undertaken an annual assessment of its performance and acted upon areas previously identified as in need of improvement?***

As part of Inverclyde Council's Planning Performance Framework 2023, a number of committed improvements and actions were identified to improve the performance and overall delivery of the planning service. The short table below sets out each respective action and identifies the current progress made as part of the continuous improvement of the service.

<b>Committed Improvement and Actions</b>	<b>Progress</b>
Address the scheme of delegation for planning applications to provide an increased response time and more efficient planning service.	Complete. Further to the appointment of the Planning and Building Standards Service Manager in August 2023, and the Head of Regeneration, Planning and Public Protection in March 2024, a review of the existing scheme of delegation was undertaken to allow for delegated decisions to be issued by the Development Management Team Leader and applications for Planning committee reviewed by the new Chief Planning Officer. The appointment of new management allowed for improvement in performance and operations of the service delivery, allowing the Development Management Team Leader to focus more time to independently review and support officer assessment of planning applications. This will continue to be monitored as the service structure progresses.
Commit further to hybrid working as a Local Authority Planning Service to demonstrate a more flexible and efficient business delivery model.	Complete. The Council's Policy and Resource Committee approved a new Flexible Working Policy for all Council employees in September 2023. The implementation of this policy would also require adaptation on the part of the Planning service, including more engagement with customers through video calls and mobile phone telephone

	communication to ensure that staff working from home were available in a capacity equivalent and no less than the availability of staff being in an office Monday to Friday, 9am to 5pm.
Progress the renewal of the Local Development Plan by utilising all available resource to the Council	Ongoing. The Environment and Regeneration Committee approved the draft Development Plan Scheme in January 2024. The Development Planning service are currently progressing the Evidence Report which will be submitted to the Scottish Government Reporter by the end of Q4 2024/25.
Provide a full complement of staff in each respective area to ensure that the planning function can be delivered by Inverclyde Council to as high a standard as possible.	In Progress. Further to difficulties experienced during the 2022/23 year with staff shortages through resignations, a full staff compliment in Planning and support services was complete by April 2024 until November 2024. Recruitment is currently in progress to backfill some recently resigned posts, with consideration being given to entry level planning roles such as Graduate/Assistant Planning Officer. The Council is continuing to explore development opportunities to support the idea of entry level staff, with HR funding available to support staff through RTPi assessment, whilst discussion have been held with the University West of Scotland (UWS) on fully funded day-release study programmes which are available and may benefit the upskilling of existing staff.
Seek feedback from our customers on our performance, engagement and new ways of working	Complete. During the 2023/24 calendar, local architects and other repeat customers were invited to meet with Planning and Building Standards management on a one-to-one basis to discuss previous experiences of the Planning and Building Standards service delivery, listen to feedback and consider subsequent improvements. Various meeting were facilitated throughout the year at both the Greenock Municipal Buildings and at the offices of those customers. It is proposed to create a quarterly customer workshop with the local architects and agents to demonstrate a commitment to improvement through feedback.
Embrace change and digital transformation within the workplace to benefit internal and external stakeholders	In progress. The Council continuous to make commitments to deliver digital transformation across the organisation. With the Planning service, all current processes and procedures are completed electronically whilst there is ongoing investment in suitable technologies for staff communication, broadcasting of Council committees, including the Planning committee.



### **3.2 Recognition and Awards**

***Has the planning authority achieved recognition at relevant awards or through performance accreditation frameworks?***

During the 2023/24 year, the Inverclyde Council planning service were not nominated for any awards. However, the service is determined to continuously improve and prioritise our customer service experience for our applicants and customers. By making improvements to our service delivery and enhancing the experience of our customers, we will endeavour to achieve recognition of these improvements through awards and performance accreditation in future years.

### **3.3 Peer Review, Good Practice Exchange and Improvement Activities**

***Has the planning authority engaged in peer review, good practice exchange or improvement activities?***

Throughout the 2023/24 year, the planning service have engaged and participated in several workshops, steering groups and events with key partners.

The Chief Planning Officer, Service Manager and Development Management Team Leader share responsibilities for representations of the service, which include attending meetings with a number of important partners. The Heads of Planning Scotland (HOPS) meetings allow for sharing of key information, policy interpretation and best practice in relation to Development Management. Engagement with regional partners, which includes the Glasgow City Region (GCR) / Regional Spatial Strategy (RSS) through Clydeplan allows for benchmarking in all aspects of service delivery and sharing of information, ideas and resource.

In relation to peer review of the service, the new National Planning Improvement Framework has been developed and introduced to change the approach taken to the assessment of planning authorities. As part of cohort two of this process, Inverclyde Council have been paired with East Dunbartonshire Council to undertake a peer review of their respective services. This process has been both positive and successful, allowing for constructive feedback and sharing of good practice working.

Additionally, the leadership team have made representations and engagement with the Scottish Government periodically throughout the year. Representation aims to maximise and increase opportunities for Inverclyde Council's planning service and to represent outward looking views and the best interests of Inverclyde Council. With a leadership team in post, it is the aim of the planning service to grow and strengthen relationships with all industry stakeholders and development partners through positive engagement.

### **3.4 Complaints**

***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?***

Inverclyde Council is committed to providing high quality customer services. We value complaints and use information from them to help us improve our services. If something goes wrong, or you are dissatisfied with our services, we invite our customers to tell us. The Inverclyde Council website has a dedicated section for complaints, whilst the Planning section of the website has a dedicated complaints section.

In November 2024, the Environment and Regeneration Senior Management Team, including the Head of Service and Service Manager for the Planning service, attended an in house training session on the Council's complaints process and complaints handling procedure.

For the reporting year 2023-24, no complaints were received by the Scottish Public Service Ombudsman relating to the Planning Service.

