



Note – Cover Photos and document date to be updated prior to publication



DEVELOPMENT MANAGEMENT SERVICE PLAN 2024 - 2026



Draft August 2024

Overview of the Council's Development Management Service

The Scottish Government's stated aim is for "a planning service that is efficient, inclusive, fit for purpose and sustainable. The planning system plays a key role in delivering high-quality places for Scotland. It balances competing demands to make sure that land is used and developed in the public's long-term interest".

The Development Management Service undertakes the regulatory functions of the Council's statutory role as "the planning authority" for Argyll and Bute* and includes:

- Processing and determination of planning and related applications under delegated powers, or by referral of more complex/contentious items to the Planning, Protective Services & Licencing (PPSL) Committee; (subject to the Council's Development Management Charter)
- Enforcement of planning regulations and condition monitoring; (subject to the Council's Planning Enforcement & Monitoring Charter)
- The provision of pre-application advice to prospective applicants;
- Representation of the Council in matters that are subject to appeal, or require to be notified to Scottish Ministers for their determination via the Directorate for Planning & Environmental Appeals (DPEA)
- The provision of information to assist the Argyll and Bute Local Review Board in their determination of applications which are subject to Local Review;
- Representation of the Council as professional witnesses at Public Local Inquiry on planning and related matters.
- Assessment and determination of applications for a High Hedge Notice.

Annually, the Development Management Service receives between 1700 and 1900 statutory planning and related applications, and approximately 500 pre-applications enquiries, 250 planning enforcement complaints and 60 consultations where input of the Council as "planning authority" is necessary.

Due to the challenges presented by the extensive geographic boundaries of Argyll and Bute, the Development Management Service continues to be delivered by three Area based teams respectively covering Bute Cowal, Helensburgh and Lomond (BCHL); Mid Argyll, Kintyre and the Islands (MAKI); and Oban, Lorn and the Isles (OLI). The Major Applications Team operates across the full extent of Argyll and Bute's planning area and provides enhanced specialist resource for more complex applications, including windfarms, aquaculture, and minerals, in addition to larger scale developments. The Service is supported by the Central Validation Team (CVT) who are responsible for the registration and validation of new submissions, and also by an Administrative Support Team which is a shared resource with the Council's Building Standards Service.

The Development Management Service is a fee earning service. Income is primarily derived from nationally set fees for planning and related applications, the Council also charges non-statutory

discretionary fees for the provision of pre-application advice and a range of post-determination services. The Scottish Government have set out an aspiration that local authority Development Management functions should operate on a full cost recovery basis; whilst it is recognised that the current statutory fee structure does not yet fully support this aim the Scottish Government have stated a commitment to further reform of planning fees to that end. Due to a higher than normal number of major applications received during both 2022/23 and 2023/24 the Council's Development Management Service has been able to recover its operational costs, including additional expenditure on staff, from surplus fee income.

Key Stakeholders

- Applicants, Agents/Architects Developers – including Aquaculture Industry, Renewables Industry, Telecommunications Industry – The 'Development Community';
- The general public / land owners / residents of Argyll and Bute – third parties affected by / benefitting from new development;
- ABC Roads, Environmental Health, Conservation & Design Officer, Biodiversity Officer, Access Officer, and Airports – Internal Consultees to the planning process;
- Nature Scot, SEPA, Health & Safety Executive, Transport Scotland, Historic Environment Scotland, Scottish Water, Highlands & Islands Airports Ltd., MoD, and Community Councils – Statutory Consultees to the planning process;
- ABC Building Standards, Development Policy, Economic Development, Development Projects, Environmental Health, Licencing, Governance, Estates, and Housing – inter-related/complementary Council activities;
- Forestry Land Scotland, Scottish and Southern Energy Networks, Highlands & Islands Enterprise – external agencies with National development interests;
- Scottish Government – policy making / legislative role / performance reporting.

Development Management Service Objectives

The work of the Development Management Service supports the Council's corporate objectives in responding to the respective Climate and Housing Emergencies, in the promotion of economic growth and addressing population decline, seeking to improve the quality of places, and protecting the natural and built environment.

1. To process planning and related applications in a timely and efficient manner;
2. To execute decision making with a high degree of competency and consistency;
3. To offer a responsive service to applicants and the public making effective use of IT to enhance customer experience and communication;
4. To investigate and act upon complaints about unauthorised development in a timely, consistent, and efficient manner;
5. To support place-making by ensuring that new development is of a suitably high quality design, served by appropriate infrastructure, and sufficiently compatible with neighbouring land uses;
6. To support business development and sustainable growth in local employment opportunities;
7. To conserve and where possible enhance the distinctive character and special qualities of the historic built environment;
8. To support the Council's response to the 'Climate Emergency' by seeking to preserve and enhance the character and diversity of the natural environment, and ensuring that new development is sustainable;
9. To support the Council's aim to reverse population decline and its response to the 'Housing Emergency' by supporting the delivery of affordable housing in the locations where this is most urgently required;
10. To promote and maintain effective working relationships with key stakeholders in the planning process;
11. To ensure that the Development Management Service has a valued and supported workforce;
12. To promote and where possible seek to advance professional standards internally and externally in planning, and improvement of the planning system;

Achievements 2023/2024

1751 Statutory Planning & Related Applications Received

1684 Statutory Planning & Related Application Casework Items Validated

1853 Statutory Planning & Related Application Casework Items Closed

110% Turnover of Statutory Planning & Related Casework Items with a consequent reduction in casework backlog by 45% (from 375 items to 206 items)

197 Enforcement Complaints Investigated

18 Enforcement Notices Issued

189 Enforcement Complaints Closed

96% Turnover of Enforcement Complaints

499 Pre-application Enquiries Validated

513 Pre-application Enquiries Closed

103% Turnover of Pre-Application Enquiries

Recruitment of 2 Area Team Leaders to facilitate succession planning

1 additional FTE Planning Enforcement Officer post funded and recruited to release additional planning officer capacity within Bute, Cowal, Helensburgh and Lomond

2 additional FTE Senior Planning Officer posts funded and recruited to meet increased demand for complex case work and cover for ATL duties

0.5 additional FTE CVT Technician post funded and recruited to facilitate succession planning and additional capacity within CVT

1 additional FTE temporary Admin resource to assist in communications and delivery of improvement actions

1 additional FTE Graduate Development Policy Officer funded by DM Service

40h/pw temporary additional Planning Officer resource funded and recruited until Nov. 2024

One off saving of £340k delivered as a contribution to the wider budget challenge facing the Council

Key Challenges and the Improvement Action Plan

The Council has experienced significant challenges in the delivery of its Development Management Service in recent years. The exceptional disruption to workflow which arose as a direct impact of the Covid pandemic along with the concurrent significant difficulties in recruiting to vacant posts which has arisen as a result of a shortage of qualified planning professionals had a significant impact on the ability of the Council's Development Management Service to meet demand for the determination of planning and related applications over this period.

