



Planning Performance Framework

12

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Introduction

This is our twelfth annual Planning Performance Framework (PPF12) for the National Park.

Published annually, this framework demonstrates the continuous improvement of our planning service and is a requirement for all planning authorities in Scotland. It represents a holistic view of our performance, giving substance to our statistics published bi-annually regarding how many applications we handled and the timescales for these.

This year's framework evidences how our long-standing commitment to early engagement and collaboration in the development process helps improve quality of outcomes. Our case study on a recent housing re-development in Drymen helps evidence this. We firmly believe that investment of time early in the process and through pre-application advice secures significant benefits and successful outcomes.

We also use a case study to evidence early outcomes from our recently established new Place Programme of work, being led by our new multi-disciplinary Place team working closely with our planning service. This is place making in action, setting out the infrastructure and development needed to encourage more sustainable recreation, travel and enjoyment of the area by everyone.

We explain how we have supported new Board Members to get to grips with the planning system as well as our procedures and approaches here in the National Park. This included deep dives into the new National Planning Framework 4 at the same time as our planning staff were digesting this themselves – so we tried some new and novel approaches towards internal and Board engagement, with great success.

An ongoing annual reporting theme for us, as part of our continuous improvement, is our work to improve our planning decision determination times. We have used a case study to reflect on this and are pleased overall to report positive progress despite there still being work to do. We are confident that strategic changes made to our team structure over this reporting period, alongside our previous changes in our approach to handling caseload management, will bear fruit over the coming year and that we will see further improvements on our decision times.

Lastly, we reflect in the final case study on our handling of a major planning application. Delivering an efficient hearing to determine the application was reliant on us using clear and robust governance procedures, successful cross departmental working between staff. We believe this to be a great example of good governance as well as the importance of sharing good practice and expertise amongst planners from different areas and organisations.

This PPF will be reported to our Planning and Access Committee, along with the Government's feedback, for awareness and discussion.

Part 1 Qualitative Narrative and Case Studies

There are four overall measures against which our performance is assessed:

- **Quality of outcomes**
- **Quality of service and engagement**
- **Governance**
- **Culture of continuous improvement**

The case studies which have been selected this year cover a range of themes which relate to the categories of performance above. As a National Park we are guided by the National Park aims, and collaborative working is a core value of our organisation, readers will find this narrative woven throughout each of the case studies alongside an emphasis on Climate and Nature. Each case study aims to provide the reader with a better understanding of the quality of our planning service and our work to improve.

Case Study Overview

Case Study	Measure	Key marker	Key Area
Case Study 1 – Passivhaus	Quality of Outcomes	3 - Early collaboration	Climate Change; Design
Case Study 2 Place Projects Programme	Quality of service and Engagement, Governance	12 - Corporate working across services, 2 - Project management	Placemaking, Collaborative Working
Case Study 3 Board Induction	Governance	9 - Stakeholders are engaged appropriately	Process improvement, Staff Training
Case Study 4 – Determination Times	Culture of Continuous Improvement	6 - Continuous improvement	Development Management Processes, Performance Monitoring
Case Study 5 -Major Application	Governance	12 - Corporate working across services, 13 - Sharing good practice	Development Management Processes, Collaborative Working

Case study 1 – Passivhaus development in Drymen raising the bar on energy efficiency

Replacement of old stock brings new lease of life to street benefitting residents, climate and nature.

This case study contributes towards the **Quality of Outcomes**

Key Markers:

3 – Early collaboration

Key Areas:

Climate Change, Design

Stakeholders:

Authority Planning Staff, Local Developer

Name of Key Officer:

Sue Laverge, Development Management Officer
Craig Jardine, Development Management Officer

Overview

This case study demonstrates how the pre-application service and application of our Local Development Plan policies managed to secure a new affordable (social housing) development of the highest energy efficiency standard and the first of its kind in Scotland.

Despite facing numerous design and delivery constraints including a confined development site, extensive demolition and site preparation, the COVID-19 pandemic and rising costs in construction materials, the development progressed smoothly through the planning system and into construction. The approved development integrates well with its surroundings, was able to retain valued design elements of the previous housing development that residents appreciated, and drastically improves energy efficiency to the overall wellbeing of the tenants.

This development provides an example of how the delivery of affordable homes can be achieved without compromising on design quality and sustainability.

Goal

- Encouraging the use of the free pre-application advice and early engagement with potential applicants.
- Setting out the requirements for supporting information at the earliest stages.
- Promoting the use of informative planning guidance and establishing consistency in the interpretation and implementation of Local Development Plan policies.
- Assisting applicants in the preparation of high-quality proposals and setting a standard for all the development in the National Park which respects the distinctive characteristics of each locality.
- Using the planning process to deliver sustainable developments that benefit our communities, nature, and climate.

Outcome

The proposal involved the demolition of an existing social housing development and replacement with a development of 15 dwellings built to Passivhaus standard (application reference 2019/0058/DET).

The original temporary post-war houses suffered from damp and were difficult and expensive to heat. Options to retrofit were considered by the applicant, however the houses were no longer fit for purpose and could not be made into viable or sustainable housing for the long term. The Local Development Plan housing policy and Supplementary Planning Guidance on Housing actively supports replacement housing proposals, particularly where the existing housing is of poor-quality design and materials and does

not meet modern energy efficiency standards. An application for replacement housing was therefore progressed.



Figure 1 Original housing development @ ECD Architects

The case was subject to early pre-application discussions, where the planning officer clearly set out the National Park Authority's expectations for supporting information, highlighted key policy requirements and signposted the agents to the Authority's Design and Placemaking Supplementary Planning Guidance. This early planning engagement provided the applicant with the necessary information required to submit a comprehensive Design and Access Statement and compliant scheme at application stage.



Figure 2 aerial view of site (original development boundary)

The proposed houses were scaled to modern housing association space standards. However, with the previous houses being of a smaller size, this presented challenges and limitations for the orientation and layout of the proposal. The previous layout created a real community feel which was valued by residents. Following engagement with the planning officer a revised layout was proposed with a benefit being the retention of the pre-existing streetscape character, albeit achieved with reduced connectivity between the streets.

Shared pathways between houses were incorporated into the layout and a parking solution found that satisfied Road Authority requirements despite the historic layout constraints. The use of curtilage parking and parking bays has the added benefit of taking cars off the street, improving the visual appearance of the development and providing a tranquil streetscape that prioritises pedestrians over vehicles.

The project proposed a mixture of terraced and semi-detached units and a split of bungalows and two-storey house types. This aligned with our Housing Policy's requirement that new housing:

"... will comprise mostly smaller sized and family sized homes to better meet the needs of people living and working here and provide a range of housing to allow families, young people of working age and elderly people to choose to remain within the National Park."

The development also includes homes designed to Housing for Varying Needs Standards with storage and charging points for electric wheelchairs and accessible wet rooms, again reflecting our Housing Policy aim that: *"New housing should preferably be built to 'varying needs' or 'lifetime homes' standards to support independent living, be accessible to as wide a range of people as possible and to allow potential for future adaptation."*

The new homes are designed to Passivhaus Standard and use up to 90% less energy for heating compared to conventional buildings. In addition to the energy efficiency of the buildings gained through fabric and orientation, carefully considered window placement and sizing, air tightness, and electricity conservation methods the Local Development Plan's Overarching Policy requires *"on-site low and zero carbon generating technologies to meet 10% of the overall energy requirements of the building rising to 20% by December 2021."* Residual heating by air source heat pump and Mechanical Ventilation with Heat Recovery plus photovoltaic panels on the roofs of the dwellings were accepted as meeting this requirement. Subsequent Passivhaus Certification meant that the residual energy needs of the houses were minimal and no longer justified the need for the photovoltaic panels. The Planning Authority responded flexibly by agreeing these changes through non-material variations to the planning permission.



Figure 3 Completed Passivhaus development © McAteer Photo & ECD architects

The importance of a landscaping plan was emphasised at the earliest stages in pre-application discussions as being important to complement the character of the built environment and add to a sense of place all while creating or retaining nature habitats. Raising this early on meant that the environment was not an afterthought but an integral part of the design and gave the applicant sufficient time to consult with landscape architects.

As part of negotiations, landscaping enhancements were introduced to soften the appearance and extent of hard landscaping and parking and assist with integrating the new development. The extent of tree planting was unfortunately limited due to an unavoidable wayleave corridor for services. However, the approved landscape plan still delivered several small native trees and shrubs, as well as wildflower meadow grass to enhance biodiversity.

The redevelopment of existing housing within an established context can have certain limitations and constraints. However, the planning officer's advice helped the applicant gain better insights and make appropriate adjustments to align with the requirements of

the Local Development Plan and in so doing, add value to the development. The influence of the National Park Authority in this case, at pre-application and application stages, overcame the constraints and resulted in added value in layout, connectivity and landscaping as well as helping deliver social housing of the highest energy standards.



Figure 4 Photograph of completed Passivhaus Development © McAteer Photo & ECD architects

Case study 2 – National Park Place Programme

Visitor destination project at Tarbet showcases community and partnership working.

This case study contributes towards **Quality of Service and Engagement and Governance**

Key Markers:

12 - Corporate working across services, 2 - Project management

Key Areas:

Placemaking, Collaborative Working

Stakeholders:

General Public (Community), Authority Planning Staff, Authority Place Projects Staff and Agent (Land Use Consultants)

Name of Key Officer:

Place Projects Team – Murry McKellar, Place Projects Advisor
Development Management – Amy Unitt, Planning Officer

Overview

This case study summarises progress on the National Park Authority's recently developed National Park Place Programme, an ambitious multi-year programme for capital investment in sustainable visitor infrastructure which aims to target and deliver key placemaking priorities across the National Park.

