

PLANNING PERFORMANCE FRAMEWORK: 2011-12

FEEDBACK REPORT: Perth and Kinross Council



Date performance report due: 30 September 2012

Date of receipt of report: 3 October 2012

National Headline Indicators

- We note that all local plans were considerably older than 5 years, ranging from 8 to 15 years, with some way still to go before your replacement Local Development Plan (LDP) could be adopted. This is too long to spend without an up-to-date policy framework; although we recognise progress has been made more recently following a project plan. Updating on the 5-year cycle is essential in giving a clear lead and certainty for future investment in development. Good progress must now be maintained with your LDP and also with subsequent plans, with good project management applied through to adoption.
- We would remind you that the Scottish Government expects a supply of effective land for at least 5 years should be maintained at all times, to ensure a continuing generous supply of land for housing. You have an essential role in enabling development, and we expect your LDP will provide an appropriate framework to support this supply.
- Your information on land supply is noted. Heads of Planning Scotland (HOPS) are currently producing workable definitions for recording 'employment land' and 'commercial floorspace' for second round of reports.
- Consistent with some other authorities, you were unable to provide data on applications that had been subject to pre-application advice. We welcome your commitment to record this going forward.
- We note that 30 major developments were decided during 2011-12, but that none were subject to processing agreements – although you had operated internal project plans that can allow accelerated processing. We also recognise your intention to 'agree and share' your project plans with applicants, and suggest you take this a step further to enter into processing agreements with applicants and consultees, as a major contributor to increasing certainty and more efficient planning processes. You will be aware that the Scottish Government has recently published a processing agreement template, which we hope will act as a good starting point.
- Approval rate (87.2%) is a few points below national average (92.2%) and appears, from previous statistics, to follow a trend over recent years.
- Average decision-making times have broadly been longer than Scottish averages, although there was some conflicting information between the statistics in the National Headline Indicators and in the Appendix. For example, the Appendix shows that householder applications took on average

a month longer than across Scotland, and non-householder local developments took on average nearly 3 months longer. We note your intention to work with customers to secure faster planning decisions and we want to see good progress made and maintained in this area.

- The statistics also suggest that the time to conclude legal agreements (65 cases during the year) will have been a contributor to delay, with these taking on average around 21 months. You need to identify what steps can be taken to break through unnecessary delays; we recognise and support your intention to develop a protocol with applicants to ensure progress on obligations within agreed timescales. Processing agreements can also help to give focus to this stage of an application and ensure important discussions happen as early as possible.
- Effective enforcement is an essential element in securing public confidence in the planning system. Your report noted a good record of activity and results in enforcement, including use of formal action and prosecution when needed, but your enforcement charter had last been published in 2009. We note your intention to review this and you should ensure a rolling programme of reviewing/updating the charter within the statutory 2-year cycle.

Defining and Measuring a High Quality Planning Service

- Much of your evidence on 'certainty' and 'open for business' naturally relates to the authority's development management process, with the absence of an up-to-date development plan for the area. It is particularly important to have a current, relevant development plan to support these essential aspects of your planning service.
- We are encouraged to see good links have formed between planning and economic/commercial interests in the council and that this can be used to support the council's corporate priority for business investment. It would help if future reports could include some examples of how this has helped with developer confidence and investment, perhaps with some customer feedback.
- You could also explain how internal relationships might have helped you to operate from a corporate perspective, including any concordats that might be in place with other parts of the council to deliver their parts of the planning service and to ensure proportionate information requests are made.
- You mention that you have a dedicated affordable housing enabler and a protocol in place to ensure speedy responses. Your next report could explain how this has helped guide what can often be a difficult issue in the planning process. Are there particular success stories that could be shared with others?
- We are interested in your validation process which allows 2 attempts to correctly submit an application. It is important to remove unnecessary process from the system and it is in everyone's interests to get this right, preferably first time. Do you have statistics you can share in your next report, along with any feedback received, that can point to successes of this policy?
- We note you have been developing placemaking guidance. It is important to have clear and robust policy to guide good quality development and places. You could provide some evidence of how you monitor and understand value added through planning and how you can learn lessons from recently completed/operational developments.

- You tell a positive story of your public engagement on the LDP. It is also encouraging to see regular engagement more generally, particularly through the Planning User Forum. You could provide some information in future reports on the outputs from the forum and how you have taken action on particular issues raised. We also welcome your provision of training opportunities for communities, including young people, and good availability and use of online planning services.
- We note a slightly higher than average delegation rate and also committee and local review body arrangements set to ensure effective business management, including an absence of formal committee recesses. Also that you set and monitor target decision dates for applications, although as reflected above decision-making timescales have often been too long – you could explain in future how you have set and managed application target dates.
- It is encouraging to see staff engaged in planning reform and culture change, and having an influence in improvement actions. We support this approach as part of a wider commitment to continuous improvement.

Service Improvement Commitments 2012-13

- You have made a range of commitments that are clearly linked to improvement needs identified in your performance report; we look forward to following progress in your next report.
- Your commitment to “work with customers to seek the delivery of faster planning decisions” is certainly a priority. You could have been more specific as to how you intend to take this forward.

Service Improvements 2011-12: Delivery

- You have demonstrated activity on several previous improvement commitments, particularly relating to application handling, and we hope you are now realising the benefits.

Conclusion

- Your report has demonstrated some evidence of a shift towards a planning reform and performance culture, for example through project planning of major applications and through engagement with customers. But work is still needing to progress across the authority to achieve this objective.
- In particular, you need to make good and rapid progress to replace your out-dated local plans and also to take steps, involving your stakeholders and your staff, to cut avoidable delays from your application handling. These are essential, alongside displaying welcoming behaviours to those seeking to invest, to support your authority’s stated commitment to business growth and inward investment, and to build a reputation of an ‘open for business’ planning authority.

The feedback in this report is based solely on the information provided to us within your Planning Performance Framework Report covering the period April 2011 to March 2012.

If you need to clarify any aspect of the report please contact us on 0131 244 7076 or email andy.kinnaird@scotland.gsi.gov.uk.

*We hope that this feedback will be of use to you in the preparation of your next report which covers the period April 2012 to March 2013. Please note that the next reports are due to be submitted to us at sgplanning@scotland.gsi.gov.uk **before 30 September 2013.***

The Scottish Government, Planning and Architecture Division
June 2013