Recovery from the legacy impacts of Covid has also been impacted by the implementation of the Scottish Government's programme of planning reform and the implementation of the Planning (Scotland) Act 2019 which has not only created additional duties for the Council as planning authority but has also given rise to a significant increase in the complexity of the planning process and the policy environment within which it operates. The Scottish Government's adoption of National Planning Framework 4 in February 2023 in itself gave rise to a similar level of disruption to the workflow of the Development Management Service as was experienced across the whole of the Covid pandemic and continues to be an additional drain on resources, along with the imposition of additional 'prior notification' categories of development.

The significant disruption to workflow experienced along with the requirement to operate for extended periods with key vacancies across the Development Management Service has given rise to a significant backlog of casework that has adversely impacted upon the timeliness of issuing planning decisions with a consequent decline not only in customer satisfaction but also the wellbeing of officers.

The long-term degradation of performance has resulted in an [Improvement Action Plan](#) being prepared and approved by the Council's Executive Leadership Team in May 2023. The Action Plan set out 4 key areas to be addressed:

1. Review staff structure and identify specific gaps and specific workload pressures
2. Review Internal Processes Including Enforcement
3. Officer Attraction, Retention, Morale, and Wellbeing
4. Communication and Engagement with Residents, Partners and Colleagues

The four key areas for action are in turn geared toward the delivery of the following objectives:

- Delivering improved performance in the determination of planning applications;
- Reduction in the backlog of planning application casework;
- To ensure continued quality of decision making;
- To undertake a review of Enforcement practices, resources and caseloads;
- To examine the structure of the DM Service to ensure that all aspects are properly resourced;
- Identify procedural and technological efficiencies to aid decision making and increase productivity;
- Review and re-focus the Pre-Application Advice Service to better meet customer requirements and seek to maximise potential for non-statutory income recovery;
- Develop and implement a Communication Strategy to improve engagement with Customers and better inform interested parties about the planning process;

- To retain experienced staff and to attract new staff to Argyll and Bute within workforce planning;
- Embed a culture of continuous support, learning and improvement for staff;
- Promotion of health and wellbeing across the DM Service;
- Inform budget setting to facilitate a financially sustainable Service.

The Action Plan identified thirty-eight specific improvement actions. Thirteen actions have subsequently been completed, and work has commenced and is on-going in relation to a further eighteen actions. The Improvement Action Plan has been attached to the DM Service Plan as [Appendix 2](#) but will remain a 'live' document that will continue to be updated as progress is made.

The actions delivered to date have primarily focussed on addressing critical resourcing issues within the Development Management Service. This has not only facilitated successful recruitment to all vacant posts but has also supported an additional 4.5 FTE permanent posts and temporary agency resource of 40 h/pw within Development Management, and has also supported the creation of 1 additional FTE within the Development Policy Team.

The action taken to date in addressing the fundamental capacity issues within the Development Management Service has had a significant impact in the improvement of performance. This is most notable in the increased output of planning application determinations since FQ1 2023/24 and the significant progress that has been made in reducing the cumulative backlog of casework by 45% in the subsequent period. This period has also seen an improvement in the throughput of newer casework with an increasing volume and reducing timescale for the progression of new applications. The improvement to timeliness in the handling of new casework in increasing volume and shorter timescales is however masked by the determination of higher numbers of 'legacy' applications which are also being determined and which have a disproportionate impact on overall average time performance measures. Based on review of part year data for 2023/24 it is expected that there is likely to be increased variance between ABC and the National Average for the annual 2023/24 reporting period; this position will however reduce as the volume of 'legacy' items being determined decreases. It is proposed that monthly/quarterly reporting formats to ELT/PPSL will continue to include additional detail that demonstrates that the effect of 'legacy' items upon overall timescale measures and inform commentary on performance against 'overall' timescale targets.

Significant effort has also been made to manage customer dissatisfaction through better communication and setting of expectations. A monthly update on the [Service Status](#), including average timescales is published on the Council website, additional resource has been employed to assist officers with the management of enquiries, and new work processes have been introduced to encourage formal extension of statutory time limits where a decision cannot be delivered within the initial prescribed statutory time periods.

Whilst the actions taken over the past 18 months have placed the Development Management Service on a much sounder footing it is recognised that there is still considerable improvement required if the Development Management Service is to be able to efficiently and effectively support the aspirations of developers and the Council's own corporate objectives.

It is recognised in particular that timeliness of decision making remains a considerable concern to the development community despite benchmarking confirming that, with the notable exception of 'householder' development, the Council largely remains within its pre-Covid position of being within 10% of the National Average in relation to average timescales based on benchmarking for 2022/23

data. This would indicate that a number of other local authorities are also facing similar issues relating to workflow and recruitment to those faced by Argyll and Bute. It is proposed the performance targets continue to be aligned toward being within 10% of the National Average; it is however noted that other authorities are making increasing use of 'processing agreements' to manage the impact of out of time applications on timeliness reporting to the Scottish Government. In order to maintain parity it is proposed that Argyll and Bute record agreed time extensions to applications in the same manner for performance reporting and benchmarking parity allowing better comparison from 2024/25 forwards.

It has been identified that there is significant potential to improve the efficiency of existing workflow processes and make more effective use of the capabilities of backoffice systems particularly in relation to pre-application enquiries, preparation of reports, planning enforcement, and the discharge of planning conditions. It is essential that these workstreams are progressed to ensure that any time-saving that can be released not only improves on performance in the timeliness of determination but also maintains the professional capacity required by the Service to deal with the increasing demands and complexity of the planning system and the post-NPF4 policy environment. The Improvement Action Plan identifies a range of process and system improvements that require to be delivered to this end.

The significant work pressure that staff have endured over an extended period of time, coupled with the impact of planning reform is recognised to have impacted significantly on staff wellbeing with increased levels of absence evident over the recent period. Whilst underlying issues with staff capacity have largely been resolved, there is still considerable work to be done to ensure that staff have the appropriate knowledge, skillset, support, and confidence to operate effectively within this rapidly changing environment. It is also recognised that the Council has a role in addressing the national shortage of planning professionals. The Improvement Action Plan includes a range of actions which are intended to improve staff development, wellbeing, the promotion of planning as a career, and future recruitment.

