



*Cairngorms National Park Authority
Planning Effectiveness Review (Development Management)
Internal Audit 2009/10*

August 2010

Strictly Private and Confidential

This report and the work connected therewith are subject to the Terms and Conditions of the engagement letter between Cairngorms National Park Authority and Deloitte LLP. The report is produced solely for the use of Cairngorms National Park Authority. Its contents should not be quoted or referred to in whole or in part without our prior written consent except as required by law. Deloitte LLP will accept no responsibility to any third party, as the report has not been prepared, and is not intended for any other purpose.

Project Sponsor	Jane Hope
Key Client Contact	Planning Team

Contents		Page
Section 1	Executive summary	1
Section 2	Detailed findings and recommendations	8
Section 3	Statement of responsibility	26

Appendices

Appendix A	Background and objectives	27
Appendix B	The planning process	28
Appendix C	Split of applications by Local Authority	29
Appendix D	Number of applications per year	30
Appendix E	National planning statistics	31
Appendix F	Average caseload per planning officer	32

Section 1 - Executive summary

1.1 Introduction

This internal audit of the effectiveness of the Planning function within Cairngorms National Park Authority (CNPA) was undertaken at the request of the Chief Executive and was approved by the Audit Committee. The scope of this report was agreed with the Chief Executive, Head of Corporate Services and Head of Planning prior to the commencement of fieldwork and is documented at **Appendix A**. It should be noted that the scope of this review was restricted to Development Management.

1.2 Background

Development Management is the process by which planning and other applications submitted are determined. The decisions made aim to balance and mediate between diverse, and sometimes competing, interests.

CNPA's planning function is unique in that they do not handle all applications relevant to the Park area - these operations are in line with the Designation Order set out by the Scottish Government. They operate a "call-in" function whereby they receive all applications from Local Authorities which apply to the Park area. CNPA then has 21 days from notification of an application to call it in from the Local Authority. Responsibility for the planning arrangements then lie with the National Park. A flowchart of the key stages of the process is documented at **Appendix B**.

The geographic area of CNPA is covered by four Local Authorities: Aberdeenshire, Angus, Highland and Moray Councils. A split of the proportion of applications which are sent by each Local Authority is documented at **Appendix C**. Approximately two-thirds of applications are received from Highland Council. Planning fees are split 50:50 between CNPA and the Council except in exceptional cases where there is a significantly higher proportion of input from one party. In this case, a revised split can be negotiated.

The Planning office is based in Ballater and at the time of our review (November 2009 – February 2010) employed a Head of Development Manager, four Planning Officers, two administrative support officers and an Enforcement Officer. Two of the Planning Officers spent 50% of their time working on the Local Plan and 50% on Development Management. The office has received over 3,000 applications for call in decisions since 2003 and calls in an average of 15% of applications received. Details of the annual number of applications received are documented at **Appendix D**. The decision to call in is based on the nature of the application and whether in terms of the Designation Order, it is "of significance to the aims of the Park". The aims of CNPA are as follows:

- To conserve and enhance the natural and cultural heritage of the area;
- To promote sustainable use of the natural resources of the area;
- To promote understanding and enjoyment of the special qualities of the area by the public; and
- To promote sustainable economic and social development of the area's communities.

Section 1 - Executive summary (continued)

1.2 Background (continued)

Because of a quirk in the Designation Order, CNPA is not able to delegate planning decisions from the Planning Committee to other officers or sub-Committees. Having made the decision that its Planning Committee should be a committee of the whole Board, it followed that all call-in decisions had to be made by the Committee of 25 members, meeting fortnightly. The frequency of meetings is dictated by the requirements to decide on call-in within 21 days from application. The majority of full planning applications are considered on a monthly basis whereas interim fortnightly meetings focus on the call-in schedule that is presented by a Planning Officer. Generally the Committee agree with the recommendations (to call-in or not) presented by the Planning Officer and have been very few cases identified where there is a deviation from recommendation (around 4% of applications). Although applications may not be called-in, members of the Planning Committee can make comments, which are then passed to the Local Authority for information. Members of the public are permitted to attend all meetings and to view Committee papers in advance. Meetings are held at various locations around the Park area.

CNPA has a protocol which was developed in 2003 in conjunction with the four Local Authorities that the National Park area covers. This covers application procedures, enforcement, criteria for call-in, planning policy framework, liaison procedures and review processes. There are also standing orders in place for the effective running of the Committee and procedural guidance for staff.

All planning authorities are required to submit information which generates national statistics on an annual basis. The national requirements are 80% of all applications to be decided within two months and 85% of all applications to be decided within three months. A summary of the national results for all planning authorities from 2004/05 to 2008/09 is documented at **Appendix E**. We do acknowledge that the Scottish Government recognises the unique nature of the planning function of CNPA and as a result they explicitly state that CNPA are different in the reports that they produce.

ePlanning is a Scottish Government initiative designed to modernise the planning service in Scotland. The purpose of this system is to allow applicants to submit planning applications online using the IDOX system. This promotes openness and transparency in the planning process and allows the public access to view and comment on any information which is publicly available. CNPA are intending to use the system in operation in Loch Lomond and Trossachs National Park.

As part of our effectiveness review, we reviewed the arrangements in place within a number of other planning authorities. We met with Loch Lomond and Trossachs National Park Authority, Highland Council and Aberdeenshire Council. A summary of their operations is documented below:

Aberdeenshire Council

The Development Management team at Aberdeenshire Council consist of 53 individuals covering professional, technical and administrative support. Only 2 of the areas covered relate to the CNPA area, Marr and Kincardine and Mearns. These areas have two Area Planning Officers, nine Planners, two Planning Inspectors and four Development Services Assistants. There is administrative support dedicated to this role, however this comes under support services rather than planning.

Section 1 - Executive summary (continued)

1.2 Background (continued)

Aberdeenshire Council receives approximately 5,000 planning applications per year, of which an average of 150 fall within the National Park area of Aberdeenshire Council. Aberdeenshire Council does not have delegated planning powers and so most local applications can be decided by the Planning Department. Those which are major or national developments are required to be presented to the Planning Committee. Each area of Aberdeenshire Council has a Planning Committee which consists of 12 members. Meetings are held every three weeks and the locations of the meetings vary depending on the area covered.

Loch Lomond and Trossachs National Park (LL&T)

The Development Management team at LL&T is led by the Head of Planning and Development Management who is supported by a team dedicated to Development Management. This consists of a Development Manager, four Planners, one Enforcement Planner, one Project Manager / Adviser, one Planning Information Officer, one Development Monitoring Assistant and five support staff.

LL&T receives approximately 450 applications for planning and other statutory consent each year along with approximately 150 formal pre-application enquiries and several hundred telephone enquiries. Under the scheme of delegation, around 90% of applications are dealt with by the Director of Planning. Approximately 90% of applications are approved. The Scottish Government have set performance targets for planning authorities for determining 80% of all applications and 90% of householder applications within two months. LL&T performance has varied between 50% and 60% in respect of all applications and around 70% in respect of householder applications.

The operation of the Planning and Development Control Committee has evolved since its inception where amendments over time have been made to schemes of officer delegation, Committee procedures and standing orders.

12 members sit on the Planning Access Committee (quorum of five) which meets monthly (3rd Monday) and on average four planning cases are considered per meeting.

