



# The Office of the National Planning Improvement Coordinator

## RTPI Scotland Thinkpiece

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### Context

RTPI Scotland has produced a series of thinkpiece papers to stimulate discussion and debate on topics areas which we will feel need further exploration to support Scottish Government to develop and advance proposals to improve the planning system. We welcome comments and views either direct to [scotland@rtpi.org.uk](mailto:scotland@rtpi.org.uk) or on social media using the hashtag **#rtpithinkpieces**.

This thinkpiece looks at the role of the office of the new National Planning Improvement Coordinator, focussing on its:

- vision and values
- status and reporting
- roles and responsibilities
- resources

### Background

The [Planning \(Scotland\) Act 2019](#) introduced provisions on the performance of planning authorities. This had two main impacts. Firstly, it made it a statutory requirement for planning authorities to prepare and publish a report on the performance of their functions and that they submit a copy of the report to the Scottish Ministers.

Scottish Ministers may by regulations make provision about the form of the report, the content of the report (including about what quantitative and qualitative information is to be included in the report, and what outcomes are to be used to assess the performance by planning authorities of their functions), the process to be undertaken in preparing the report and how the report is to be published.

The Act also provided for Scottish Ministers to appoint a National Planning Improvement Co-ordinator to monitor the performance by planning authorities and provide advice to planning authorities “and to such other persons as the co-ordinator considers appropriate” in relation to what steps might be taken by planning authorities or such other persons to improve the performance of their functions.

Scottish Ministers can publish regulations to make further provision about the appointment and functions of the Co-ordinator.

The Institute believes however that there is potential to build on the provisions and in so doing introduce a powerful new resource for all users of Scotland's planning system. If implemented well the Office of the National Planning Improvement Coordinator (ONPIC) has the potential to raise the profile of planning and strengthen the ability of the planning system to deliver on many of Scotland's priorities.



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## Vision

From the outset RTPI Scotland believes that it is essential that the vision and values for the ONPIC are agreed collectively. We consider that the vision should be based upon:

- striving to ensure that the Scottish planning is world leading in providing a high performing, efficient and effective service for all engaged
- a culture of continuous improvement is embedded in planning authorities
- a collaborative, inclusive and constructive approach to performance improvement is taken by all stakeholders in the planning service

We believe that it should work to values that ensure that it:

- can provide independent views based upon sound professional judgement and evidence
- is open and transparent in undertaking its work
- is inclusive, constructive, and collaborative in undertaking its functions

## Status and Reporting

### Status and Position

RTPI Scotland is firmly of the view that the ONPIC should be an independent 'planning champion', equipped to provide peer support to planners and other users of the system working in local government, national government, agencies, the private and the third sectors.

We believe that this role should take a positive approach to working alongside planners across sectors and specialisms to improve performance throughout the planning system, not just in local authorities. The Institute maintains that the perception of the independence of the role, not just from local government but other users of the planning system, including the development industry and community interests, will be crucial to its success. We therefore urge the government to consider creating an independent appointment where 'ownership' should be shared collectively by all users of the planning services. A possible precedent is the [Scottish Roads Works Commissioner](#) which is an independent public official established under section 16 of the Transport (Scotland) Act 2005 and is accountable to the Scottish Ministers and ultimately the Scottish Parliament.

Given this we believe that there is a need to ensure that there is a transparent appointment process through the public appointments process. Although the lead officer in ONPIC may need to be approved by the Minister they should have the freedom to highlight the role and impact of all those organisations engaged in the planning system, not just planning authorities.

### Reporting and Management

#### *Line Management*

The reporting lines of the ONPIC will be a factor in perceptions around its independence and neutrality. As stated earlier we believe that there is a need for it to be independent of government and therefore it should not be line-managed by the Chief Planner or anyone on government. However, it is considered that Scottish Government Planning and Architecture Division should act as its sponsor within Scottish Government as is the case with, for example, [Architecture + Design Scotland](#). The ONPIC will have a role in assessing the performance of parts of Scottish Government and its agencies, so these arrangements are important in ensuring that there are no conflicts, or perceived conflicts, of interests.