It is also recognised that despite the recent improvements within the Development Management Service, there still remains a considerable degree of customer dis-satisfaction. In this respect it is critical that in the short-medium term that the backlog of casework is resolved and ensures that the continuing impact on both customers and overall performance is removed. Further work is also required to improve communications with regular customers to ensure that they understand the challenges facing the Development Management Service, to provide confidence that these are being addressed, and to provide support for architects and agents who may also be experiencing difficulty with the additional policy implications of NPF4 and LDP2. The Improvement Action Plan includes a range of activities which are intended to improve engagement with key stakeholders.

Despite statutory planning fees having been increased from April 2022 it is recognised that the current fee structure is insufficient to support full cost-recovery of the statutory activity of the Development Management Service. Officers will continue to advocate for further reform of statutory fees and investigate opportunities to supplement planning fee income through the introduction of discretionary charges.

Monitoring and Reporting on Performance

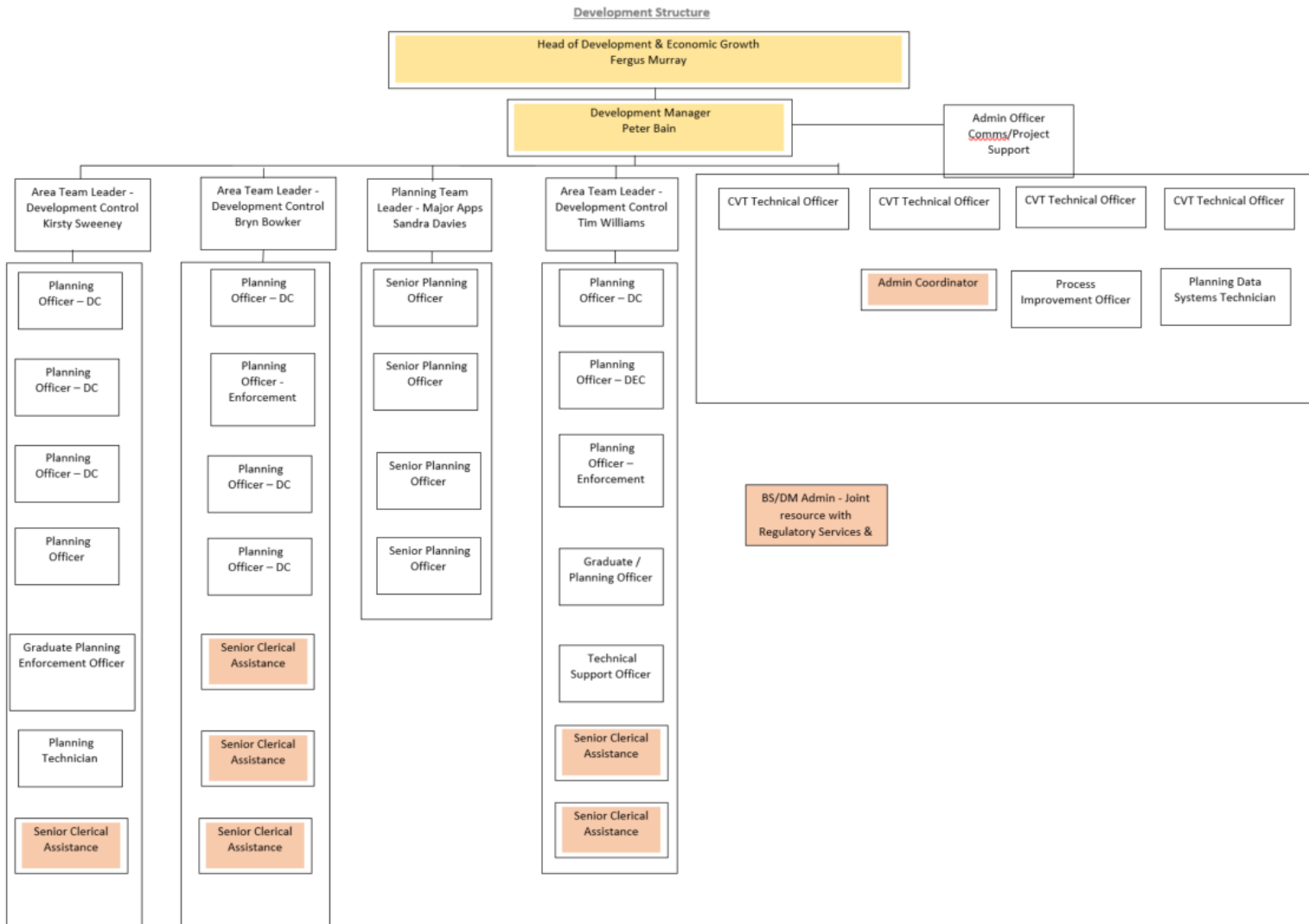
The performance of the Development Management Service is subject to a significant level of internal and external scrutiny through regular performance reporting. The Key Performance Indicators utilised to monitor the performance of the Development Management Service in delivering against its Service Objectives are collated within [Appendix 1](#). A streamlined set of Service Standards are published within the Development Management Charter which is intended as a quick reference guide to establish and manage customer expectations for the processing of planning and related applications. The Planning Enforcement and Monitoring Charter sets out an overview of the Council's approach to planning enforcement and service standards.

The overall performance of the Council as Planning Authority and requirement for improvement has until recently been subject to annual reporting to Scottish Ministers through a [Planning Performance Framework](#) (PPF) report. From 2024/25 the PPF will be replaced by the [National Planning Improvement Framework](#) (NPIF) – Argyll and Bute Council's first NPIF report will be submitted during FQ3 2024/25.

The Council is also required to submit bi-annual returns to the Scottish Government (SG) for inclusion in their bi-annual publication of [Planning Statistics](#). This data allows for benchmarking of performance against other local authorities. The National Average is the benchmark which is predominantly utilised in the review and setting of performance targets in relation to timeliness of determining planning applications. The latest wholeyear statistics available from the Scottish Government are for the period 2022/23.

