



# Planning Performance Framework 2014-15







### 1. Introduction

**sport**scotland is the national agency for sport. Our vision is a Scotland where sport is a way of life and has a positive impact on people and communities. Our focus is on building a world class sporting system for everyone in Scotland. The availability of a network of quality places for people to get involved in sport is crucial to deliver this vision.

The planning team comprises a Lead Manager and 3 planners.

#### What we do:

The planning team sits within the Facilities Team and has the key work areas of:

- Inputting to the development of spatial policy and legislation in relation to sport.
- Undertaking our role as a statutory consultee.
- Working with partners to plan strategically for their sport and sporting estate.
- Developing the Facilities Planning Model for use at national and local authority level.
- Assessing the need and demand for facilities in relation to capital funding applications.

# 2. Headline Indicators

**Table 1 - Development Plans** 

Development Plan Engagement	2012-13	2013-14	2014-15
Pre-main issues report engagement (meeting and/or submission)	4	5	5
Respond to MIR	6	4	4
Respond to Strategic/Local Development Plan	7	12	5
Other consultation involvement (input to wording or additional sites consultation)	3	4	2
%age of responses within set timescales			100

Table 2 - Planning applications - Number & Type of response

Response	2012-13	2013-14	2014-15
No comment/advisory only	8 (15%)	47 (60%)	46 (69%)
Recommend grant with conditions	11 (20%)	29 (37%)	20 (30%)
Recommend grant	33 (61%)	n/a	n/a
Objection or holding objection	2 (4%)	2 (3%)	1 (1%)
Total	54	78	67

Table 3 - Planning applications – response times

	2012-13	2013-14	2014-15
Average response time (days)	13	10	8
Responded to within agreed timescales	49 (91%)	77 (99%)	67 (100%)

Table 4 – Pre-application enquires – response times

	2014-15
Number of pre-application enquiries received	24
Average response time (days)	15

# 3. Defining and measuring a high-quality planning service

#### a) Open for business

Our team ethos is focused on providing a high quality and efficient service to partners and customers. We are a small team based in one office location which enables ease of information sharing and shared knowledge of expected behaviors.

We have geographic allocations for our staff which means one point of contact for each Planning Authority. The planner with geographic responsibility for an area will work with a range of partners: Council and Leisure Trust partners – planners; sports development and asset management; national and local sports partners and relevant **sport**scotland colleagues in our wider team. Staff have strong links to and knowledge of these wider areas, which enables a holistic approach to be taken to involvement in development proposals.

Our average response time for planning applications of 8 days evidences this focus on efficient service. We have managed to reduce this each year through prioritising effort in this area. In order to continue to provide a quality service we are unlikely to be able to reduce this much further and will seek to maintain an average timescale of response within 10 days from receipt of a consultation.

July 2015 2 of 11

In the year 2012-13, 91% of planning applications were responded to within agreed timescales, and our aim was for this to be 100% for 2013-14 (see Table 3). In 2013-14 99% of consultations were responded to within agreed timescales. In 2014-15 we met our aim that all applications are responded to within agreed timescales. We will seek to continue this approach.

We seek to find solutions to issues in relation to planning applications, evidenced by the small number of objections made (1% of cases), and also seek to request conditions only where necessary (30% of cases), see Table 2. Please note that in relation to Table 2 we have combined the 'No comment/Recommend grant' consultation responses as these both reflect cases where we have neither objected nor suggested conditions. The feedback to the 2013-14 report queried the change in relation to responses that were 'no comment/advisory only' and the reason for this is as noted above in relation to combining the response types.

The feedback to last year's Planning Performance Framework Report requested that a summary of the nature of objections and the subsequent outcomes could be provided. In 2014-15 we made one holding objection, this was in relation to a site where adjacent works would affect a pitch, we issued a holding response seeking further information, however the Council issued a planning permission without responding to us.

In relation to planning applications the feedback also noted giving consideration to publishing standing advice. The work we have done in relation to updating our document on our approach to planning applications will address this to a degree. Given the relatively small number of applications we get and the varying types of these, it would be difficult to provide standing advice that would cover all areas, as opposed to specific responses when we are consulted, but will continue to monitor the requirement for this.

