

Planning Service Improvement Plan 2012-2014: Cairngorms National Park Authority

Introduction

1. The delivery of a very high quality planning service is fundamental to the successful management of any National Park. The Cairngorms National Park Authority is committed to developing a culture of continuous improvement in its planning service by reflecting on our past experience, listening to others and proactively managing a series of staged improvements to our processes and our culture. In particular we are constantly striving for ways in which the planning service can help deliver the wider management of the Park as set out in the National Park Partnership Plan which has been agreed with Ministers following widespread public consultation.
2. This Planning Service Improvement Plan reports on our recent progress in improving our service and presents our planned improvements for the years ahead. The Plan sets out how we will improve our planning service to meet the government's aspiration of Planning Reform and our service to customers. The scope of the Plan covers all aspects of the planning process including development plans, development management and enforcement. The Service Improvement Plan sits alongside, but does not duplicate, our Development Plan Scheme which sets out how we will prepare the new Local Development Plan. Further information about that Scheme can be found [here](#).

Background

3. The overarching strategic context for the planning in the National Park is provided by the National Park Partnership Plan which is prepared by CNPA as specified in the National Parks (Scotland) Act 2000 and is based on the four statutory aims of the Park. The Partnership Plan sets out the strategic vision and overarching strategy for managing the Park and provides the strategic context for the Local Development Plan. All public bodies are required to have "due regard" to the Park Partnership Plan. These special arrangements are different from most other Local Planning Authorities in Scotland.
4. The planning arrangements in the Cairngorms National Park are unique in Scotland and are based on a partnership approach between the Cairngorms National Park Authority (CNPA) and the five local authorities. CNPA is required to prepare one or more Local (Development) Plans for the area. The Local Plan was adopted in October 2010 and covers all of the Park, except for Perth and Kinross which is covered by a separate Local Plan – this is due to the Park boundary extension which also took place in October 2010. Work is well under way, as set out in the Development Plan Scheme, on preparation of one Local Development Plan for the Park which is due to go through the formal consultation process in spring 2013 with a view to adoption in 2014.

5. CNPA is the planning authority with respect to the preparation of the Local Development Plan and for those planning applications which it decides to “call-in” for determination and for subsequent actions. Applications are called in if they raise “...a planning issue of general significance to the National Park aims” ([CNP Designation Order, 2003](#)). Those applications that are not “called-in” are dealt with by the local authorities in line with the relevant Local Plan. A protocol is in place between the CNPA and the five local authorities to set out how the detailed processes work.
6. On 28 March 2012 Derek Mackay, the Minister for Local Government and Planning, made a statement to the Scottish Parliament setting out the Scottish Government’s proposals for future reform of the planning system to help the planning system reach its potential in supporting economic recovery. The proposals took account of a report by Audit Scotland on Modernising the Planning System (Sept 2011) which contained a number of recommendations for Scottish Government and for planning authorities. The emphasis of the Ministers statement is on non-legislative measures but legislative changes will be brought forward where necessary. The key priorities for the next stages of planning modernisation are:
 - a) promoting the plan-led system
 - b) driving improved performance
 - c) simplifying and streamlining processes
 - d) delivering development
7. In association with this statement a new Performance Management Framework was launched by Heads of Planning Scotland, setting out very clearly what a “high quality planning service” should look like and how it will be assessed. The Framework provides an excellent basis for our work on service improvement.
8. Within the National Park the CNPA planning service is high-profile, frequently featuring in the local press and sometimes capturing national media attention. Due to the very nature of the planning process the decisions made by the Planning Committee are frequently controversial and attract comment from individuals and interested parties. It is imperative that all aspects of our planning service are well thought-through and presented, that our planning processes are efficient and effective and that our communications work is proactive and well-developed.

Summary of recent service improvements

9. CNPA has already undertaken considerable work to improve our planning service over the last few years. An interim review of implementation of the last Service Improvement Plan (2011/12) was presented to the Planning Committee in December 2011. Overall, good progress had been made, as summarised in **Annex I**. We are confident that the improvements made are resulting in better relationships with key stakeholders and a more positive role for our Planning Service in delivering the aims of the Park.

10. In summary, our key achievements in the past year have been:
 - Improved Service performance and efficiency – including a much more efficient electronic “call-in” process and a lower active case-log.
 - Enhanced customer engagement – including a new Developers Forum, a new customer feedback system and establishment of Community Representatives Network.
 - Integration of the planning service with our wider work on sustainable development – including interaction with community action planning and schools initiative about planning.
 - Measures to raise design standards – including new Sustainable Design Awards and Design Advice Panel.