Highland Council

Almost 70% of the applications received by CNPA fall in the Badenoch and Strathspey area which is covered by two Planning Officers within Highland Council, supported by an Administration team in Kingussie. Highland Council receives approximately 300 applications per year which are within the National Park. Highland Council also has devolved planning powers where local applications can be determined by Planning Officers. Any major development requires consideration and decision via the Planning Committee.

Section 1 - Executive summary (continued)

1.2 Background (continued)

Forthcoming changes

It should be noted that much of the fieldwork was undertaken prior to the Management Team restructure within CNPA and this may have an impact on some of our recommendations. There are a number of forthcoming changes which may affect the planning function including:

- As a result of the Strategic Review undertaken by the Scottish Government in 2008, the number of Board members will reduce from 25 to 19 from October 2010. This will include seven ministerial appointees, seven Local Authority nominees and five directly elected members.
- The CNPA Designation Order is currently being redrafted to reflect the recommendations from the Strategic Review. It is also being redrafted so that the delegation of specific planning functions exercisable by CNPA is restated with the effect that it can be dealt with by the Authority in a number of ways. The benefit is that this will be more reflective of recent planning reforms and will allow for more consistency in decision making with the other National Park as well as Local Authorities.
- Scottish Ministers decided to extend the boundary of the National Park area into Perth and Kinross. Scottish Natural Heritage were responsible for providing a proposal stating where the extended boundary should lie and the revised allocation of the local authority nominations to the Board, taking into account the new boundary. Two public consultations were held in 2009 and 2010 and a modified Designation Order has been laid before Parliament. Commentary from the Rural Affairs and Environment Committee are expected in September 2010 with the Order taking effect from October 2010.

1.3 Approach

Our review covered the following areas:

- Attendance at Planning Committee meetings;
- Interviews with CNPA staff;
- Meetings with Highland Council, Aberdeenshire Council and Loch Lomond and Trossachs National Park.

We reviewed all relevant Planning documentation, undertook analysis of national statistics and where available those within the other organisations that we visited and reviewed a number of planning files.

Section 1 - Executive summary (continued)

1.4 Conclusion

The overall objective is to assess the controls in place for the following audit areas:

Audit areas	Overall Assessment	Report Ref.
There is an appropriate process in place for receipt, preparation, presentation and determination of planning applications	**	2.1; 2.2; 2.10; 2.17
There is appropriate guidance in place for staff	***	2.6; 2.11
Sufficient resource is employed to manage applications which is comparable with local authorities and similar sized organisations	***	2.5
A planning committee structure is in place which has an appropriate remit and procedures which is reviewed on a regular basis	**	2.3; 2.8; 2.9; 2.10
Effective monitoring arrangements are in place over planning performance with lessons learned communicated across the organisation	***	2.14; 2.18
Planning performance is reported to senior management on a regular basis with follow up action reported where appropriate	****	
Delays in determinations are investigated and appropriately reported	***	2.4
There are mechanisms in place to gain applicant feedback	**	2.16
There has been an assessment of the impact of changes in planning regulations	**	2.13
There is evidence of collaborative working both within and outwith CNPA	**	2.7; 2.11; 2.12; 2.14; 2.15

Key:

- **** Arrangements accord with good practice and are operating satisfactorily (recommendations are in respect of minor matters).
- *** Adequate arrangements are in place, but certain matters noted as requiring improvement.
- ** Arrangements in place offer scope for improvement.
- * Inadequate level of control and unacceptable level of risk.

Section 1 - Executive summary (continued)

1.4 Conclusion (continued)

We can conclude that although the planning function is operating as per Scottish Government requirements and follows policy, there are a number of potential areas for consideration in terms of improving efficiency and effectiveness. We have summarised the key areas for consideration below and further details of our findings and recommendations can be found within **Section 2** of this report.

Our key findings are as follows: -

- CNPA should consider whether planning powers could be delegated to a small number of Committee members for call-in decision in order to reduce the impact of time, travel and resource involved in full planning meetings held on a fortnightly basis. (*Recommendation 2.1*);
- CNPA should consider the viability and impact of managing all applications relating to the CNPA area. This should be considered as part of the second stage of the Strategic Review. (*Recommendation 2.2*);
- The number of members on the Planning Committee should be reviewed and refined as appropriate. The average number across National Parks and Local Authorities reviewed is 12. The refinement of numbers gives the organisation an opportunity to reduce the workload of members, focus resource in appropriate areas and demonstrate a reduction in travel and expenses. This would also contribute to the achievement of the environmental KPI's set within the organisation. (*Recommendation 2.3*);
- CNPA should consider developing a report which documents the receipt date and status of current applications. Any delays in determinations should be reported to give management and the Committee assurance that applications are being progressed as far as possible. (*Recommendation 2.4*);
- CNPA should implement a caseload management system in order to more transparently and effectively manage planning applications. We suggest liaising with other organisations to establish a mechanism for developing this. (*Recommendation 2.5*);
- All procedures and Standing Orders should be reviewed and updated as a result of changes in planning reform, the revised Designation Order and the implementation of a number of our recommendations. (*Recommendation 2.6*);
- The frequency of billing for application fees should be reviewed as should be proportion of split of fees. (*Recommendation 2.7*);
- All papers and minutes relating to the Planning Committee should be posted on the CNPA website. (*Recommendation 2.8*);
- Where deferrals for decision are as a result of incomplete or poorly prepared applications, consideration should be given to rejection rather than deferral due to the level of discussion involved. (*Recommendation 2.9*); and
- The length and format of Planning Committee papers should be reviewed to establish whether these are the most user-friendly and time-efficient option. CNPA should review the papers of other Planning functions. (*Recommendation 2.10*).

Section 1 - Executive summary (continued)

1.4 Conclusion (continued)

Our detailed findings and recommendations are within **Section 2** of this report. In total, we identified **eighteen** recommendations as follows:

Description	Priority	Number
Major issues that we consider need to be brought to the attention of Management and the Audit Committee	1	0
Important issues which should be addressed by management in their areas of responsibility	2	10
Minor issues where management may wish to consider our recommendations	3	8
	Total	18

1.5 Acknowledgements

We would like to take the opportunity to thank all of the staff within the Cairngorms National Park Authority, Loch Lomond and Trossachs National Park, Highland Council and Aberdeenshire Council who were involved in assisting us in this review.