We encourage and make our staff available for pre-application discussions, we started to record these in 2014-15 and Table 4 above shows these. In 2014-15 we received 24 pre-application consultations, and the response timescale was on average 15 days. One of the pre-application cases, where we were awaiting additional information from others before we could respond, skewed the response time. If it was excluded from the figures the average response time would be 10 days. We will aim to reduce this average to 10 days, the same as our target response time for planning applications. We are comfortable that the time taken in providing pre-application feedback will in many cases mean a reduced timescale for responding as well as reducing the need for additional information at planning application stage.

We have provided on our website contact details for our planners on a geographic basis and text encouraging early engagement in relation to development proposals. We have included similar wording in our updated guidance in relation to our approach to development proposals affecting playing fields. We also plan, with the publishing of our updated guidance later in 2015, to present this to the various RTPI chapters and also to share this with Planning Authorities and offer to present this as part of their CPD programmes.

The feedback on our 2013-14 Planning performance framework noted that there was a lack of evidence of how we ensure information requests are proportionate. As a small team it has always been communicated that we should request only what is necessary in order for us to provide a consultation response. Given the nature of the consultations we receive there is

July 2015 3 of 11

not generally a requirement for significant reports/analysis/studies to be provided and we have no evidence in terms of feedback from applicants that requests we have made for information are disproportionate. To document this way of working we have updated our guidance document on making responses to planning application consultations to make it clear that planners should carefully consider any information requests prior to making them, and that these should be proportionate.

# b) High Quality Development on the Ground

We recognise the importance of early engagement in this area. In the 2012-13 Planning Performance Framework we set the aim for engagement in the Development Planning process of holding a meeting with each Planning Authority at the pre-Main Issues Report stage. In the year 2014-15, we have had 5 such meetings with Planning Authorities.

We have recognised in our work with partners some recurring issues, eg around the siting of synthetic pitches, and are undertaking work on a guidance note which provides good practice on this area. We are also keen to look at our input as a statutory consultee in terms of playing capacity for sports created as a result of planning applications that we're consulted on, and will do this in the financial year 2015-16.

We are currently undertaking a piece of work which will update our position in relation to our role as a statutory consultee. This has still to be finalised but we have included below an extract of one of the case studies that we have in this.

# Case Study 1 – Our approach as a statutory consultee

#### Harhill Street and Elder Street, Govan



We were consulted on two applications for residential development in Govan, Glasgow; one application was on the site of an existing full size blaes football pitch and the other on the site of a former school which also involved the loss of a blaes pitch. Following discussions with Glasgow Life, the charitable trust which manages pitches and other sports facilities for Glasgow City Council, the applicants agreed to make available £130,000 per site (to replace the capacity that would be lost) towards provision of either a new grass pitch suitable for football and new changing accommodation at the Drumoyne Primary School Community Campus, Langland Road, or, delivering pitch capacity improvements in the west of the city at a site to be chosen in agreement with **sport**scotland.

Both applications were approved subject to a legal agreement between Glasgow City Council and **sport**scotland to ensure the provision of the agreed pitch compensation works.

July 2015 4 of 11

It was later agreed that the sum secured for both sites would be best spent at the Drumoyne Primary School Community Campus, a site which is located within less than a mile from the pitches that would be lost. In total, a sum of £260,000 was used toward the delivery of a new strategic pitch sport venue at the site, ensuring that new provision was delivered at a location accessible to users of both of the former pitches, and supporting community use from Greater Govan and the west of the city,

Drumoyne Primary School and Community Campus are complete and comprise a full-size, floodlit, synthetic pitch, and up to three natural grass pitches orientated as either one football and one rugby pitch, or three football pitches, as well as a floodlit 7-a-side sand-filled synthetic pitch, all serviced by new changing accommodation. The venue is used extensively by Park Villa, one of Govan's best known community sports clubs.

# c) Certainty

The benefit of a small team, based in the one location, is that there can be easy sharing of good practice and cases. The team meets on a regular basis to discuss work areas.

