



Scottish Natural Heritage
Dualchas Nàdair na h-Alba

nature.scot

Planning Performance Framework Annual Report

Period: 1 April 2019 to 31 March 2020



Planning Performance Framework Annual Report

Contents

1. Introduction	1
2. Description of our service	1
<i>Organisational structure</i>	2
<i>Resources</i>	2
3. Performance markers	3
3.1 Placemaking.....	3
<i>a. Strategic planning</i>	3
<i>b. Development Plan engagement</i>	3
<i>c. Development Management</i>	4
<i>Pre-application engagement</i>	5
<i>Consenting</i>	6
<i>Delivery of development</i>	6
3.2 Capacity-building.....	7
<i>d. Sharing good practice, skills and knowledge</i>	7
<i>e. Evidence and data-sharing</i>	8
3.3 Service.....	9
<i>f. Decision-making timescales</i>	9
<i>g. Joint-working arrangements</i>	9
<i>h. Engagement with service users</i>	9
4. Changes to meet this year's improvement priorities	10
5. Service improvements for 2020/21	11
Appendix: Consultation statistics	

1. Introduction

This is a report to the Scottish Government on our performance within the Planning System during the period 1 April 2019 to 31 March 2020. It reports against a series of performance markers covering different elements of our engagement in the Planning System, and identifies priorities for improvement during the next reporting period from 1 April 2020 to 31 March 2021. It follows a template agreed with the other Key Agencies and the Scottish Government.

2. Description of our service

Our planning service includes advice and associated capacity-building and guidance. It supports implementation of the Third National Planning Framework, and accords with Scottish Planning Policy and the Scottish Regulators' Strategic Code of Practice. It helps deliver the Scottish Government's commitment to tackling the twin challenges of climate change and biodiversity loss, and the transition to a net zero carbon economy that is fair for all. It now has a key part to play in helping Scotland's economic recovery from the Covid pandemic.

Our services aim to help make Scotland the best place to live, work, visit and do business. To support this aim, and achieve the right development in the right place, we have promoted plan-led approaches and engaged early with development interests to provide certainty for investment as soon as possible. In summary, we:

- build greater capacity amongst planning authorities and developers to achieve sustainable use of our natural assets - our guidance and training helps maximise the opportunities and competitive advantage from our natural resources;
- influence national strategic development policies and plans and associated Strategic Environmental Assessment (SEA);
- input to regional and local spatial plans - we are an active partner in Development and Marine Planning, master plans and action programmes;
- provide early, pre-application advice on development proposals, including mitigation measures;
- advise decision-makers on potential impacts of proposals on the natural heritage, targeting matters of potential national interest; and
- inform post consent monitoring at a strategic and project level to advance understanding of the impact of development on the natural heritage.

Our planning service has delivered multiple benefits that contributed to all four of the outcomes in our corporate plan [Connecting People and Nature](#), around which our work is based:

1. More people across Scotland are enjoying and benefiting from nature.
2. The health and resilience of Scotland's nature is improved.
3. There is more investment in Scotland's natural capital and its management to improve prosperity and wellbeing.
4. We have transformed how we work.

The service helped to deliver the priorities for 2019/20 set out in our business plan for the period [It's in our Nature: Year Two](#); including:

- place making, targeted investment in green infrastructure and strategic path networks, and helping more people to connect with and benefit from nature;
- preparing for the challenges arising from new international targets for biodiversity in 2020 and ensure that we are maintaining, protecting and enhancing Scotland's nature;
- demonstrating how people, the climate and the economy can benefit from investments in nature, to pursue opportunities for investment and to maximise the benefits and impacts that this brings;

- continuing to support Scottish Government's commitment to plan-led development and the transition to a low-carbon economy through the development of renewable energy resources on land and at sea; and
- ensuring that our workforce is fit for the future, through a new Organisational Development Framework; focussing on workforce wellbeing and skills development, organisation design, innovation through technology and working in partnership.