The Strategic Tourism Infrastructure Development (STID) study for West Loch Lomondside helped identify the priority sites for investment and the scale of investment needed. The study received Covid Recovery funding via Visit Scotland through the Rural Tourism Infrastructure Fund (part of the Scottish Government's

Covid Recovery initiative seeking to ensure a coordinated and proactive approach to improving Scotland's visitor infrastructure).

The Place Programme provides new impetus and focus on raising standards of infrastructure in the National Park, as well contributing to the transition to net zero through planned and co-ordinated place-based action in support of sustainable visitor access, travel and experience.

The projects are managed and delivered by a recently established multidisciplinary Place Projects Team working with support from the planning service in relation to programme development, strategic and place-based planning and the submission of planning applications. Early engagement with external stakeholders, local communities and businesses is a key element, as is the close collaboration and effective working between the Place Projects Team (with landscape, architecture, and project management expertise) and the Planning Team.

The case study focuses on demonstrating the value that planning can deliver in partnership with others, resulting in the effective delivery of a planning permission for an exemplar visitor infrastructure proposal for Tarbet Pier Visitor Site that will benefit both the community and visitors alike.

Goal

To identify and progress key place making projects in the National Park through the National Park Place Programme and thereby raise standards of infrastructure in the National Park. The programme is trialling a new approach to ensure effective use of constrained funding and resources to stimulate further investment.

The preparation of a strategic delivery programme is essential to unlocking resources and the support required from partners, by developing longer term projects to a stage where they are 'shovel ready' and can take advantage of additional funds. For example, the Visit Scotland's Rural Tourism Infrastructure Fund, requires applications to be supported by a strategic plan.

The Place Projects team brings in the capacity to oversee project management of these infrastructure projects and draws on the expertise of various specialist advisors within the organisation with minimal disruption to existing work streams. Intended outcomes from this heightened focus and capacity secured within the organisation will ensure the delivery of high-quality development proposals, meaningful consultation with the local community and businesses, deeper consideration of outcomes for climate and nature, and improved places for the enjoyment of the community and visitors.

Outcome

The site being shared for this case study is an area of land on the west bank of Loch Lomond, currently used as a popular visitor car and motorhome park, picnic areas and public toilets. The site has the advantage that the National Park owns part of the site, making it an ideal site to test and implement proposals for the enhancement of visitor infrastructure and acting as a catalyst to unlocking investment from funding organisations and private developers.



Figure 5 Visitor and parking management pressures

The vision for the site was developed in consultation with the community as part of a [charrette](#) in 2013 which originally highlighted the need to prioritise investment in the area. The charrette identified back then that “*The key next step for Tarbet is for local landowners and stakeholders to create a shared and co-ordinated masterplan approach to secure the best future for the place and the community*”. It was subsequently allocated for mixed-use in the Local Development Plan in 2017 and, within that, was identified as a place making priority.

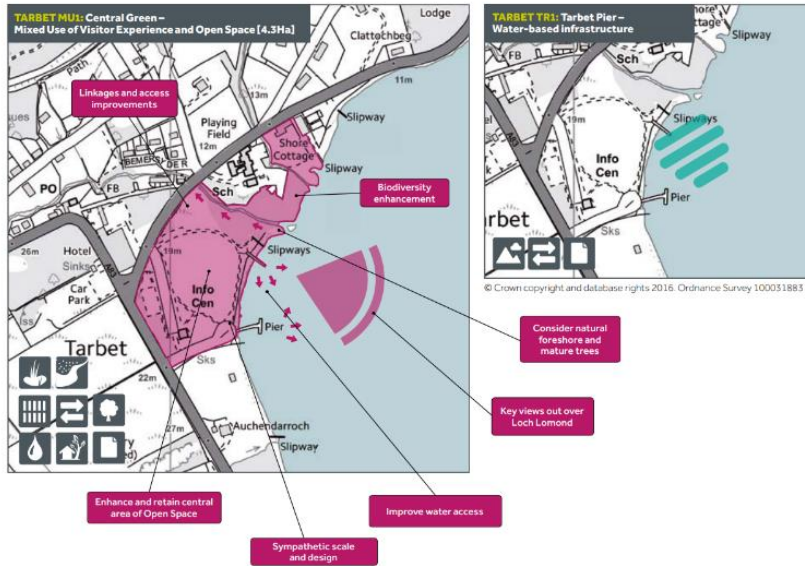


Figure 6 Extract from the Local Development Plan showing the site allocation.

The community were kept informed of progress in relation to the delivery of place making priorities for the site via the 'Action Programme' published at regular intervals. However, little progress has been made since the allocation.

Progress was accelerated by the commissioning of the STID study as part of this new Place Programme initiative established by the National Park Authority. The STID for West Loch Lomond (which includes Tarbet) identifies preliminary strategic proposals for the main settlements and visitor attraction areas. The proposed strategic enhancements to active travel infrastructure and to public transport are intended to increase opportunities for modal shift from cars to more sustainable forms of transport. With the STID identifying the Tarbet Pier Visitor site as a key priority, the 'Tarbet Visitor Site Masterplan & Delivery Project' was commenced by the Project Place Team and work began straight away on re-engaging the community in person.

Stakeholders were invited to meet on-site to inspect the Tarbet Pier Visitor Site. The visit included representatives from the Community Council, Community Development Trust, Argyll and Bute Council, as well as local landowners, businesses, and the Councillor for Lomond North Ward. National Park staff and our agent, Land Use Consultants (LUC), hosted discussion on a range of issues affecting use of the site by locals and visitors, and how these could be tackled through infrastructure opportunities



Figure 7 Site Visit and Walkover - September 2022

This was followed by a meeting with the Community Council and a Public Drop in event in late 2022, which were planned with the guidance of the Development Management Planning Team. These provided opportunity to input into emerging designs and comment on early draft of concepts.



Figure 8 Public drop-in event at the Three- Villages Hall, 6th December 2022

At the Community Council meeting, no substantial objections were raised, providing reassurance that appropriate management and maintenance would be in place following the development. The drop-in event was mostly attended by locals (22 participants) who were supportive of the scale of change and provided largely positive feedback and constructive commentary.

The proactive engagement across stakeholders culminated in the staged development of a Masterplan upon which the Place Projects Team sought pre-application advice from Development Management colleagues at each stage as the design of the proposals progressed. The National Park's Access and Recreation officers helped develop options for suitable cycle and pedestrian links throughout the site.

This productive working relationship ensured continued alignment with the policies of the Local Development Plan and related guidance (including the then draft NPF4 which was published during the Masterplan development process). For example, the plans included detail on the management and enhancement of existing and creation of new habitats on site to ensure biodiversity net gain in accord with the new NPF4 requirements.



Figure 9 Image of the development by O'Donnell Brown from LUC report

Despite the close working and collaboration, existing protocols within the Scheme of Delegation ensured that the planning process was appropriately mindful of the relationship of the applicant (the National Park Authority c/o the Place Projects Team) and the National Park as planning authority. This avoided any potential conflict of interest and ensured that the National Park was transparent and accountable in the decision to support its own application.

A detailed planning application was submitted in January 2023 (reference: [2023/0011/DET](#)).

The Tarbet Pier Visitor site redevelopment sets a benchmark and best practice for effective project planning and infrastructure delivery.

The additional capacity and joined up working between our recently established place project team, planning and other departments allowed the project to harness the expertise within various teams at every stage of the project.

The success of the project highlights the benefits of the place projects programme in cementing collaborative working practices both cross-departmentally and with external stakeholders – particularly the community. The place projects programme is an exemplar of effective resource allocation, evidencing how a small, dedicated team can progress the delivery of sustainable tourism initiatives, designed to improve places for visitors and the community alike.

Case study 3 – Board Member and Staff training - induction and National Planning Framework 4

Delivering training to improve planning processes and performance

This case study contributes towards **Governance**

Key Markers

9 - Stakeholders are engaged appropriately

Key Areas

Process Improvement, Staff Training

Stakeholders

Planning Committee, Authority Planning staff, Authority other staff

Name of Key Officer:

Bob Cook – Development Management Manager
Douglas Smith - Board and Committee Manager

Overview

With Board Members appointed for a fixed term, there were several changes with new Members joining the Board in 2022. These changes needed a managed approach to ensure that new Board Members were supported to understand their role and their statutory responsibilities in decision making.

Aside from the usual support available to Board Members as part of the induction process, there was a critical and time-sensitive need to provide in-depth training to Members to prepare for upcoming Board decisions. Secondly, training was required on the National Planning Framework 4 as a key Planning Policy change. The latter was rolled out to all staff as it was essential for all practitioners to

develop awareness of the policy change being brought into effect by NPPF4.

To deliver training in this area, we undertook a review of upcoming Board business and decisions, alongside identifying important statutory considerations (such as professional Codes of Conduct). We devised an induction plan that would enable debate and decisions on these matters to be progressed without delay. For example, known pipeline major planning applications and the [Loch Lomond byelaw review](#) (both Board-level decisions) required focused training on the regulatory and legislative context to ensure Board Members had a comprehensive understanding of relevant background material along with the organisation's responsibilities within the relevant statutory frameworks and role of Board Members.

This was a different approach to the one we would have taken had significant decisions not been required so early in the new appointments, where we would have focused on ensuring the Board understood the organisational context and operational planning first and then used this as a foundation to build from.

We were also in an unusual situation whereby some Board Members had detailed knowledge of the planning system from current or previous roles, and we had to ensure everyone had the same standard training, knowledge and awareness to ensure that the Board were supported to deliver robust decisions.



Figure 10 Welcoming New Board Members July 2022

Goal

- To deliver to the Board an induction and training in planning policy and procedure to build their capacity and knowledge and enable informed engagement with the planning process leading to robust decision making.
- To deliver training on a complex subject in an accessible and engaging manner, for example by building on the experience of using digital platforms used in other training sessions to help raise awareness of the new National Planning Framework 4 (NPF4).
- To ensure a smooth transition and integration as new Board members join, by providing adequate support.