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### *Reporting*

The Scottish Government and COSLA currently jointly chair the High-Level Group on Planning Performance which has members from [Heads of Planning Scotland](#) (HOPS), RTPI, [Society of Local Authority Chief Executives](#) Scotland (SOLACE), the [Key Agencies Group](#), and the [Society of Local Authority Lawyers & Administrators in Scotland](#) (SOLAR). It is considered that this group should continue to play a critical role when the ONPIC is established and that it will be the key reporting point.

However, the High-Level Group does not currently have representatives from all stakeholders in the planning service and RTPI Scotland is of the view that there is a need to broaden its 'ownership' to allow private sector and community interests to be heard.

### **Roles and Responsibilities**

The 2019 Planning Act legislates for each planning authority are to prepare a report on the performance of their functions annually. They are obliged to submit a copy of the report to the Scottish Ministers and publish it. Scottish Ministers may by regulations make provision about the form of the report including about what quantitative and qualitative information is to be included in the report, and what outcomes are to be used to assess the performance by planning authorities of their functions.

The Act sets out the key responsibilities of the office of ONPIC to:

- (a) monitor the performance by planning authorities of their functions, and
- (b) provide advice to planning authorities, and to such other persons as the co-ordinator considers appropriate, in relation to what steps might be taken by planning authorities or such other persons to improve the performance of their functions.

RTPI Scotland believes the role should be a supportive one, acting as a critical friend to all those involved in planning including those from the public, private and third sectors. The role should explicitly not be about 'naming and shaming' organisations or individuals where improvements could be made. Rather, we believe that there are opportunities and challenges arising around the operation of ONPIC to constructively support continuous improvement. This should focus around:

- Assessment
- Supporting improvement
- Sharing good practice

### **Assessment**

There are a few key questions we believe need to be made clear:

- What approach should be taken towards assessment?
- How is success measured?
- What is the audience for ONPIC's work?

### *Approach*

The ONPIC will have an important role in defining what constitutes 'good' or 'poor' performance and what level of 'poor' performance will justify intervention. We are of the view that the assessment process should not take a binary 'pass/ fail' approach but must be seen as an opportunity to improve performance and to identify how this can be done through agreeing improvement plans where necessary. This approach can build upon current practice where planning authorities publish a [Planning Performance Framework](#) (PPF) report annually. The PPF, introduced by planning authorities in 2012, was developed by HOPS, in conjunction with the Scottish Government. The

Framework captures key elements of a high-performing planning service and comprises a mix of qualitative and quantitative performance measures that provide a toolkit of indicators. It offers a balanced measurement of the overall quality of each planning service and is used to promote continuous improvement. This process is managed by HOPS and includes benchmarking and peer review processes to highlight best practice and improvement.

All thirty-four planning authorities and seven key agencies prepare a PPF report, receiving feedback on their reports from the Scottish Government. PPF reports assess performance against a set of fifteen Performance Markers agreed by the High-Level Group on Planning Performance.

The PPF document can be used as promotional tool or an audit document or both. It is encouraged that local authority leadership is consulted to get a steer on how they envisage the PPF to be used. Many authorities take their PPF report to committee. HOPS recommend the report is taken to committee after feedback has been provided by the Scottish Government.

The PPF defines and measures how a planning authority is achieving a high-quality planning service. The report begins with a qualitative story of that year's performance supported by case studies. The information and policy that sits behind this performance story is then included prior to the considering of what improvements are desired in the coming year. It then provides more measured information on the authorities' work programmes called National Headline Indicators (NHI). This is followed by the Scottish Government Annual Official Statistics for that Authority. It ends with a snapshot of the workforce and planning committee meeting information for that planning authority. The PPF report is split into seven parts:

- Part 1: Qualitative Narrative and Case Studies
- Part 2: Supporting Evidence
- Part 3: Service Improvements
- Part 4: National Headline Indicators (NHI)
- Part 5: Official Statistics
- Part 6: Workforce Information
- Part 7: Planning Committee Information

RTPI Scotland is of the view that the current PPF model is a useful foundation for a future agreed assessment criteria and framework, though we believe that this should move away from measuring outputs towards a more outcomes and impacts based approach. This is discussed in more detail below.