More specific key deliverables identified for our planning service where:

- Influence city & regional growth strategies/deals to better reflect the role of nature and prepare the foundations for an enhanced commitment to nature in the new National Planning Framework as part of the transition to a low-carbon economy.
- Help key industry interests - particularly housing, energy and transport – and enterprise bodies to use proportionate environmental assessment.
- Be an active, valued and inclusive partner in development planning.
- Provide targeted and streamlined advice on proposals to enable good development.
- Progress investment on green infrastructure improvements through our leadership and support of national projects, such as the Green Infrastructure Strategic Intervention (GISI).
- Fund the National Walking and Cycle Network (NWCN) and the Central Scotland Green Network (CSGN).

Our service has sought to enhance the quality of people's lives by tackling disadvantage and promoting equality and fairness; provide social and economic competitive advantage through a Scottish brand framed by natural capital; and minimise adverse impacts on nature. We have adopted the [Place Principle](#) to help overcome organisational and sectoral boundaries, and encourage better collaboration and community involvement.

Organisational structure

The strategic direction of our engagement in the Planning System is provided by our Board and Senior Leadership Team. Our Planning for Development service statement [Planning for Great Places](#) outlines our approach. It strengthens the connection between people, development and nature, and focuses our efforts on: earlier and more upstream engagement in the Planning System; stronger working with business interests; and providing clearer advice that is alert to other interests.

The service was delivered by Activity and Area teams. Our *Supporting Good Development* Activity coordinates our work within the Planning System. It leads onshore development advice, our input to development planning, working with Industry and strategic planning. To support this, our *People & Places* Activity provides advice on placemaking and green infrastructure and engagement with community planning; and our *Sustainable Coasts and Seas* Activity leads marine planning and development advice. Local delivery of the service across the country is through seven Area Teams (*Northern Isles & North Highland, South Highland, Argyll & Outer Hebrides, Strathclyde & Ayrshire, Tayside & Grampian, Forth and Southern Scotland*).

Resources

The service is funded through our Scottish Government grant-in-aid. Given the multiple benefits it achieves, we continued to invest a significant proportion of the funding in planning and placemaking work. In 2019/20 this approximated to £4 million (7% of our £56.2 million grant-in-aid) and was made up of staff costs of £3.5 million (70 full-time equivalents) and project costs of £0.5 million.

3. Performance markers

3.1 Placemaking

a. Strategic planning

We contributed to strategic planning through our advice on a range of strategic policies and plans, associated SEA and the development of plans for projects that are part of the Third National Planning Framework. Our contribution in 2019/20 included:

- supporting the implementation of the new Planning Act by inputting to the work programme for Transforming Planning in Practice as a member of Development Management Working Group and contributing to Key Agency input to other working groups;
- preparing our response to the Scottish Government's call for ideas for the fourth National Planning Framework (NPF4) - Our Board considered two papers to frame our response;
- responding to Scottish Government consultations on Planning Fees and Performance, the District Heating Regulation - Heat Networks Bill, the National Transport Strategy and Housing to 2040;
- advising on 252 SEA consultations, from pre-screening to Environmental Reports (See Appendix, Table 1 for details), covering a wide range of policies and plans - eg. Sustainability Appraisal of Permitted Development Rights, National Transport Strategy, Scottish Transport Projects Review (STPR), Road Safety Framework, National Tourism Strategy and Export Plan;
- a workshop with Transport Scotland on the draft National Transport Strategy consultation document, advice to Transport Scotland and its consultations on the development of STPR, as well as participation in a series of STPR2 workshops, identifying interventions from a national to a local scale to support Regional Transport Strategy updates, and input to the review of the Scottish Transport Appraisal Guidance (STAG);
- inputting to SPEN's Sustainability Working Group, and responding to SSEN's Draft Business Plan;
- supporting the SCDI Clean Growth Leadership Group, including providing a speaker at the high-profile launch event; partnering in the SCDI Forum in 2019, with a workshop presentation on the economic benefits from nature.