In relation to development plans, we have a standard template in terms of our approach to these, in order that staff are clear of the areas we wish to engage with and what our remit is. We have amended this to reflect the publication of the new SPP in 2014. We have also prepared a procedure note which outlines how staff should engage with the LDP process: at what points in it; key areas for us and what questions we should be asking when we read the MIR and LDP in terms of its approach to sport and physical activity.

In relation to planning applications, we have a good practice document which sets out the approach that staff should take to planning applications, in order to ensure we are consistent in this area. This is continually reviewed, the feedback on our report last year requested an overview of changes made. This year we have: included reference to the standard conditions document we have prepared; clarified that information requests should be proportionate; clarification in relation to decision making during probationary period; expanded on requirement for escalation of discussion internally for major and/or politically sensitive proposals.

We have had some staff changes this year and took the opportunity to prepare a guide which has links to all relevant documentation for the planner's work areas, we will keep this under review. We have also prepared a document which contains standard wording in relation to commonly requested planning conditions in our role as a statutory consultee.

We aim to respond timeously to planning applications and pre-application enquiries, as evidenced by our response times to these (see Tables 3 and 4).

# d) Communications, engagement and customer service

We have developed a document management system to store all correspondence and documents.

We have a database for storing all planning consultations received, and from this we can monitor the outcomes of consultations as well as timescales. We had sought to merge this with a wider information management system, but this is unlikely to be a priority for us and we are comfortable that we can monitor our work in this area with the existing system. We have implemented a system of recording pre-application consultations (see Table 4 above).

July 2015 5 of 11

We have a recording system for our engagement with development plans. We have also implemented a system for monitoring and seeking to engage with Open Space Strategies and the development of Supplementary Guidance.

As we are a small team, we can fairly easily seek feedback from partners as part of our work. An online customer survey (via Survey Monkey) has been undertaken in relation to the wider facilities team, of which the planning team forms part. We do not have the analysis of this as yet but a task for this year will be its analysis and implementing any action points arising.

We also plan, with the publishing of our updated guidance (on our approach to our statutory consultee role), to present this to the various RTPI chapters and also to share this with Planning Authorities and offer to present this as part of their CPD programmes.

#### e) Efficient and effective decision making

Our members of staff have clear subject and geographic areas of responsibility. Backed up with standard approaches where relevant, staff are empowered to lead on these areas with referral to the Lead Manager where necessary. Regular communication assists with this.

We have seen with the new Development Plan system the importance of the need for engagement at a very early stage, which we were not always doing in the past, leading to objections from **sport**scotland at the Proposed Plan stage. For those Planning Authorities now involved in preparing a new Plan, we have learned from this experience and are engaging at an early stage in the process, the aim being to have early resolution of any issues, in advance of the Proposed Plan being prepared (see Table 1 above).

We have undertaken to ensure that our input to Development Plans is proportionate and delivers the outcome of a positive spatial policy approach for sport. We are doing this by tracking our input to Development Plan consultations through the various stages from pre-Main Issues Report to Proposed Plan, and any change to policy which results. We looked at a number of policy areas and tracked the policy approach (and any changes) from Development Plan stage to adoption. The key findings are in the below table and were based on analysis of 8 LDPs. We have amended our approach to focus on the key areas which Planning Authorities and reporters consider should be taken into account.

July 2015 6 of 11

Table 5 – Analysis of our LDP Engagement

Response Topic	Overall Outcome
Site specific reps.	Site specific reps are worthwhile.  Leads to clarifications and, where needed, amendment to policy or site designations in the interest of sport/recreational access.
SPP para226	Some differing approaches but generally wording from SPP or policy reflects its provisions where requested.
Green networks (general)	Hooks to SPG/Strategies supported – potential to tailor responses to refer to SPP/OSS (Outdoor Sports Strategy) where these exist? Support that cycling is not only about active travel.
Access rights	Reference to these generally included/strengthened where requested.
Country / regional parks	Generally considered unnecessary to differentiate between recreational countryside greenspace or map smaller greenspace/fields in LDP.
Strategies / FPM work	Where we're already involved with LA's strategy more willing to create hooks in LDP.
Renewables	Where broader no. of criteria are included and ref. to SPP, DPEA likely to consider sufficient; in responding we should consider if recreation/sports adequately covered by wording.
Disused mineral	Councils minded to include broader statement of 'generic remediation' and 'positive use' rather than specific land uses.