We do not believe that the ONPIC should have direct responsibility for receiving and assessing complaints about the performance of planning authorities. It is envisaged that as part of any assessment there will be opportunities for the users of that service to engage.

There are other avenues where people can raise points of concern such as the [Scottish Public Services Ombudsman](#) and the RTPI for complaints regarding members who are accused of breaching the Institute's [Code of Professional Conduct](#). There will be a need to maintain a clear separation between the RTPI's role in upholding professional standards, and the Coordinator's role in evaluating and supporting the performance of the system.

### *Measurement*

In terms of assessing the performance of planning authorities, RTPI Scotland believes that there is a need to shift away from an approach broadly based on the speed of decision making. Good planning goes well beyond processing planning applications and includes development planning and enforcement. It is also important to move towards measuring the quality of the outputs and outcomes from the planning system.



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It has been helpful, therefore that Scottish Government has been a co-funder of research commissioned by the RTPI to consider how local authorities can measure the outcomes of planning. [Measuring What Matters: Planning Outcomes Research](#) means going beyond simple metrics like speed of processing applications and number of housing units delivered and assessing planning in terms of placemaking aspirations and social, economic, and environmental value, to track and improve the impact of planning.

This reviewed the context and needs of planning jurisdictions across the UK and Ireland, identifying guiding principles, developing a toolkit, and then contextualising, testing, and refining that toolkit. It has resulted in the publication of a report and series of toolkits which can be adapted by local planning authorities across the UK and Ireland to improve their outcome measurement.

The [Scottish toolkit](#) was tested in Scotland and the ONPIC should look to work with planning authorities, Scottish Government, key agencies and others to explore how it can be implemented as part of the move towards outcome-focussed performance management and assessment.

#### *Audience*

It should also be borne in mind that ownership of the planning system does not just sit with local authority planning services, but planners working across the public, private and third sectors, and indeed all those organisations who interact with planning services. Given this, RTPI Scotland is of the view that the ONPIC should look to engage with key stakeholders including Scottish Government, its agencies and the Department of Planning and Environmental Appeals, as well as those regularly engaging with the planning system including agents, consultants, and developers. Authorities' planning performance can be influenced, constrained, or improved by the behaviours of applicants and agents. Lessons learned from such behaviours should be shared by the ONPIC. Any assessment should also share lessons for elected members.

There should also be a role for the ONPIC in assessing progress made by planning authorities in supporting ambitions to achieve government targets, those regarding net zero carbon.

#### **Supporting improvement**

The effectiveness of the ONPIC will in part rest on to what extent the role supports all planners to develop the skills, behaviours and knowledge needed to deliver great places across Scotland. RTPI Scotland believes that ONPIC should take a constructive and supportive approach to assessing planning authorities to create a culture of continuous improvement.

#### *Organisational Reviews*

RTPI Scotland is of the view that there is an important role for the ONPIC in not only assessing performance but working with planning authorities (and others) to identify the steps to be taken improve. We believe that this needs to be taken forward in a collaborative and supportive manner.

We cannot see any value in taking an 'inspector calling' approach where planning authorities feel that they are being audited. A more mature and sophisticated process that is based upon conversation and dialogue around self-assessment would be a more effective approach.

There should be a role of the ONPIC to constructively challenge the self-assessment and/ or progress being made on identified improvement priorities. This should result in identifying agreed areas for improvement and discussion about what can be done to support the planning authority to make the changes necessary. This should involve the production of an agreed improvement plan clearly setting out what is expected of whom by when. As part of this the ONPIC should work with the planning authority to identify ways in which improvements can be undertaken which could include, for example,

learning from other authorities, learning from examples of good practice, peer review, mentoring, behaviour change programmes or organisational development.

It is anticipated that the ONPIC will act as the signpost for much of this development and improvement work rather than being directly involved in its provision.

#### *Thematic Reviews*

We wonder if there is scope for the ONPIC to undertake thematic scoping and assessment on key challenges faced across several geographies. This could provide a proactive trouble shooting approach to important issues identified, for example, from the ONPIC's annual report or discussion with stakeholders.

#### **Good practice, Intelligence and Evidence**

The ONPIC will through its work gather a rich source of information and intelligence on good practice, lessons learned and emerging issues. It will also need to be familiar with the types of interventions that planning authorities will require to improve their performance. The ONPIC should make best use of what it gathers through its work and consider how best to use this to help support improvement.