Case Study: Strategic planning for wind farm repowering in South Lanarkshire

We are working with the South Lanarkshire Council, Scottish Government Energy Consents Unit and a group of seven developers to test a new approach that will facilitate the repowering of wind farms; with the aim of speeding up the planning process, reducing costs and delivering greater benefits for nature. The project began in September 2019 and is starting to deliver results. Work has been completed on bird monitoring and landscape and visual impacts, and a development framework for the cluster of wind farms is in preparation. By the end of 2020 we aim to have a model developed that can be adapted and applied to clusters of wind farms elsewhere in Scotland

b. Development Plan engagement

We continued to be an active partner in Development Planning in 2019/20, supporting our commitment to a plan-led approach to development. Through engagement in the plan-making process, we planned for further investment in natural capital, helped to balance competing interests and guide development to the right places. Our contribution included advising on development frameworks, briefs and master plans, supplementary guidance, action programmes, SEA and Habitats Regulations Appraisal (HRA).

We responded positively to opportunities to engage early in the pre-MIR plan preparation process, for example:

- multi-partner discussions for the Inner Moray Firth LDP pre-call for sites stage;
- working with The Highland Council to explore a more effective way to link the very early stages of Local Development Plan (LDP) preparation and its environmental assessment, developing an approach that uses SEA site assessment questions at the Call for Sites stage.

Appendix, Table 1 shows the number of development planning consultations received in 2019/20. We received a total of 96 statutory and non-statutory plan consultations. This was an expected small increase on the previous couple of years, as we moved further into plan cycles.

Examples that demonstrate the added value we have brought to Development Planning in 2019/20 include:

- working with planning authorities, Sustrans and other key stakeholders to develop the Dundee to St Andrews strategic access link;
- maintaining a national overview and work to influence key stakeholders in planning for City Deals (Glasgow, Edinburgh, Inverness, Stirling, Dundee/Perth and Aberdeen) and the Borderlands regional growth deal;
- advising on the West Edinburgh MIR and City Mobility Plan to help ensure that transport and spatial planning benefit from nature-based solutions that are responsive to place;
- publishing guidance on [spatial planning for coastal change](#);
- working with public and private sector stakeholders on the Fort William 2040 Vision and Masterplan, and the progression of associated key investment opportunities.

Case Study: East Lothian ClimatEvolution Project

We have been working together with East Lothian Council, SEPA, Scottish Water, Scottish Government and developers on the [ClimatEvolution Project](#); a visionary approach to the delivery of blue and green infrastructure for an area of East Lothian, including the new Blindwells development, the former Cockenzie Power Station site and existing settlements. The integrated approach to planning and design, and use of nature-based solutions, is a blueprint for the positive part development can play in adapting to and mitigating the impacts of climate change, and providing community benefits through, for example, addressing strategic drainage challenges, connecting people through active travel, delivering innovative geo-thermal energy generation, and the provision of new sport and leisure opportunities.

c. Development Management

We provided advice on 473 planning application consultations (excluding 'no comment' responses). We advised developers, local authorities and agencies on the impact of development proposals on natural heritage interests, including advice on mitigation. This has enabled the delivery of development priorities across a range of industrial sectors including housing, renewable energy, manufacturing, transport, marine development, fish farming and telecommunications.

We provided advice and support to the Planning and Environmental Appeals Division (DPEA) through attendance at the public local inquiry for North Lowther Energy Initiative (providing evidence on landscape and visual impacts and our process of considering national interest), and more generally as a member of the DPEA Stakeholders Group.

Pre-application engagement

Our early pre-application engagement aimed to support a more efficient Planning System. It allowed issues to be identified early in the development and planning process. It afforded time to try and resolve issues ahead of applications being submitted. We responded to 186 pre-application consultations, often in collaboration with other key agencies. Examples of pre-application engagement in 2019/20 include:

- input to masterplanning for the redevelopment of Longannet embedding nature based solutions into the design and layout of the new use of an industrial site;
- resolving an SPA issue with the Lairg to Loch Buidhe Overhead Line through analysis of existing data and expert peer review, avoiding need for additional survey work and further delay to the project;
- advice and support for Orkney Islands Council's impact assessment of its own suite of wind farm proposals;
- working with Energie-Kontor to improve the design of their Lairg II wind farm to avoid impacts on peatland habitat and develop a Habitat Management Plan to benefit upland birds;
- engagement with SSEN over Western Isles transmission and avoidance of impacts on Marine Protected Areas;
- providing advice on the HRA for the £250 million Grangemouth Flood Protection Scheme, including proposals for the development of potential compensation areas, and ground investigation works to be carried out in 2020;
- developing spatial guidance and policy to help identify and avoid sensitive seabed habitats in selecting suitable locations for development;
- Inputting to the development of new regulatory approach for wild fish interactions to reduce delays in the planning process.