### **Attribute 4: This Planning Authority has sound governance**

#### **4.1 Scheme of Delegation**

***Does the planning authority have an effective scheme of delegation in place?***

Within Inverclyde's 2022/23 Planning Performance Framework, one of the key service improvements identified was to aim to revise the internal scheme of delegation in relation to the sign-off process of delegated decisions within the Development Management Team. This review was triggered by previous long-term vacant posts in relation to the Head of Service and Service Manager positions, where previously the Director of Environment and Regeneration was required to sign out all applications as the Chief Planning Officer. A review was therefore undertaken on the scheme of delegation for planning applications. Further to the appointment of a new Service Manager and new Head of Service, which has included a new appointment of Chief Planning Officer, applications are now all signed off at a delegated level by the Development Management Team Leader, other than planning applications called to the Planning Committee.

The Development Management Team Leader post was vacated in November 2024, requiring an interim process for delegated decisions. Pending the appointment of a new Development Management Team Leader as part of the service redesign, all delegated decisions are currently being signed off by the Chief Planning Officer, with support from the Planning & Building Standards Manager.

## **4.2 Statutory Training for Elected Members**

***Have all councillors who exercise a planning function undergone statutory training and is there is evidence of ongoing training for members?***

In October 2024, Inverclyde Council appointed Brodies LLP to undertake an online training session for all elected members in relation to the legal and procedural aspects of the Planning Committee and the Local Review Body functions. This focused on key areas of interest affecting the local decision-making process; including overview of NPF4, which was adopted post the Council's LDP; housing provision; housing in the countryside; energy storage and generation infrastructure; short term lets. These issues have been raised in relation to planning applications considered by the Planning Board/Local Review Body and as part of the LDP development.

## **4.3 Decision Making Process**

***Have more than x % of officer recommendations have been overturned by councillors at committee or Local Review Body.***

In the 2023/24 year, no officer recommended decisions were overturned at Planning board.

During the same period, there have been 11 applications which have been appealed to the Local Review Body. Of the 11 applications going to LRB, 73% of the original officer recommendations were upheld. Three applications have been successfully appealed with planning permission granted.

## **Attribute 5: This Planning Authority has effective leadership**

### **5.1 Chief Planning Officer**

***Does the planning authority have an identified Chief Planning Officer in place?***

The introduction of the Planning (Scotland) Act 2019 requires planning authorities to nominate an officer within the local authority to the role of Chief Planning Officer. Under the Councils Scheme of Delegation, the role of Chief Planning Officer may be delegated to an officer with the Environment and Regeneration directorate, ensuring that the appointed person is suitably qualified in line with the Royal Town Planning Institute criteria for Chief Planning Officers. The appointment of the Head of Regeneration, Planning and Public Protection was advertised and recruited on the basis that the post holder would assume the role of Chief Planning Officer for Inverclyde Council; and this arrangement is now in situ.

## **5.2 Chief Planning Officer - RTPI**

***Is the planning authority's Chief Planning Officer a member of the Royal Town Planning Institute?***

Since March 2024, Inverclyde Council's Chief Planning Officer role has been undertaken by Neale McIlvanney MRTPI, Head of Regeneration, Planning and Public Protection.

## **5.3 Policy and Corporate Decision-Making Advice**

***Does the Chief Planning Officer advise on corporate decision making and policy within the broader organisation?***

As part of this role, the Chief Planning Officer is responsible for advising the Planning Board, whilst also making representation at the Environment and Regeneration Committee on corporate decision making and policy. Additionally, the Chief Planning Officer is also responsible for reporting to the Councils Corporate Management Team and the Senior Management Team with the Environment and Regeneration Directorate. The role of Head of Regeneration, Planning and Public Protection is a chief officer role, which has a broad remit across a range of place-based operational and strategic services. This has assisted to guide the pre-development stages of some of the major capital projects under City Deal and Levelling Up Fund; develop town centre strategies, advance an economic growth plan and lead the corporate delivery of the Local Housing Strategy.

## **5.4 Planning Leadership Team**

***Does the planning authority have a strong leadership team that supports a culture of continuous improvement?***

In relation to day-to-day leadership of the Planning Service, responsibility lies with the Planning and Building Standards Service Manager, Daniel Henderson FRICS, to oversee performance and operational management of the Council's Development Planning, Development Management, Planning Enforcement and Building Standards services. At present, in addition to allocation and monitor of workloads for Development Management and Building Standards services, high priority is being placed on the delivery of the Council's new style Local Development Plan as required under the Planning (Scotland) Act 2019.

The Planning and Building Standards Service Manager duties include operational management including responsibility for budget management and financial governance, working closely with Procurement, Legal and Internal Audit. This includes monthly meetings with Finance to review spend, fee income and general financial monitoring including reporting of any irregularities. Operational duties also include the management of

recruitment and selection process whilst also having responsibility for the annual review of a business continuity plan as a resilience measure for service delivery and liaison with the regional Civil Contingencies Team. In addition to the above duties, the leadership team are responsible for management of and response to enquiries from Councillors, MSPs, MPs in addition to Freedom of Information (FOI) requests, complaints and liaison with the Council's media team where necessary.

In relation to performance management, the leadership team are responsible for ensuring that both the Planning and Building Standards services deliver efficient, high-quality services which are to our customer's expectations. Performance is monitored monthly to align with Scottish Government KPI's and reported periodically as required by Government. The current role of Development Management Team Leader requires effective implementation of our service strategies, service plans and staff development.

### **5.5 Advice and Support to External Bodies through Engagement**

***Does the Chief Planning Officer advise and support external bodies through engagement in organisations' committees, advisory groups or working groups?***

The Chief Planning Officer, Service Manager and Team Leader share responsibilities for representations of the service, which include attending meetings Heads of Planning Scotland (HOPS), Glasgow City Region (GCR) / Regional Spatial Strategy (RSS) meetings with Clydeplan and meeting with the Scottish Government. Representation aims to maximise and increase opportunities for Inverclyde Councils planning service and to represent the views and interests of Inverclyde Council.