#### *Identifying and sharing good practice*

The [Developing Skills, Behaviours and Knowledge to Deliver Outcomes](#) report written by RTPI Scotland for Scottish Government in 2017 highlighted the need to:

- Coordinate the gathering of information, intelligence, and good practice
- Share good practice, learning resources and platforms
- Signpost to events & training
- Matchmake and support collaboration between organisations
- Develop and deliver a multi-sector, multi-disciplinary transformational development programme aimed at changing behaviours.

We believe that there can be role for the ONPIC in this working with the Partners in Planning group and through exploring the future of the [Partners in Planning website](#) which aims to be a portal for good practice in planning across Scotland.

There are examples of inspection and performance development organisation establishing web portals for their resources and those from elsewhere that would be considered useful such as [Education Scotland national improvement hub](#).

#### *Research, data, and evidence*

The data, evidence and intelligence collected by the ONPIC should be analysed, organised, and shared in a way that supports stakeholders in the planning service to be aware of issues, good practice, and evidence.

There is data collected across Scottish Government, HOPS, RTPI and other organisations that is useful in establishing trends and providing a picture of the current situation in relation to, for example, number of planning applications, progress on development plans, resourcing and speed of decision making. The Annual PPFs provide a very rich source of information and data. RTPI Scotland would like to see the ONPIC take a central role in the analysis of these in providing a coordinating role for data gathering, analysis and sharing key statistics and trend. We believe that as part of this there are significant opportunities in linking the ONPIC's work into the [Scottish Government's digital planning transformation strategy and transformation programme](#).

RTPI Scotland also thinks that the ONPIC could be the natural home for commissioning research to support performance improvement and to explore how to tackle emerging issues which have been identified through its assessment work.

The ONPIC should publish an annual report setting out what it has done through the year, the themes and challenges that have emerged and the lessons that it has learned.



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## Resources

The financial memorandum accompanying the draft Planning Bill estimated the costs of introducing a National Planning Improvement Coordinator. It suggested that one person be appointed at a similar grade to a C2 Reporter with an annual cost of approximately £84,625.

It also includes provision for appointing a person to carry out an assessment of planning authorities' performance. It was proposed that they who would be paid a day rate, based on the Scottish Government's Public Sector Pay Policy for Senior Appointments: Technical Guide, using the mid-range for a chair and member of a Band 3 body. Scottish Government estimated that two people may be required, at rates of around £179 for the lead assessor and £134 for the other. They said that the length of time will be dependent on the issue to be investigated but is likely to be a minimum of two days and a maximum of two weeks to investigate and report the recommendations and that this would give a total cost for each assessment of between £626 and £3,130. How often assessments might be required will depend on planning authorities' performance, but costs have been estimated based on one every two years, at a median cost of £2,000. This gives a total cost of £10,000 over 10 years.

RTPI Scotland remains unconvinced about the level of resources that were originally proposed. For comparison, in 2019 the [Office of the Planning Regulator](#) in Ireland had a [budget of €2,367,000](#) (approximately £2,027,00). While this organisation has a wider remit than that of the National Planning Improvement Coordinator, it highlights the scale of resource required to support a commitment to improvement.

To fulfil the potential to become a useful resource for planners working in all sectors across Scotland, identifying where and how planning services can be improved, and working alongside planners to development knowledge and skills, the ONPIC will need to be properly resourced. RTPI Scotland suggests that to ensure that the ONPIC has the resources they need to be effective, a 'performance offset' could be attached to planning fee income. The latest available figures of combined income from planning fees for applications and deemed applications across Scotland was £25,564,000 in 2014-15. If this was taken as a baseline a 1% offset would generate around £250,000 per annum. This does not factor in any fee increases since then or the move towards meeting full costs recovery. The ONPIC could use this resource to work with a range of organisations, including those who comprise Partners in Planning, to support skills development, knowledge exchange and behaviour change programmes.

The offset could be a useful way of showing those involved in the system that their fees are being used to help support improvement.

**The Royal Town Planning Institute** is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit, have 2,100 members in Scotland and a worldwide membership of 26,000.

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