Case Study: Sectoral Plan for Offshore Wind

Throughout 2019/20 we have worked with Marine Scotland in the preparation of a Sectoral Plan for offshore wind energy in Scotland, which has a key role to play in Scotland's transition to a net zero carbon economy. This plan-led approach directs offshore wind development to those areas of our seas best able to accommodate large scale turbine arrays with least impact upon nature and other interests and uses. We have helped to identify areas offering opportunities for development, alongside those where constraints may exist. A focus of this has been bespoke guidance for each draft plan option area illustrating where and how best to minimise visual impacts from the coast, to inform lease applications at an early stage.

We have continued to focus on Development Management advice cases with potentially the most significant impacts on the natural heritage; those that give rise to issues of national interest. Following the establishment of our service statement thresholds for consultations in 2015/16, there was been a significant reduction in the number of planning applications we are consulted on (Appendix, Table 2). This decrease continued in 2019/20 with 516 planning application consultations, less than half the number of consultations we received in 2015/16.

The success of our pre-application engagement and advice to improve development outcomes is again reflected in the continued low number of application consultations resulting in an outright objection (Appendix, Table 2). We have objected outright to less than 1% of the planning applications we have been consulted on in each of the last six years, with only three outright objections to planning applications in 2019/20; a wind turbine (impacts on a Wild Land Area) and two forestry buildings (impacts on a Special Protection Area). In addition, we objected to three Section 36 wind farm applications (in relation to landscape and visual impacts on a National Scenic Area and Wild Land Areas).

Consenting

Examples of where we have worked closely with developers in 2019/20 to successfully deliver improved development outcomes include:

- collaborating with Mowi to develop and agree an adaptive management framework to manage the risks of sea lice on FWPM, allowing the proposed expansion of Macleans Nose fish farm;
- landscape advice on major wind farm cases including Glenshero, Kirkan, Rothes III, Clash Gour and Sanquar II;
- providing peat management advice (jointly with SEPA) to Liberty Group for the proposed aluminium factory site at the Lochaber Smelter, identifying least environmentally damaging solutions;
- responding to the planning application for a major substation for Orkney connection project;
- assisting Scottish Power over plans for the restoration of the Valleyfield ash lagoons at Longannet adjacent to the Firth of Forth SPA;
- placemaking and green infrastructure advice for the major Durieshills Hill housing proposal in Stirling;
- advising Argyll and Bute Council on the restoration requirements at Merk Hydroelectric Scheme.

Case Study: Meadowbank Development Green Roof Options Appraisal

We have been working with City of Edinburgh Council and others to explore the viability of integrating green roofs into an existing development proposal. [The Meadowbank Development Green Roof Options appraisal](#) was the result of a partnership between the Scottish Government, Architecture and Design Scotland, the Scottish Federation of Housing Associations and City of Edinburgh Council. The partners commissioned a multi-disciplinary design team (comprising Architects, Landscape Architects, Structural Engineers, Quantity Surveyors and a leading UK Green Roof expert) to carry out a viability study based on an existing housing and mixed-use development proposal at Meadowbank, close to the centre of Edinburgh. The team took a collaborative place-based approach to identifying solutions appropriate to the specific challenges and opportunities at the site.

Delivery of development

We continued to lead the delivery of the following national infrastructure projects that provided further opportunities for active travel, improving health and helping communities to grow economic activity and employment:

- [Green Infrastructure Strategic Intervention](#): We allocated a further £7.5m of the European Regional Development Fund to 8 capital green infrastructure projects in deprived areas of urban Scotland. Alongside of our existing 7 capital and 11 community engagement projects, this brings the total investment, with match funding, through the fund to almost £40m. The first of our Phase 1 projects are set to complete during 2020. Their impact will be demonstrated through case studies showing the multiple benefits they bring to local communities.
- [National Walking and Cycling Network](#): We continued to lead on the National Walking and Cycling Network with main partners Sustrans and Scottish Canals, spending a further £270K on improvements to 7 of Scotland's Great Trails. This brings the total joint investment in strategic route development over the first five years of the project to £30 million.