A key function of the service leadership aims to create effective partnerships and ensure that our services are implemented to work effectively with private individuals (e.g. land and business owners), public and statutory bodies and a variety of internal and external stakeholders to create relationships that will enable development and regeneration for Inverclyde. This also includes effective cross cutting and working with colleagues in Legal, Roads, Environmental Health, Housing, Education, Trading Standards, Licensing, Economic Development and many other areas to achieve the Council's strategic aims, best value and provide efficient services.

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	3
5. This Planning Authority has effective leadership	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).

<b>Improvement Action</b> What action will you take? What will the outcome be?	<b>Owner</b>	<b>Importance</b> High Medium Low	<b>Timescale</b> Short term – 1 year Medium term – 3 years Long term – 3+ years	<b>Resources</b>
Increase engagement with stakeholders and partners and engage in wider peer review to embed continuous improvement.	D Henderson / N McIlvanney	High	Short	Cross Service Working – Housing, Planning, Public Protection. Input from Corporate Comms
Obtain recognition for high performing staff / customer engagement / project work through awards.	D Henderson	Medium	Medium	RTPI, HOPS etc
Increase resilience around decision making process, CPO / committee responsibilities	N McIlvanney	High	Long	Legal Services, Member Services
Minimise total number of complaints received.	D Henderson	High	Long	HR, Customer Services + Chief Executives Office
Explore other ways of upskilling staff and enabling staff development, for example developing relationships with planning staff in other organisations	D Henderson	Medium	Short	HR, HOPS, RTPI + Training Partners



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: This planning authority has a robust policy and evidence base**

### **6.1 Local Development Plan**

***Does the planning authority have an up to date Local Development Plan in place and/or is on track to adoption?***

The Local Development Plan sets out the Council's strategy, policies and proposals for the use of land and buildings within Inverclyde, and, together with the Clydeplan Strategic Development Plan, is the document the Council uses to determine planning applications and provide advice on development proposals. The current Local Development Plan was adopted 26 August 2019.

On 17 May 2021, Inverclyde Council published its Proposed Local Development Plan. The consultation period ran until 9 July 2021 and is now closed. The representation received are being considered and will be reported to a meeting of the Council's Environment and Regeneration Committee in due course. If the representations raise any issues that cannot be resolved the Proposed Plan and the relevant representations will be submitted to the Scottish Ministers for Examination.

The evidence report is now ready to be presented for approval by full Council with intended submission to Scottish Government for gate check in line with the Development Plan Scheme for submission by Q4 2024/25.

### **6.2 Regional Spatial Strategy**

***Does the planning authority have an up to date Regional Spatial Strategy in place/or on track to adoption?***

The principal role of Clydeplan is to prepare and maintain an up-to-date Regional Spatial Strategy for the Glasgow City Region. This process involves engagement through joint

working and consultation with a number of key stakeholder organisations and the wider community. Unlike its predecessor the Strategic Development Plan, the Regional Spatial Strategy will not form part of the statutory Development Plan system. This will now comprise of the National Planning Framework and the Local Development Plan.

### **6.3 Evidence Report**

***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?***

The Development Planning Team are currently progressing the evidence report with a view of submitting the final evidence report to the Scottish Government in Q4 2024/25 in line with the timeline as indicated within the Development Plan Scheme.

### **6.4 Local Development Plan – Appeal or Judicial Review**

***Have the application of the Local Development Plan's policies been found to be deficient at appeal or judicial review?***

In July 2020, a decision of the Court of Session quashed Chapter 7 of the adopted Local Development Plan ('Our Homes In and Communities'). In light of this, the Council agreed to review its Local Development Plan. As part of the adopted plan, it was intended to submit a new Proposed Plan to the Scottish Government for consideration in 2021, however due to unforeseen delays this was not possible.

With the introduction of the Planning (Scotland) Act 2019, a requirement was placed on planning authorities to develop a new style Local Development Plan, the development of which is currently in progress. The Proposed Plan 2021 therefore remains a material consideration in addition to the adopted plan.

## **Attribute 7: This Planning Authority makes best use of data and digital technology**

### **7.1 eDevelopment Portal**

***Has the planning authority encouraged and promoted planning applications to be submitted through the e-development portal?***

With a continued commitment to digital modernisation and a paperless planning service, the Planning and Building Standards service of Inverclyde Council actively encourage all applicants to use the eDevelopment portal managed by the Scottish Government. Figures for planning applications submitted between 1st April 2023 and 31st March 2024 indicates



that 96% of applications are submitted through the eDevelopment portal. Links are provided within the Council website to encourage customers to use the eDevelopment portal, whilst all other communications from Council officers will advise new or repeat customers of the service to use the portal.

## **7.2 Data Governance Strategy**

***Does the planning authority have a data governance strategy in place for the management of planning data?***

Information and data are a key asset for the Council. It is central to the Council's business processes, decision making and service delivery. It also provides evidence and ensures accountability around Council actions and performance. It is crucial that information is managed effectively to maximise value for the Council and its stakeholders, and to manage related risks, including around information management compliance. Effective use of information will also support service transformation and adoption of new ways of working.

The Council's Information Governance Steering Group (IGSG) are responsible for the overall review, monitoring and implementation of strategy in relation to digital data and information.

As a group, the IGSG will ensure there is clear direction, visible ownership, coordination and management support for information governance across the Council. On behalf of the planning service, the Planning and Building Standards Service Manager is responsible for service representation at the IGSG. Through the work of the IGSG, the planning service has been able to improve the management and governance of the following key areas.

- Information Asset Register – Monitored annual to review all digital assets which the planning service is responsible for, in addition to historical information.
- Website Accessibility – Review of information provided within the relevant sections of the Council's website for the planning service to ensure that information provided for customer is accessible and identifiable for customer through search engines.
- Training – The IGSG have recommended the introduction of corporate training through HR in relation to data protection, notably GDPR, enhancing the planning service by allowing for greater understanding and transparency when sharing information.