Outcome

The training on the recently published NPF4 was structured into bite-size sessions covering select policies and key issues to help Members digest the volume of detailed policy information and prevent them becoming overwhelmed. The sessions were interactive and attended by planning officers in both policy and

development management teams to help facilitate discussion around the new policy areas and interpretation in practice.



Figure 11 Members of the Planning and Access Committee on site visit as part of a day long session learning about our Local Development Planning, Communities and Tourism work areas

The session structure built upon a successful earlier roll-out of training workshops for staff, led by planning managers and attended by all planning staff and key members from other departmental teams. These presentation and Q&A sessions sought to raise awareness of the new NPF4 across the wider organisation and its implications for activities within other teams and their own workstreams.

The series of NPF4 training workshops were well attended and well received by the Board who engaged proactively in the facilitated discussions of the key changes, issues and policy interpretation. The training sessions for staff have helped foster closer working relationships and collaboration between planners and other departments relation to addressing the key objectives of climate and biodiversity through the planning process and more widely.

Case Study 4 – Performance Improvement Project

Working towards improving our determination timeframes – Phase II

This case study contributes towards the **Culture of continuous improvement**.

Key markers:

6 – Continuous Improvement

Key Areas:

Development Management Processes, Performance Monitoring

Stakeholders:

Authority Planning Staff

Name of Key Officer:

Bob Cook, Development and Support Manager

Overview

This case study sets out the specific actions undertaken through the reporting year to maintain the performance on determining planning and other applications and demonstrates the significant progress made to date. Overall, our average results for 2022/2023 show a stable position relative to the previous reporting year. Further work is required to more closely align with the Scottish average determination times, and this shall be carried forward as a service improvement for 2023-24.

Goal

To re-establish a positive momentum towards reduced determination times and finalising a new team structure to assist enhanced caseload management – particularly in the sign-off of junior officer and planning assistant's reports of handling.

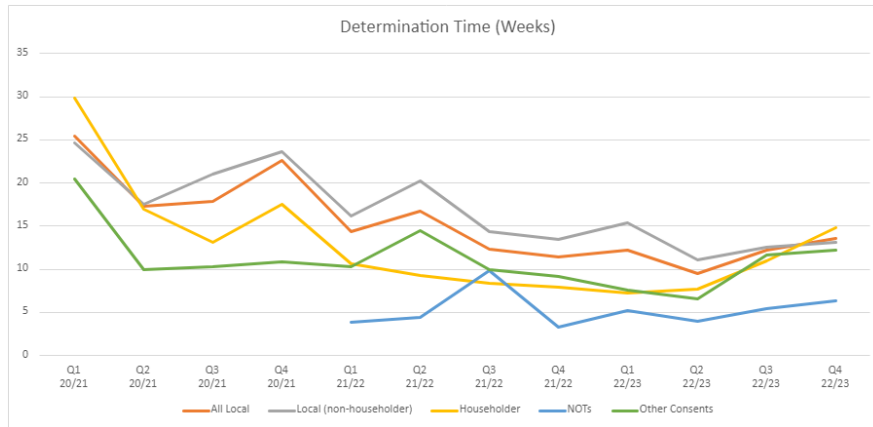
Outcome

We revised the existing team structure, this provides enhanced support to planning assistants, junior officers, and support staff as well as a more efficient throughput of planning decisions.

Determination times had become significantly extended when we went into the first lockdown in March/April 2020. In the first quarter of 2020/21 it was only possible to determine a low number of cases within the expected timeframe.

As reported on in the previous PPF, the backlog of cases which had built up through the first lockdown was effectively cleared and, despite no discernible reduction in the number of applications being submitted to the authority, the overall number of live planning applications under consideration by the DM team at any one time had gone down – this positive trend continued until the close Q2 of 22/23. PPF 11 explained the measures we adopted and how these were effective in bringing down determination times at a steady rate.

We noted, however, that there was still room for improvement, and this was carried forward as an improvement priority for this year and has again been identified as a priority for next year as this is a long-term project.



In the graph above, figures from Q3 and Q4 in 22/23 indicate an increase in the average time taken to determine most applications. This can be attributed primarily to staff vacancies arising within the DM team and an ongoing high workload. In August 2022 we lost one of the two managers of the team as she moved to a new role with another organisation. In that same period an experienced officer commenced her maternity leave. Despite an early recruitment campaign for both positions, it proved impossible to fill either. No suitable candidates came forward. Interim arrangements were put in place to support the now single manager for the Service which involved the more senior planning officers taking on additional responsibilities. However, our overall staff capacity was reduced and the increase in determination times was the result. The pressure on the team was additionally heightened by a number of significant Local and Major applications progressing within this time frame.

Our response to the challenge of recruiting new staff was to look carefully at our existing staff structure. Particularly why the vacant planning manager role failed to attract interest in recruitment – and particularly why no internal staff were attracted by what should have been an opportunity for progression. Positive engagement sessions

with the established planning officers, the remaining DM manager and our Director of Place, indicated that it was the focus of that particular managerial role on the support systems to the DM service – rather than planning case work - that had resulted in no individual putting themselves forward for the managerial role. In light of this feedback and also taking into account feedback from the [Best Companies](#) staff engagement survey that the National Park runs with all staff on a two-yearly basis since 2015. This resulted in a project to devise an alternative structure, with the proposed creation of three new senior planning officer roles and a new senior planning support co-ordinator. This proposed re-structure was under development during the latter part of the reporting period for this PPF. It was undertaken with close collaboration with all staff in the DM team and with our HR advisors. The outcome of the project was not concluded until April this year, so there will be an update report in subsequent PPF's.

In summary, planning application determination times increased in the latter part of this reporting period, but we continued to see the underlying benefit of changes implemented from the previous year. The small increase in determination times this time around is a direct consequence of staffing issues and significant Local / Major planning applications. We anticipate that we will be able to recover the improvement in determination times seen in early 21/22.

However, it is perhaps worth noting that the new requirements for the consideration of applications brought in as a consequence of the adoption of NPF4 are likely to result in additional pressures on staff time in the assessment of applications. This impact will be carefully monitored as part of the ongoing performance reporting and our continued efforts towards improving our determination times.

Case study 5 – Fish Farm

Handling a complex planning application and running an efficient determination hearing.

This case study contributes towards the **Governance**

Key markers:

12- Corporate working across services, 13 - Sharing good practice

Key Areas:

Development Management Processes, Collaborative Working

Stakeholders:

Authority Planning Staff

Name of Key Officer:

Alison Williamson – Lead officer

Overview

The determination of this major planning application (ref .2021/0357/DET) provides an example of effective Development Management processes and cross departmental working.

The application for a marine fish farm at Beinn Reithe, Loch Long was submitted late 2021. It was the first marine aquaculture development proposal in the National Park and included the use of technology not thus far employed in Scotland. This was an application that required careful consideration and required significant resources to manage the off-site determination hearing and site visit with significant interest from the public - all while adapting to the new ways of working resulting from the pandemic and induction of new Board Members who would be involved in the decision-making process – (view Case study 3). This review illustrates that the existing processes, significant internal experience and close working between teams set the foundations that enabled the organisation to respond to the dynamic nature of the planning process. As this was also a cross-boundary planning application, it

required planning officers to work with Argyll and Bute planning officers.

Goal

We recognised that this planning application would draw heavily on staff time across a range of teams. Our organisational culture has long facilitated collaborative working within the National Park Authority.

Effective cross-departmental working on this case necessitated proactive planning to manage increased demands on staff time whilst avoiding disrupting the continuity of the day-to-day operations of other departmental work streams.

The nature, scale of the application and the public interest it generated would demand a proactive approach to managing the decision-making process involving comms, IT, legal and governance teams and our facilities team.



Figure 12: Photograph of Loch Long

Outcome

While the case was the first proposal for a marine fish farm the National Park had received, it showed that our existing procedures, already benefitting from the experience of other major applications, are sufficiently robust. It is evident that our organisation's resilience makes it possible to respond to changing needs and to trial innovative working practices. For example, we were able to benefit from our new ways of working which permitted time efficient on-line meetings. We planned site visits taking account of safety constraints and related logistics, contingencies for site access.

Liaison with Argyll & Bute Council gave us the opportunity to draw on their experiences of determining fish farm proposals, again enhancing partnership working and sharing of best practice.

The planning officer's assessment required regular close working with National Park landscape and ecological advisors, requiring structured approach to project meetings and regular communication. In our emerging hybrid working environment we were able to utilise new ways of working and collaborative software tools to facilitate effective remote communication between teams and also between officers and applicant. Close working was also required with the Comms team (due to significant public and media interest) and Legal and Governance and facilities and IT teams to arrange site visits and help coordinate the logistics and running of the off-site hearing as part of the Board meeting. Additionally, measures were put place to manage staff annual leave, ensuring that robust governance advice was always at hand.

Immediately prior to the decision hearing taking place, a site visit was organised to enable Members to understand the context of the site and the proposal. This was to a remote location and with challenging weather conditions, required careful organisation from a logistics and safety perspective – again this exemplified effective cross team working across the Planning and Governance teams.

As separately referenced in Case Study 3, there was a change in Board membership during this time, and all Board Members were given prior training on planning. This was important to enable Members to participate in the Board decision and equipped them with the knowledge necessary to follow the planning terminology and process and make an informed decision.

After a thorough assessment of the application and the potential impacts, a recommendation to refuse the application was brought to the National Park Board. Based on the information in the planning assessment and responses by statutory consultees and community representatives, as well as representations from the applicant and speakers both in support of and in objection given at the public hearing, the Board, by a majority, agreed with the officer's recommendation to refuse the application.

Quality of Service and Engagement

This section provides evidence that our planning service is undertaking positive actions to support sustainable economic growth by providing clarity, certainty and a positive customer experience.