The performance of the Development Management Service is also subject to Quarterly reporting to the [Planning, Protective Services and Licencing](#) (PPSL) Committee, and the Council's Executive Leadership Team (ELT). Performance data at a more local level is also submitted Quarterly for inclusion in the 'Area Scorecards' for the Council's four Area Committees. A monthly update report on performance and operational issues is provided for review by the Exec Director/ Head of Service and the Policy Lead for Planning & Regulatory Services. Internal performance reports providing data on the performance of teams and individuals is produced on a monthly basis to inform operational decisions on resourcing, caseload allocation and 1:1 performance discussions between Team Leaders and Planning Officers.

Service Structure – August 2024



Note: Improved formatting of Service Structure to be prepared for document prior to publication

Appendix 1:

Key Performance Indicators for Development Management 2024 - 2026

Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
1. To process planning and related applications in a timely and efficient manner;	Timeliness of decision making / processing	Average time taken to determine 'major' planning applications ²	NPIF Report	Annual	<43 weeks ³	National Average ⁴ (2022/23 – 39.5 weeks)	<u>2022/23</u> ABC 43.1 weeks
			SG Publication	Bi-annual			<u>2023/24 FQ2</u> Nat. Avg. 52.9 weeks ABC 18.8 weeks
		Average time taken to determine 'local non-householder' planning applications ²	NPIF Report	Annual	<16 weeks ³	National Average ⁴ (2022/23 – 14.4 weeks)	<u>2022/23</u> ABC 16.3 weeks
			SG Publication	Bi-annual			
			PPSL / ELT	Quarterly ¹			
			PRS Policy Lead	Monthly ¹			<u>2023/24 FQ2</u> Nat. Avg. 14.1 weeks ABC 23.3 weeks
		Average time taken to determine 'householder' planning applications ²	NPIF Report	Annual	<10 weeks ³	National Average ⁴ (2022/23 – 8.9 weeks)	<u>2022/23</u> ABC 12.7 weeks
			SG Publication	Bi-annual			
			PPSL / ELT	Quarterly ¹			
			PRS Policy Lead	Monthly ¹			<u>2023/24 FQ2</u> Nat. Avg. 8.2 weeks ABC 16.5 weeks
		Average time to undertake	PRS Policy Lead	Monthly	<5 working days	n/a	

		validation check from receipt					
		% of 'local non-householder' applications determined within statutory time Period (2 months) ²	NPIF	Annual	>45% ³	National Average ⁴ (2022/23 – 48.0%)	2022/23 ABC 38.5%
			SG Publication	Bi-annual			2023/24 FQ2 Nat. Avg. 50.8% ABC 20.0%
		% of 'householder' applications determined within Statutory Time Period (2 months) ²	NPIF	Annually	>65% ³	National Average ⁴ (2022/23 – 71.5%)	2022/23 ABC 37.3%
			SG Publication	Bi-annually			2023/24 FQ2 Nat. Avg. 76.5% ABC 28.9%
	Efficiency of decision making	Turnover of Statutory Applications (applications valid / applications determined)	PPSL / ELT	Quarterly	>100% ⁵	n/a	
			PRS Policy Lead	Monthly			
		% of applications determined under delegated powers	NPIF	Annual	>95% ³	National Average ⁴ (2022/23 – 96.4%)	2022/23 ABC 98.2%
			SG Publication	Bi-annually			2023/24 FQ2 Nat. Avg. 93% ABC 97.1%
		Delivery of a balanced budget for the DM Service	NPIF	Annual	£0 Negative Variance	n/a	
			PRS Policy Lead	Monthly			
	Explanatory Notes: 1 Data set will be based on 'raw' data not including adjustment for 'clock stopping'.						

	<p>2. Excluding applications subject to a processing agreement / agreed extension of time. 3. Target set at being within 10% of the National Average 4. National Average based on latest available data from Scottish Government Statistical Publications (2022/23) 5. Target of >100% set with the aim of managing an existing backlog of casework.</p> <p>Additional measures for reporting performance on processing of Prior Notifications, Discharge of Conditions, Non-Material Amendments to be developed during 2024/25 alongside enhanced workflow for these processes.</p>						
Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
2. To execute decision making with and achieve a high degree of competency and consistency;	Consistency in Decision Making	% of all decisions which are a departure to the Development Plan	PPSL / ELT	Quarterly	<5%	n/a	
		% of original decisions upheld following LRB	NPIF	Annually	>50%	n/a	
		% of original decisions upheld following appeals	NPIF	Annually	>50%	National Average (2022/23 – 46.2%)	2022/23 ABC 0% (2 apps)
	SG Publication		Bi-annually	2023/24 FQ2 Nat. Avg. 46.4% ABC 0% (1 app)			
	Competency in Decision Making	No. of decisions subject to Judicial Review	PRS Policy Lead	As necessary	Avoid	n/a	
		No. of decisions subject to adverse SPSO recommendation in relation to competency of process	PRS Policy Lead	As necessary	Avoid	n/a	

Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
3. To offer a responsive service to applicants and the public making effective use of IT to enhance customer experience and communication;	Customer Satisfaction	No. of complaints upheld as a % of total no. of complaints	NPIF	Annually	<25%	n/a	
			PPSL / ELT	Quarterly			
		No. of complaints upheld by SPSO	NPIF	Annually	Avoid	n/a	
			PPSL / ELT	Quarterly			
		Feedback from Customer Satisfaction Survey	NPIF	Annually	n/a	n/a	
	Managing Customer Expectations	% of 'major' applications determined within the timescale established by processing agreement	NPIF	Annually	>60%	National Average ⁶ (2022/23 – 58.7%)	<u>2022/23</u> ABC No data
			SG Publication	Bi-annually			
		% of 'local non-householder' applications determined within the timescale established by processing agreement	NPIF	Annually	>70%	National Average ⁶ (2022/23 – 66.9%)	<u>2022/23</u> ABC No data
			SG Publication	Bi-annually			

	% of 'householder' applications determined within the timescale established by processing agreement	NPIF	Annually	>80%	National Average ⁶ (2022/23 – 78.0%)	<u>2022/23</u> ABC No data	
		SG Publication	Bi-annually			<u>2023/24 FQ2</u> Nat. Avg. 72.7% ABC No data	
	% of Listed Building / Conservation Area Consent applications determined within the timescale established by processing agreement	NPIF	Annually	>80%	National Average ⁶ (2022/23 – 77.6%)	<u>2022/23</u> ABC No data	
		SG Publication	Bi-annually			<u>2023/24 FQ2</u> Nat. Avg. No data ABC No data	
	Efficient Use of IT	% of applications submitted via ePlanning Portal	NPIF	Annually	95%	n/a	
		Publication of updated DM Service Status	ABC website	Monthly	Min. of 12 updates annually	n/a	
<p>Explanatory Notes: ⁶ National Average based on latest available data from Scottish Government Statistical Publications (2022/23)</p>							

Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
4. To investigate and act upon complaints about unauthorised development in a timely, consistent, and efficient manner; ⁹	Consistency of Enforcement Activity	Up to date Enforcement Charter in place	NPIF	Annually	<2 years old	n/a	
		% of original Enforcement Notices upheld on appeal	PPSL / ELT	Quarterly	>50%	n/a	
	Efficiency of Enforcement Activity	Turnover of Enforcement Casework ⁷	PPSL / ELT	Quarterly	100%	n/a	
	Timeliness of Enforcement Activity	% of Complainants issued with initial update within 5 weeks ⁸	PPSL / ELT	Quarterly	>75%	n/a	
	Explanatory Notes: ⁷ Data set total no. of complaints received / no. of cases closed. Detail of no. of cases taken up (i.e. breach of control suspected) will be provided for comparison. ⁸ Measured from date of receipt of original complaint ⁹ Enforcement Performance measures to be implemented and expanded from FQ1 2025/26 following implementation of revised workflow systems for Planning Enforcement						
Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
5. To support place-making by ensuring that new development is of a suitably high quality design, served by appropriate	Identifying the delivery of high quality development within ABC	Argyll and Bute Design Awards (DP Service)	NPIF	Annually	n/a	n/a	
		Promotion of development within ABC recognised	NPIF	Annually	n/a	n/a	

infrastructure, and sufficiently compatible with neighbouring land uses;		through external awards					
		Promotion of high quality design outcomes (DP Service)	ABC Website	As necessary	n/a	n/a	
Explanatory Notes: ABC Design Awards held on a bi-annual basis by Development Policy Team with involvement of PPSL							
Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
6. To support business development and growth in local employment opportunities;	Support for Business and Employment	No. of business and industry planning applications submitted annually	ABC Corporate Outcome Indicators	Annually	n/a	n/a	
		Approval Rate as % of all decisions	NPIF	Annual	>95% ¹²	National Average ¹¹ (2022/23 – 93.5%)	<u>2022/23</u> ABC 99.5%
			SG Publication	Bi-annually			<u>2023/24 FQ2</u> Nat. Avg. 97.5% ABC 99.0%
		Average time taken to determine 'major' Business & Industry planning applications	NPIF	Annually	<20 weeks ¹²	National Average ¹¹ (2022/23 – 24.2 weeks)	<u>2022/23</u> ABC No data
			SG Publication	Bi-annually			<u>2023/24 FQ2</u> Nat. Avg. 31.9 weeks ABC No data
Average time taken to determine	NPIF	Annually	<14 weeks ¹²	National Average ¹¹	<u>2022/23</u> ABC 19.5 weeks		

	'local' Business & Industry planning applications	SG Publication	Bi-annually		(2022/23 – 12.4 weeks)	<u>2023/24 FQ2</u> Nat. Avg. 12.0 weeks ABC18.0 weeks
	% of 'local' pre-application enquiries with initial response issued within 30 working days ¹⁰	PPSL / ELT	Quarterly	>75%	n/a	
	% of 'major' pre-application enquiries with initial response issued within 40 working days ¹⁰	PPSL / ELT	Quarterly	>75%	n/a	
	Turnover of pre-application enquiries	PPSL / ELT	Quarterly	100%	n/a	
<p>Explanatory Notes: 10 Review and update of pre-app process and workflow required to allow reliable data collection – implementation from FQ1 2025/26 11 National Average based on latest available data from Scottish Government Statistical Publications (2022/23) 12 Target set at being within 10% of the National Average</p>						

Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
7. To conserve and where possible enhance the distinctive character and special qualities of the historic built environment;	Timely processing of applications for Listed Building and Conservation Area Consents.	Average time taken to determine Listed Building and Conservation Area planning applications ¹³	NPIF	Annually	<12 weeks	National Average ¹⁴ (2022/23 – 10.9 weeks)	2022/23 ABC 16.2 weeks
			SG Publication	Bi-annually			2023/24 FQ2 Nat. Avg. No data ABC No data
Explanatory Notes: 13 Excluding applications subject to a processing agreement / agreed extension of time. 14 National Average based on latest available data from Scottish Government Statistical Publications (2022/23)							
Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
8. To support the Council's response to the 'Climate Emergency' by seeking to preserve and enhance the character and diversity of the natural environment, and ensuring that new development is sustainable;		None identified at this time					
	Explanatory Notes: The Development Management Service does not currently record or have access to a relevant data set measuring the value of Biodiversity Net Gain. It is noted that the Scottish Government has commissioned research into various methodologies for measuring bio-diversity at site level and they have set out the aspiration for producing a common framework through an agreed Scottish approach to measuring biodiversity which would allow for consistent and comparable assessment of losses or gains in biodiversity across sites and allow comparison and trading across sectors. It is proposed that performance indicators of DM in this respect be reconsidered at such time as a national biodiversity metric or measurement tool has been identified by the Scottish Government. Research into Approaches to Measuring Biodiversity in Scotland (www.gov.scot)						

Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes	
9. To support the Council's aim to reverse population decline and its response to the 'Housing Emergency' by supporting the delivery of affordable housing in the locations where this is most urgently required;	Support for delivery of new housing	Average time taken to determine 'major' Housing planning applications ¹⁵	NPIF	Annually	<43 weeks ¹⁶	National Average ¹⁷ (2022/23 – 39.3 weeks)	<u>2022/23</u> ABC 46.6 weeks	
			SG Publication	Bi-annually			<u>2023/24 FQ2</u> Nat. Avg. 99.8 weeks ABC No data	
		Average time taken to determine 'local' Housing planning applications ¹⁵	NPIF	Annually	<19 weeks ¹⁶	National Average ¹⁷ (2022/23 – 17.2 weeks)	<u>2022/23</u> ABC 16.6 weeks	
			SG Publication	Bi-annually			<u>2023/24 FQ2</u> Nat. Avg. 17.0 weeks ABC 29.2 weeks	
	Explanatory Notes:							
	15 Excluding applications subject to a processing agreement / agreed extension of time.							
16 Target set at being within 10% of the National Average								
17 National Average based on latest available data from Scottish Government Statistical Publications (2022/23)								
Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes	
10. To promote and maintain effective engagement with key stakeholders to the planning process;	Customer Engagement	Annual Customer User Forum	NPIF	Annually	Min. of 1 event per annum	n/a		
		Publication of Customer Newsletter	NPIF	Quarterly	Min. of 4 per annum	n/a		
	Consultee Engagement	Ensure that regular liaison arrangements are in place with all	NPIF	Annually	Min. of 1 event per annum per stakeholder	n/a		