In August 2023, the Council's Policy and Resources committee approved a £1 million ear marked reserve to support digital transformation across the Council. Whilst no funding was awarded directly to the planning service, the funding will be allocated to a number of projects which support the planning service, resulting in wider improvements to the service and customer experience. These shall include.

- Migration to a new corporate data storage solution is nearing completion providing additional capacity and security and improved performance
- Customer Service System – Improvement of processes within the Customer Service Centre to introduce expanded availability through self-service portals online and within Council buildings.
- Complaints System – Replacement of existing complaints handling system and Freedom of Information (FOI) requests to invest in new software for recording and responding to enquiries.
- Microsoft 365 – Investment in hardware and software for all services to optimise opportunities afforded by Microsoft 365. This includes a Council wide move toward the use of software such as Microsoft Teams, aligning with other local authorities, replacing the use of existing software packages.

### **7.3 Web Mapping, GIS and Spatial Data**

***Does the planning authority have the ability to use interactive web-mapping, GIS and spatial data?***

Within the Development Planning team, the Senior Planning Technician has responsibility for the management, monitoring and delivery of all mapping and spatial data relative to local planning policy. This includes providing mapping and GIS support to the Planning Policy team – producing maps, plans, diagrams, and other elements to enable the delivery of the Local Development Plan. Management of spatial datasets encompass every element of the Local Development Plan, as well as the broader portrayal of the built and environmental in Inverclyde. These are also part of a central resource, available to all GIS users in the Council, and are fed into the spatial hub which is curated by the Scottish Government Improvement Service.

At present, Inverclyde Councils Development Planning service utilise the corporate GIS system through Cadcorp SIS. The use of this software is paramount to the delivery of a number of projects, which includes

- **LDP Adopted Plan 2019 and LDP Proposed Plan 2021**
- **LDP4** – Currently in Production
- **Land Surveys** – (e.g. Housing Land Supply, Vacant & Derelict Land Supply and the Business & Industry Land Supply).
- **Environmental Context**

## **7.4 Digital Engagement – Website, Social Media**

***Does the planning authority have the ability to use digital approaches to engagement, including website, social media and other platforms?***

To maximise outreach to members of the public, including community bodies and underrepresented groups, the Planning service has sought to utilise several digital engagement tools.

### **Consul – Community Choices Platform**

Inverclyde Council have a new community engagement platform called Inverclyde Community Choices. This is a digital tool for citizen participation enabling open, transparent and democratic engagement between public bodies and communities. The Software (Consul) was developed by Madrid City Council and currently used by 100 cities in 55 countries across the world

The Platform has five key elements:

- **Debates** - Enables people to express the issues that are important to them. Creates space for listening, collaboration and sharing of issues and ideas
- **Proposals** - People can submit proposals at any time on a subject or issue. Proposals can gather ‘supports’ up to an agreed threshold. When the threshold is reached, the proposals can be moved to the voting section, where a vote can be taken for or against the proposal, or be directly considered to be carried out.
- **Voting** - The voting module allows people to vote on citizens’ proposals. The local authority may ask citizens to vote on specific options within a proposal
- **Collaborative Legislation** - A space to propose and discuss legislation and open documents for consultation
- **Participatory Budgeting** - Allows citizens to directly propose and decide how to spend part of a local authority’s budgeting is spent. Any registered user can make proposals and vote on the ideas of others. The budget can be divided different categories and or areas.

The use of the Community Choices Platform enables a wide reach of engagement for several Council services, including Planning, to enable the development of community led feedback and suggestions.

### **Corporate Communications Team**

The Council Corporate Communications Team are engaged where it is considered essential to maximise the sharing of information relative to a significant area of planning engagement. A recent example has included the publication of a call for Local Place Plans in August 2024. This included the release of supporting guidance and endorsement from the convener of the

Environment and Regeneration Committee to encourage residents and community bodies to engage with the Council on Local Place Plans. Our Corporate Communications Team also maximise the outreach of engagement through the Council's official social media channels on Facebook, LinkedIn and X (Twitter).

### **Council Website**

The Council's website is updated and maintained frequently to ensure that all information relevant to the Planning service is beneficial to our stakeholders. This includes dedicated sections on our website to Development Management and Development Planning.

## **Attribute 8: This Planning Authority has effective and efficient decision-making processes**

### **8.1 Decision Making Timescales**

<p><b><i>Does the planning authority planning have the ability to make decisions on planning applications within the required timeframes?</i></b></p>
---

To ensure that the reporting of performance information is a true and accurate reflection of the current service delivery of the planning service, detailed of the decision-making timescales from 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024 have been provided, whilst a six-monthly interim update has been provided to report decision making performance from 1<sup>st</sup> April 2024 to 30<sup>th</sup> September 2024. This has been reported to provide transparency and relevance, whilst also reflecting a steady improvement in the service delivery with the benefit of a full complement of staff.

The interim reporting of performance in relation to decision making timescales indicates that the planning service is trending towards improvement overall. Through six months of the 2024/25 year, it should be noted that application response times for all local developments has increased from 47.3% to 76.6%. Whilst it is acknowledged that there are areas for improvement, overall performance in relation to timescales has improved for householder, local developments (non-householder) and other developments.

<b>2023/24</b>			
<b>Application Type</b>	<b>Number of applications not subject to processing agreement</b>	<b>Average Time (Weeks)</b>	<b>Timescales</b>
Major Developments (N03A)	1	51.8	
Minerals	-	-	
Other (N/14/N15/N17/N18x)	51	8.1	
All Local Developments (N01/N03B/N04B/N10B)	283		
• Local: less than 2 months	134	7.0	47.3%
• Local: more than 2 months	149	14.9	52.7%
Householder (N01)	166		
• Local: less than 2 months	74	6.0	44.6%
• Local: more than 2 months	92	14.4	55.4%
Local developments (N03B/N10B) (non-householder)	117		
• Local: less than 2 months	60	8.3	51.3%
• Local: more than 2 months	57	17.0	48.7%
Housing (local) (N03B)	25		
• Local: less than 2 months	10	13.2	40%
• Local: more than 2 months	15	23.6	60%
Business and Industry (N04B)	1		
• Local: less than 2 months	-	-	-
• Local: more than 2 months	1	9.0	100%
Other developments – Local(N10B)	91		
• Local: less than 2 months	50	7.4	54.9%
• Local: more than 2 months	41	13.2	45.1%

The following table outlines performance based on an interim reporting period through six months of the current financial year.