Development Plan Scheme

The [Development Plan Scheme 2022](#) (DPS) committed us to early preparatory work on a new Local Development Plan during the 2022/23 period and was aligned, to the best of our ability, to the publication of National Planning Framework 4, and the draft regulations and guidance on Local Development Plans. It summarises some of our key work areas, these were outlined in the previous [Planning Performance Framework and have since been progressed](#). This included inviting all communities to prepare Local Place Plans and collating a significant proportion of our evidence base to inform the preparation of our Evidence Report for the Gatecheck stage in preparing our new Local Development Plan. We utilised recently commissioned research on housing and short-term letting, nature networks and 20-minute neighbourhood (Forth Environment Link Study of Drymen) alongside our annual monitoring reports, action programme reviews to help inform this ([view Case Study 2 in the PPF 21/22](#))

We have since commissioned new research; an Open Space Audit, and a Play Sufficiency Assessment. Early in 2023 we undertook targeted stakeholder engagement, to inform the drafting stages of our National Park Partnership Plan and Regional Spatial Strategy prior to formal engagement (into the 2023/24 reporting year). As preparations are underway for the new Local Development Plan, we are also ensuring we continue to have up-to-date planning guidance. We adopted three new guidance documents– Strathard Framework, Active and Sustainable Travel and Safeguarding

Important Local Facilities and Business. These can be accessed on our [website](#).



Action Programme

The [Action programme](#) lists the actions needed to facilitate development on each of the sites proposed for development and identifies the actions needed from a range of stakeholders including landowners, developers, local communities, local authorities and key agencies to help deliver on the plan's vision and strategy. The Action Programme was last updated in November 2021 and is on track to be refreshed before November 2023. Early in 2023 we engaged all landowners with site specific questions with a focus on those sites that had showed initial progress, but that had appeared to have stalled, or where there had been little evidence of activity towards delivery. This engagement will feed into the 2023 Action programme update and will also be used to inform where a review of the current allocation may be required in accordance with new NPF4 policy requirements and re-assessment of allocations for the next Local Development Plan.

Regular tracking of the allocated sites and engagement with partners such as our housing delivery partners, and Local Authorities has allowed continuous monitoring of activity throughout the Local Development Plan period. Of all the sites that are yet to be developed; over half are showing progress, this includes those where pre-application advice for a proposed development has been sought. Overall, the progress on allocated sites proves the past and ongoing role of the Local Development Plan in supporting delivery of the majority of the allocations over the plan period.

Being clear and proportionate - Developer contributions

We have an adopted developer contributions policy within the Local Development Plan and Housing Supplementary Guidance. [The Developer Contributions guidance](#), adopted in June 2018 is still current and available on our website. At pre-application stage potential applicants are informed of this policy and the likely requirements. The [Callander South Masterplan Framework](#) and the [draft update of this framework](#), provide further guidance on the developer contributions that will be expected in this area.



Complaints Recording

In 2022/23 we handled 7 official complaints (6 the previous year) and 14 frontline complaints (up from 7 last year). Of the 7 official complaints, 2 were partially upheld and 5 were not upheld, including one case that was referred to the Scottish Public Services Ombudsman.

Subjects of the official complaints included conduct of an officer on a site visit, the authority's handling of an enforcement case, dissatisfaction with the outcome of a planning decision and the related handling of neighbour objections.

We received more frontline complaints (although three of the 14 concerned the same issue). Matters raised included dissatisfaction with new GDPR-driven procedure in relation to publication of representations and contributor anonymity, advert fees and the Neighbour Notification procedure, our handling of representations and user experience in relation to our online planning portal.

Service Design – User research

We hired a service designer who mapped out all the services we provide as an organisation. We undertook research on the user experience of the services the National Park Authority provides, in order to better understand these. Agents and architects were included in this survey, as frequent users of the planning service this provided us with insights from the outside perspective. Below is a summary of the feedback on the planning service:

What was good?

- Planning service is overall very smooth. Communications are good and are, for the most part, responded to very quickly. The planning service feels personal and human and the journey for each application feels consistent.
- It was noted that the way the previous LDP was done should be noted as an exemplar for Scotland on how to do an LDP, according to one participant.
- Our pre-application service is thorough and well thought through. It was also mentioned that a majority of Local Authorities now charge for this service - we don't.

Areas for potential improvement

- When applications go to Board/Local Review Body it was mentioned by one participant that we don't seem too keen to do site visits or allow hearings. However, the participant also stated that they believe we discuss, and debate said applications in far more detail than other Planning Authorities in Scotland.
- Occasionally communications may face a delay - although the participant always welcomed the thoroughness of communications once received.
- "Planning Speak" was noted as a 'pain point' for one planning agent's client. *"If I apply planning permission, am I likely to get it approved or not?"* – this is what the applicant would like to know. Clients come to me (agent) and ask what it means, and I act as a translator.

Pre-application service

Throughout 2022-23 we have continued to provide a responsive [free pre-application enquiry service](#). We have householder and non-householder enquiry forms on our website and guidance notes setting out the minimum requirements for information to handle an application and targeting a 20-day timescale to respond. We have not fully monitored the response time performance on our pre-application enquiries as yet and inevitably there are some enquiries where a response takes longer. In such instances officers endeavour to keep enquirers informed of progress and likely timeframes to respond.



In 2022/23, we responded in writing to 231 pre-application enquiries. To put this in perspective; the total number of planning applications received in 2022/23 was 334. Providing pre-application advice therefore is a significant part of the planning officers and assistants workload.

Evidently, not all the planning applications that were received in the PPF 2022/23 reporting period were determined within that same reporting period. The number of planning applications determined in the April 2022 - April 2023 period was 268, this includes Prior Notifications, Tree work applications and applications for Listed Building Consent / Conservation Area Consent as well as Advertisement Consent.

Pre-application advice is predominantly sought for development proposals that then result in a Detailed or Householder Planning Application, of which 174 were determined in 2022/23 (including applications that were withdrawn). Of these 174 applications, 25 were preceded by a pre-application enquiry (14.3%). This is in line with the previous year's figure (15%). Of the 25 that were provided with pre-application advice, only one case was refused (and one withdrawn). The total number of withdrawals in 2022/23 was 32, and 14 applications were refused. This data alone does not permit us to establish whether there is a correlation between pre-application advice and the likelihood of an application being approved or refused. However, it remains our experience that early engagement with applicants at pre-application stage results in a smoother application process – and the avoidance of some applications being submitted that would have had little chance of approval – thereby avoiding abortive work.

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

Planning phone line

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

Governance

This section provides evidence that our structures and processes are proportionate, effective and fit for purpose.

Planning and Access Committee training

Membership of the Planning and Access Committee has changed significantly throughout 2022-23, reflective of the change in membership of the National Park Authority Board as a result of fixed term appointments and both Local Authority and National Park elections. Consequently, a lot of the training and development work undertaken has concentrated on the fundamentals of the role and responsibilities of planning committee members. Alongside this induction training, an emphasis has been placed on committee Members developing their understanding of the Fourth National Planning Framework (NPF4) throughout the lead up to its implementation. See also Case Study 3.

The following training sessions took place throughout the year:

- August 2022: The Roles and Responsibilities of a Planning and Access Committee Member (with Director of Place and Development Planning Team)
- September 2022: Legal Duties when making Planning Decisions (with Anderson Strathern, our external legal advisors on Planning)
- February 2023: NPF4 Transition – Part 1 (with Director of Place and Development Planning Team)
- April 2023: NPF4 Transition – Part 2 (with Director of Place, Development Planning Team, and Anderson Strathern)

Continuing to develop the planning team

As well as focussing on the development of planning knowledge and skills, courses were available which focused on staff wellbeing, cybersecurity and training to use MS 365 in ways that will improve

security and records management. Training sessions on NPF4, led by planners within our team, were opened up to all staff in the organisation and were used as much for awareness raising as well as identifying future opportunities and aligning of workstreams with other departments. An additional series of training sessions were run that specifically targeted the needs of operational managers. A departmental wide off-site day was hosted in May 2022 for all staff to connect and learn more about specific place-based projects and activity in Balmaha.

Internal Training

Financial year 2022/23

- NPF4 workshops – all staff training on NPF4. This was run over the course of several weeks covering the various topics in separate sessions
- Training on the new fee regulations (this was held in advance of the new circular being issued)
- Inserting emails into DMS

External courses/conferences

Financial year 2022/23

- Sharepoint training led by QA (all day training for staff to help with the migration to MS 365)
- Tackling difficult conversations in the public service
- A training day for Board Members was also opened up to new members of staff who would be working closely with board members to allow for shared familiarisation with processes and the opportunity to meet.

- UniMap Web Seminar
- Living Well Locally 20minute neighbourhood pilot – Forth Environment Link led project in Drymen invited to share the process and outcomes of the pilot with all staff from the NPA
- Climate Emergency training – Keep Scotland Beautiful Insights People Behavioural Awareness Coaching and Training for all Managers
- Cyber security – ongoing courses run by Boxphish university
- Edevelopment webinar ‘connectors and data fields’
- Edevelopment review for edevelopment and a look ahead to 2023

Sharing best Practice and Skills with others -2022/23

Local Place Plans - We have met and shared progress with Local Place Plans with colleagues working at other planning authorities and ensured publication of as much information on our website in a transparent and accessible way.

Evidence base – We met with Fife and Perth and Kinross Local Authorities to share and discuss the various approaches taken in gathering the required data for the evidence base. Later we met with the Cairngorms National Park Authority to share our learning on the preparation for the evidence base.

Living Well Locally – We met with West Dunbartonshire Council for a focused discussion on Living Well Locally. We learned about the methodology WDC are exploring to help them define the criteria and spatial parameters of ‘20-minute neighbourhoods’.

