



Scottish Natural Heritage
Dualchas Nàdair na h-Alba

nature.scot

Planning Performance Framework Annual Report

Period: 1 April 2018 to 31 March 2019



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	2
3.1 Placemaking.....	2
<i>a. Strategic planning</i>	2
<i>b. Development Plan engagement</i>	3
<i>c. Development Management</i>	4
<i>Pre-application engagement</i>	4
<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.....	10
<i>f. Decision-making timescales</i>	10
<i>g. Joint-working arrangements</i>	10
<i>h. Engagement with service users</i>	10
4. Changes to meet this year's improvement priorities	11
5. Service improvements for 2019/20	12

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 2018 to 31 March 2019. 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 2019 to 31 March 2020. 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, accords with Scottish Planning Policy and the Scottish Regulators' Strategic Code of Practice, and helps deliver the Scottish Government's commitment to a transition to a low-carbon economy.

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);
- influence 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;
- monitor 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 now 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 2018/19 set out in our business plan for the period [Making Connections: Year 1](#); including:

- active support for sustainable development of renewable energy, housing, transport and green infrastructure;
- encouraging innovation and investment in nature-based solutions;
- providing opportunities for more people to enjoy the benefits of nature and to take care of it;
- leading the delivery of the Scottish Biodiversity Strategy;
- championing delivery of Scottish Government's Climate Change Plan.

Our services have 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.

Organisational structure

The strategic direction of our engagement in the Planning System is provided by our Board and Senior Leadership Team. Our Board considered our engagement in the Planning System in 2017. This led to [Planning for Great Places](#) – our new Planning for Development service statement launched in June 2018. The new approach strengthens the connection between people, development and nature. It 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.

We re-organised how we implemented this approach in 2018/19. Our *Supporting Good Development Activity* coordinates our work within the Planning System. It leads onshore development advice, development planning work and the upstream aspects of the Planning System. To support this, our *Placemaking for People and Nature 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.

Our planning service was delivered locally across the country by 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 2018/19, this approximated to £5.1 million (12% of our £46.6 million grant-in-aid) and was made up of staff costs of £3.8 million (75 full-time equivalents) and project costs of £1.3 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 development of plans for projects that are part of the Third National Planning Framework. Our contribution in 2018/19 included:

- responding to consultations on Scotland's Energy Efficiency Programme, the Scottish Forestry Strategy, the Crown Estate Scotland Investment Strategy and the Sustainability Appraisal of Extending Permitted Development Rights in Scotland.
- providing evidence to the Parliament's Economy, Energy and Fair Work Committee inquiry on Scotland's Construction Sector;
- advising on 236 SEA consultations, from pre-screening to Environmental Reports (See Appendix, Table 1 for details), covering a wide range of policies and plans - e.g. Scottish Government's Offshore Renewables Plan for Deep Waters around Scotland, Scottish Borders Local Development Plan, Transport Scotland's Review of the National Transport Strategy, Scottish Government's Unconventional Oil and Gas in Scotland;
- helping Clyde and Shetland Marine Planning Partnerships bring their draft plans forward ready for consultation;
- contributing to the Heads of Planning Renewables Subgroup;
- input to the development of a new approach for the next Overall Assessment for Scotland's Marine Atlas, which will underpin a future revision of the National Marine Plan;

- supporting Marine Scotland in the design of the Sectoral Plan for Offshore Wind Energy and location of future development zones, including a Strategic Visibility Mapping project to inform design principles for future offshore wind farms (see case study below);
- exploring the potential role of biodiversity and environmental net gain, with a view to developing the concept for consideration in the Fourth National Planning Framework;
- providing advice to Scottish Government, Local Authorities and other partners involved in the Borderlands Growth Deal, especially regarding nature-based tourism, active travel for the economy, and the role of nature in improving placemaking and place-shaping;
- contributing to the Vacant and Derelict Land Initiative with a view to maximising the opportunities for people and nature;
- input to Scottish Environment Protection Agency (SEPA) Sector Plans for housing, transport utilities and water supply and waste water.