		key DM consultees					
	Effectiveness of Consultee Arrangements	Average response time for External Consultees	NPIF	Annually	<21 days	n/a	
		Average response time for Internal Consultees	NPIF	Annually	<21 days	n/a	
	Elected Member Engagement	Number of Member Enquiries Received / Responded	NPIF	Annually	n/a	n/a	
		Delivery of Elected Member Training	NPIF	Annually	Min. of 9 events per annum	n/a	
Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
11. To ensure that the Development Management Service has a valued and supported workforce;	Support DM Staff Health and Wellbeing	Monitor Absence Rates	HR report to Development Manager	Monthly	n/a	ABC	
		Number of casework items per ft Planning Officer ¹⁸	DM Management Team	Monthly	<50	n/a	
		Up to date Health & Safety Policies	DM Management Team	Quarterly	<2 years	n/a	

	Promote staff retention and successful recruitment	Staff Retention (average time in post)	NPIF	Annually	n/a	n/a	
		Up to date Succession and Recruitment Plan	Corporate – HR	Bi-annually	<6 months	n/a	
		Staff Survey	DM Management Team	Annually	n/a	n/a	
		Leaver Survey – lessons learnt	DM Management Team	As necessary	n/a	n/a	
Explanatory Notes: 18 Upper threshold intended as a general guide – this will be for ATLs to set on an individual basis having due regard to level of experience, complexity of casework and any other demands upon officer time.							
Objective	Outcome	Description of Measure	Reporting Mechanism(s)	Reporting Frequency	Target	Benchmarking	Notes
12. To promote and where possible seek to advance professional standards in planning, and improvement of the planning system;	Promote professional development and individual performance	% of Professional DM staff (LGE 11 +) with RTP1 accreditation	NPIF	Annually	100%	n/a	
		% of DM Staff to have completed Career Conversation within preceding 12 months	NPIF	Annually	100%	n/a	
		Up to date Training Plan for DM	NPIF	Annually	<1 year	n/a	

	Review of individual / team performance	DM Management Team	Quarterly	n/a	n/a	
		ATL/Officer 1:1	Monthly			
	Annual Planning Conference (with DP)	NPIF	Annually	Min. of 1 event annually	n/a	
	Participation at HoPS Conference and Sub-Groups	NPIF	Annually	n/a	n/a	
	Respond to SG consultations relevant to Development Management	NPIF	Annually	n/a	n/a	
		PPSL	As required			
	Review and sharing of best practice	NPIF	Annually	n/a	n/a	
	Provide update to Elected Members on Appeal Decisions	PPSL	As required	n/a	n/a	

Appendix 2:

Improvement Action Plan for Development Management 2023 – 2026 (updated August 2024)

Improvement Area 1 - Review staff structure and Identify key gaps and specific workload pressures

ACTION	TIMESCALE TO COMMENCE	LEAD OFFICER	DELIVERY	STATUS/RESOURCES	Notes/Comments
1:01 Review validation team numbers to help reduce validation times	Commenced FQ4 2022/23	HOS	Development Manager	COMPLETED FQ4 2022/23	Temporary increase of CVT staffing levels effected from March 2022. CVT performance recovered from +28 days to being within 5 day target during Autumn 2022 and has subsequently continued to operate within performance target.
1:02 Review Enforcement Planners numbers to enable Planners to focus on Planning Applications and	Commenced FQ4 2022/23	HOS	Development Manager	COMPLETED FQ1 2023/24	Additional Enforcement Officer post covering Helensburgh and Lomond/Bute and Cowal created. Post filled from May 2023.

deal with Enforcement backlog					
1:03 Review Major Applications Team Planner Numbers	Commenced Summer 2022	HOS	Development Manager	COMPLETED FQ1 2024/25	Funding for two additional Senior Planners identified however recruitment has proven problematic (posts advertised several times no successful applicants; see action) Additional resource has been provided through use of agency staff as a temporary measure. Two additional SPO post filled from June 2024
1:04 Review Senior Planner and Team Leader Grades	Commenced June 2023	HOS	Development Manager	COMPLETED FQ4 2023/24	Job Evaluation process completed Sept 2023. Senior Planners (4 posts); Team Leaders (4 posts) additional funding required to maintain differentials. Funding agreed by S95 Officer Completed – Revised JDPS approved 06.02.24
1:05 Review Admin support for Development	Commenced June 2023	HOS	Development Manager	COMPLETED FQ2 2023/24	One additional administration post LGE 8 recruited with post taken up in August 2023

Manager with a focus on communication management					
1:06 Review Planning Policy Team capacity	Commenced Summer 2023	HOS	Planning Policy Manager	COMPLETED FQ2 2023/24	One additional post created within Development Policy team
1:07 Succession planning for validation service	Commenced June 2023	HOS	Development Manager	COMPLETED FQ2 2023/24	One additional post to provide validation capacity to maintain recovery of performance succession planning.
1:08 Addressing Backlog of Planning Application Casework	Commenced April 2023	HOS	Development Manager	IN PROGRESS	<p>Focus of DM Service delivery has moved from continuation of service with prioritisation afforded to key applications to a focus on increasing productivity and addressing an accrued backlog of 375 applications.</p> <p>Updated performance stats provided to Policy Lead monthly and to ELT/PPSL quarterly.</p> <p>FQ1 24/25 update: Improving availability of professional staff resource across DM and active caseload management has seen improved output</p>

					from FQ1 2023/24 onwards. Backlog reduced from 350 to 150 items. Additional Agency resource recruited to provide support through until FQ3 2024/25.
1:09 Review of Planning Officer Resources deployed in West of Argyll in both short and long term.	October 2023 Rescheduled FQ4 2023/24 Rescheduled FQ2 2024/25	Development Manager	Development Manager	NOT STARTED	Current imbalance in resources allocated to MAKI and OLI – require to ensure that both offices are appropriately staffed to meet demand and provide flexibility and resilience to accommodate absence and periods of increased demand. Commencement delayed due to key staff absence within OLI and MAKI teams.
1:10 GIS Resource for Contaminated Land	FQ4 2023/24	HOS	Development Manager / Reg. Services & Building Standards Manager	IN PROGRESS	DM to jointly fund a temporary resource within Reg. Services to collate and create GIS data layer on contaminated land. Output is required to provide an improved resource for identifying historic land contamination in the planning process, and to release existing resource within Reg. Services for responding to backlog of planning consultations on contaminated land.