Staff wellbeing

- We have now fully adopted a hybrid working model, as well as providing many other flexible working patterns.
- We have also launched out new fresh approach to promoting, physical, mental, and emotional health by enlisted the services of a holistic life coach to do just that.
- We have updated all of our IT office desks and meeting rooms to provide technology that lends itself to the new way of remote working as well as updating our conference and internal communications system.
- We have continued with staff communications through our staff bulletin which was developed in lockdown but we felt there was real benefit, so it has been updated and now forms part of our regular staff comms.
- We continue to review workloads and recruit for vacant posts.
- Following a review of our induction programme for new-starts to the organisation, we have updated and added key bits of information not only on how to use the systems but also team quick reference guides, which give new starts the key information they need on each team.

Culture of Continuous Improvement

This section provides evidence that we are continually reviewing and improving our planning service

New and updated Planning guidance

In [PPF 11](#) we provided information on the work underway to prepare additional Planning Guidance so we can reliably provide relevant and up-to-date policy advice. The following have since been adopted and are now available on our [website](#) :

- [Safeguarding important local facilities and business](#)
- [Sustainable and Active Travel](#)
- [Updated Visitor Experience Planning Guidance](#)
- [Final Strathard Framework](#)

Selecting the policy topic areas was a data driven process, largely informed through the monitoring audit and feedback from planning officers. The new and revised guidance offers an opportunity to ensure the Local Development Plan keeps abreast of the changing policy context and respond to new or continuing issues. It will also help with efficiencies and consistency of handling of proposals.

In addition to the guidance above, we have also made improvements to the advice provided on tree protection. Having received feedback from our Trees and Woodland Advisor we revised our website guidance notes on tree works and the protection of trees in February 2023. This was to update old references and refine the advice to make a clearer distinction between their relative purposes and avoid duplication. Our new revised guidance '[Protecting Trees in the National Park](#)' is about why and how tree protection is achieved and '[Work to Protected Trees in the National Park](#)' is about how to apply for consent for tree works.

The new and revised guidance is pertinent to the themes around sustainability, placemaking, health and wellbeing and echo priorities set out in the NPF4. Moreover, they align with key work areas of other departments, therefore supporting the delivery on strategic objectives, such as the ongoing work on sustainable transport in a rural area.



Loch Lomond & The Trossachs @lomondtrossachs · Aug 4, 2022 ...
A great day to welcome Minister @lornaslater to the National Park to hear about our work on sustainable travel, the challenges & opportunities of 20-minute neighbourhoods in rural settings & the investments we're making in facilities including at the ever-popular Conic Hill.



Simplifying and Streamlining - Short Term Let (STL) Licences

The introduction of a licencing system for Short Term (Holiday) Let properties required new systems to be put in place to deal with an influx of planning enquires from the public and also a means by which to deal effectively with consultations to the National Park as planning authority from the four underlying Local Councils - licensing authorities - across the Park. In the run-up to the scheme's implementation, our officers liaised with the four councils regarding the information needed and timeframes for consultation responses.

We set up a dedicated email address to receive and respond to consultation requests from licensing authorities which was also used to re-direct short term let planning enquiries from the public to ensure these were dealt with separately from the pre-application enquiries - for swifter response.

We also set up a [dedicated STL information page on our website](#) and liaised with the licensing authority's key contacts to seek to align our website information and direct the public to the correct departments.

Following implementation, and with the process and procedures continuing to evolve across the four licensing authorities, we continue to liaise on the format and content of consultation requests (mindful of our obligations under GDPR) and also to provide our responses in their desired format. The ongoing nature of the scheme (licenses are to be renewed every 3 years) means we are further looking to adapt our internal procedures to allow this new workstream to be shared among officers to speed up response timeframes moving forward.



Figure 13 Short-term lets webpage content. Image is of an Agritourism self-catering unit Netherglenny Bothy

Part 2 Supporting Evidence

Qualitative narrative and Case studies checklist

Case Study Topics	Issue covered by case study	Case Study Topics	Issue covered by case study
Design	1	Interdisciplinary Working	
Climate change	1	Collaborative Working	2, 5
Conservation		Community Engagement	
Biodiversity		Placemaking	2
Regeneration		Design Workshops/ Charrettes	
Environment		Place Standard	
Greenspace		Performance Monitoring	4
Town Centres		Process Improvement	3
Masterplanning		Project Management	
Local Develop Plan & Supplementary Guidance		Skills Sharing	
Housing Supply		Staff Training	3
Affordable Housing		Online Systems	
Economic Development		Data and Information	
Enforcement		Digital Practice	
Development Management Processes	4, 5	Transport	
Planning Applications			

Web Sources

To compile Part 1 above we have drawn on the following:

[Website – Planning pages](#)

[LIVE Park Twitter](#)

[Adopted Local Development Plan, Supplementary and Planning Guidance](#)

[Action Programme](#)

[Development Plan Scheme](#)

[Pre-application advice page](#)

[Design and placemaking guidance](#)

Case Study 1

<https://www.scottishconstructionnow.com/articles/work-starts-on-drymen-passivhaus-social-housing-development>

[Scotland's first Passivhaus certified social housing development completes in Stirlingshire | Cruden Homes \(crudengroup.co.uk\)](#)

https://www.urbanrealm.com/news/10292/Drymen_social_housing_earns_Passivhaus_certification.html

Case Study 2

[LDP-Charrette-Report-Part-2-Drymen-Balmaha-Tyndrum-Arrochar-Tarbet-Succoth.pdf \(lochlomond-trossachs.org\)](#)

[Significant investment in popular visitor sites across National Park - Here. Now. All of us. -Loch Lomond & The Trossachs National Park \(lochlomond-trossachs.org\)](#)

[Agenda Item 5 - National Park Place Programme \(lochlomond-trossachs.org\)](#)

[Agenda Item 5 - Appendix 3 West Loch Lomond Strategic Development Framework \(lochlomond-trossachs.org\)](#)
[2023/0011/DET | Redevelopment of Tarbet visitor site comprising: Alteration and extension of toilet block; erection of cafe building; installation of 2no. shelter structures; alteration to pier and erection of pier shelter ; expansion and alteration of vehicle/coach parking; provision of cycle path; alteration to A82 trunk road to form bus stop; upgrade of Pier Road; formation of formal parkland; woodland management and ancillary landscaping works | Loch Lomond And Trossachs National Park Visitor Site Tarbet Argyll And Bute \(lochlomond-trossachs.org\)](#)

Case Study 3

[Special Board Meeting 30 January 2023 - Here. Now. All of us. - Loch Lomond & The Trossachs National Park \(lochlomond-trossachs.org\)](#)

Case Study 4

[Best Companies | Loch Lomond and The Trossachs National Park Company Profile](#)

Case Study 5

<https://www.lochlomond-trossachs.org/park-authority/our-board-committees/meetings/special-board-meeting-to-hear-major-planning-application-2021-0357-det-installation-of-a-marine-fish-farm-and-associated-development-including-shore-base-slipway-pontoon-and-road-upgrades-at-beinn-r/>

<https://www.lochlomond-trossachs.org/wp-content/uploads/2022/10/Agenda-Item-4-Major-Planning-Proposed-Fish-Farm-at-Beinn-Reithe-Loch-Long.pdf>

<https://www.lochlomond-trossachs.org/statement-on-loch-long-fish-farm-planning-application/>

The following are examples of positive feedback from our customers directly via email:

Applications

I was off last week, and the Planning Permission came through! Thanks for all your help and assistance in getting this over the line. You've been a great help. Thanks again.

*Kind Regards **Agent***

Many thanks for your help with this and facilitating an early meeting and quick response. It is much appreciated.–

Applicant

*I would personally like to express my gratitude to you and your Planning Team for your hard work and professionalism [with respect to a proposed development]. Your report into the same was excellent and was fundamental in planning being refused last night. I am both relieved and encouraged that planning has been refused. ...' **Member of the public supporting planning decision and process***

*We would like to give all involved a big thank you for your hard work and going out of your way to give a prompt decision Again a BIG thank you to all **Member of the public***

Now our works are underway I just want to thank you both very much for assisting us

*to get this processed and over the line to allow us to undertake the works. Your assistance and attention to the tight timescales that we imposed were very much appreciated. Just wanted to say thank you both on behalf of the project. Thanks for all your hard work. **Applicant (public body)***

Pre Application

*Thank you [planning officer] for your quick response.. – **Prospective applicant***

*Thanks very much - **Applicant***

Monitoring/discharge of conditions

*Good evening [monitoring officer],...I'm taking two minutes to thank you for taking the time to meet with me today. We really appreciate all your doing for the park, and for being so attentive to our wee house. You are most definitely an asset to the working of the LLNP and I'm so very very glad to have met you .We have been blessed with a wonderful team of professionals that I know are helping us with our project to the very end. Thank you for helping to put our worries to bed today and I'm praying for an easier time to come for us all....I found your words a comfort today. Thank you. **Member of the public***

Community engagement & Liaison

*I was delighted to be able to attend the Rural Housing Scotland conference on Friday and really appreciated the support of LLTNP to allow this to happen....So thank you and your team for the help and support. **Community Development Trust member***

Part 3 Service Improvements

In the coming year we will:

No.	Area for Improvement	Planned Action
1.	Planning application determination times - phase III	<p>Implement a restructure of the Development Management Team – which, through enhanced management capacity, support to other staff and efficiencies, will deliver reduced determination times.</p> <p>Continue to develop and implement enhanced caseload management and reporting tools to enable monitoring of determination times on a monthly basis.</p>
2.	Deliver planning / governance efficiencies	<p>Prepare our first Planning Fee Charter (covering discretionary charging and exceptions).</p> <p>Deliver LDP Act requirements.</p> <p>Local Review Body Member training and develop options for an independent Planning Advisor to become involved in hearings when necessary.</p> <p>Scheme of Delegation Review.</p>
3.	Progress towards Digital Transformation	<p>Active participation in the Scottish Government’s development and trialling of the forthcoming Digital Planning platform.</p> <p>Skilling up on new developments in our in-house software (e.g. Microsoft 365, Sharepoint) to maximise efficiencies</p>
4.	Local Place Plan requirements	<p>Prepare and implement a procedure to disseminate Local Place Plans internally amongst staff, to Board Members and with partner organisations.</p> <p>Establish a monitoring programme to collect data that will inform Scottish Ministers’ 7-year Review of the impacts of Local Place Plan as required by the Planning (Scotland) Act 2019.</p>

Our delivery of service improvement actions from previous year

1) Planning Application Determination Times – Phase I and II complete – Phase III ongoing

Continue positive momentum to reduce determination times. Developing enhanced caseload management and reporting tools to enable monitoring of determination times on a monthly basis.