11. There are encouraging signs that this proactive work on service improvement is showing dividends (further detail in **Annex 2**). The early results of our ongoing Planning Service Feedback Survey to June 2012 (42 responses) indicated that:
 - Our overall planning service was rated as either “good” or “excellent” by 53% of people: 76% say it is “adequate” or better
 - Against the six most important features of our service our performance was rated as “excellent” for four aspects and “good” for two.

12. Furthermore, CNPA came out as the top-rated public sector organisation in a Business Survey undertaken by the Cairngorms Business Partnership (June 2012, based on over 40 responses) which assessed a number of organisations in terms of overall level of external support to businesses in the Park (further detail in **Annex 2**). It was also encouraging to see that our performance in this respect was improving over time.

Preparation of the Service Improvement Plan 2012 -14

13. To discuss the service improvements required we brought together all the staff associated with the planning process in a special, independently-facilitated “Planning Summit” in mid-April. The Convener of the Planning Committee attended, and we had very useful contributions from the Director of Planning at Loch Lomond and the Trossachs National Park Authority.

14. We used, as a basis for discussions, Part 2 of the new Performance Framework agreed by Heads of Planning Scotland which sets out eight keys areas of activity that need to be addressed. The results were then reviewed with planning colleagues and other staff. We also consulted with staff from the five local authorities as part of our review of the Planning Protocol. We discussed our general ideas around Service Improvement with the Developers’ Forum in mid-May and invited feedback. And we consulted with the new network of community council/association planning representatives about how we could work together better.

Forward Plan for 2012-14

15. The issues to be addressed and the identified actions are structured under eight areas of activity which define a “high quality planning service” from Part 2 of the Planning Performance Framework (Heads of Planning Scotland, 2012).

1) Open for Business

Key Cairngorms issues:

1. Ensuring that the planning process plays a positive role in encouraging and facilitating a sustainable economy, supporting thriving businesses, communities and affordable housing
2. Getting off to the best possible start with discussions about any proposal (i.e. pre-application discussions) so that key planning issues are addressed early-on
3. Maintaining and developing good relations with key regular applicants and their agents so that we get better outcomes

Actions:

- a) Assist the Cairngorms Business Partnership (CBP) to lead the formation of an Economic Forum and preparation of the Economic Diversification Strategy for the Park
- b) Consolidate the Developers Forum and make sure it is worthwhile for all concerned so that key relationships are built and that developers/agents/architects etc are very well involved in the development of policy and how it is implemented
- c) Prepare a Planning Concordat with CBP as a joint statement of commitment setting out roles and responsibilities of applicants, planning authority and wider business community
- d) Maximise the potential of the Housing Enabler Service we provide in partnership with NGOs and local authorities
- e) Improve internal systems to ensure very close working arrangements between economic development and planning staff.

2) High quality Development on the Ground

Key Cairngorms issues:

1. Improving standards of design in applications coming forwards
2. Focus proactive attention on particular parts of the Park
3. Better and earlier engagement and information sharing with key environmental NGOs

Actions:

- a) Move forwards the place-specific initiatives (e.g. in Aviemore and in Cairngorms Rothiemurchus and Glenmore area) and ensure they influence standards of development
- b) Judge and celebrate the Sustainable Design Awards
- c) Design Advisory Panel in place and working well
- d) Initiative to promote earlier and more positive environmental NGO engagement with the planning process
- e) Produce and promote more visual illustrations of good design in the Park – linked to the Design Awards

3) Certainty

Key Cairngorms issues:

- 1. Ensure that our approach to providing specialist advice is timely, proportionate and positive.
- 2. Ensure that CNPA staff and Board members are well-informed and well-aligned about our planning policy and get out more to see how it affects planning determinations on the ground
- 3. Providing clarity about what standard is expected in planning applications

Actions:

- a) Consult on the draft Local Development Plan and full set of Supplementary Planning Guidance at the same time to allow consultees to see whole picture
- b) Implement a system of process agreements for major applications
- c) Undertake habitat surveys for all proposed allocated sites in the Local Development Plan
- d) Develop a pre-application initiative with partner local authorities to ensure we have the best possible pre-application discussions (involving staff training, new work procedures, a new procedural note and enhanced management scrutiny)
- e) Review and agree existing protocol with SNH
- f) Review and simplify the Development Appraisal Toolkit
- g) Extend the Member Development Programme and include key staff and partners