Recruitment process concluded Feb 2024. Project underway.

Improvement Area 2 – Review Internal processes including enforcement

ACTION	TIMESCALE TO COMMENCE	LEAD OFFICER	DELIVERY	STATUS/RESOURCES	Notes/Comments
2:01 Assess policy requirements against NPF4	Commenced Feb 2023	HOS	Development Manager with input from Policy Manager	COMPLETED FQ4 2023/24	Review completed FQ4 2023/24 but remains under review for any external guidance from Scottish Government/DPEA appeal decisions.
2:02 Review Pre application advice process	Commenced August 2023	HOS	Development Manager / ATLS / Officers / Customers (consultation)	IN PROGRESS	Review will assess different levels of pre application advice and associated planning fees to help speed up process for applicants. Review will also consider use of Self – serve (website content) and Validation guidance – checklists? SG agenda? Behind schedule due to key staff absence. Customer consultation completed Jan 2024. Further work delayed until FQ3 2024/25.
2:03	Commenced February 2023	HOS	Development Manager / ATLS /	IN PROGRESS	Initial assessment completed FQ4 2022/23 and issued to Officers; Ongoing monitoring.

Provide clear guidance on NPF4 policy implications and continue to update as required Action requires to be updated to address LDP2			Development Policy Manager		Exercise requires to be repeated in FQ4 2023/24 to account for LDP2 adoption. Ongoing requirements for development of guidance on Climate Change / Biodiversity Metric for net gain / Short Term Lets
2:04 Review enforcement reporting	September 2023 Rescheduled FQ4 2023/24 Rescheduled FQ3 2024/25	HOS	Development Manager	NOT STARTED	Commencement delayed due to reduced resource arising from key absence. Review will now commence FQ3 24/25 with intent to implement alongside updated Enforcement Charter during 2025 Basic reporting measures identified for DM Service Plan however these will require review alongside a revamped charter and workflow.
2:05 Review of ABC Planning Enforcement Charter	September 2023 Rescheduled FQ4 2023/24 Rescheduled FQ2 2024/25	HOS	Development Manager	IN PROGRESS	Commencement delayed due to reduced resource arising from key absence. Light touch review to be taken forward to Sept. 2024 PPSL meeting.

2:06 Review of enforcement workflow processes	September 2023 Rescheduled FQ1 2024/25 Rescheduled FQ3 2024/25	Development Manager	Development Manager / ATLS / Enforcement Officers / Sys. Techs	NOT STARTED	Commencement delayed due to reduced resource arising from key absence. Review will now commence Jan 2024 with intent to implement initial improvements alongside updated Enforcement Charter in FQ3 2024/25, and a more significant overhaul as part of implementation of Enterprise workflow (see action 2:07)
2:07 Expand Enterprise performance management system	Commenced June 2023	HOS	Development Manager / Sys. Techs	IN PROGRESS	<p>Improve the functionality of the Enterprise system to assist officers with performance and monitoring of productivity.</p> <p>Development of Enterprise Workflow is linked to role out of IDOX Document Management System (DMS) which will replace Civica. This related project has been delayed due to issues outwith the control of ABC.</p>
2:08 Review DM manual	Commenced June 2023	HOS	Development Manager / ATLS / Sys. Techs	COMPLETED FQ2 2024/25	<p>Internal Audit Action</p> <p>Continue to update the manual to ensure all DM Officers provide a consistent approach to decision making.</p> <p>Action is linked to 2:07 and has been subject to delays accrued by the wider role out of the new IDOX DMS</p>

					In light of delays to IDOX DMS an updated process note updating and existing processes has been completed FQ2 2024/25
2:09 To invest in IT improvements and training staff as part of a wider Council transformation programme	Commenced 2022	HOS	Development Manager and Team Leaders; Planning Policy Manager. Sys. Techs.	PROJECT CANCELLED FQ2 2024/25	Implementation of IDOX DMS and enhanced Public Access to support development of the digital office with streamlined back office systems; Focus on efficient and improved decision making. IDOX Document Management System (DMS) was intended to replace Civica. This related project has been impacted by issues outwith the control of ABC. DM component of project group will refocus and seek to maximise potential of existing systems from FQ3 2024/25
2:10 Agree clear protocols on when consultee advice is needed and timescales for delivering the advice	Sept. 2023 Rescheduled for FQ4 2023/24	HOS	Development Manager and Planning Policy Manager.	IN PROGRESS	Providing clear and consistent advice to all Officers on when to trigger consultations and expected timescales for delivery. Linked to 2:11 Draft document prepared FQ4 2023/24 and circulated to officers.

<p>2:11</p> <p>Review and seek new Service Level Agreement with ABC Roads to improve consultation process/content.</p> <p>Include formal process for escalation and determining items where disagreement cannot be resolved (PPSL? – DM resource issues?)</p>	<p>FQ4 2023/24</p>	<p>HOS</p>	<p>Head of D&EG / Development Manager / Roads</p>	<p>IN PROGRESS</p>	<p>Follow up expected launch of updated ABC Roads Design Guide with Training / Roles</p> <p>Templates / Service Level Agreement</p> <p>Monthly Area based liaison meetings scheduled from Feb 2024 forward. (1st meeting 22nd Feb 2024)</p> <p>Quarterly meetings of DM/Roads Management team scheduled from FQ4 2023/24 forward</p>
<p>2:12</p> <p>Review RoH templates and guidance for officers in light of both NPF4 & LDP2 with a</p>	<p>FQ4 2023/24</p>	<p>Development Manager</p>	<p>Development Manager / ATLS / Sys. Tech</p>	<p>IN PROGRESS</p>	<p>Review reporting requirements with a view to streamlining RoHs and improving officer productivity.</p> <p>Benchmarking with other LA's, review of legislative requirements, review of Uniform system capabilities / Officer training</p>

view to streamlining and providing greater consistency across officers and teams in terms of output and effort required.					Linked to actions 2:07 and 2:08 Updated templates to accommodate LDP2 rolled out Feb 2024.
2:13 Review RoH sign off process and guidance to improve opportunity to provide sign off cover across ATL / SPO staff	FQ1 2024/25	Development Manager	Development Manager / ATLS / Sys. Techs	IN PROGRESS	Linked to actions 1:04 and 2:12 Requires regrading of SPOs Seek to improve efficiency of RoH sign of process alongside improved use of systems for producing RoHs.
2:14 Review processes and procedures in relation to the handling, publication, and reporting of third	FQ2 2024/25	Development Manager	Development Manager / Legal / PPSL	NOT STARTED	Seek to reduce opportunity for submission of late reps – reduce disruption to determination process. Require to be completed in time to feed into review of Scheme of Delegation in Sept. 2024