The feedback on decision making performance recognises the improvements that were made to average determination times in Q1 and Q2 of 22/23, relative to the preceding year. An ongoing focus has continued on performance - utilising reporting tools to monitor caseload management, recording 'stop the clock' dates when cases cannot be progressed (while awaiting key information from applicants) and adopting the option to refuse some applications when progress is stalled due to insufficient supporting information not being forthcoming. See Case Study 4.

2) Improved monitoring of Section 75 agreements – Complete

Establish a new monitoring system of the pipeline of Section 75s to enhance tracking between external legal advisors and Park Authority staff. This will also extend to keeping a note of compliance with the requirements set out in the Section 75s.

A basic system has been established. Progress continues to be made in this area – notably through a regularly updated list of ongoing S.75 cases prepared by the Legal team and discussed with the DM Planning manager. This has been particularly useful in highlighting legacy cases which are often linked to S.75 legal agreements – and a plan of action can be developed for each case.

3) Prepare updated infrastructure requirements with public body partners for key strategic sites – Complete

To work with Stirling Council and consultants to undertake a piece of work that will result in updated Callander South Planning Guidance. This work will provide further clarity on developer contributions where it is anticipated that the updated planning guidance will set out expectations from each development parcel for infrastructure in their plot and set out the common infrastructure that developers will be expected to contribute to across the masterplan area. Further review will also be undertaken for other key strategic development sites in Arrochar and Balloch.

An updated [draft of the planning guidance for Callander South Planning Guidance](#) was approved by [Planning Committee on 19th December 2022](#) for public consultation and published for consultation for six weeks during January and February 2023. This sets out details of a shared infrastructure phasing plan and highlights the expected type of contribution each “plot” should make and prioritises these. This seeks to help provide developers with more certainty and inform discussions at development management stage and help deliver a co-ordinated development that will achieve the aspirations set out in the masterplan framework. To support this work a separate study has been undertaken to provide indicative costs for each of the listed infrastructure. Further targeted engagement has since taken place and the guidance will be updated accordingly (into year 2023/24).

4) Integrated approach to new strategic plan preparation – complete

With the review of the National Park’s Partnership Plan underway, this will establish the overall approach for the next Local Development Plan. There is also a new requirement for the Park Authority to prepare a Regional Spatial Strategy and (working in partnership with others) – a Regional Land Use Framework. There are opportunities for streamlining our approach to preparing these plans by taking an integrated approach through developing shared vision and central narrative. Efficiencies can also be achieved by integrating key tasks such as research, evidence base, stakeholder engagement and developing monitoring frameworks

During 2023/23 we decided to progress our suite of strategic plans in a more streamlined manner to create efficiencies and avoid duplication. These plans include the National Park Partnership Plan and Regional Spatial Strategy (which will both form the same plan for the National Park) and the Local Development Plan and anticipated Regional Land Use Framework (See [Board Paper](#) and Figure 15 below) mapping out the relationship between the Plans.

Our National Park Partnership Plan sets the vision for all our other plans

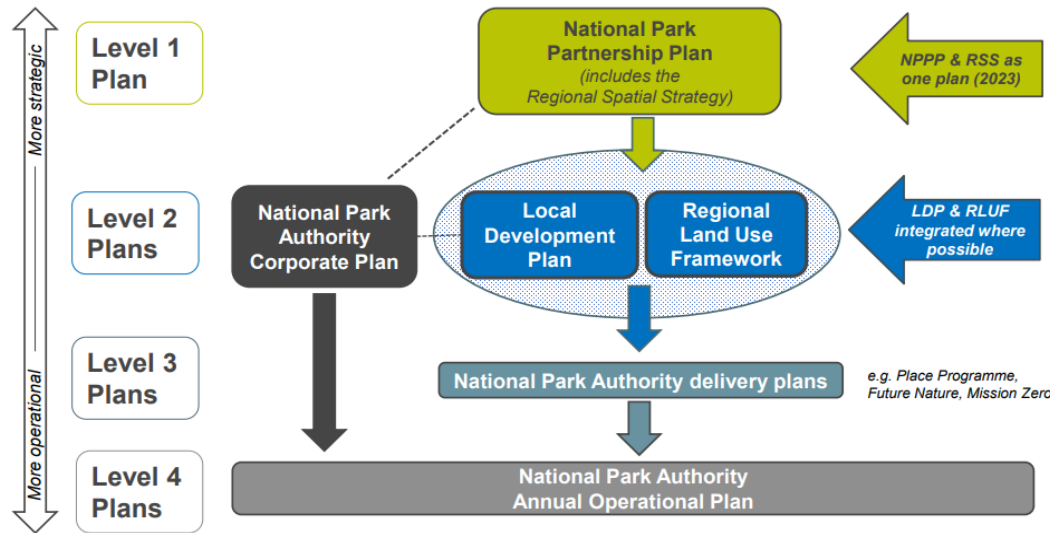


Figure 14 Diagram setting out how the various plans relate to each other

Taking an integrated approach involved updating the knowledge and evidence base that will underpin all of these plans. We also collated a set of topic papers on the key strategic issues that we know we need to plan for and used these to support engagement with staff and NPA Board Members and stakeholder engagement to help inform this consideration. We undertook specific research where gaps in our knowledge base were identified. Topics included mapping carbon emissions for the National Park and identification of a routemap to achieve a net zero National Park, research on the local housing market, second homes and short-term letting, community wealth building and transition towards a greener economy opportunities and identification of nature networks.

We sought to gather information from key agencies on infrastructure and services with some mixed success and [have supported communities to prepare Local Place Plans](#). We developed an engagement

plan for the formal engagement phase of our draft National Park Partnership Plan (post this PPF reporting period), the results of which will directly inform our evidence report for our new Local Development Plan Gatecheck stage.

We supported targeted work with the [Lochgoil community](#) to learn more about effective community engagement in land-use decision making. The image below depicts an abbreviated version of the invite that was sent out to Communities and the partners involved. We have used our planning role to help support communities and local stakeholders to consider wider elements of placemaking including land use change that is needed to support nature, climate and community wealth building opportunities as part of a fair transition. This work was part of our pilot work funded by the Scottish Government to test the concept of Regional Land Use Partnerships.

Lochgoil Land Use Community Discussions

Lochgoil has been selected as one of five rural communities across Scotland to undertake a learning programme focusing on land use.

The sessions will explore ways to help tackle climate change and encourage nature, identify sustainable land-based priorities & opportunities for local people, and give voice to the communities' needs and wishes through developing a shared vision for future land use.

The 'learning' is for everyone – participants, partners and Scottish Government. The overall purpose of the programme is to support and strengthen community inclusion in decision making about how local land is used.



Figure 15 Community invite to participate in learning programme led by Social Enterprise Academy in Partnership with the LTTNPA, as part of the National Park Authority's Regional Land Use Partnership pilot award from the Scottish Government.

Aligned to this is has been our support to communities to prepare Local Place Plans. In the reporting period we issued a formal invite to all communities to prepare a Local Place Plan, uploaded information on our website, provided in-kind support and funding to eight communities. We consider that having a set of LPPs helps to not only inform our LDP from a holistic, place-based perspective, but also grows community empowerment and capacity. The process of supporting NPPP and LPP preparation has also delivered added value by enabling strong and trusting relations to develop between the Park Authority and community groups, which will enable continued integrated working and community participation to deliver LDP and NPPP aspirations offering positive long-term impacts.

Part 4 National Headline Indicators

A: DEVELOPMENT PLANNING

Headline indicators - Local Development Plan	2022-23	2021-22
Age of local development plan(s) (years and months) at end of reporting period <i>Requirement: less than 5 years</i>	6 years 3 months	5 years 3 months
Will the local development plan(s) be replaced by their 5th anniversary according to the current development plan scheme?	No	No
Has the expected date of submission of the plan to Scottish Ministers in the development plan scheme changed over the past year?	No	No
Were development plan scheme engagement/ consultation commitments met during the year?	N/A	N/A

Effective Land Supply and Delivery of Outputs	2022-23	2021-22
Housing approvals by financial year	41 units	57 units
Housing completions over the last 5 years	206 units	203 units
Marketable employment land supply	14.95 ha	14.95 ha
Employment land take-up during reporting year	0 ha	0 ha

B: DEVELOPMENT MANAGEMENT

Headline Indicators – Project Planning and Decision-making	2022-23	2021-22
Project Planning <ul style="list-style-type: none"> Percentage and number of applications subject to pre-application advice Percentage and number of major applications subject to processing agreement or other project plan Percentage planned timescales met 	Project Planning <ul style="list-style-type: none"> - 14.3% of applications subject to pre-app advice (25 applications). -No Major applications were subject to a processing agreement. -21 Local Developments were subject to a processing agreement - 52% of these were concluded within agreed timescales 	Project Planning <ul style="list-style-type: none"> 64 apps 15.27% 10 processing agreements 40%
Decision-making <ul style="list-style-type: none"> Application approval rate Delegation rate Validation - % validated on first receipt 	Decision-making <ul style="list-style-type: none"> 93.5 % 98.5% 32.6% 	Decision-making <ul style="list-style-type: none"> 95.1 % 96.4% 40%

Headline Indicators - Decision-making timescales - Average Number of Weeks to Decision	2022-23	2021-22
Major developments	54.3 weeks	n/a – no applications
Local developments (non-householder)	13.2 weeks	16.3 weeks
Householder developments	9.3 weeks	9.1 weeks

Headline Indicators - Legacy Cases – over 1 year old	2022-23	2021-22
Number cleared during reporting period	18	15
Number remaining	10	12

C: ENFORCEMENT

Headline Indicators – Enforcement	2022-23	2021-22
Time since enforcement charter reviewed (months) <i>Requirement: review every 2 years</i>	12 months ¹	0 months
Complaints lodged and investigated	16	27
Number of breaches identified – no further actions taken	3	5
Cases closed	0	7
Notices Served	6	2
Direct Action	0	0
Reports to Procurator Fiscal	0	0
Prosecutions	0	0

¹ As of March 2023

National Headline Indicators - Contextual Statement

This statement provides some headline commentary surrounding the notable trends in the National Headline Indicators. Our detailed statistics are in Part 5 (following on from this section) and this statement also provides comment on the standout figures from that area.