Section 2 - Detailed findings and recommendations

2.1 Delegation of Planning Powers

Finding	Recommendation	Rationale	
<p>CNPA is unique in that it does not handle all planning applications relevant to the Park area. The Designation Order set by the Scottish Government allows CNPA to call-in those applications which are significant in respect of the nationally set aims of the National Park. The Designation Order is also unclear on the powers of delegation from Committee to officers or sub-committees.</p> <p>As a result, all planning applications in the Park are considered by the Planning Committee for a decision on whether or not these should be called in and determined by CNPA. These meetings require to be held on a fortnightly basis to meet the 21-day deadline.</p> <p>We acknowledge that there is a significant amount of work required to prepare call-in reports.</p> <p>The Designation Order is currently being redrafted with a revised version expected in September 2010.</p>	<p>In light of the revised Designation Order which will allow for delegation of some planning functions, CNPA should consider using a smaller Committee of members for call-in decisions.</p> <p>It is acknowledged that this would involve careful consideration of the membership, particularly for ministerial appointments.</p>	<p>The delegation of planning powers around call-in to a small Committee of members would reduce the time taken to decide on applications at Planning Committee meetings.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Already under active consideration. A paper is to be presented to the Board on 15 October with proposals for new call-in arrangements based on fewer members and more use of electronic communications without the need for face-to-face meetings.</p>		<p>Chief Executive October 2010</p>	<p>Two</p>

Section 2 - Detailed findings and recommendations (continued)

2.2 Scope of applications

Finding	Recommendation	Rationale	
<p>CNPA currently call-in applications which are deemed significant in terms of the aims of the Park.</p> <p>All applications which are not relevant remain with the Local Authority for determination.</p> <p>CNPA receives approximately 484 applications per year and on average 15% of applications are called in, however we do acknowledge that the call-in percentage has been reducing in recent years.</p> <p>Although CNPA are in a position where they can control the applications that they handle, they are in a unique position in terms of their status as a planning authority and this is not consistent with the other National Park in Scotland.</p> <p>Feedback from the Councils has indicated that the management of all applications for the Park area would be a preferable solution.</p>	<p>Although we acknowledge that handling of all applications to the Park area would increase the workload of the Planning team, CNPA should consider the viability of managing all applications relating to the Park area.</p> <p>This is an issue that all organisations and officers within CNPA are aware of.</p> <p>We suggest that the Scottish Government considers this during the second phase of the Strategic Review.</p>	<p>Although the workload of the Planning team would increase, CNPA would retain ownership and decision making powers for all applications relating to the Park area.</p> <p>CNPA would also retain all fees for applications, which would be a significant increase in income and would assist in funding additional staff where required.</p> <p>The management of all applications would also avoid any duplication of effort with the Local Authorities and would ensure that on a national basis, there is consistency of approach in planning terms for the National Parks for Scotland.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>This is a matter for the Scottish Government and was left to Stage 2 of the Strategic Review of National Parks which remains on hold. There are many opinions on whether CNPA should be a full planning authority, but little hard evidence. An evidence-based decision will only be feasible once the CNP's Local Plan has been in place for at least 3 years, with monitoring of determinations revealing the levels of consistency of decision-making. Suggest therefore that the issue is best returned to in 2013/14.</p>		<p>No action proposed – on hold pending evidence gathering over the next 3 years</p>	<p>Two</p>

Section 2 - Detailed findings and recommendations (continued)

2.3 Planning Committee Membership

Finding	Recommendation	Rationale	
<p>As per the Designation Order set by the Scottish Government, the CNPA Planning Committee has 25 members, all of which are members of the Board.</p> <p>We do acknowledge that as a result of the Strategic Review, the number of Board members will be reduced to 19 in October 2010.</p> <p>However, Planning Committee meetings are held on a fortnightly basis and the majority of members attend which increases travel costs and the demands on members to attend.</p> <p>Due to the number of people in attendance, we did note that there can often be duplication in the discussion outcomes and points raised and the length of the meetings can be significantly longer than expected.</p>	<p>CNPA should review the number of members of the Planning Committee. We acknowledge that all members were placed on the Planning Committee as a result of the original Designation Order, however the revision of the Designation Order may be an opportunity to streamline the process.</p> <p>All other Planning Committees reviewed have an average membership of 12, although we do realise that these authorities also have delegated planning powers.</p> <p>As part of the review, CNPA should liaise with LL&T in terms of structure and membership. Their Planning Committee consists of 12 members.</p> <p>The impact of any changes should be reflected in the role and remit of the Committee.</p>	<p>The rationalisation of the number of members would allow for a more efficient process, reducing travel costs for members and the requirement to attend fortnightly meetings.</p> <p>This would also assist with one of CNPA's Key Performance Indicators relating to environmental management and reducing vehicle emissions.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>In hand. This is being considered as part of the Service Improvement Plan (SIP) being brought to Management Team, and then to Board on 17 September 2010.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>October 2010</p>	<p>Two</p>

Section 2 - Detailed findings and recommendations (continued)

2.4 Delays in Determinations

Finding	Recommendation	Rationale	
<p>During our review of Planning Committee meetings and through discussions with staff, we noted that there is no formal mechanism to monitor and report on delays in determinations to the management team or to the Planning Committee.</p>	<p>CNPA should consider the development of a report which documents all current applications demonstrating date of receipt and current status.</p> <p>This should be reported to the senior management team on a regular basis and if deemed appropriate, to the Planning Committee.</p> <p>Any delays in determination should be highlighted and explained within the report.</p>	<p>The explanation of delays in determinations will allow more effective management reporting, performance management and will assure the Committee and management that planning applications are being effectively management by the team as far as possible.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Agreed – being addressed through SIP. Management Team now has a standing item on its agenda on Development Management caseload which would be supported by the recommended report.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>October 2010</p>	<p>Two</p>

Section 2 - Detailed findings and recommendations (continued)

2.5 Caseloads of planning officers

Finding	Recommendation	Rationale	
<p>Our analysis aimed to provide an assessment of the average caseload per planning officer for the National Parks and a sample of Local Authorities which cover the CNPA area in order to establish whether resource was currently placed in the correct areas. Due to differing structures in organisations, availability of information and different planning powers, it was difficult to come to a consistent approach in terms of average caseload.</p> <p>During discussions with CNPA officers, there did not appear to be a structured process in place for allocation of work to planning officers which did result in some officers having a higher caseload than others.</p> <p>Our analysis has made some assumptions, however is documented at Appendix F.</p>	<p>CNPA should ensure that a caseload management system is implemented.</p> <p>Management may wish to liaise with other authorities to identify the arrangements in place.</p>	<p>The lack of available information nationally suggests this is an area which has not been exclusively considered in the past. A consistent approach to caseload management, particularly in the National Parks, where there is an expectation that there will be continual increases in collaborative working would be beneficial and should allow resource requirements to be better defined.</p>	
Management Response		Responsibility/ Deadline	Priority
Accepted – being addressed through SIP		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>March 2011</p>	Two

Section 2 - Detailed findings and recommendations (continued)

2.6 Review of Procedures and Standing Orders

Finding	Recommendation	Rationale	
<p>CNPA has a number of documents in place in relation to planning as follows:</p> <ul style="list-style-type: none"> • Standing Orders; • Protocol with Local Authorities; • Public Planning Information; • Commenting Policy. <p>We have noted that all of these documents are scheduled for review, however this has not yet been undertaken.</p> <p>We also noted that the process of commenting is not referred to in the protocol document which is the point of reference for Local Authorities.</p>	<p>All documentation should be reviewed and updated.</p> <p>We recognise that as a result of the implementation of a number of our recommendations and a number of forthcoming changes through Scottish Government, processes may change and this will influence the current content of the policies.</p> <p>Commenting should also be referred to within the protocol document.</p> <p>The revision of documentation should provide an opportunity to review that of Local Authorities and LL&T in order to identify any areas for inclusion and where appropriate, adoption of best practice.</p>	<p>The implementation of the recommendations will provide an opportunity to revise policies and procedures and identify areas for improvement.</p> <p>The adoption of best practice from other areas will allow CNPA to self-assess their current position.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Accepted – being addressed through SIP. Revised Standing Orders are to be brought to the Board on 15 October 2010. A public information leaflet has been updated, but publication has been held up by capacity constraints (because of Local Plan and supplementary guidance taking priority). Protocol is due for revision in the light of the Park extension.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>March 2011</p>	<p>Two</p>