1 <sup>st</sup> April 2024 – 30 <sup>th</sup> September 2024			
Application Type	Number of applications not subject to processing agreement	Average Time (Weeks)	Timescales
Major Developments (N06A)	2	35.0	
Minerals	-	-	
Other (N14/N15/N17/N18x)	29	4.0	
All Local Developments (N01/N03B/N04B/N10B)	122		
• Local: less than 2 months	95	5.5	76.6%
• Local: more than 2 months	27	25.6	23.4%
Householder (N01)	58		
• Local: less than 2 months	53	5.4	91.4%
• Local: more than 2 months	5	37.5	8.6%
Local developments (N03B/N10B) (non-householder)	63		
• Local: less than 2 months	41	5.7	65%
• Local: more than 2 months	22	22.9	35%
Housing (local) (N03B)	9		
• Local: less than 2 months	1	5.0	11.1%
• Local: more than 2 months	8	24.4	88.9%
Business and Industry (N04B)	1		
• Local: less than 2 months	-	-	-
• Local: more than 2 months	1	24.5	100%
Other developments – Local (N10B)	54		
• Local: less than 2 months	40	5.7	74%
• Local: more than 2 months	14	22.0	26%

## **8.2 Applications Appeals**

***Are less than x% of planning decisions overturned at appeal or judicial review?***

During the 2023/24 year, there were 11 application which were appealed to the Local Review Body whilst one application was submitted to the Department for Planning and Environmental Appeals. No applications were appealed to through judicial review.

	<b>Appeals</b>	<b>Decisions Upheld</b>	<b>Percentage</b>
LRB	11	8	73%
DPEA	1	1	100%
Judicial Review	N/A	N/A	N/A

## **8.3 Enforcement Charter**

***Does the planning authority have an up-to-date Enforcement Charter in place?***

Inverclyde Council's Planning Enforcement Charter was published in November 2023, The Charter, along with the current Summary Enforcement Register can be found online on the Council's website.

The Council investigates when unauthorised development is brought to its attention by members of the public or is noted by planning officers. It may also undertake monitoring of planning permissions. If it is considered that it is in the public interest to do so, the Council has powers to take enforcement action.

The Charter explains how the enforcement process works in Inverclyde, it outlines the key points and the Council's procedures, and it details the service standards that the Council sets. It also explains what happens at each stage of what can often be a lengthy process.

The Council aims to ensure that our adopted procedures are fair and reasonable and that affected interested parties are kept informed and are made aware of what is required. The Council hopes that the Planning Enforcement Charter is useful, and that feedback is provided where there is room to improve the service further.

## **8.4 Enforcement Resource**

***Does the planning authority have the ability to resolve enforcement cases?***

The Inverclyde Council Planning service currently has no dedicated Enforcement team or Enforcement Officers. Enforcement investigations are currently undertaken by the Development Management Team due to the proportionately smaller number of enforcement cases which are reported within the Local Authority area. However, despite the planning service having no dedicated resource for this purpose, planning enforcement cases

are recorded, investigated and responded to by the Council's Development Management Team and therefore do have the ability to resolve enforcement cases. At present, there is currently no business justification for a dedicated enforcement resource. Since the departure of the Development Management Team Leader, who led all enforcement activity; the service management has dispersed responsibility for enforcement amongst development management officers to a) minimise capacity impact on any particular officer b) ensure that greater resilience is held in the team, so that the service is not as vulnerable to single point dependencies c) allow allocation to work to play to strengths in officers whether that be because of familiarity with the case or type of issue or workload capacity or complexity d) to embed a culture of peer review, where officers support others to validate/challenge recommended outcomes.

Attribute	Score (1=Making excellent progress, 5= No progress)
6. The planning authority has a robust policy and evidence base	3
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
Maintain performance levels and timescales as achieved to date in 2024/25.	D Henderson	High	Long	Staff – monitoring of workload and performance by leadership team
Ensure that LDP/Evidence Report is progressed timeously and has content that is robust to allow the plan to form appropriate	D Henderson	High	Short, Medium, Long	Cross Service Working, EMR for Consultant Appointment



conclusions as to policy and land allocations				
Maximise digital engagement	D Henderson	High	Medium	Corporate Comms, ICT
Prepare an updated timetable for preparation of the new Local Development Plan	D Henderson	High	Short	Corporate Comms
Continue to support Clydeplan's regional planning work to set an overall long-term vision	D Henderson / N McIlvanney	High	Long	Glasgow City Region + Partners
Continue to monitor enforcement through existing systems described in section 8.4	K Dean	Medium	Long	Development Management Team



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: This Planning Authority has good customer care**

### **9.1 Pre-Application Advice**

***Does the planning authority have the ability to offer pre-application advice where it is requested***

The Planning service currently operates a pre-application advice service in both a formal and informal capacity.

Where a customer, member of public or any other person with a relevant interest wishes to engage with the planning service, Officers from the Development Management Team and Development Planning Team are available to take enquiries on an ad-hoc basis. Advice can be provided by contacting Officer through

- The Council Website – Officer email addresses and telephone numbers (including mobile phones) are available
- Customer Service Centre – Any general enquiries can be reverted to the planning service to arrange a meeting by appointment in person or via an online video call
- Elected Member Referral – Enquiries are often received via elected members; enquiries are then delegated to case officers.

It should be noted that the above, informal approach, is taken for non-complex enquiries which typically relate to householder or local applications with low risk and complexity.