Development Planning

We have not replaced our current Local Development Plan (2017-2021) within the five-year target. As explained in previous Planning Performance Reports, this was an informed decision, approved previously by our Planning and Access Committee and based on an assessment of the risks associated with proceeding at a time when the new planning system was being introduced and a new National Planning Framework awaited. In June 2021, we updated our Development Plan Scheme and indicative timeline for preparing a new Local Development Plan which was to be updated and reviewed during 2023 following further clarity after publication of awaited Local Development Planning guidance. The focus of work during 2023 will be on further community engagement with regards to Local Place Plans and starting preparation of the Evidence Report for the Gatecheck stage. As this report demonstrates, we have already begun research on selected policy themes for a robust baseline and have been preparing additional Planning Guidance to ensure planning advice remains relevant and up to date especially with regards to themes around sustainability, placemaking, health and wellbeing.

Development Management

As one of the service improvements identified for the year 2021-22, there has been an ongoing focus on reducing the average determination time of planning applications (see Case Study 4 'Determination Times Performance Improvement Project – phase II'). As a result of measures put in place, the average length of time to determine local applications had fallen from 20.6 weeks to 13.9 weeks for the 21/22 reporting period. Householder applications similarly had reduced down to an average 9.1 weeks. Performance continued on an even keel for Q1 and 2 of this PPF 12 reporting period. However, as covered in Case Study 4, the latter half of the year saw a downturn in determination times due to carrying significant staff vacancy (including one key post at managerial level) as well as an ongoing high number of planning applications received and significant Local and Major applications coming to a conclusion. Despite this, our average figures across the whole year remain relatively consistent with the 21/22 period. We have maintained a stable position. Case study 4 explains our response to regain an improving position, which is to implement a revised structure for the Development Management team. Creating a new tier of Senior Planners to ensure management responsibilities are covered from an increased number of roles and direct sign-off on reports of handling prepare by those staff - but a continued focus themselves handling more complex applications and working closely with the overall team manager. Also crucial to this re-structure was creating a new Senior level in the Planning Support team to help direct and prioritise all the support functions to the DM Service.

Legacy Cases

We continued to have a focus on reducing legacy cases (cases which remain live but not determined after one year) and had a figure of 10 such cases at the close of the PPF12 reporting period. This is reduced from 12 the previous year. Clearly the recording of these cases is always a 'moving picture' as new cases fall into the recording 'window' and others are determined or returned. For this period we had a particular focus on returning some stalled applications that were clearly not progressing – usually for lack of key supporting information - and invited the applicant to assemble a full package of supporting information and resubmit at a future date.

There were 21 **processing agreements** drawn up this year as part of our approach to improving determination times. 52% of those applications were concluded within agreed timescales.

Enforcement

Our Enforcement Charter was updated during the PPF 11 reporting period and so remains in accord with legislation – and is a useful first reference point for all enforcement matters - as well as setting out how the National Park undertakes monitoring of approved development.

As always, our approach to resolve a potential breach of planning control is by negotiation and agreement in the first instance rather than formal action and hence the low number of Notices served – although this increased to 6 – as compared to 2 in the previous period. This may reflect the ending of the Chief Planner's temporary guidance on the relaxation of enforcement action - as a legacy from the pandemic.

We continue to have a close eye on a situation near Balquidder resulting from the sale of small parcels of land from a former farm steading to a number of individuals, 20 or so 'plots' having been individually purchased - many with the expectation of undertaking some form of development. Some unauthorised ground engineering has presented a significant risk to a sensitive riparian location subject to important statutory natural heritage designations. This became a focus of formal action as reported in PPF 11 and remains ongoing.

Another enforcement action of note during this reporting period concerned an area of Church land centrally located within Luss Village on west Loch Lomond. A planning application was submitted by an Outdoor Activity company for the change of use of garden ground for use for outdoor education (a sui generis use). This was a retrospective application as the activities involving school age children had already commenced. This proved very contentious locally from a residential amenity perspective – as the land adjoined a number of residential properties. This was refused planning permission following consideration at our June 2022 Planning Committee – decision issued 30th June 2022. An **Enforcement notice** was issued - requiring the ongoing use of land to cease. This was issued by the National Park on 29th July to take effect on 26th August. The applicant lodged appeals against refusal of permission and enforcement notice. The Enforcement Notice appeal was withdrawn on 28th October.

The DPEA issued a decision notice on 3rd November 2022 to dismiss the appeal and refuse planning permission.

Part 5 Official Statistics

A: Decision-making timescales (based on 'all applications' timescales)

Timescales	2022-23	2021-22	2020-21	2019-20
Overall				
Major developments	54.3 weeks	n/a – no applications	66.4 weeks	21.1 weeks
Local developments (non-householder) <ul style="list-style-type: none"> Local: less than 2 months Local: more than 2 months 	13.2 weeks 6.4 weeks 16.7 weeks	16.3 weeks	22.2 weeks	11.2 weeks
Householder developments <ul style="list-style-type: none"> Local: less than 2 months Local: more than 2 months 	9.3 weeks 6.0 weeks 13.1 weeks	9.1 weeks	16.3 weeks	7.4 weeks
Housing Developments				
Major	n/a – no applications	n/a – no applications	66.4 weeks	21.1 weeks
Local housing developments <ul style="list-style-type: none"> Local: less than 2 months Local: more than 2 months 	20.7 weeks 7.7 weeks 24.0 weeks	18.6 weeks 6.6 weeks 21.9 weeks	25.9 weeks 7.1 weeks 27.6 weeks	15.2 weeks
Business and Industry				
Major	n/a – no applications	n/a – no applications	n/a – no applications	n/a – no applications
Local business and industry developments <ul style="list-style-type: none"> Local: less than 2 months Local: more than 2 months 	12.5 weeks 6.1 weeks 15.4 weeks	16 weeks 7 weeks 18.8 weeks	23.6 weeks n/a 23.6 weeks	14.9 weeks
EIA Developments	54.3 weeks (The Major Application was also EIA)	40.1 weeks	30.3 weeks	n/a – no applications
Other Consents	9.8 weeks	10.7 weeks	11.7 weeks	9.9 weeks
Planning legal agreements <ul style="list-style-type: none"> Major: average time Local: average time 	n/a – no applications 27.7 weeks	n/a – no applications 38.6 weeks	66.4 weeks 49.1 weeks	n/a 18.7 weeks

B: Decision-making: local reviews and appeals

	Total number of decisions	Original decision upheld					
		2022-23		2021-22		2020-21	
Type	No.	No.	%	No.	%	No	%
Local reviews	6	6	66.7%	5	100%	1	25%
Appeals to Scottish Ministers	2	2	50%	0	n/a	2	100%

Contextual Statement on Official Statistics

The commentary relating to determination times, processing agreements and enforcement is provided in the contextual statement above under National Headline Indicators.

Part 6 Workforce Information

This is a snapshot of staffing at 31 March 2022.

Planning Service Management	Tier 1 Chief Executive	Tier 2 Director of Place	Tier 3 Head of Service	Tier 4 Manager
	1	1		3