Section 2 - Detailed findings and recommendations (continued)

2.7 Application Fees

Finding	Recommendation	Rationale																			
<p>Application fees are set at a standard 50/50 split between CNPA and the Local Authorities. The only exception is for major planning applications where depending on the level of input required, the split of fees may be negotiated.</p> <p>CNPA invoices the Local Authorities on an annual basis at the end of each calendar year. The fees received for planning applications have been as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Local Authority</th> <th style="width: 35%;">Fees Billed 2008</th> <th style="width: 35%;">Fees Billed 2009</th> </tr> </thead> <tbody> <tr> <td>Aberdeenshire Council</td> <td style="text-align: right;">£2,175</td> <td style="text-align: right;">£1,361</td> </tr> <tr> <td>Angus Council</td> <td style="text-align: right;">£1,015</td> <td style="text-align: right;">£507.50</td> </tr> <tr> <td>Highland Council</td> <td style="text-align: right;">£59,740</td> <td style="text-align: right;">£40,237.50</td> </tr> <tr> <td>Moray Council</td> <td style="text-align: right;">£725</td> <td style="text-align: right;">£1,812.50</td> </tr> <tr> <td style="text-align: center;">TOTAL</td> <td style="text-align: right;">£63,655</td> <td style="text-align: right;">£43,919</td> </tr> </tbody> </table>	Local Authority	Fees Billed 2008	Fees Billed 2009	Aberdeenshire Council	£2,175	£1,361	Angus Council	£1,015	£507.50	Highland Council	£59,740	£40,237.50	Moray Council	£725	£1,812.50	TOTAL	£63,655	£43,919	<p>The frequency of billing for application fees should be reviewed. Consideration should be given to invoicing Local Authorities (as a minimum Highland Council) on a quarterly basis.</p> <p>As highlighted in recommendation 2.2, if CNPA were to consider all planning applications relating to the Park area, this would result in the organisation retaining 100% of the fees.</p>	<p>The increased frequency of invoicing ensure that funds are received on a timely basis and increases assurance that the fees to be invoiced are correct.</p>	
Local Authority	Fees Billed 2008	Fees Billed 2009																			
Aberdeenshire Council	£2,175	£1,361																			
Angus Council	£1,015	£507.50																			
Highland Council	£59,740	£40,237.50																			
Moray Council	£725	£1,812.50																			
TOTAL	£63,655	£43,919																			
Management Response		Responsibility/ Deadline	Priority																		
<p>Agree recommendation around increased frequency of billing – we will aim to bill between 2 and 3 times per year to balance cash flow improvement against additional resource costs of increased billing.</p> <p>While consideration of all applications would effectively double planning fees received, it should be noted that the costs of planning service delivery far outweigh the fee income received. Any move toward full planning powers should not, therefore, be viewed as a potential for increased overall resources for the Authority.</p>		<p>Finance Manager</p> <p>From October 2010</p>	<p>Two</p>																		

Section 2 - Detailed findings and recommendations (continued)

2.8 Review of Planning Meetings

Finding	Recommendation	Rationale	
<p>Our testing in this area extended to review of Planning Committee minutes and papers for a sample of 45 meetings and attendance at two Planning Committee meetings.</p> <p>We noted the following:</p> <ul style="list-style-type: none"> • Five cases were identified where the minutes of the meeting could not be located on the CNPA website; • One case was identified where the call-in report could not be located on the CNPA website; • At the Planning Committee meetings attended, there was a degree of duplication in the discussion and both meetings overran significantly. 	<p>All papers and minutes should be posted on the CNPA website to ensure all members of the public have appropriate access to the information.</p>	<p>The recording and posting of all available information ensures the public are aware of all decisions made and the rationale for doing so.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Accepted. Website posting to be addressed through SIP. Operation of Planning Committee meetings to be addressed through the opportunity provided by training for new members on 7 October 2010, together with plans for more regular training / development sessions throughout the year.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>March 2011</p>	<p>Two</p>

Section 2 - Detailed findings and recommendations (continued)

2.9 Deferrals

Finding	Recommendation	Rationale	
<p>Our testing in this area extended to review of Planning Committee minutes and papers for a sample of 45 meetings and attendance at two Planning Committee meetings.</p> <p>We noted that from 64 applications which were presented for discussion, 10 were deferred for decision.</p>	<p>We acknowledge that in some cases, deferrals may be required, however where this is due to applications which are not appropriately prepared, consideration should be given as to whether these should be rejected. The level of discussion for deferrals is significant; however, this could be a result of the number of members in attendance.</p>	<p>The recording and posting of all available information ensures the public are aware of all decisions made and the rationale for doing so.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Consideration to be given to establishing some guidelines / improved understanding for members on when deferral or refusal may be the most appropriate course of action.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>March 2011</p>	<p>Two</p>

Section 2 - Detailed findings and recommendations (continued)

2.10 Revision of format of Planning Committee reports

Finding	Recommendation	Rationale	
<p>As part of our review of planning effectiveness, we analysed the Planning Committee reports, which are created on a fortnightly basis.</p> <p>The papers are extremely comprehensive and contain a significant amount of detail and we acknowledge that these often require to be produced at very short notice due to frequency of meetings and targets for distribution of papers.</p> <p>However, there can be a lack of clarity in terms of the relationship between the application and the strategic aims of the Park which is ultimately the deciding factor for call-in.</p>	<p>The length and format of Planning Committee papers for full applications should be reviewed.</p> <p>The papers of other organisations should be reviewed and areas of best practice adopted. The review of reports would provide an opportunity to develop a consistent approach to reporting with LL&T.</p>	<p>The review of planning papers will allow for a more concise approach in which areas of best practice from other organisations can be identified and adopted.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Accepted – to be addressed through SIP.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>January 2011</p>	<p>Two</p>

Section 2 - Detailed findings and recommendations (continued)

2.11 Protocol between CNPA and Local Authorities

Finding	Recommendation	Rationale	
<p>CNPA developed a protocol in 2003 with the four Local Authorities (Aberdeenshire, Angus, Highland and Moray) around the exercise of development control functions in relation to CNPA. The key purpose of the protocol is to meet the aims of the National Park. It covers the following areas:</p> <ul style="list-style-type: none"> • Planning Application Procedures; • Enforcement; • Criteria for call in; • Planning Policy Framework; • Liaison procedures; • Review. <p>Although there is no evidence of review on the protocol document, we have been advised that the last known review date was August 2009.</p>	<p>The protocol should be reviewed following the restructure of the planning department and the implementation of a number of our recommendations.</p> <p>This should be considered in conjunction with the Local Authorities and should receive their input particularly around notification, consultations and liaison.</p> <p>The protocol document should contain signed agreement from all local authorities to demonstrate agreement with the objectives set out in the document.</p>	<p>The protocol is the agreement which all parties are expected to deliver on customer expectations. Although the majority of the responsibility will lie with CNPA for making decisions regarding applications, there needs to be clear agreement that the expectations are realistic and achievable. These may change over time and with amendments to legislation and as a result continued review of a key document is required.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Agree recommendation. Protocol also requires to be reviewed to incorporate Perth and Kinross Council. Some extension to deadline to complete this work allowed in order to give time for implementation of other recommendations as suggested.</p>		<p>Director Sustainable Rural Development with Head of Development Management – June 2011</p>	<p>Three</p>