Where a pre-application meeting or advice is sought in a more formal capacity, the Development Management Team can facilitate any request which is made by an applicant for a pre application meeting.

Applicants must give the Council at least 12 weeks' notice of the intention to submit a National or Major Application. Following set procedures, all affected community councils must be consulted, and the applicant must hold at least one public event for members of the public to receive comments on the proposals. Public events must be advertised at least 7 days in advance; in Inverclyde all planning notices are placed in the Greenock Telegraph.

After consultation, the applicant requires to produce a pre-application consultation report. It should set out how the applicant has responded to the comments made, including the extent to which the proposals have changed, if at all, because of the pre-application consultation. The report is then submitted with the planning application.

The planning service recognise that the pre-application process can provide a number of advantages to both applicants and the Council and this process is highly recommended to support and enable a positive application process.

Detailed information on additional information required before submitting a planning application can be found on the Council's website under the Development Management section titled Applying for Planning Permission. During any pre-application meeting, the planning service would endeavour to set out the information required as accurately as possible.

The service management has set up a series of quarterly liaison meetings with frequent customers (agents) to discuss opportunities to optimise service delivery. It is anticipated this will be an initial focus of discussion to determine how the service and agents collaborate to utilise pre-application procedures to best effect.

## **9.2 Engagement Events**

***Has the planning authority held regular engagement events with developers and communities?***

In 2025, the Planning service will facilitate the inaugural Inverclyde Council Planning and Building Standards Customer Forums. The nature of these forums would give our repeat customers a platform to discuss any technical or procedural aspects of the planning and building warrant process, whilst also offering an opportunity to provide feedback which our customer or their clients may have experienced from our services. It is proposed to co-chair a programme of meetings, with an aim of delivering a minimum of three forums in 2025. The aspirations for the Customer Forums is to ensure that the customer has ample opportunity to engage with us and to ensure the service is working as efficiently and professionally as possible, particularly with local agents.

## **9.3 Customer and Stakeholder Surveys**

***Do the results from the customer and stakeholder survey show that customers are satisfied with the service offer by the planning authority?***

At present, the Inverclyde Council planning service does not hold quantitative or qualitative survey data to allow for a review of customer satisfaction. The service is awaiting feedback from the recent circulation of the National Planning Improvement - Customer and

Stakeholder Survey. The findings from this will allow the local authority to review service delivery and customer satisfaction in relation to the planning service.

During the window of the survey, the Inverclyde Council Planning service contacted a selection of new and repeat customers to raise awareness of the survey and to ask for their feedback through the survey process using the template communication toolkit created by the Improvement Service.

## **Attribute 10: This Planning Authority has effective engagement and collaboration with stakeholders and communities**

### **10.1 Infrastructure for Engagement**

***Does the planning authority have a community engagement strategy and infrastructure in place to ensure engagement is early, collaborative, meaningful and proportionate?***

The Participation Statement for Local Development Plan 4 (contained within the Development Plan Scheme) sets out in detail the ways in which the Council will engage with key stakeholders at all stages of preparing LDP4. The Participation Statement sets out the intended engagement through the evidence gathering process, call for sites and the proposed plan stages. The Participation Statement also sets out what to expect during the examination and final stages of the plan-making process, how the Council will support communities in preparing Local Place Plans and that the Council may seek to use mediation to overcome locally contentious issues.

### **10.2 Community Engagement**

***Has the planning authority undertaken community engagement, for example consistent and effective use of the Place Standard Tool, to inform decision-making processes?***

As part of the ongoing exercise to gather supporting evidence to enable the delivery of the new Local Development Plan, the Council has identified a variety of approach to support engagement with key stakeholders.

The local authority has been able to demonstrate successful engagement with several key stakeholders as part of the Council Town Centre Regeneration Forums, including in person meetings with Council representatives, elected members/councillors, local businesses and community members. By engaging with stakeholders through three key stages which included a walk round each town centre, public drop-in sessions to allow for presentation of ideas on a set of consultation boards at a public drop-in event and lastly by publishing priorities and projects online for stakeholder consultation and views. The Place Standard Tool and placemaking principles have been key within this process and have enabled the delivery of Town Centre Action Plans which will form the basis of evidence to set out a

strategy for placemaking that will support the council's growth and regeneration aims and provide a place context for future Local Development Plan considerations.

As part of the self-assessment process, the planning service has also identified community engagement as a priority area as part of the new Local Development Plan. As such, the Development Planning team will increase the current level of community engagement to deliver an inclusive approach in line with Scottish Government guidance on *Effective Community Engagement in Local Development Planning*.

### **10.3 Engagement with Under Represented Groups**

***Has the planning authority engaged with a good representation of the community including young people, gypsies and travelers, people with protected characteristics, including disability, race, age, sex and sexual orientation, and including people from a range of socio-economic backgrounds?***

As part of the Council's Development Plan Scheme, approved in January 2024, the Council shall endeavour to engage with as many underrepresented groups as possible. This shall include gathering of information from the following organisations and communities to help in the preparation of the evidence report.

- Key agencies
- Government Agencies
- Stakeholders
- Land/property owners
- Community Councils/Groups
- Children/youth groups
- Gypsies/travellers
- Local authorities
- Council Services
- Councillors/MSPs/MPs

The Development Planning service will successfully engage with the aforementioned groups by publicising calls for evidence through our use of the Council's Corporate Communications team. This shall include the use of the following communication tools.

- Social media – The Council's Corporate Communications Team (CCT) have created a communication strategy for the local development plan process which is continuous monitored and updated. The CCT have recently publicised the call for Local Place Plans on social media channels including Facebook, LinkedIn and X (Formally Twitter).
- Council website – The Planning service aims to share all available information on its website to ensure that up to date information is available to stakeholders whenever it is needed.

- Local press – Through the Council’s Corporate Communications Team

Wider consultation shall also allow submission of evidence through targeted e-mailing, with invitations to submit evidence, whilst it is also intended to coordinate a number of events and workshops with public/groups/organisations.