Case Study: Strategic visibility modelling for offshore wind energy projects

We commissioned specialist consultants to undertake Zones of Theoretical Visibility (ZTV) modelling to inform the draft Sectoral Plan for Offshore Wind Energy. Using ZTV modelling at this strategic stage can inform the initial location of large wind energy development offshore, to the point that significant landscape, visual and cumulative impacts are avoided or substantially reduced. This work builds on our initial landscape and visual appraisal of the Marine Scotland Areas of Search, and has modelled the visibility of 200m turbines from nine sections of coastline. From this data, locations can be identified where the curvature of the earth starts to reduce the visibility of wind turbines, or where visibility of turbines can be removed altogether.

b. Development Plan engagement

We continued to be an active partner in Development Planning in 2018/19, 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:

- Scottish Borders – pre-MIR advice on possible sites for inclusion;
- Clackmannanshire – review of draft MIR with early indication of issues and highlighting areas of policy change;
- Edinburgh – advice and support on landscape and visual impact assessment, Key Agency workshops and early support with SEA.

Appendix, Table 1 shows the number of development planning consultations received in 2018/19. We received a total of 83 statutory and non-statutory plan consultations. This is similar to last year, but fewer than in previous years – which reflects the stage we are at in plan cycles.

Examples that demonstrate the added value we have brought to Development Planning in 2018/19 include:

- working with public and private sector stakeholders on the Fort William 2040 Vision and Masterplan, and the progression of associated key investment opportunities (see case study below);

- contributing as an active partner in Moray Council's quality audit process to assess major applications - an innovative and effective approach encouraging collaboration and raising the standard of development, and has been entered for the Scottish Quality in Planning Awards;
- providing landscape and placemaking advice at the examination stage of the West Highland and Islands proposed Local Development Plan;
- responding to masterplan, design frameworks and supplementary guidance consultations in Moray, Highland, Western Isles, Orkney and Shetland Islands Councils; providing placemaking, landscape and natural heritage advice to create better places that incorporate opportunities for people to use active travel and connect with nature;
- working closely with Moray Council and the Cairngorms National Park Authority over the Habitats Regulations Appraisal during the preparation of their proposed Local Development Plans, devising a simplified means of presenting the assessment, as well as building understanding and capacity for future HRAs;
- helping to integrate marine and terrestrial planning in preparation of a new LDP for Dumfries and Galloway, and alignment with the National Marine Plan prior to work on a regional marine plan for this area.

Case Study: Fort William 2040 Vision and Masterplan

We have worked closely with Scottish Government, The Highland Council and other public and private interests to develop a vision and masterplan for Fort William, championing the contribution that placemaking and nature-based solutions can make to the success of new development proposals in and around Fort William. This includes our input to the Scottish Government's Lochaber Delivery Group and our work as a member of the Council's Lochaber Project Board, helping to deliver key business ambitions and investment in the region. We have emphasised the wide-ranging benefits from improving active travel infrastructure, creating better-quality and more accessible greenspace, and improving access to the waterfront and key views. These benefits include tackling some of the key issues in the region, such as attracting a new workforce for Liberty Group developments, and addressing significant road traffic congestion.

c. Development Management

We provided advice on 690 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 and telecommunications.

We also provided advice on the impacts on natural heritage interests at two public local inquiries in 2018/19:

- Coul Links golf course: impacts on sand dune habitat of Loch Fleet SSSI;
- Harryburn wind farm: wider countryside landscape and visual impacts.

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 349 pre-application consultations, often in collaboration with other key agencies. Examples of pre-application engagement in 2018/19 include:

- early engagement at the pre-scoping stage for the Red John pumped storage hydro scheme near Loch Ness; providing advice on alternatives as well as assessment methods that resulted in amendments to the scheme and only a light touch at the environmental reporting stage;
- working with partners to support the environmental assessment processes associated with the dualling projects for the major trunk roads A96 and A9 (see case study below);
- continuing to assist the Home Office and the Scottish Government with the roll-out of the Emergency Services Network, a new mobile telecommunications system for the police, fire and ambulance services - minimising impacts on National Scenic Areas, SSSIs, National Nature Reserves and Wild Land Areas;
- supporting delivery of the Scottish Government's 4G Infill Programme to extend coverage to remote communities through addressing any natural heritage issues at an early stage;
- ongoing advice and support to Orkney Islands Council in its appraisal of potential locations for a Council-owned wind farm proposal.
- collaborating with The Highland Council on the provision of engineering advice to minimise environmental impacts of hydro scheme developments.
- working with Green Highland Renewables and SEPA to establish mitigation measures for a suite of proposed hydro schemes to supply power directly to Liberty Group's aluminium smelter site in Fort William;
- meeting with wind farm developers looking to bid in the upcoming offshore wind leasing rounds, steering interest towards areas of least natural heritage sensitivity.
- assisting Cromarty Firth Port Authority with amendment of plans to extend the Invergordon Service Base to avoid the loss to habitat of a Special Protection Area;
- advice on anti-predator measures for Loch Dunvegan fish farm expansion to minimise impacts on seals and porpoises within a Special Area of Conservation;
- providing solutions to potential protected area issues for re-conductoring works between Fort William and Fort Augustus.