Section 2 - Detailed findings and recommendations (continued)

2.12 Duplication of preparatory work

Finding	Recommendation	Rationale	
<p>Discussions with both Aberdeenshire Council and Highland Council highlighted a number of weaknesses in the current planning process. One of these related to the potential duplication of work.</p> <p>Due to tight timescales for all Planning authorities and the time taken to call-in an application, the Councils may undertake preparatory work in order to anticipate the application being returned to them for decision. However, this does duplicate the work that requires to be undertaken by CNPA in order to make a call-in decision.</p> <p>We were unable to quantify the extent to which this occurs, as this is not measured by either Council.</p>	<p>Within the protocol document (which sets out the expectations of all parties), there should be clear criteria for the decision to call an application in. Both Councils should be aware of this and as a result be able to anticipate whether they expect an application to be called in or not.</p> <p>The extent to which duplication occurs should be monitored by the Councils and this should be a subject of discussion at communications meetings.</p> <p>Consideration should also be given to the extent to which the ePlanning facility will reduce this.</p>	<p>It is acknowledged that there will be occasions where duplication of work is unavoidable, however clearly set criteria and regular communication between the organisation may reduce the extent to which this occurs.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Discussions will be held with Local Authorities to determine the extent to which duplication does occur as part of discussions around review of the protocol. In practice, however, it may be impractical to establish clear criteria for call-in as this effectively is the role of the Planning Committee call-in function. Decisions are often fairly delicate balances around the significance of applications and their potential impact on the National Park and clear criteria may not be capable of being determined in practice.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>June 2011 (to determine whether any further action is required)</p>	<p>Three</p>

Section 2 - Detailed findings and recommendations (continued)

2.13 Consideration of the impact of changes in planning regulations

Finding	Recommendation	Rationale	
<p>From August 2009, there was a change in the Planning Regulations which affected all planning authorities.</p> <p>The key changes were that a hierarchy of developments was introduced with new targeted timescales for completion. Pre-application consultation was also introduced for major and national developments. Neighbour notification was also introduced whereby the authority is required to inform neighbours of any amendments to applications. This is no longer the responsibility of the applicant. The timescales for planning appeals was also reduced and Local Review Bodies were created to deal with appeals.</p> <p>All of these changes have an impact on the way that authorities operate. Our discussions with CNPA, LL&T and the Local Authorities did not indicate that any organisation had a strategy to manage these changes and there did not appear to be a group created prior to implementation in order to address this in a consistent manner.</p>	<p>Although the changes in regulation have been in place for some time now, there is an opportunity to consider how some of the requirements are addressed.</p> <p>The implication of these changes could form part of the discussion at the Communications meetings.</p>	<p>The consideration of how to effectively manage the changes in regulation would avoid potential duplication of work and ensure a consistent approach across the relevant planning authorities.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Agreed – need for more formally documented overarching approach to these issues, either through the implementation of the revised policy or through a review of the concordat with Local Authorities. It is noted that a paper has previously been presented to Planning Committee which sets out the various impacts of the Planning Regulations for the Authority.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>June 2011</p>	<p>Three</p>

Section 2 - Detailed findings and recommendations (continued)

2.14 Collaboration with Loch Lomond and Trossachs National Park

Finding	Recommendation	Rationale	
<p>Discussions with CNPA and LL&T staff highlighted that both parties are keen to continue to develop a relationship and work collaboratively to develop planning within the National Parks.</p> <p>We are aware that the Head of Corporate Services for CNPA is seconded to LL&T on a part-time basis and the contacts and relationships have already been developed. He is currently acting as the independent advisor to the LL&T Local Review Body within their Planning scheme.</p> <p>It is also noted that CNPA will utilise the ePlanning facility already in place at LL&T. However, both parties continue to have separate policies, procedures and protocols.</p>	<p>We have already recommended that Standing Orders and procedures are reviewed and updated, however this should be undertaken in conjunction with LL&T and where possible, consolidated policies and procedures developed. However, we do acknowledge that the potential for full integration of policies may be limited by differing structures required by call-in arrangements.</p> <p>Regular meetings should be organised between Planning Officers at both parties in order to ensure consistency of approach and identification of areas of best practice.</p>	<p>Consolidation of policies and some working practices would allow a greater degree of clarity in terms of a Scottish National Park approach to planning.</p> <p>It would also ensure applications relevant to the National Park areas are handled consistently which is particularly helpful where appeals are concerned.</p> <p>The consistency of approach and consolidation of policies may also reduce the workloads of both organisations.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Accepted – joint meeting of both NPA Management Teams held twice per year – planning issues already highlighted as an area needing a joint approach. A formal schedule of work will be established within that joint management framework.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>October 2010</p>	<p>Three</p>

Section 2 - Detailed findings and recommendations (continued)

2.15 Liaison with Local Authorities

Finding	Recommendation	Rationale	
<p>Discussions with CNPA and Aberdeenshire and Highland Councils highlighted that there are communication meetings held on a fairly regular basis, however these are at a high level, for example, Heads of Planning meetings.</p> <p>There is no consistent and formalised approach to meetings of Planning Officers between CNPA and the Local Authorities and we also noted that neither party has attended the other's Planning Committee meetings.</p> <p>The Local Authorities highlighted a number of administrative issues that they felt warranted discussion, however there is no mechanism to be able to discuss this at Planning Officer level. Highland Council raised a number of points which warrant discussion such as:</p> <ul style="list-style-type: none"> • the Local Authority reference number is not included on correspondence from CNPA and as a result increases the time taken to find the original record; • The implication of neighbour notification rules and who undertakes this role; • Distribution of Planning Committee papers; • Attendance at Forum for Delivery of Housing. 	<p>Regular meetings should be held with Local Authorities (quarterly) in order to discuss progress, any significant cases and any administrative areas which require discussion.</p> <p>If possible, a representative of CNPA should try to attend at least one Planning Committee meeting per year of the Local Authorities. The Local Authorities should be encouraged to do the same.</p> <p>CNPA should include the Local Authority reference number on correspondence in future.</p>	<p>The formalisation of meetings would encourage both parties to highlight any issues that can then be quickly resolved.</p> <p>The attendance at meetings may drive forward the relationships between the organisations and develop an understanding in relation to the partnership working elements of the planning function. For example, this may allow better tracking of how comments made by CNPA at call-in stage are incorporated in Local Authority decisions.</p> <p>It also provides an opportunity for knowledge sharing, discussion on interesting cases and increases the depth of knowledge for all parties.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Accepted – use potential to use SIP to address these and other mechanisms required to ensure better and more structured collaboration with partners.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>June 2011</p>	<p>Three</p>

Section 2 - Detailed findings and recommendations (continued)

2.16 Customer Service Feedback

Finding	Recommendation	Rationale	
<p>CNPA do not have any mechanism in place to obtain, monitor and action customer feedback.</p> <p>This is not unique to CNPA and through our discussions with LL&T and other Local Authorities, we identified that no other organisation has this system in place.</p>	<p>CNPA, in liaison with the other applicable planning authorities, should develop and distribute a customer service feedback form. This should be distributed to customers when planning applications have been determined. This could be in the format of a paper document or an online questionnaire.</p> <p>The results of this could inform part of the discussion at the Communications Meetings with other planning authorities.</p>	<p>A mechanism for feedback will allow CNPA to have a sense of the public perception of the effectiveness of their planning function. It will allow areas of best practice and excellent service to be identified and shared with the team and will also identify any areas for development which can be actioned as appropriate.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Recommendation accepted. Overall means of accessing customer feedback to be considered by Communications and Engagement Team.</p>		<p>Director Communications and Engagement</p> <p>June 2011</p>	<p>Three</p>