3.2 Capacity-building

Our programme of capacity-building is integral to our commitment to upstream engagement in the Planning System. It includes training and guidance to support planners and developers, helping them to understand and take account of the natural heritage in designing proposals and decision-making.

d. Sharing good practice, skills and knowledge

We developed and shared good practice with a wide range of different stakeholders to help generate good development proposals. This included:

- continuing our series of 'Planning for Great Places' [webinars](#) to assist practitioners with development and planning issues (wind turbine aviation lighting, planning for coastal change, solar energy development, Habitats Regulations Appraisal, and development on peatland);
- preparing new content on our website, including pages on [good practice construction](#) and [placemaking and green infrastructure](#), and improving access to all of our planning-related [standing advice and guidance documents](#);
- providing SEA training for Crown Estate Scotland and for Key Agency Group partners, jointly with HES and SEPA;
- delivering a workshop with HES and SEPA for Scottish Government Environmental Assessments team;
- running an EIA training course for key agencies, including SEPA, HES, Scottish Forestry, Marine Scotland and SG Energy Consents Unit;
- providing lectures, dissertation research topics and workshops to planning and engineering students at Aberdeen, Dundee, Heriot Watt and Strathclyde Universities, including the trialling of on-line scenario-based learning;
- an ongoing programme of capacity-building within local authorities, helping planning officers to consider natural heritage issues early on in their planning and decision-making, including a joint workshop with Edinburgh, Lothians and Borders local authorities;
- delivering a joint presentation with SEPA to Senior Managers and staff at Robertson Construction and Balfour Beatty;
- giving a presentation to the Solar Trade Association on benefitting nature;
- presenting and exhibiting at conferences and events eg. All Energy, Scottish Renewables hydro conference, Scottish Renewables Onshore Wind Conference, Wildlife and Renewable Energy Network, Scotland's Towns Partnership, Association of Environmental and Ecological Clerks of Works (AEECoW) annual conference, Scottish Power's World Environment Day event and Global Goals event;
- helping to organise the Fifth Conference on Wind Energy and Wildlife Impacts in collaboration with wind energy companies, environmental consultancies, scientific institutions, RSPB and JNCC;
- advising CARES panel on natural heritage impacts from community energy developments;
- sponsoring a conference on Future Planning – Designing Places in a Climate Emergency, organised by the Ecosystems Knowledge Network;
- organising a multi-agency lessons learned site visit to the Aberdeen Western Peripheral Route, jointly with Transport Scotland;
- hosting a two day workshop with consultancy CBEC on river processes and sustainable approaches to river restoration;
- establishing strategic engagement group with Network Rail to deliver biodiversity benefits within their estate;
- running a workshop on assessment of offshore wind bird impacts to engage stakeholders in the development of guidance for new applications.

Case Study: Sharing Good Practice: Helping Scotland's Pollinators

We hosted a Sharing Good Practice event [Creating a buzz in development – how can developers help Scotland's pollinators?](#) It was attended by a wide range of stakeholders, including Planning Authorities, Public Bodies, Biodiversity and Community Partnerships, Academic Institutions, NGOs, architects and consultants, and power and construction companies. Delegates were informed of current infrastructure projects benefitting pollinators, with some of the cost saving examples that minimise maintenance regimes and examples of good soil management. Interactive workshops considered master-planning for pollinators and learning on the ground, and exhibition stands by guest organisations promoted pollinator work. The varied audience made for good networking and the sharing of ideas.