Case Study: Dualling the A9

We have been part of the Environmental Steering Group (ESG) for the A9 dualling programme since its inception, working with Transport Scotland and other statutory consultees (SEPA, HES, CNPA and Perth & Kinross Council) to support the environmental assessment process. The ESG has provided advice to Transport Scotland at the earliest opportunity on potential issues that need to be considered, so that by the time they reach the full Environmental Statement stage for any of the individual road projects, the majority of issues have been addressed. By facilitating collaboration, the group has also served as a valuable opportunity to improve working practices for the construction of the road, and to ensure that all of the statutory consultees are working to the same understanding of the proposals. Working together, we are more aware of the critical issues arising in each other's remits and can arrive at solutions that meet all needs. Examples of this are the discussion of woodland planting mitigation in the Killiecrankie area to ensure it is sympathetic to the HES Inventory battlefield status of the area; and our continued engagement in the 'co-creative process' with the local community to develop route options and road design through the River Tay (Dunkeld) National Scenic Area.

We have continued to focus on Development Management advice cases with potentially the most significant impacts on the natural heritage. 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). However, we were consulted on a total of 752 cases in 2018/19, slightly up on the figures for the previous three years which have ranged between 645 and 720 cases.

Despite the increase in consultations, the success of our pre-application engagement and advice to improve development outcomes is reflected in the continuing 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 five years, with only a two outright objections to planning applications in 2018/19; a wind farm (impacts on a National Scenic Area) and a single house (impacts on habitat feature of a Special Area of Conservation). In addition, we objected to five Section 36 wind farm applications; in relation to landscape and visual impacts (two), impacts on seabird features of Special Protection Areas (two) and on peatland habitat (one).

Consenting

Examples of where we have worked closely with developers in 2018/19 to successfully deliver improved development outcomes include:

- Coulags Hydroelectric Scheme - ensuring impacts on sensitive landscape were minimised by adapting design and construction techniques to suit the local environment (see case study below);
- NorthConnect Interconnector - a strategic electricity connection to Norway where we minimised impacts on the Buchan Ness to Collieston Special Protection Area.
- Moray East Wind Farm: minimising underwater noise impacts on marine wildlife during their unexploded ordnance (UXO) campaign;
- East Coast offshore wind farms - through a graduate PhD internship, we were able to re-model cumulative impacts to cetaceans using the Interim Population Consequences of Displacement model (iPCOD), which informed Marine Scotland decision-making;
- Dornoch Bridge Quarry - working with the developer to improve surface water management to avoid impacting on fresh water pearl mussel SAC, and management of gravel washings and tree planting to help improve riparian habitat.

Case Study: Coulags Hydro-electric Scheme

Green Highland Renewables' Coulags Hydro-Electric Scheme is widely considered an exemplar of good construction practice. The development is situated on a tributary of the River Carron within a National Scenic Area and Wild Land Area in Wester Ross, and shows how, with the right approach, development can be accommodated in a sensitive landscape. The success of the scheme in minimising landscape and visual impacts is a result of early pre-application engagement to recognise and understand the key sensitivities, a willingness to adapt design and construction techniques to suit the local environment, a high level of construction expertise and the ongoing dialogue and partnership approach adopted throughout the construction phase.