Section 2 - Detailed findings and recommendations (continued)

2.17 Implementation of a planning system

Finding	Recommendation	Rationale	
<p>CNPA currently operates an access database where all planning records for applications have been recorded since 2003.</p> <p>Although this currently works for the requirements of the organisation, this is not consistent with other local authorities or LL&T who use the Uniform system.</p>	<p>CNPA should consider the implementation of a planning management system such as Uniform which is consistent with other planning authorities and allows for more effective reporting on planning performance.</p> <p>If possible, CNPA should explore the possibility of joining the current operation of LL&T.</p>	<p>The use of a planning management system would allow for consistency of recording of information and effective reporting and monitoring.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Recommendation accepted. Planning management systems should be implemented as an element of the proposed joint working initiative with Loch Lomond and Trossachs National Park Authority on establishing ePlanning systems.</p>		<p>Corporate Services Director with Head of Development Management</p> <p>March 2011</p>	<p>Three</p>

Section 2 - Detailed findings and recommendations (continued)

2.18 Planning statistics

Finding	Recommendation	Rationale	
<p>We obtained copies of the national planning statistics which are documented at Appendix E. During our review of this information, we did note that the data reported was inaccurate as one line of figures was missing. We were unable to identify the information for all planning authorities and as a result the information at our Appendix represents the nationally reported figures.</p> <p>Although the planning statistics are helpful, they refer to turnaround times and the number of applications received per year.</p> <p>They do not refer to average caseload per officer, applications per area of each Authority or any other benchmarking information.</p>	<p>CNPA should use the existing relationships in place with LL&T and the Local Authorities in order to share information in terms of their own planning statistics, caseloads etc.</p> <p>This should form part of the Communications meetings held with Local Authorities.</p>	<p>The additional information from other Local Authorities would allow CNPA to benchmark against others, identify areas of best practice and potentially change existing practice where another organisation works particularly effectively.</p>	
Management Response		Responsibility/ Deadline	Priority
<p>Recommendation accepted – the Authority will seek to establish and monitor statistics around officer caseloads and other appropriate service management performance indicators.</p>		<p>Director Sustainable Rural Development with Head of Development Management</p> <p>June 2011</p>	<p>Three</p>

Section 3 - Statement of responsibility

Statement of Responsibility

We take responsibility for this report which is prepared on the basis of the limitations set out below.

The matters raised in this report are only those which came to our attention during the course of our internal audit work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of internal audit work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices. We emphasise that the responsibility for a sound system of internal controls and the prevention and detection of fraud and other irregularities rests with management and work performed by internal audit should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify all circumstances of fraud or irregularity. Auditors, in conducting their work, are required to have regards to the possibility of fraud or irregularities. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud. Internal audit procedures are designed to focus on areas as identified by management as being of greatest risk and significance and as such we rely on management to provide us full access to their accounting records and transactions for the purposes of our audit work and to ensure the authenticity of these documents. Effective and timely implementation of our recommendations by management is important for the maintenance of a reliable internal control system.

Deloitte LLP

Inverness

August 2010

In this document references to Deloitte are references to Deloitte LLP.

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 2 New Street Square, London EC4A 3BZ, United Kingdom.

Deloitte LLP is the United Kingdom member firm of Deloitte Touche Tohmatsu ('DTT'), a Swiss Verein whose member firms are separate and independent legal entities. Neither DTT nor any of its member firms has any liability for each other's acts or omissions. Services are provided by member firms or their subsidiaries and not by DTT.

©2010 Deloitte LLP. All rights reserved.

Appendix A - Background & objectives

Background

Cairngorms National Park Authority operates a unique planning function in that they do not handle all applications relevant to the Park area. They operate a “call-in” function where they have 21 days from notification of an application to call it in from the local authority. CNPA then becomes responsible for the planning arrangements for that application.

This process has been in place for six years and in order to evaluate the effectiveness of current practice, CNPA have requested a review of the arrangements in place to evaluate how successful this operation has been in terms of service delivery and to identify any potential areas for improvement or consideration of best practice in other areas.

This review will assess the resource that currently goes into planning application management with the aim of providing best value guidance. Current practice will be benchmarked against comparative organisations and alternative practices and procedures suggested where necessary.

Objectives

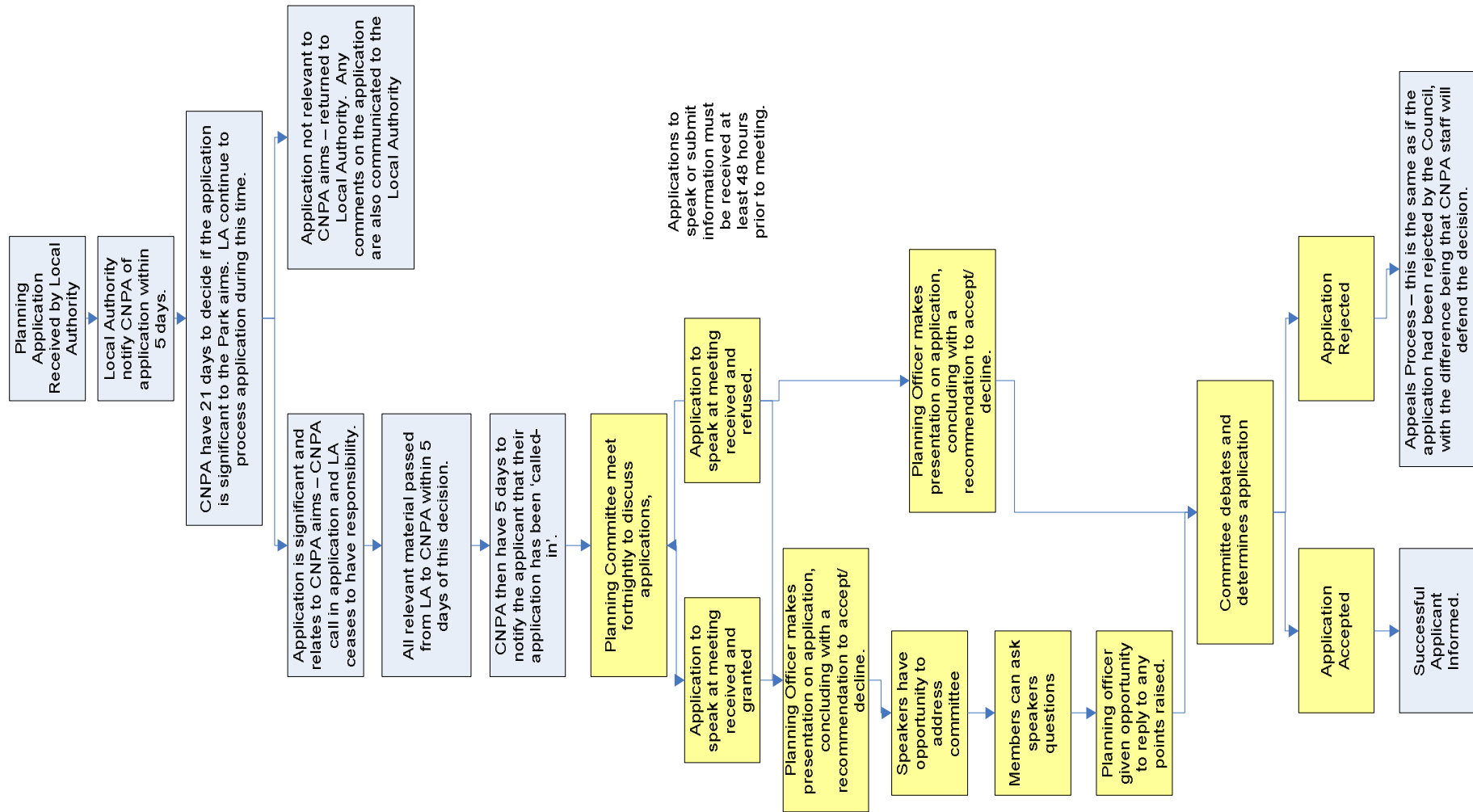
Our review will assess the performance of CNPA in terms of management of planning applications over the last six years. We will provide statistical analysis of performance along with a comparison against local authorities and other parks as well as providing an indicator of national performance.