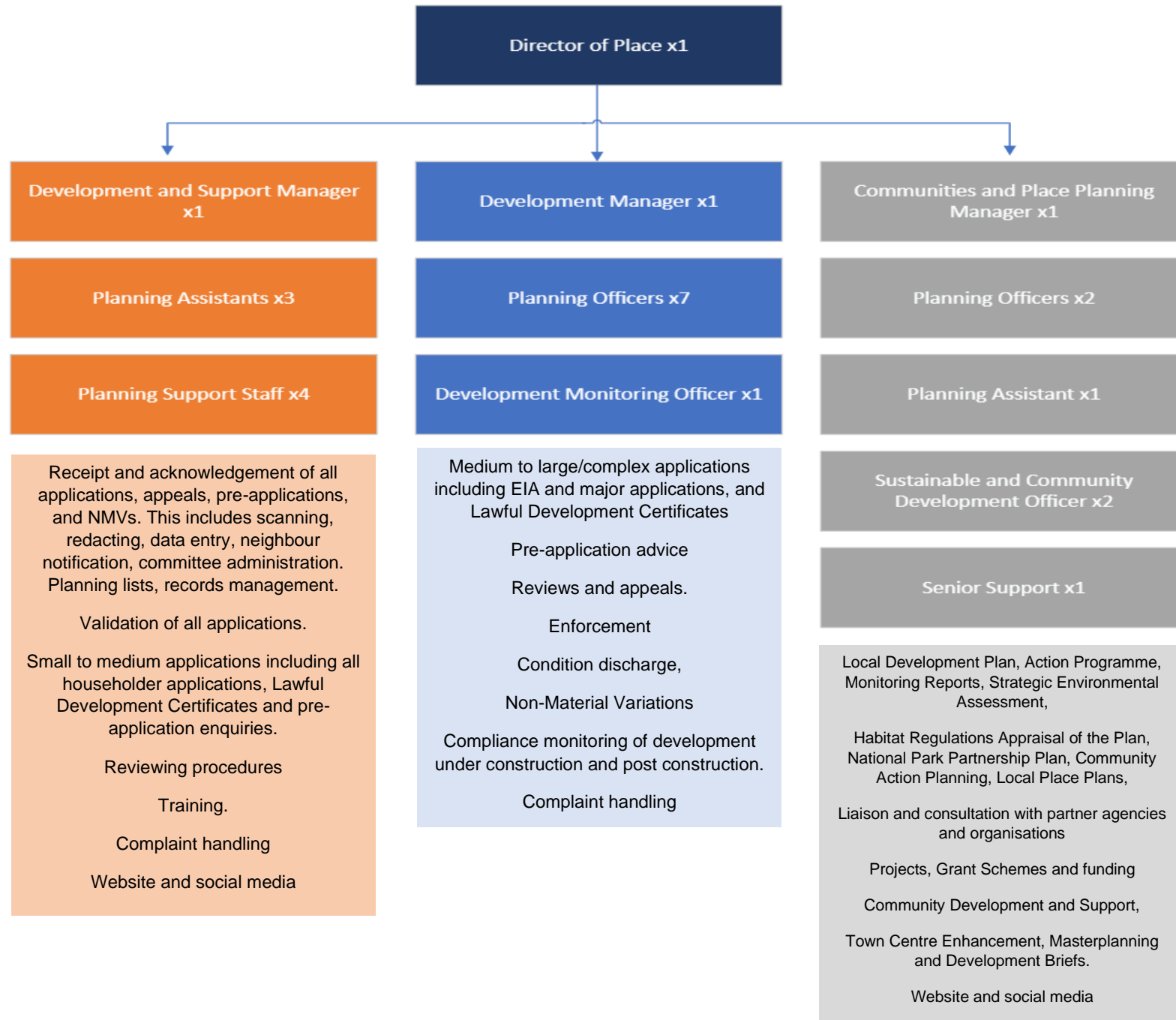
Staff Age Profile	Headcount
Under 30	1
30-39	6
40-49	11
50 and over	7
	25

*This table does not include the Chief Executive but includes the Director of Place and Managers and all planning and planning administration staff.

RTPI Chartered Staff	Headcount
Chartered Staff	16

Staff Count: We have 25 staff comprising **18** FTE staff and **7** part time staff (equivalent to 4.7FTE) (full complement would be **26** FTE).

Vacancies: As of the 31st March 2022 there were **0** vacancies in the Development Planning team and **1** vacancy in the Development Management team.



Part 7 Planning Committee Information

Committees & site visits	No. per year
Full Council committees ¹	7
Planning Committees	4
Area Committees (where relevant)	n/a
Committee site visits ²	1
LRB ³	4
LRB site visits	0

Notes

1. References to committees also include National Park Boards.
2. Number of site visits are those cases where were visits carried out by committees/boards.
3. This related to the number of meetings of the LRB, application numbers going to LRB are reported elsewhere.

Part 8 Key Markers

No.	Performance Marker	Evidence
1	Decision-making: authorities demonstrating continuous evidence of reducing average timescales for all development types	Statistics presented in 'Part 4 National Headline Indicators'
2	Project management: <ul style="list-style-type: none"> offer of processing agreements (or other agreed project plan) made to prospective applicants in advance of all major applications; and availability publicised on website 	<p>The statistics presented in 'National Headline Indicators Development Management', show how we have used processing agreements this year, compared to none the previous year. Further explanation on this is given in the 'National Headline Indicators - Contextual Statement': Development Management.</p> <p>The availability of processing agreements is promoted on our website: https://www.lochlomond-trossachs.org/planning/planning-applications/make-an-application/helpful-resources/planning-processing-agreements/</p>
3	Early collaboration with applicants and consultees on planning applications <ul style="list-style-type: none"> availability and promotion of pre-application discussions for all prospective applications; and clear and proportionate requests for supporting information 	<p>We offer free pre-application advice as part of our planning service, and this contributes significantly to the quality of our service. This is evidenced in the statistics.</p> <p>We promote it on our website: https://www.lochlomond-trossachs.org/planning/planning-applications/make-an-application/ under the section on 'Make an application' and to promote this service we also make sure to include a link to the pre-application service on our Local Development Plan page https://www.lochlomond-trossachs.org/planning/planning-guidance/local-development-plan/, as we understand that for some applicants navigating planning policy may be daunting. Enquiries to our pre-application service can vary from being specific to very general enquiries, in both instances the service helps prospective applicants navigate the policy documents and what supporting information is likely to be required and where other key agencies are likely to be consulted.</p> <p>Clear and proportioned requests for supporting information is evidenced in Case study 1 and case study 2. These case studies demonstrate how early engagement allowed us to request supporting information at the earliest stages and that these were directly related to policy criteria necessary for the case officer to assess the proposal against the policy, planning guidance and specialist advice.</p>

No.	Performance Marker	Evidence
4	Legal agreements: conclude (or reconsider) applications within 6 months of resolution to grant (from last reporting period)	View 'Part 4 National Headline Indicators' and 'Contextual statement' We have a robust internal procedure in place involving our own legal team and our external solicitors to try to resolve under 6 months. This also forms a Service Improvement for 2022-23 "Improved monitoring of Section 75 agreements as updated on in the Improvement Priorities section.
5	Enforcement charter updated / re-published within last 2 years	See 'National Headline Indicators - Contextual Statement': Development management – Enforcement Charter: The current version is on the website: https://www.lochlomond-trossachs.org/wp-content/uploads/2022/04/Enforcement-Charter-March-2022.pdf
6	Continuous improvement: <ul style="list-style-type: none"> • show progress/ improvement in relation to PPF National Headline Indicators; and • progress ambitious and relevant service improvement commitments identified through PPF report 	Service improvements a covered under Part 3 Improvement Priorities. Continuous improvement efforts also evidenced in Case Study 4 and evidence given in the example of Short-Term Lets. We have developed new ambitious and relevant service improvement commitments for the forthcoming year, reflecting on current performance and priorities for the coming year.
7	Local development plan less than 5 years since adoption	Under the section on the Development planning Contextual statement and the 'Development Plan Scheme', we provide additional explanation as to the status of our Local Development Plan and next steps on preparing our New Local Development Plan.

No.	Performance Marker	Evidence
8	Development plan scheme – next LDP: <ul style="list-style-type: none"> • on course for adoption within 5-year cycle; and • project planned and expected to be delivered to planned timescale 	This is covered in the section on our Development Plan Scheme.
9	Stakeholders including Elected Members, industry, agencies, the public and Scottish Government are engaged appropriately through all key stages of development plan preparation	The section on the Development plan Scheme and the Development Planning Contextual statement provide evidence on the progress being made in preparing the new Local Development Plan and continued engagement with various agencies and stakeholders such as Communities and Board members (Case Study 3). We have also evidenced the support given to communities as they prepare their Local Place Plans to ensure strong alignment and integration between these and the Local Development Plan.
10	No longer applicable – gap kept for data continuity	
11	Production of relevant and up to date policy advice	<p>Under ‘Culture of Continuous Improvement’: we explain how we have identified and acted on the need for additional policy guidance to reflect current pressures and offer clearer guidelines. This provides an update on the work that was in progress in last year’s PPF. Internal training for all staff as also mentioned in case Study 3 and listed under ‘staff training’ evidences the quick response to ensuring staff have a good understanding of new requirements and so we provide up-to-date advice and consistency. All staff were able to access the training, as the planning department works closely with other teams and this allows for a greater awareness and joined-up thinking when providing advice</p> <p>The Section on the Development plan Scheme and the Development planning Contextual Statement elaborates the ongoing work on the new Local Development Plan.</p>
12	Corporate working across services to improve outputs and services for customer benefit (for example: protocols; joined-up services; single contact arrangements; joint pre-application advice)	<p>This is evidenced in Case Study 2 and case Study 5.</p> <p>Case Study 3 also demonstrates how we made improvements to provide a better service for customer benefit.</p> <p>The example given on the Short-Term lets further demonstrates how we have sought to improving the customer service experience and streamlining by providing a single contact dedicated mail box and consistency of advice on any pre-applications. Part 2 supporting evidence includes feedback from customers on the quality of service, which is not captured in the Headline Indicators.</p>

No.	Performance Marker	Evidence
13	Sharing good practice, skills and knowledge between authorities	<p>This is set out in the Governance section case study 5 and under Culture of Continuous Improvement Case on the Short -Term Lets as well as under ‘Sharing Best practice with others’. The team are also actively involved on Knowledge Hub.</p> <p>We continue to work closely with all four local authorities, in particular Argyll and Bute Council and Stirling Council. We continue to regularly attend their Housing Forum meetings, and protocols in relation to affordable housing contributions remain in place.</p>
14	Stalled sites / legacy cases: conclusion or withdrawal planning applications more than one-year-old (from the same time last year).	<p>This is covered in the National Headline Indicators Contextual statement</p>
15	Developer contributions: clear and proportionate expectations <ul style="list-style-type: none"> • set out in development plan (and/or emerging plan); and • in pre-application discussions 	<p>This is covered under ‘Quality of Service and Engagement’: ‘Being clear and proportionate - Developer contributions’. We have an up-to-date Developer contributions guidance and Housing guidance with clear expectations for both monetary and non-monetary contributions. Clear and proportionate expectations of Developer Contributions are set out in pre-application discussions.</p>

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