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](#): The Scottish Government approved a second phase taking the total value of the fund to £37.5m, enabling us to fund about 20 major projects over the next three years, as well as 14 Green Infrastructure Community Engagement projects. This will help transform some of Scotland's most deprived areas by giving people access to greenspace and engaging communities to effect change.
- [National Walking and Cycling Network](#): In 2018/19 we worked together with lead partners Sustrans and Scottish Canals and other key stakeholders to complete improvements on 16 of Scotland's Great Trails.

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 to help generate good development proposals. This included:

- an ongoing programme of capacity-building within local authorities. This has helped planning officers to consider natural heritage issues early on in their planning and decision-making;
- a programme of lectures and workshops in college and university planning and engineering courses, with the aim to influence future developers and planners. This work included supplying research topics to Strathclyde University's 'Engage' programme for research in collaboration with industry. Examples of topics were landscape impacts from upland tracks, and green-infrastructure-related research;
- a Sharing Good Practice event covering Successful Environmental Management and Good Construction, in collaboration with the construction industry;
- introduction of a new series of 'Planning for Great Places' webinars to assist practitioners with development and planning issues. Topics delivered covered upland track construction and visualisation for wind energy projects;
- industry capacity-building training sessions, in collaboration with SEPA, for Robertson Construction, AMEY Highways, Scottish Power and Network Rail;
- presentations at industry conferences, including promoting biodiversity on solar farms at the All Energy event, and promoting good practice on hydro scheme development at the Scottish Renewables hydro conference;
- contributing to the drafting of the ICE report State of the Nation: Infrastructure and Investment 2018;
- sponsoring the annual Association of Environmental and Ecological Clerks of Works conference;
- running learning visits to wind farm sites for planning authority and Energy Consents Unit staff;
- providing SEA/EIA training for Scottish Government and Key Agencies, including a two-day EIA training Course for participants from Scottish Government, SEPA, Forestry Commission Scotland, and HES;
- delivering a joint workshop with HES at the EIA Scottish Practitioners Conference, as part of the launch of Version 5 of our [Environmental Impact Assessment Handbook](#). The new version incorporates changes to EIA regulations and includes a new chapter on cultural heritage impact assessment;
- holding a joint workshop with Scottish Power Energy Networks to share experiences and plan how best to work together to help deliver on the UN sustainable development goals;
- launch of our [Planning for Great Places](#) service statement at an SCDI event to highlight to its members the importance of nature to Scotland's economy and the benefits from investing in natural capital.
- presenting our aspirations for connecting people and nature, and our planning services to support this, to the Heads of Planning Conference in Shetland;
- a staff secondment to Scottish Government Energy Consents Unit to help build broader understanding of nature interests and develop closer working relationships;
- engagement of staff in a programme of aquaculture site visits and industry interchange to build mutual understanding.

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

- developing new guidance on planning for coastal change to help Planning Authorities take account of coastal change, consider the risks to infrastructure and identify nature-based solutions to reduce risks (see case study below);
- refreshing our guidance on [Good Practice During wind Farm Construction](#), in collaboration with industry and public agency stakeholders;
- consulting on good practice guidance for hydro developments;
- producing a 'dangle' book visual guide for hydro construction site staff dealing with invasive non-native species;
- publication of [Maximising the benefits of green infrastructure in social housing](#) – the result of collaborative research with social housing providers. With a view to implementing the report's recommendations, a joint steering group comprising the Scottish Federation of Housing Associations, Architecture & Design Scotland and Scottish Government Planning & Architecture Division has launched a call for expressions of interest in exploring opportunities to demonstrate how input from design professionals at an early stage of procurement can help support better outcomes for place;
- preparing guidance on the provision of advice to Planning Authorities on the use of Acoustic Deterrent Devices (ADDs) in and around the Inner Hebrides and the Minches SAC.

Case Study: Looking Ahead – Planning For Coastal Change

We developed [new guidance](#) to encourage those involved in development at the coast to take the effects of coastal change into consideration, both for new proposals and for existing infrastructure at risk from future change. Publication was supported by an interactive webinar, attracting 80 attendees from Scottish Government, SNH, SEPA, the Dynamic Coast project, Crown Estate Scotland, Ordnance Survey, Historic Environment Scotland (HES), Scottish Water, Transport Scotland, Planning Authorities, universities and private consultancies. We will be making the PDF guidance into a digital interactive format, in keeping with Scottish Government's aims for digital planning.