4) Communications, Engagement and Customer Service

Key Cairngorms issues:

- 1. Improve presentation of the planning process, the role it plays in managing the Park and the progress being made

2. More emphasis on the promoting innovative activities that we do already, especially around stakeholder engagement improving the CNPA website on planning issues
3. Enhanced availability of planning staff in the west of the Park
4. More focus on collaborative work with community councils/associations

Actions:

- a) Develop a communications plan, as part of the Communications and Engagement Strategy, to clarify the messages, processes, stories and statistics required
- b) Review and improve the planning section of CNPA website
- c) Implement the e-planning system for development management
- d) Development of a Planning Charter to set out customer standards
- e) Establish new network of planning representatives from community councils and associations to work alongside Community Liaison Officers
- f) Meet with two of the CNP Advisory Forums per year to promote wider discussion about the role of Planning in the achievement of the NP vision
- g) Review and improve the schools engagement programme about planning in the Park
- h) Improve planning staff accessibility and visibility to customers in the west of the Park
- i) Produce short update every year on implementation of the Local (Development) Plan and associated work.

5) Efficient and Effective Decision Making

Key Cairngorms issues:

1. Simplify and streamline “call in” process
2. Making sure the processes and procedures at Committee meetings are as effective as possible
3. Being more proactive about dealing with delayed cases

Actions:

- a) Delegate responsibility to the Head Planner to take the majority of the “call in” decisions
- b) Review of the Planning Report format to make it shorter and to focus more on the appraisal section
- c) Improve Committee procedures (including review of Standing Orders) to shorten time available for representations, address site visits, shorten planning papers and promote use of video and other images

6) Effective Management Structures

Key Cairngorms issues:

1. Making sure that our unique planning arrangements in the Cairngorms National Park are fit for purpose and in line with planning reform
2. Making sure that we adequately resource our planning team and the necessary wider work

Actions:

- a) Keep under review our partnership approach to planning arrangements with local authorities
- b) Review resources required in the Planning Team and benchmark, as far as we are able, with other planning authorities in relation to the “call-in” processes, administration support and travel to and from Ballater

7) Financial Management and Local Governance

Key Cairngorms issues:

1. Programme Managers and allocation of resources across staff teams
2. Improve procedures for decisions about financial allocation and staff resources at Inquiries which can carry significant staff and legal costs

Actions:

- a) Improve process for decisions about when and how to feed into Inquiries
- b) Implement new Programme Manager arrangements to improve cross-team working

8) Culture of Continuous Improvement

Key issues to address:

1. Developing and fostering a helpful and proactive culture to assist with development delivery
2. Consolidating the service improvements already made so they become part of our normal practice
3. Continued development of an innovative, progressive and imaginative approach to our planning service

Actions:

- a) Key staff to participate in the significant training initiative to be run by Improvement Service on “Better outcomes for planning” in planning and economic development
- b) Enhanced training initiative for Board and key staff on planning and economic development

Implementation and monitoring progress

16. The Plan will be implemented as a key part of our Corporate Plan within the programme of work coordinated by our Head Planner and overseen by the Director of Sustainable Rural Development. A Project Board involving the Convener of Planning Committee and external partners (to be confirmed) will maintain top level oversight.
17. We will report progress to Scottish Government as part of the new arrangements on performance management for planning authorities.
18. We will report on progress to our Board as part of Corporate Planning Monitoring arrangements and will include regular reports to the Community Council Planning Representatives Network and the Developers Forum. We will publish periodic updates on our website.

Cairngorms National Park Authority
July 2012

Annex 1: Summary of progress made with implementation of Service Improvement Plan 2011/2012

Of the 23 individual actions agreed in the Plan:

- 1. 15 actions have been completed.** Highlights include:
 - a) Four community-focused training events took place
 - b) Developer Forum established to follow-on from the four Planning Service workshop held earlier in 2011
 - c) Schools initiative about planning has been launched in conjunction with Planning Aid Scotland
 - d) Customer feedback system is now in place on CNPA website
 - e) Consultation feedback on the LDP Main Issues Report was independently analysed
 - f) Sustainable Design Award has been agreed and is ready for launch
 - g) Design Advisory Panel is now in place
 - h) Local Development Plan is available on-line as part of E-Planning Programme
 - i) Electronic approach to “call in” system has been reviewed and improved
 - j) Network of Community Council Planning Reps established
 - k) Head of Planning now has delegated authority to refuse applications due to lack of information
 - l) Discussion has taken place about shared approach to enforcement but some local authorities are not keen to progress further at this time – we will continue to explore this.

