



BRIEFING

AUDIT SCOTLAND REPORT: MODERNISING THE PLANNING SYSTEM

INTRODUCTION

This *Briefing* sets out RTPI Scotland's response to the Audit Scotland report *Modernising the Planning System*, which was published on 15 September 2011. The report contained 3 Key Messages focuses on issues around:

- progress made in modernising planning
- the performance of the planning service in Scotland
- resourcing the planning service.

TOP LINES

RTPI Scotland was pleased to sit on the Advisory Group on the report. Our response to the report is that:

- progress is being made and the report shows that **users of the planning system are generally satisfied with it**, even though there have been significant reductions in planning staff and a need to adapt to a considerable number of changes in the last 5 years.
- we **need to build on the progress** made - RTPI Scotland is working with Scottish Government, Heads of Planning Scotland, the Improvement Service and others to ensure that planning plays a key role in delivering sustainable economic growth.
- the significant changes made to the planning system over the last few years need to be allowed to bed down – we **do not need another major overhaul** of the system.

- we agree with the report in that a **more comprehensive approach to measuring success is required**. Speed of decision can be important but there is a need to take a more holistic view of performance.
- the planning service needs to be **resourced properly**. We need an easily understandable fee structure which recognises this, bearing in mind that planning fees in Scotland are low compared to other parts of the UK.

PROGRESS

Audit Scotland's Key Message 1

The Scottish Government, key national agencies and planning authorities have made progress in modernising the planning system and are working better together. However, more progress is needed to realise the full potential of modernisation

RTPI Scotland would emphasise that:

1. **Significant progress** has already been made:

- Audit Scotland's own survey work shows that **83%** of agents; **79%** of developers; **73%** of householders and **71%** of businesses who have used the planning application process were satisfied with it.¹
- In 2005 **28%** of local development plans had been adopted in the previous 5 years. In 2011 this had risen to **55%**²
- Take up of e-planning is **3** times higher than forecast and it is estimated that applicants will, on average, save **£206** for every application submitted online³

This is despite:

- the number of FTE planning staff in local planning authorities **falling by over 10%** between 2006 and 2010 (from around 1700 to 1575)⁴. It is likely that staff levels have decreased further since 2010.
- Scottish Government not yet introducing commitments such as the more liberal permitted development rights for developments. Scottish Government has said that this could lead to a **20 - 25%** reduction in planning applications, which would be circa **4,000** applications per

¹ Modernising the Planning System, Audit Scotland, 2011

² Scottish Government in the Scottish Planner, August 2011

³ Ibid

⁴ Scottish Government Planning Workforce Survey 2010

annum⁵, and which could free up time for planning officers to concentrate on other priorities.

- the need for the planning service to adapt to the introduction of a number of new approaches emanating from the 2007 Planning Act in this time.
2. We agree that **we need to build on the progress** which has already been made. Given this:
- RTPI Scotland is in discussions with Scottish Government, Heads of Planning Scotland, COSLA and others in the development industry to explore the idea of establishing a **Scottish Forum for Planning** to bring together key interests to constructively discuss and propose action on approaches to key planning issues.
 - RTPI Scotland, Heads of Planning Scotland, COSLA, the Improvement Service and Homes for Scotland are continuing to develop **training programmes and resources** to support planners to up skill and adapt to the new planning regime. This is despite a reduction in funding for the Planning Development Programme from £2.6 million between 2006/7 to 2010/11 to £150k for 2011/12 – 2012/13. This equates to reduction of an average of £520k per annum to an average of £75k per annum.
3. Now, more than ever, **planning needs to be able to bed down**, not more change. The modernisation programme was not about simplification but about responding to the changed context for planning. It now has to balance increased levels of interest from communities in planning and built environment issues with the aim of making the system more facilitative and pro-active. It is working to bed in a large number of new approaches and procedures which have been introduced to help this.

PERFORMANCE

Audit Scotland's Key Message 2

Despite modernisation and falling numbers of applications, few councils are performing well against timescales set for processing planning applications. However, time is only one indicator of performance and a more comprehensive measurement framework is needed. The Scottish Government and Heads of Planning Scotland are working together to develop a new framework for measuring and reporting performance.

RTPI Scotland would emphasise that:

⁵ The Town and Country Planning (General Permitted Development) (Scotland) Amendment Order 2011 Householder Permitted Development Rights: Consultation Paper, Scottish Government, October 2010

1. The period of Audit Scotland's survey has been **superseded** by new figures which show an improvement in performance. We are seeing improvements in processing times. In 2010/11:
 - **42,057** planning applications were processed by Scottish planning authorities⁶ an increase of **1,562 (3.9%)** on 2009/10
 - **66.4%** of non-major planning applications were processed in under 2 months⁷. This is an increase of **1.4%** on 2009/10 figures
 - **92.4%** of planning applications were approved by Scottish planning authorities⁸
 - The approval rate for planning applications in Scotland has consistently been over **91%** over since at least 2004/5.⁹
2. We agree that a **more comprehensive measurement framework is required**. Speed of decision can be important but there is a need to take a more holistic view of performance. We support the work being undertaken by Heads of Planning Scotland and Scottish Government in developing a framework which looks not just at speed of decision but also, for example, the quality of development on the ground, customer service and stakeholder engagement.
3. A **quick decision may not always be the right decision**. Planning has a major influence over Scotland's built environment so it is right to ensure that the final outcome, which may be around for decades, is the right one. Developers don't necessarily want a speedy decision. They want clarity over the timescales that will be required to make the decision.

RESOURCES

Audit Scotland's Key Message 3

The funding model for processing planning applications is becoming unsustainable. The gap between income and expenditure is widening, leading to greater dependence on already constrained council budgets

RTPI Scotland would like to emphasise that:

1. The planning service needs to be **resourced properly**. Most other services work on the basis of full costs recovery. The customers of planning system are not just applicants but also the wider community. We need an easily understandable fee structure which recognises this. Planning fees in Scotland are low compared to other parts of the UK. Audit Scotland's report shows that the maximum fee for a planning

⁶ Scottish Government Planning Authority statistics 2010/11

⁷ ibid

⁸ ibid

⁹ ibid

application to build new homes or create more floorspace in Scotland is **£15,950** compared to **£250,000** in England, Wales and Northern Ireland

2. There is need to bear in mind that **effort and time** which goes into providing the context for the processing of planning application:
 - the new planning regime has introduced requirements for Pre Application Consultation
 - discussions between planning authorities and applicants are encouraged
 - there is an ongoing need to consult with other key consultees and agencies
3. The Audit Scotland report focuses on the development management aspects of planning. You cannot divorce the development management side of planning from the **development planning** side, especially as we are moving towards a plan-led approach which encourages more investment in producing plans to guide development and give more certainty to decision making on planning applications. It should also be borne in mind that planning authorities need to resource **enforcement** action to deal with development which has proceeded without the necessary planning permission.

If you want to discuss this please contact Craig McLaren, National Director of RTPi Scotland on 0131 229 9628 or 07850 926881

Published 15 September 2011

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- maintain high standards of planning education
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- support our membership to work with others who have a role in developing places in Scotland
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

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