In relation to the outcomes of our input to Development Plans, please see below four case studies in relation to recent engagement in LDP preparation.

# Case Study 2 – Development Plan Outcomes

Case Study A - During the previous LDP, from MIR to LDP, we consistently gave the same message on the need for a policy on development affecting outdoor sports facilities. Our view was upheld by Reporters at Examination and a policy along the lines of the then SPP para 156 was included in the Adopted Plan. The Council has recently been in touch with us in relation to their new MIR seeking views on how to update this policy in relation to the new SPP para 226. We think this shows that being consistent in our approach assists in increasing awareness of this policy area and the need for it to be covered by the Development Plan.

Case Study B - At pre-MIR stage, as well as providing comments based on our 'key issues template', we also carried out a review of policies of relevance to our remit in the current Local Development Plan, given the new SPP, and anticipating that for Planning Authorities embarking on their second LDP there may be policies that will be carried forward largely unchanged from the first LDP. We felt that it was helpful to provide these comments at the pre-MIR stage as there may not be the opportunity to comment on the specifics of policy wording during the MIR consultation, where only 'main issues' are addressed. We subsequently met with planners to discuss this and received feedback that this was useful to them as they develop the LDP.

July 2015 7 of 11

Case Study C – We met the Council at pre-MIR stage and discussed the benefit of a clearly worded policy in relation to outdoor sports facilities and highlighted that the SPP wording could be used as the basis of a policy. The LDP was recently published with such a policy and we have confirmed our support of this.

Case Study D – Through our membership of the Key Agencies Group we were aware that the Council was engaging with Key Agencies on an early draft of the LDP. We contacted the Council and highlighted that we'd be keen to provide feedback if of assistance. The draft text was shared with us and we made some suggestions in relation to changes, which in our view would give a stronger policy position in relation to sport and physical activity. The Council took on board most of our suggestions and the need for representations when the LDP was published was reduced.

We recognise that some of our guidance (eg on the Facilities Planning Model and on Guidance on Pitch Strategies) is out of date. While the principles are still relevant these need to be updated. In relation to the Facilities Planning Model document, this has been updated. With our new Corporate Plan, we are seeking to integrate the planning for sport with the planning for places for sport, as such, updating our guidance on pitch strategies will be considered as part of this work.

# f) Effective Management Structures

We have developed a way of working where each team member has clear roles and responsibilities, along both geographic and subject areas. However, as we are a small team we have sufficient familiarity with all areas of work which enables us to respond to peaks of work in areas where this occurs. We meet as a team on a 6 weekly basis to discuss work areas and on a weekly basis to discuss current planning application consultations and any urgent matters.

In the feedback to the last Planning Performance Framework Report more information was requested in relation to our decision making role. In most cases, decision making sits within the planning team in relation to our input to LDPs/SPGs etc and planning applications. Where we have made an objection to a planning application, the sign off of the Head of Facilities and the Lead Manager (Planning) is needed if the objection is to be withdrawn. It is expected, however, that planners will use good judgment to flag sensitive issues to the Lead Manager, given that we are a small team based in one location this is what happens. We have taken the opportunity to document this in our procedure notes for development plan and statutory consultee engagement. We have also included the requirement in these procedure notes that sign-off from the Lead Manager is needed for all development plan and planning application responses during the probationary period for new staff.

The planning team sits within a wider Facilities and Sports Development Team which is similarly arranged along the lines of geographic and subject area responsibility; close working with these colleagues is required to effectively deliver our work areas.

# g) Financial Management and local governance

We are governed by general governance applying to **sport**scotland.

The planning team has a budget which we seek to use in helping Councils, Leisure Trusts and Sports Governing bodies take a strategic approach to their sports' facility requirements. As such, our main budget is spent on: delivery and improvement of the Facilities Planning

July 2015 8 of 11

Model (in partnership with Sport England) and contributing to the costs of preparation of Sports Governing Body's facility strategies and Local Authority Pitch and Facility Strategies.