We have continued to update and expand our range of standing advice and guidance to support high-quality development, including:

- publication of [standing advice notes for protected species](#) to guide developers and planners through planning requirements, survey methods, mitigation and licensing;
- a revised version of the [Good Practice Guide to Hydropower Construction](#), a joint publication with SEPA and Scottish Renewables;
- a review of Developments on Peatland guidance jointly with SEPA
- input to the development of guidance by the UK Space Agency on the assessment of environmental effects of spaceport activities;
- a revised version of our [General scoping and pre-application advice for onshore wind farms](#), including new advice on assessing the impacts of turbine lighting;
- developing further standing advice for Marine Scotland in relation to aquaculture marine licensing, and initiation of standing advice for Local Authorities.

e. Evidence and data-sharing

Our programme of research and evidence gathering increased knowledge and understanding of development issues, helped to solve problems and improved the quality of development proposals. Examples in 2019/20 include:

- commissioning work to develop a decision support framework for the bird impacts of offshore windfarms, to help make our future advice more efficient and transparent;
- engaging in discussions with the Offshore Wind Industry Council and a range of partners on Barriers to Growth as part of the Offshore Wind Sector Deal, to identify shared priorities to overcome current consenting challenges;
- discussing innovation projects with the aquaculture industry to support the sector in finding new approaches to overcome environmental constraints;
- supporting SEPA's implementation of new modelling and monitoring techniques for aquaculture developments, improving accuracy and speed of decision making;
- working with Scottish Enterprise and the Infrastructure Commission for Scotland to deliver a Scottish Futures Group workshop which was one of the key evidence-gathering sessions for the Commission's initial report.

Case Study: A green heart to future infrastructure investment plans

We provided advice to the Infrastructure Commission in response to their *Call for Evidence*. This included case studies that illustrate the contribution of natural capital to Scotland's infrastructure. Our advice aimed to encourage more investment in natural capital; put investment in natural capital on a level footing with other infrastructure types; and develop an approach to infrastructure planning that delivers benefits for nature and reduces conflict between development and protecting natural capital. We want investment in natural capital infrastructure (whether green or blue) to become routine in the planning, management and maintenance of our built environment.

We also made additional efforts to share our data and make information more accessible to stakeholders by:

- continuing to help maintain the online [Air Pollution Information System](#) (APIS), an essential tool for developers and planners in assessing air emission impacts on protected areas from development proposals such as combustion plants and intensive livestock units;
- progressing our GovTech Challenge project to develop an automated online platform for developers and land managers to gain easy access to information and advice regarding protected areas; through to the start of Phase 2 and prototype development;
- ongoing membership of the Scottish Government/Local Energy Scotland CARES panel providing early planning advice on funding applications.

3.3 Service

We aimed to provide an efficient service that kept our advice on plans and applications on track to meet timescales and key deadlines.

f. Decision-making timescales

We continued to perform well in 2019/20 in terms of response times, with 98% of responses to SEA provided by the required date, and 95% of responses to planning consultations within agreed service timescales (Appendix, Table 3).

g. Joint-working arrangements

We have collaborated with the Key Agencies Group (KAG) and others on initiatives to support the ongoing reforms to the Scottish Planning System, and continue to work jointly with the other key agencies to provide integrated services wherever possible. This has included:

- publishing [People, Place and Landscape](#) setting out a joint vision and approach with HES for managing change in Scotland's landscapes, together with an action plan for its implementation;
- considering revisions to working arrangements with CNPA and LLTNPA in relation to landscape advice and casework affecting European Sites;
- supporting Cromarty Port Authority in their review of activities and compliance with Natura requirements;
- as part of the Social Housing and GI Steering Group, meeting with three groups of potential partners to discuss opportunities for joint working and to add value to housing developments;
- establishing a common KAG position on Masterplan Consent Area provisions in Planning Bill, balancing safeguards with enabling;
- working with Cairngorm Mountain and Nevis Range on monitoring and future plans;
- establishing a new working group with Civil Engineering Contractors Association (CECA), AEECoW and SEPA;
- as part of KAG, bringing partners together to develop a shared vision for Forthside;
- working with the SCDI Initiative on Clean Growth;
- running a joint workshop with Scottish Enterprise on how our two organisations can best work together.

h. Engagement with service users

We commissioned Why Research to undertake our annual customer satisfaction survey for 2019/20, to gather evidence to support our commitment to continuous improvement. For the first time, the survey was run jointly with another key agency (HES), to develop a consistent

key agency approach and avoid customers receiving separate surveys. The survey provided positive feedback on the performance of both agencies:

- Overall satisfaction with the service we provide is high.
- We are seen to make a positive contribution to the planning process.
- Most respondents found it easy to contact staff.
- Views about our guidance and advice were positive.