Although much of the review will assess performance within CNPA, we will liaise with local authorities and similar organisations in order to identify existing processes and performance and identify areas of best practice.

In terms of assessing CNPA performance our objectives are to assess whether:

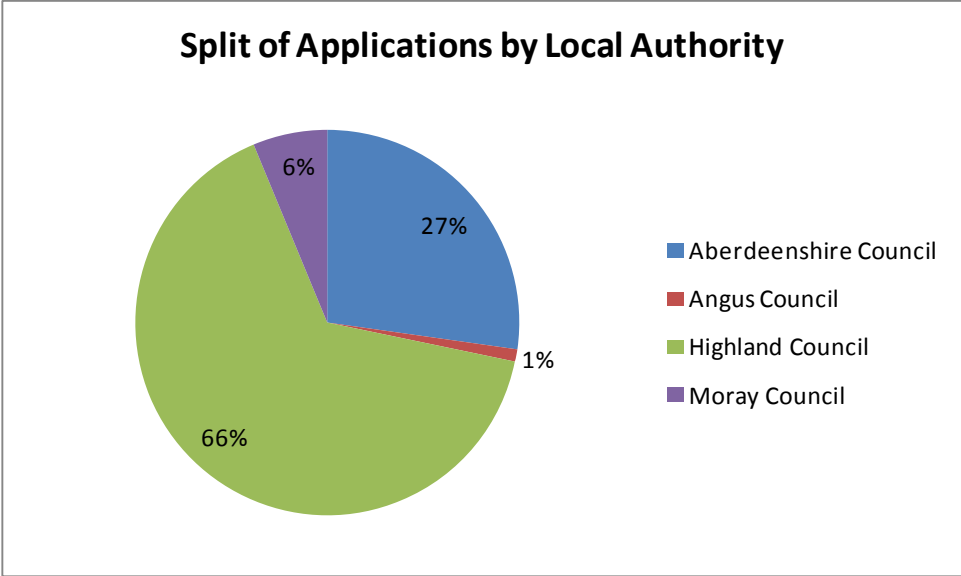
- There is an appropriate process in place for receipt, preparation, presentation and determination of planning applications.
- There is appropriate guidance in place for staff.
- Sufficient resource is employed to manage applications, which is comparable with local authorities and similar sized organisations.
- A planning committee structure is in place which has an appropriate remit and procedures which is reviewed on a regular basis.
- Effective monitoring arrangements are in place over planning performance with lessons learned communicated across the organisation.
- Planning performance is reported to senior management on a regular basis with follow up actions reported where appropriate.
- Delays in determinations are investigated and appropriately reported.
- There are mechanisms in place to gain applicant feedback.
- There has been an assessment of the impact of changes in planning regulations.
- There is evidence of collaborative working both within and outwith CNPA.

Appendix B - The planning process



Appendix C – Split of applications by Local Authority

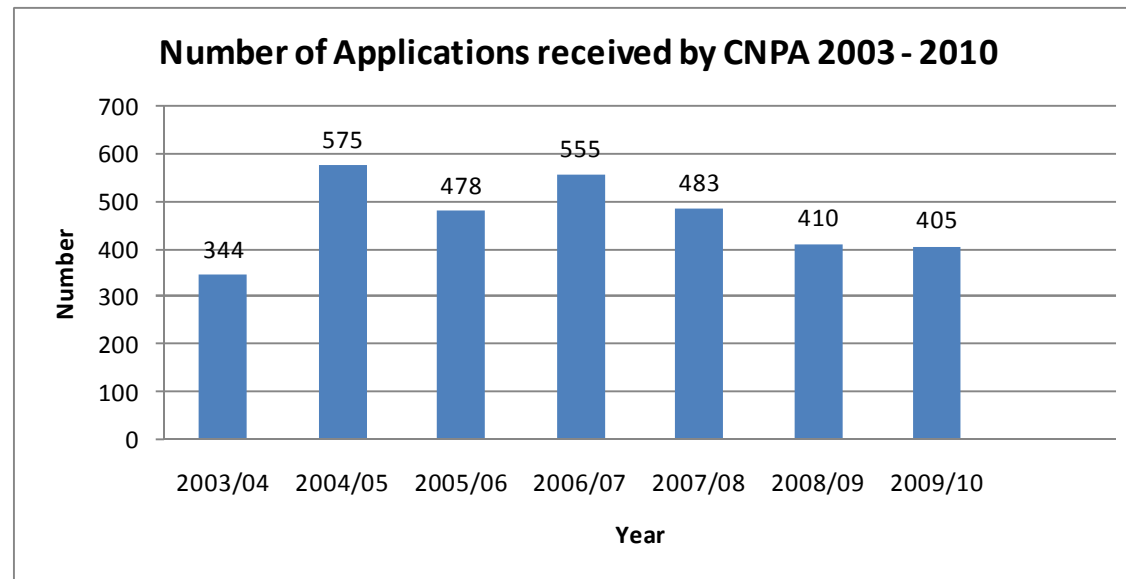
CNPA has received 3,275 applications between 2003 and the end of February 2010. All applications will have been passed to CNPA through one of the four Local Authorities which cover the National Park area. The chart below demonstrates the split of applications by Local Authority over the last seven years.



As demonstrated above, the largest proportion of applications are received from Highland Council. Approximately 70% of the applications received from Highland Council relate to the Badenoch and Strathspey area. Approximately 27% of applications are received from Aberdeenshire Council from two areas, Kincardine and Mearns and Marr. Aberdeenshire Council is the third largest Council in Scotland in terms of Planning.

Appendix D - Number of applications per year

The graph below demonstrates the number of applications received by CNPA each year from inception to the end of February 2010. This information has been taken from the database maintained by CNPA’s Planning department.