#### h) Culture of Continuous Improvement

**sport**scotland involves staff in the development of its Corporate Plan and resulting business plan actions. We have recently produced our 2015-19 Corporate Plan and staff have been engaged in the development of this and subsequent business plan activities.

Of our team of 4 planners, with the departure of the countryside planner we took the decision appoint a planner as opposed to a countryside planner, and to split the remit of this work area across the team. This has meant a reduced geographic area of responsibility for planners across the 32 Council and 2 National Park areas. The key work areas for the countryside planner were in relation to access policy and legislation and marine planning, and 2 planners have taken lead responsibility for these work areas. This also has benefits for business continuity in terms of sharing the knowledge base for these areas within the team.

We have in place a staff performance framework that is based on a series of functional and behavioral competencies. This is linked to a 'Personal Development Plan' which outlines a staff member's development requirements. Training and learning opportunities are provided for staff to deliver development requirements identified in Development Plans. We have implemented an 'ELearning' platform which enables staff to directly access a range of online training as well as booking training opportunities.

As a result of this staff development framework we have been able to access a range of training, not only related to technical planning skills, but also on transferable skills including (in 2014-15): Microsoft Word; Recruitment and Selection; Equalities; Project management; Managing yourself and your time; Questioning techniques and Conferences (Young Planners, RTPI Scotland, Outdoor Recreation Network, Sports and Play Construction Association)

Our team sits within a wider facilities and sports development team and we encourage staff to work closely with colleagues in these areas, in order that they can develop an understanding of the wider sports environment within which they work.

# 4. Supporting Evidence

- Monitoring information in relation to planning consultations received.
- Monitoring information in relation to development plan involvement and a detailed review of the outcomes of our input to 8 LDPs.
- Informal feedback from partners.
- Reporting against our business plan objectives.

July 2015 9 of 11

# **5. Delivery of our Service Improvement Plan Actions**

No.	Action	Complete/Comments
1	We will engage with all Local Authorities at pre-main issues report stage.	Yes, engaged with a number of Local Authorities as relevant (see Table 1).
2	We will update our standard approach for staff in relation to engaging with the development plan system on publication of the revised SPP.	Complete.
3	We will monitor and engage with SPGs relevant to our area of work.	Yes. We monitor these and have responded to a number of these, for example in relation to: masterplans; community infrastructure; onshore wind and town centre action plans.
4	We will monitor and engage with the development of Open Space Strategies.	Yes. We monitor these and have responded to one this year – East Dunbartonshire.
5	We will respond to all planning application consultations within the agreed timescales.	Complete.
6	We will move our planning application database to a more user friendly platform. This will include for recording national/major/local development and preapplication enquires.	No, however, we are comfortable that we can monitor and report with the system we have and this is no longer a priority.
8	We will update our guidance on Pitch Strategy Preparation and the Facilities Planning Model (to be completed end financial year 2015).	Our guidance on the Facilities Planning Model has been completed. However, the guidance on Pitch Strategy Preparation is linked to a wider area of work in relation to integrating planning for sport and the places for sport which is ongoing, and will be considered as part of that work.
9	We will prepare guidance on the siting of synthetic grass pitches (to be completed by	This is underway. Our planner undertaking this was on maternity leave and we took the decision that the work

July 2015 10 of 11

	end 2014).	area should await her return. It will be completed by the end of this financial year.
10	We will ensure staff receive training and learning opportunities identified as part of their appraisal process.	Complete.
12	Review our input to development plans	Complete. We will continue to monitor this on a 2 yearly basis.
13	Updating our document in relation to our approach to development proposals	In draft form, will be completed by end August 2015.
14	Implement customer service survey	Online survey issued, results, analysis and actions still to be done.

# 6. Service Improvement Actions 2014-15

In the coming year, key improvement actions will be:

- 1. Those outlined above, in particular the customer service survey and any actions arising.
- 2. Examine outcomes in relation to our role as a statutory consultee in terms of capacity created.
- 3. Publicise our updated document in relation to our approach to planning applications via: our website; RTPI chapters and Planning Authorities

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July 2015 11 of 11

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