party representations.					
2:15 Review of model conditions.	FQ4 2023/24 Rescheduled for FQ2 2024/25	Development Manager	Development Manager / ATLS / Sys. Tech	IN PROGRESS	Require to review model conditions to ensure these remain competent in relation to LDP2 Seek to update model conditions within Uniform system to improve ease of use.
2:16 Review process and resource for discharge of conditions. Streamline and make better use of systems.	FQ3 2024/25	Development Manager	Development Manager / ATLS / Sys. Tech	NOT STARTED	Require new process to identify and allocate resource for discharge of condition and to ensure competent and consistent handling/recording. <i>Potential to charge – future revenue stream either for additional resource or savings but requires investment in process/systems development before this can be realised.</i>
2:17 Review processes and procedures to streamline the handling and determination of	FQ3 2023/24	Development Manager	Development Manager / ATLS / Sys. Tech	IN PROGRESS	Review the processes and procedures for handling of 'minor' casework items including statutory notifications under the GPDO. Opportunity to streamline procedures and minimise the use of professional officer time required for reporting and review of less complex items.

statutory notifications.					TELNOT notification process completed Jan 2024. Work continuing to look at revised process for Prior Notification items.
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Improvement Area 3 - Officer Attraction, Retention, Morale and Wellbeing

ACTION	TIMESCALE TO COMMENCE	LEAD OFFICER	DELIVERY	STATUS/RESOURCES	Notes/Comments
3:01 Work with HR and Communications team to improve planning adverts to help recruitment.	Spring 2023	HOS	Development Manager	COMPLETED FQ4 2022/23	Improved advert narrative generated; Link in to AB the Place To Be campaign. Working with HR to engage with potential future planners through careers fairs, development of promotional material.
3:02 Ensure time for staff to come together and talk about issues they are facing	Summer 2023 Rescheduled for Summer 2024	HOS	Development manager/Planning Policy Manager	IN PROGRESS	Taking time for face to face meeting across the planning service and sharing issues between team members; Increasing return of staff to office environment has improved staff interrelations along with annual conference and LDP2 training which afforded

					<p>opportunity for face to face interactions. Morale within DM Service remains low however.</p> <p>DP/DM Annual Conference Scheduled for April 2024</p> <p>Revised office accommodation and equipment secured in Oban and Helensburgh</p>
3:03	Autumn 2023 Rescheduled for Summer 2024	HOS		TO BE RESCHEDULED	<p>Review in light of introduction to LDP2 to highlight best practice and case studies delivered on the ground.</p>
3:04	Commenced Nov 2023	HOS	Development Manager and Planning Policy Manager	ON GOING	<p>Relaunch 'Careers Conversations' to identify staff training requirements and discussion on performance.</p> <p>Career's conversations and development of DM training plan for 2024/25 to be completed across DM Service by end of FQ 4 2023/24.</p> <p>Update: FQ2 24/25 Training Plan to be finalised.</p>

grow our own' and ensure skill gaps are met and to maintain succession planning at all levels within the team.					
3:05 Hold Argyll and Bute Design Competition to better recognise outcomes on the ground.	Summer 23 repeated every 2 years.	HOS	Planning Policy Manager	COMPLETED FQ2 2023/24	Nominations for design competition closed with public vote underway. Awards ceremony held Summer 2023

Improvement Area 4 - Communication and Engagement with Residents, partners and Colleagues

ACTION	TIMESCALE TO COMMENCE	LEAD OFFICER	DELIVERY	STATUS/RESOURCES	Notes/Comments
4:01 Hold regular meetings with internal and external	FQ3 2023/24	HOS	Development manager and Team Leader	ON GOING	Establish dates where meetings with agents; internal and external stakeholders will be held Linked to actions 2:10 and 2:11

stakeholders of the DM Service					Regular liaison meetings with Forestry Land Scotland / SEPA / Roads / SSEN established. Regular liaison meetings with EH / HES / Nature Scot still TBA Customer User forum scheduled for 1 st October 2024
4:02 Carry out well publicised quick wins through improvements to the accessibility of the website and improved customer response times	FQ4 2023/24 Rescheduled for FQ1 2024/25	HOS	Development Manager/Planning Policy Manager and Communications Team	IN PROGRESS	Ensure planning is centre placed in the council's new website; Establish clear communication protocols with officers and Developers utilising additional admin support. Initial review of website content commenced along and discussion with Web Team initiated
4:03 Improve communication with the development industry through a greater focus on local agents and restarting	Autumn 2023 Rescheduled for FQ4 2023/24 Rescheduled for FQ2 2024/25	HOS	Development Manager / Development Policy Manager	IN PROGRESS	User forum to be reinitiated – arrangements to be confirmed during FQ4 2023/24-FQ2 2024/25 Action rescheduled to allow engagement with local Agents following adoption of LDP2. Key staff absence has also reduced resource available during FQ3 2023/24 to progress arrangements. User Forum to be held 1 st October 2024 as a hybrid event

developer forum (s)					
4:04 Direct Members to the Members portal to register complaints regarding the planning service to enable a consistency of approach to be taken.	Summer 2023	HOS	Development Manager	COMPLETED	Improving complaint handling/customer relation position has seen an increase in the use of Member Portal for local member enquiries. No further action required at this time.
4:05 Work with the communications team to establish approaches to counter negative media coverage and celebrate good stories	Summer 2023	HOS	Development Manager	ONGOING	Improving complaint handling/customer relation position has reduced the requirement for proactive intervention at this time. Opportunities to provide positive coverage of DM Service and performance remain under review.

<p>4:06</p> <p>Seek to ensure that all applications are either determined within the statutory timescale, or where this is not possible ensure that an extension period is communicated.</p>	<p>Commenced Summer 2023</p>	<p>Development Manager</p>	<p>Development Manager / ATLs / POs / Sys. Tech</p>	<p>IMPLEMENTED</p>	<p>New process to record and provide agents with extension of time in place. Remains under review with requirement for regular reinforcement.</p> <p>Significant reduction in customer complaints following introduction.</p>
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