- The average number of planning applications received each year is 484;
- CNPA decides to call-in approximately 15% of all applications put forward by Local Authorities. We do acknowledge that this varies and has been following a reducing trend in recent years;
- 2003/04 is not a complete record of all applications due to the fact that CNPA only became fully operational in September 2003 therefore data for 2003/04 does not represent a full year;

Appendix E - National planning statistics

The table below summarises the delivery of nationally set planning objectives for determination. A target of 85% achievement within 2 months is set and 80% within 3 months. The results from 2004/05 to 2008/09 are documented below. This is the only national information available. It should be noted that CNPA is unique in its capacity to call-in applications and is recognised by the Scottish Government as operating differently.

Council	2004/05			2005/06			2006/07			2007/08			2008/09		
	Total Decided	% Decided in 2 months	% Decided in 3 months	Total Decided	% Decided in 2 months	% Decided in 3 months	Total Decided	% Decided in 2 months	% Decided in 3 months	Total Decided	% Decided in 2 months	% Decided in 3 months	Total Decided	% Decided in 2 months	% Decided in 3 months
Aberdeen City	2232	70.6	85.0	975	68.9	81.9	2304	65.8	80.0	2159	64.3	78.9	1949	77.4	90.6
Aberdeenshire	3911	65.5	78.6	3794	56.2	70.0	3938	51.6	65.4	4058	37.1	53.9	3872	43.4	57.2
Angus	1407	69.4	82.1	1439	65.7	79.3	1495	69.4	78.0	1508	63.4	76.6	1277	70.5	79.2
Argyll & Bute	2608	65.0	78.6	1715	64.3	75.8	1752	62.9	74.3	1668	65.7	72.3	1561	62.4	72.8
Cairngorms	21	0.0	23.8	106	0.0	20.8	43	0.0	25.6	61	0.0	42.6	51	0.0	33.3
Clackmannanshire	396	84.1	91.2	371	81.1	92.4	381	85.3	93.7	409	86.1	93.2	339	87.9	94.1
Dumfries and Galloway	2487	55.9	70.9	2455	61.4	76.0	2422	60.8	75.1	2327	60.4	74.6	1991	59.1	73.6
Dundee City	916	62.4	83.0	875	62.6	80.0	947	58.9	79.5	966	55.5	74.0	739	62.5	79.8
East Ayrshire	1066	57.3	76.3	1110	49.5	70.1	1050	54.4	71.1	943	62.8	73.7	762	39.6	61.7
East Dunbartonshire	1101	71.6	80.9	1188	54.7	72.0	1151	60.0	77.7	896	53.0	65.3	1101	65.3	69.7
East Lothian	1326	72.2	80.7	1164	72.7	81.2	1169	68.9	78.2	1159	64.5	72.9	1109	69.8	76.7
East Renfrewshire	1080	77.2	91.0	978	69.5	88.5	947	71.8	89.4	936	66.9	85.0	813	76.0	87.5
Edinburgh	4473	61.9	82.1	4464	63.7	82.9	4418	63.9	83.5	4399	68.1	84.1	3809	69.6	85.1
Falkirk	1022	57.2	75.0	1085	61.2	73.2	1103	63.6	76.7	565	54.5	82.4	504	65.1	89.3
Fife	3724	65.5	83.2	3621	48.2	69.6	3678	49.4	71.1	962	66.8	83.0	852	55.8	72.5
Glasgow City	3723	54.8	71.3	3729	64.3	77.4	3449	68.0	79.3	3483	53.9	69.3	3144	53.0	69.7
Highland	4743	52.9	71.3	4470	54.3	71.9	4605	56.0	71.2	3596	54.4	71.4	2981	68.9	81.1
Inverclyde	404	68.6	83.9	564	73.9	86.0	538	78.1	87.8	4288	56.1	71.5	3921	51.7	68.2
Loch Lomond and Trossachs	421	54.9	68.4	393	47.1	63.6	431	47.8	66.4	491	74.5	87.2	402	72.6	85.6
Midlothian	895	68.9	78.7	895	69.6	79.2	791	60.6	77.3	360	50.0	67.2	312	47.1	69.2
Moray	1388	60.1	74.3	1353	57.9	71.6	1470	46.7	63.2	838	69.3	80.4	648	67.6	77.9
North Ayrshire	1113	67.8	78.4	1076	69.9	81.8	1118	75.3	85.6	1428	46.2	60.2	1238	47.8	64.2
North Lanarkshire	1984	72.3	84.0	1863	63.4	81.6	2003	76.1	84.3	1001	77.1	87.4	871	73.9	84.5
Orkney	452	48.0	77.4	483	35.6	75.1	559	45.6	70.1	1719	73.8	83.8	1459	69.7	80.1
Perth and Kinross	2269	45.2	74.8	2183	55.7	79.5	2215	48.4	69.5	582	65.9	86.8	514	68.9	85.0
Renfrewshire	1275	63.7	83.2	1235	63.0	78.4	1146	61.4	78.9	2389	48.1	68.9	2126	55.4	72.5
Scottish Borders	2142	53.2	73.8	2152	46.9	67.3	2169	45.2	62.5	1091	61.4	77.2	930	66.2	78.5
Shetland	405	56.8	81.7	204	0.0	74.0	172	22.1	58.1	2133	44.9	63.3	1725	52.1	70.2
South Ayrshire	1586	60.7	79.2	1488	55.8	77.0	1587	56.3	75.0	457	23.4	57.5	371	36.9	68.7
South Lanarkshire	2786	68.4	81.8	2669	65.0	77.9	2692	77.1	86.1	1491	47.6	66.9	1463	43.0	64.5
Stirling	955	72.3	83.6	996	72.2	82.7	946	67.7	78.1	2519	72.8	82.5	2174	68.2	77.6
West Dunbartonshire	524	72.9	85.1	520	76.9	84.2	188	81.5	92.5	990	67.0	80.7	801	66.2	79.3
West Lothian	1405	85.1	92.1	1236	84.1	90.4	1242	77.9	85.4	384	77.8	89.7	393	66.7	82.4
Western Isles	480	65.6	91.0	542	57.7	87.2	478	60.7	83.7	1140	78.8	87.1	1018	74.1	83.3
SCOTLAND	56720	62.9	79.1	53391	60.3	76.9	54597	61.0	76.0	53396	58.7	73.7	47220	60.5	74.7

Appendix F – Average caseload per Planning Officer

The analysis below is an approximate assessment of the average caseload per Planning Officer. Due to a lack of available information, we have had to make some assumptions and the caseload figures are taken from CNPA records of applications submitted for approval.

CNPA

CNPA receive an average of 468 applications per year which require assessment of whether to call the application in. Based on a staffing establishment of four planners, this would represent an average caseload of 117 applications per year. It is acknowledged that a high proportion of these applications will not be called in and will be referred to the relevant Local Authority. On the basis of an average call-in rate of 15%, this can be equated to approximately 70 cases for determination. This would equate to 18 cases per year per officer, and work involved in reviewing applications in the lead up to call-in.

Loch Lomond and Trossachs National Park

The average number of applications handled by Loch Lomond and Trossachs is 450 per year. Based on a staffing establishment of four planners, the average caseload per year would be approximately 112. We do acknowledge that 90% of applications are determined by the Head of Planning, which is not applicable at CNPA.

Highland Council

Highland Council handles approximately 4,500 planning applications per year. The Council have 29 Planning Officers (currently carrying two vacancies), which represents an average caseload of 155 applications per officer per year.

Aberdeenshire Council

Aberdeenshire Council handles approximately 4,000 planning applications per year. The Council have xx Planning officers, which represents an average caseload of xx applications per officer.