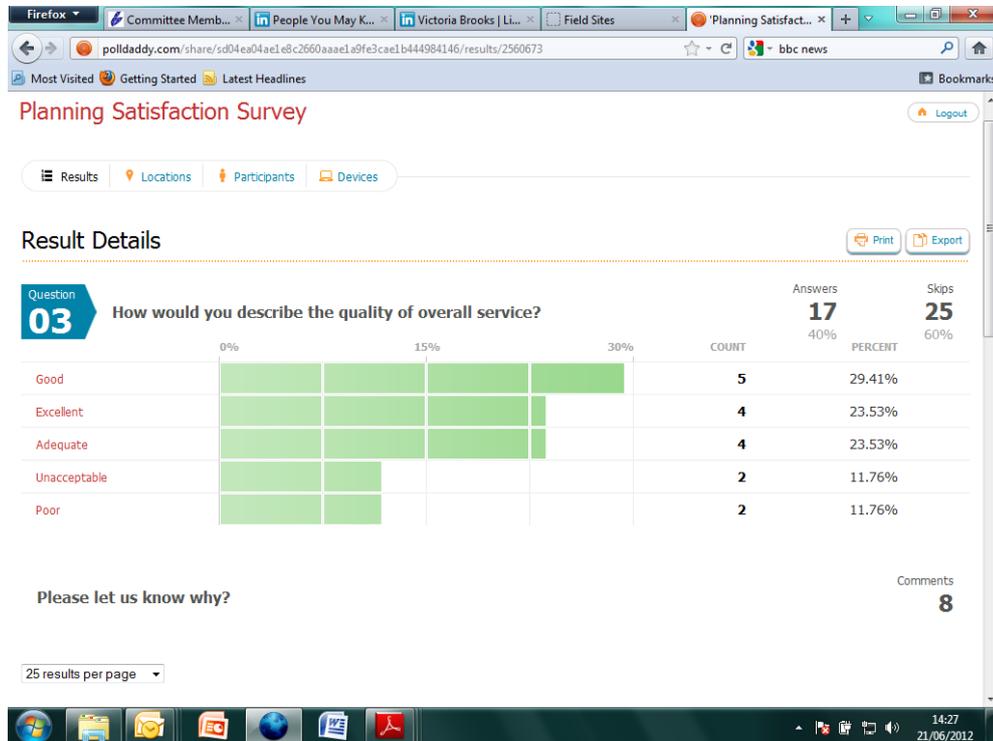
- 2. Six actions have seen progress made but are not quite completed/resolved:**
 - a) Planning arrangements: Discussions are ongoing with partner local authorities about planning arrangements in National Park and how we can be more effective.
 - b) Improve standards of design: Some discussion has taken place with the developer community, especially about the Sustainable Design Award, but we need to consolidate this work.
 - c) E-planning system for development management: Considerable work undertaken and programmed for phased introduction from July 2012.
 - d) Joint work with Loch Lomond and the Trossachs NPA regarding policy development: We have some strands of joint work in place (esp. regarding renewable policy and permitted development) but there are opportunities to develop this work further.
 - e) Improve availability of statistics on planning: Some statistics are available online as part of work on the Local Development Plan and basic planning performance statistics are now available online but presentation needs improved to facilitate ease of access and presentation of the role the planning plays in the managing the Park. National standardisation of this information is under way but special allowance will be required to cater for our unique “call-in” arrangements.
 - f) Energy savings initiative for prospective planning applicants: This is being investigated with the Energy Savings Trust and is likely to be taken forwards as part of the Programme on Low Carbon Cairngorms in the Partnership Plan.

3. Two actions have still to be addressed:

- a) Information on the CNPA website about planning has not been substantially improved.
- b) E-planning system has not yet been widely promoted to the public – the Development management e-planning system is not yet functional and promotion of the system can only follow.

Annex 2: Summary of feedback about our Planning Service and overall organisational performance

The two charts below are taken from our ongoing Planning Service feedback survey on our website (June 2012, based on 42 responses). Further details [here](#).



The chart below is taken from an annual survey of businesses in the Park undertaken by the Cairngorms Business Partnership (based on over 400 responses). Businesses were asked to rate the overall contribution of organisations operating in the Park using a 1 to 10 rating scale, where 1 was 'very poor contribution' and 10 was 'very good contribution'.