The main areas where respondents would like to see improvements are in consistency of advice within SNH and across other agencies, clarity and conciseness of guidance and higher levels of collaboration with other agencies.

Our complaints procedure provides a further opportunity for customers to contact us over any issues. We received two planning-related complaints in 2019/20. Both were in relation to dissatisfaction with our advice on development proposals; on the part of the developer in one case and an individual objector in the other. The two cases were resolved.

Other examples of engagement with service users (in addition to the capacity-building outlined in section 3.2 above) included:

- working closely with the renewables sector through our engagement with Scottish Renewables and through liaison meetings with individual developers, as well as attendance at key sector events;
- issuing our Planning for Development e-newsletter, keeping developers, planners and other stakeholders informed of the work we are doing to address development issues and the publication of any new or updated guidance, as well as inviting feedback.

4. Changes to meet this year's improvement priorities

To meet the improvement priorities we had set for 2019/20, we have:

- Continued to support the Scottish Government's improvements to the Planning System by helping further with the implementation of the new Planning Act and preparing a response to the government's initial call for ideas on NPF4.
- Further embedded the Place Principle and place-based approaches in the way we work, to help ensure the provision of services and caring for assets in a place are planned in collaboration with local communities to improve lives and support inclusive and sustainable economic growth; including our ongoing leadership of the ERDF Green Infrastructure Strategic Intervention, and developing a framework of spatial priorities and projects to deliver more focused action across Scotland.
- Focused our planning advice on issues of national interest, with support on issues of lower risk provided through standing advice/guidance and capacity building with key stakeholders; leading to a further reduction in the number of development management consultations we received and freeing up more staff time for upstream engagement in the Planning System.
- Made greater use of digital communication media and explored new technology for sharing knowledge and building capacity in local authorities, industry sectors and other key agencies; including improved access to standing advice and guidance on our website, establishing a programme of webinars, and further development of an automated on-line advice service as part of the GovTech Catalyst programme that pays suppliers to solve public sector problems using innovative digital technology.
- Targeted our engagement with business interests to those best placed to shape future investment in nature. For example. Inputting to Scottish Power Energy Network's Sustainability Stakeholder Working Group, Scottish & SSEN's Draft

Business Plan, the review of STAG, and working with Network Rail on maximising the benefits to nature on their landholding.

- Created efficiencies in our work with Marine Scotland by clarifying roles and responsibilities, and secured improved outcomes in marine aquaculture casework by helping to implement a new approach to marine aquaculture, including strengthened regulation to protect wild salmonids and for managing the use of Acoustic Deterrent Devices.

5. Service improvements for 2020/21

We will continue to embed the [Planning for Great Places](#) commitments and approach in our service. This is reflected in our Business Plan for 2020/21 [Putting Nature First: Year Three](#), which sets out the ambitious steps we will take to tackle the climate change and biodiversity emergencies, and move Scotland to a nature-rich future. Our services will aim to:

- Put nature at the heart of the Planning System by influencing the new National Planning Framework and be an active, valued and influential partner in development planning and regional/city/island growth deals.
- Provide targeted and influential advice on proposals to enable good quality development that secures positive benefits for nature.
- Engage with key business interests and industry sectors to help them maximise the competitive advantage of nature and invest in the nature-based solutions required in response to the climate emergency and biodiversity crisis.
- Make the case through evidence and best practice for nature-based solutions in our towns and cities.
- Provide effective input to strategic sectoral and marine spatial planning, and advice on major developments, to guide sustainable use of our coasts and seas.

Through our advice, we will help shift the focus of the Planning System from avoiding the worst negative impacts to delivering positive benefits for nature, thereby halting and reversing biodiversity loss. We will share our expertise of green and blue infrastructure to promote nature-based solutions and encourage greater natural capital investment through development strategies and plans.

We are also committed to exploring new ways of working that facilitate good regulation and earlier certainty for investment. We want to: support greater integration of various place-based land use planning initiatives to achieve Sustainable Land Use; champion Place-based approaches through national, regional and local spatial planning; and encourage more inclusive engagement in the Planning System.