It is intended that the LDP process will involve the development of an equalities impact assessment, and engagement will be carried out with hard-to-reach groups and the specified protected population groups to ensure the content of the LDP is reflective of the wider needs of our communities.

#### **10.4 Local Place Plans**

***Has the planning authority supported the production of Local Place Plans when requested?***

Local Place Plans were introduced by the Planning (Scotland) Act 2019, giving communities the new power to produce their own plans to inform the preparation of the Local Development Plan. In August 2024, Inverclyde Council launched an invite to community bodies to prepare a Local Place Plan for their area to create a community led approach for future development aspirations. The Council has promoted LPP’s through use of the Council’s Corporate Communications team, utilising social media channels, Council’s website and elected member engagement. The Development Planning Policy Team has been having discussions with several community groups who have expressed an interest in the development of a LPP for their community. The ongoing discussion and development of LPP’s remains at an early stage, with a tentative deadline of July 2025 proposed for submission to the Council.

The Council’s Development Planning Team have already undertaken in-person engagement and are offering a number of support mechanisms to aid the development of LPP’s. These include the sharing of any available documents or policy information available online or archived, face to face stakeholder engagement where requested, printing and mapping services, training to support the facilitation and engagement of community events and assistance to apply for funding opportunities for professional or consultancy support.

#### **10.5 Customer Satisfaction – Collaboration**

***Do the results from the customer and stakeholder survey show that stakeholders are satisfied with their collaboration with the planning authority?***

Whilst the Inverclyde Council Planning service does not have a dedicated customer survey, the service is awaiting feedback from the recent circulation of the National Planning Improvement - Customer and Stakeholder Survey. The findings from this will allow the local

authority to review service delivery and customer satisfaction in relation to the planning service.

During the 2023/24 year, the Planning service has considered feedback from customers which includes the local authority's repeat customers through one-to-one engagement. Feedback received in these sessions has been considered and drive change and improvements progressively.

Attribute	Score (1=Making excellent progress, 5= No progress)
9. This planning authority has good customer care	3
10. The planning authority has effective engagement and collaboration with stakeholders and communities.	3

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
Prioritise engagement with community bodies and underrepresented groups in 2025/26.	D Henderson	High	Medium	Corporate Comms, Communities Team
Develop PBS Customer Forum, working with group participants to benefit customer and applicant experience.	D Henderson	High	Long	Customer Participation
Develop pre-application process to give customers valuable feedback.	D Henderson	Short, Medium	Long	Survey Feedback, Customer Input
Deliver effective community engagement events to promote the importance of the planning service and planning profession.	D Henderson	Medium	Medium	Corporate Comms, Community Bodies, Education, Safer Communities Team

Develop new customer survey to ensure qualitative and quantitative data is available for analysis by leadership team.	D Henderson	Medium	Medium	Customer Service Team, Planning Admin
Explore the scope for more detailed chargeable pre-application discussions on Major developments in partnership with agents, architects and developers	D Henderson / N McIlvanney	Medium	Medium	Legal Services
Continue to encourage communities to prepare Local Place Plans and provide resources to communities to enable them to produce Local Place Plans	K Dean / M Pickett	High	Short	GIS Mapping, Corporate Comms





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: This Planning Authority supports the delivery of sustainable, liveable and productive places.**

**11.1 Place and Wellbeing Outcomes**

*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?*

Inverclyde Council is aware of the Place and Wellbeing Outcomes and their importance. We recognise that these outcomes provide a consistent and comprehensive focus for where place impacts on the wellbeing of people and the planet.

They are also key features for delivering Scotland's local living and 20-minute neighbourhood ambition. Their development has been supported by the organisations that sit on the Place and Wellbeing Collaborative.

The Place and Wellbeing Outcomes are:

- Movement – active travel; public transport; traffic and parking
- Spaces – streets and spaces; natural spaces; play and recreation
- Resources – services and support; work and economy; housing and community
- Civic – identity and belonging; feeling safe
- Stewardship – care and maintenance; influence and control

**11.2 Tools to Deliver Sustainable, Liveable and Productive Places**

*Has the planning authority identified tools and approaches to delivering sustainable, liveable and productive places and is implementing them?*

### Place Standard Tool

The Place Standard is a tool to structure conversations about local places. It helps us to think about the physical and social aspects of places, and the important relationships between them. The Place Standard Tool has relevant themes to inform the assessment of places and will allow us to identify specific issues for improvement. The themes have been carefully chosen based on evidence about their combined influence on our health and wellbeing.

Understanding what is good about a place now, and what could be better, can help us make good decisions and allow us to target resources where they are needed most. The Place Standard Tool can support the design and delivery of successful places, creating good-quality places where people want to live.

### Place and Wellbeing Assessment

In November 2024, the Development Planning team engaged with the Improvement Service in relation to the planning and implementation of a Place and Wellbeing Assessment (PWA) for Inverclyde. It is anticipated that the PWA will be undertaken in January 2025 and focus on a number of key demographics and statistics across the various localities within Inverclyde.

### Play Sufficiency Assessment

Children have a right to play. Through play, children and young people can explore the world around them in a creative and engaging way. Research shows that children experience a range of health, wellbeing, developmental and educational benefits from outdoor play, and through learning in, and connecting with, nature.

Ensuring children's access to play and engaging children in the planning system upholds their right to play and relax.

As part of the PSA, the Council have issued a questionnaire to ask for views and opinions on the key factors which make play spaces desirable to children and young people. The PSA questionnaire has returned just over 190 responses to date, enabling Inverclyde Council to assess existing play spaces for children in their area to better understand the spaces that are working well, and the improvements that require to be made for the creation of better play environments. The results of this survey will help us understand what is liked and disliked in relation to our outside play spaces.