We will continue to support the Planning System as best we can during the Covid restrictions, responding to consultations on development policies, plans and proposals, and supporting these through targeted advice, guidance and capacity building. We will be as proportionate, pragmatic and prompt as possible in the way we work.

We will be working with development and planning stakeholders to ensure that nature supports Scotland's green recovery from the Covid pandemic, and make us more resilient socially, economically and environmentally.

Appendix: Consultation Statistics

Table 1

Number of consultations	14/15	15/16	16/17	17/18	18/19	19/20
Development plans						
Statutory consultations on Main Issues Reports	10	14	9	8	6	7
Non-statutory consultations on Main Issues Reports ¹	18	8	19	15	10	9
Statutory consultations on Proposed Plans	46	58	15	10	42	66
Non-statutory consultations on Proposed Plans ²	59	37	72	51	25	14
Total no. of consultations	133	117	115	84	83	96
SEA						
Pre-screening and screening	185	150	106	176	166	197
Scoping	37	38	31	25	34	27
Environmental Reports	51	51	40	28	36	40
Total no. of consultations	273	239	177	229	236	264
Planning applications						
Applications subject to EIA	254	152	110	103	97	104
Non-EIA application consultations	788	568	535	594	655	412
Pre-application consultations	356	333	313	250	219	186
% of all applications subject to pre-application advice	30%	32%	27%	25%	25%	27%
Total no. of application consultations	1042	720	645	697	752	516

Table 2

Planning application response types	14/15	15/16	16/17	17/18	18/19	19/20
Outright objection	9 (0.9%)	5 (0.7%)	6 (0.9%)	5 (0.7%)	2 (0.3%)	3 (0.6%)
Conditioned objection	61 (6%)	40 (6%)	47 (7%)	48 (7%)	65 (9%)	47 (9%)
Holding objection	34 (3%)	36 (5%)	41 (6%)	35 (5%)	32 (4%)	23 (4%)
Advice only	782 (75%)	592 (82%)	499 (77%)	564 (81%)	591 (79%)	400 (78%)
No comment	156 (15%)	47 (7%)	52 (8%)	45 (6%)	62 (8%)	43 (8%)

Table 3

Average response times ³	14/15	15/16	16/17	17/18	18/19	19/20
Development plans						
Statutory consultations on Main Issues Reports	61 days	53 days	46 days	75 days	35 days	78 days
Non-statutory consultations on Main Issues Reports	28 days	27 days	25 days	19 days	8 days	28 days
Statutory consultations on Proposed Plans	25 days	30 days	16 days	17 days	40 days	26 days
Non-statutory consultations on Proposed Plans ²	17 days	19 days	25 days	32 days	17 days	19 days
SEA						
Pre-screening & screening	11 days	11 days	7 days	6 days	9 days	9 days
Scoping	23 days	24 days	25 days	22 days	26 days	29 days
Environmental Report	40 days	45 days	39 days	44 days	40 days	49 days
All SEA consultations	18 days	20 days	14 days	7 days	16 days	13 days
% of responses by required date	99%	98%	100%	98%	96%	98%
Planning applications						
EIA consultations	21 days	27 days	21 days	24 days	28 days	21 days
Non-EIA consultations	13 days	13 days	12 days	11 days	13 days	13 days
Pre-application consultations	16 days	15 days	16 days	15 days	15 days	18 days
All planning consultations	14 days	14 days	13 days	12 days	13 days	13 days
% of EIA responses provided within 28 days	70%	60%	68%	65%	55%	63%
% of non-EIA responses provided within 14 days	64%	64%	66%	66%	63%	64%
% of responses provided by required date (including agreed extensions to statutory deadlines) ⁴	96%	95%	96%	95%	94%	95%
% of all responses subject to an agreed extension to statutory timescale	15%	16%	15%	16%	18%	15%

¹ Includes consultations on topics such as calls for sites, topic papers, research, HRA, SEA and draft supplementary guidance.

² Includes consultations on documents such as draft Proposed Plans, HRA and SEA draft supplementary guidance.

³ Median used to calculate the average.

⁴ Required dates include those where a new extended deadline has been agreed with the planning authority and where they have given us an initial deadline which is greater than the minimum 14 days.