### Town Centre Regeneration Forums

The Inverclyde Town Centre Regeneration Forum provides the foundation for regeneration of the network for town and local centres. Each of the town centres within the Local Development Plan (Greenock, Gourock and Port Glasgow) has a Town Centre Action Plan, capturing the ambitions and needs of the community, with a strong focus on projects that

are capable of being delivered over a short-to-medium term timescale, and which have potential to form bids for external or place-based funds.

Each Action Plan sets out a strategy for placemaking that will support the council's growth and regeneration aims and provide a place context for future Local Development Plan considerations. The Action Plans will help to communicate a sense of shared ambition for the town centre and inform its future development priorities.

## **Attribute 12: This Planning Authority supports the delivery of appropriate development**

### **12.1 Section 75 Agreements**

***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?***

The policies applicable to contributions for infrastructure (Section 75 agreements) are addressed within the Local Development Plan and are embedded into several Policies where contributions may be sought (including in enabling development, community facilities and drainage infrastructure). The Supplementary Guidance on Enabling Development sets out processes which will support the use of legal agreements and/or planning conditions. Supplementary Guidance on Developer Contributions is to be prepared in the future. Circumstances where there is a requirement for contributions is outlined within these and such contributions will only be sought where necessary and in accordance with the five tests set out in Planning Circular 3/2012.

The planning service where possible, will set out the need for contributions to infrastructure secured through a Section 75 legal agreement through the pre-application process and advice given to applicants, where applicable. Our advice shall endeavour to set out policy context and considerations and aim to identify the need for this requirement at an early stage in the planning process. However, the specific financial contribution that may be required will be settled within the detailed assessment of the full application through consultation with relevant internal departments and external bodies.

### **12.2 Planning Conditions**

***Does the planning authority take a proportionate approach to imposing conditions?***

A proportionate approach is taken by the Planning Service when applying conditions. The imposition of conditions is reflected in the scale of development for all applications, whereby conditions are only imposed where they are considered to meet the six tests set out within Planning Circular 4/1998: the use of conditions in planning permissions.

For matters which could impact the viability of the development or require further detailed information for assessment will be attempted to be addressed prior to determination to reduce the need for conditions and further information to be submitted post-consent. When conditions are necessary, the Planning Service will have open communication with the applicant to advise of these requirements prior to determination.

The management of conditions and marking of discharged conditions is an important aspect which is carefully monitored and recorded in uniform and emails relating to the progress of conditions recorded on file.

### **12.3 Housing Land Requirements**

***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?***

The Housing Supply Target (HST) outlines the estimated level of additional housing that can be delivered on the ground and informs the formation of the Housing Land Requirement. The Scottish Government Local Housing Strategy guidance notes that this should be a summary of the level and type of housing to be delivered over the period of the Local Housing Strategy (LHS) together with an explanation around how the HST (split into market and affordable) has been determined.

The Inverclyde HST paper was published in 2023 as a supporting piece of evidence for the Inverclyde LHS 2023-2028. The paper noted that to support the policy aspirations of Inverclyde Council and its partners, there would be a shift towards regeneration in the social rented sector rather than the previous absolute supply growth agenda. This shift to regeneration is reflected within the Inverclyde LHS 2023-2038 and will do so for future Strategic Housing Investment Plans over the duration of the current LHS. Moreover, as set by the Inverclyde Alliance there is a shift for housing policy to support a repopulation agenda that requires the expansion of private sector tenures.

Because of such considerations then, the housing supply targets noted the pivot towards private sector housing over the next decade. Towards that end it was proposed that **the HST will be 1875 units over the decade and will be split using a ratio of 60% private sector units to 40% affordable housing units**. Affordable housing refers to social rented units and other tenures delivered through the AHSP, inclusive of social rented, mid-market rent, and new supplied shared equity models. It was determined that an annual basis for how these targets should be met would be too restrictive. Rather the HSTs has been set to be met over the duration of the strategy to support innovative regeneration strategies, not stifle them. The Inverclyde HST is presented within table 1.

Table 1: Inverclyde Housing Supply Targets and Tenure Breakdown

Housing Supply Targets 2023-2033	Tenure Breakdown
1875 units	60% Private Sector; 40% Affordable

The Inverclyde HLR will provide adequate land to deliver Inverclyde's Housing Supply Targets set within the Inverclyde Local Housing Strategy (LHS) 2023-2028 as a minimum.

There are senior stakeholder discussions underway through Homes for Scotland and with volume builders to understand how to better support and attract house building to Inverclyde. This has been positively received, and it is intended to build on this as the LDP progresses.

#### **12.4 Processing Agreements**

***Are the number of processing agreements the planning authority has agreed with applicants increasing?***

The Planning Service continue to offer processing agreements, most commonly for larger and major applications. The uptake of these from applicants is however low as perhaps its more in the interest of the Planning Service to meet application processing deadlines.

Stop the clock procedure is more commonly used for smaller applications which can be appropriately applied without agreement with the applicant.

#### **12.5 Delivery Programme**

***Does the planning authority have an effective delivery programme in place that supports the delivery of development on the ground?***

Following the adoption of Local Development Plan 3 in 2019, the Council published draft supplementary guidance on enabling development. The supplementary guidance provides detailed information on specific policies in the Inverclyde Local Development Plan, thereby enabling the Plan to focus on the spatial strategy, main policies and development proposals.

Attribute	Score (1=Making excellent progress, 5= No progress)
12. The planning authority supports the delivery of sustainable, liveable and productive places	3
13. This planning authority supports the delivery of appropriate development	3

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).

<b>Improvement Action</b> What action will you take? What will the outcome be?	<b>Owner</b>	<b>Importance</b> High Medium Low	<b>Timescale</b> Short term – 1 year Medium term – 3 years Long term – 3+ years	<b>Resources</b>
Work collaboratively with all stakeholders to ensure that appropriate development is enable through the planning process.	D Henderson	High	Long	Homes for Scotland, Housing, RSLs, Customers, GCR, Business/Building/Land Owners etc
Ensure that the Council supports the delivery of sustainable, liveable and productive places	D Henderson	High	Long	As Above