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 2018/19 include:

- continuing our support of Marine Scotland's Scottish Marine Energy Research (ScotMER) research programme to produce prioritised lists of research requirements and the successful delivery of agreed priority projects, reducing consenting risk across all EIA topic areas. This is re-enforced by our membership of the research panel for the European Offshore Wind Deployment Centre, which has also commissioned research of benefit to future offshore wind projects, and through our input to other national research initiatives focusing on offshore renewables such as the Offshore Renewables Joint Industry Programme, Offshore Wind Strategic Monitoring & Research Forum and BEIS Offshore Energy SEA programme;
- producing the revised national Landscape Character Assessment for Scotland - now available via the SNH website on an interactive map (see case study below);
- commissioning research to inform guidance development for the offshore renewables sector, including on the Selection of Buffer Zones for Impact Assessment to Inform Offshore Renewables Consenting, and the Application of Noise Abatement Systems for Mitigating Piling Noise in Scottish Seas;

- hosting two study tours for Japanese colleagues to share our experience in offshore wind development;
- providing oral and written evidence to both the ECCLR and REC Committee inquiries on fish-farming, highlighting the challenges and potential solutions to environmental issues faced by the sector;
- updating Landscape Capacity Studies for wind energy development in East and South Ayrshire;
- establishing a National Technical Group to provide informed advice to Planning Authorities on potential interactions between fish-farms and the interests of Special Areas of Conservation, such as wild salmon and freshwater pearl mussel.

Case Study: Landscape Character Assessment for Scotland

Landscape Character Assessment (LCA) identifies and describes the diversity of landscape. It is the commonly accepted way of understanding landscapes, and underpins modern landscape planning. In 1999, Scotland was the first country to achieve nationwide coverage of LCA through an SNH-led programme of individual assessments. Following a comprehensive review, we have produced an updated, digital version which is available on our [website](#). The review involved partnership working with FCS and HES, analysis by consultants, a users' questionnaire, and consultation rounds with all local authorities and our own landscape advisers. The result is a much-improved source of the key landscape information for Scotland. We will also be providing links to related information and revised background chapters, which will be added to the web page in the future.

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

- continuing to 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;
- making a successful application to the GovTech Challenge to develop an automated online platform for developers and land managers to gain easy access to information and advice regarding protected areas (see case study below).
- ongoing membership of the Scottish Government/Local Energy Scotland CARES panel providing early planning advice on funding applications;
- contributing to the Regional Advisory Groups set up to approve conditions and discuss post-consent monitoring requirements for offshore renewables, including for Meygen tidal array, Moray Firth and Forth and Tay wind farm clusters;
- working as part of the organising committee for the international Conference on Wildlife and Wind (to be held in Stirling in August 2019).

Case Study: Online access to automated information and advice on protected areas

We made a successful application to the GovTech Challenge and received an award of up to £1.25 million to develop an online predictive service for protected area information and advice. The 24-hour service would provide information and advice tailored to customer needs based on their specific location and project proposal, including an initial assessment of potential impacts and advice on mitigation to help shape development, or other land management proposals, so that they benefit the natural heritage features of protected areas. This will provide a quick way to inform developers, land managers and other parties of any potential constraints, and help steer proposals in a positive direction from the start. Over 60 interested companies have been invited to submit innovative technical solutions, five of which will be selected to develop their ideas further.

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 2018/19 in terms of response times, with 96% of responses to SEA provided by the required date, and 94% of responses to planning consultations within agreed service timescales (Appendix, Table 3).

g. Joint-working arrangements

As a member of the Key Agencies Group we have collaborated 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:

- a review of the Stage 1 Report on the Planning (Scotland) Bill, and consideration of Stage 2 amendments including a [Joint Statement](#) from the Key Agencies Group relating to amended provisions for Masterplan Consent Areas in Stage 2 of the Planning (Scotland) Bill;
- start of discussions on input to the preparation of National Planning Framework 4;
- updating the Key Agency [Joint Statement](#) on pre-application, which sets out the principles governing our commitment to effective and timely pre-application engagement with Planning Authorities and developers in relation to development of national and major significance;
- working with Local Development Plan teams through user research to identify a wider suite of relevant environmental information, improve the cascade of information from LDPs into other planning and environmental assessment processes, and developing and improving user guidance;
- collaborating with Scottish Government's Digital task Force to develop digital platforms for LDP and other information;
- setting up a subgroup to consider how greater collaboration at an earlier stage of masterplanning can help deliver shared objectives and positive outcomes for placemaking;
- input to the Information Service's Partners in Planning (PiP) initiative to develop skills and build capacity across the Planning System; and the launch of the PiP web portal for sharing information and best practice, including preparation of a short film on the role of Key Agencies in the Planning System and an active learning workshop;
- hosting a conference 'Planning for Positive Outcomes – Working with the Key Agencies' promoting collaboration and constructive dialogue between planners and Key Agencies;
- taking a collective approach to reporting on planning performance, including a peer review exercise and preparation of a [Joint Statement](#) on Key Agency performance in 2017/18.

h. Engagement with service users

We commissioned Why Research to undertake our fifth annual customer satisfaction survey to gather evidence to support our commitment to continuous improvement. The main findings from the 2019 Customer Survey (of our 2018 service) provided positive feedback on our performance:

- SNH is perceived to make a positive contribution to the planning process.
- Overall satisfaction with the service received from SNH remains high.
- Most customers agree that SNH's approach to advice is enabling and influential.

- Views are positive in relation to contacting SNH.
- Awareness of SNH guidance documents remains high and views on the guidance are positive.
- There has been an increase in the level of awareness of the SNH Service Statement.

The main areas where respondents would like to see improvements are in consistency of advice within SNH and across other agencies, as well as guidance which is clearer and more concise, and easier to find on the website. There were also requests for SNH to have a more robust involvement in local issues and in objecting to planning applications.

Our complaints procedure provides a further opportunity for customers to contact us over any issues. We received three planning-related complaints in 2018/19, all from individual objectors to planning applications regarding the absence of an SNH objection. One of the complaints was upheld and led to us altering our position to a holding objection in relation a Natura issue.

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;
- liaising with the aquaculture sector, including regular meetings with the Scottish Salmon Producers Organisation (SSPO), and our input to the Industry Leadership Group, Farmed Fish Health Framework groups, Interactions and Technical Working Groups;
- meeting regularly with a range of non-governmental organisations to discuss planning issues, both individually (e.g. RSPB), and collectively through Scottish Environment LINK;
- 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;
- upgrading our Casework Management System to ensure that it is GDPR-compliant.

4. Changes to meet this year's improvement priorities

As introduced in Section 2, we repositioned our planning and development services in 2018/19. This reflected the changing external operating environment and our resourcing challenges. It strengthened alignment of our efforts to the whole of the government's work in order to maximise our support for inclusive and sustainable growth.

This repositioning led to the launch of our new Planning for Development Service Statement [Planning for Great Places](#). The new statement highlights our focus on: sharing knowledge about Scotland's nature; helping developers invest in nature; supporting plan and placemaking; and providing advice to enable good development. Delivery of our new Service Statement has required leadership and commitment for early and upstream engagement in the Planning System, strong working with business interests and clear advice that demonstrates that we are alert to other interests.

We continued to raise awareness of the Scottish Regulators' Strategic Code of Practice and embed its implementation into all aspects of our regulatory role through the delivery of our Action Plan. To aid this, we have adopted a new approach to the application of our [Balancing Duties](#). This is focused on use of enabling behaviours as well as discharging due processes, to take account of wider socio-economic interests at all stages of our engagement in the Planning System. We have engaged with partner agencies to further join-up our regulatory roles. For example, we worked with Marine Scotland regarding our advice on aquaculture,

well boat licences, and European Protected Species; and with local authorities to identify priorities for our support of placemaking.

Our Workforce Planning has provided greater capacity in our staff to lead, engage and inspire, so that we can more effectively connect people and nature through the Planning System. In particular, we have widened our skills base in facilitation and placemaking.

5. Service improvements for 2019/20

We will continue to embed the Planning for Great Places commitments and approach in our services in 2019/20. This is reflected in our Business Plan 2019/20 [It's in our Nature: Year Two](#).

We aim to provide earlier, stronger and more positive interaction with stakeholders that is good for business, climate and nature and helps decision-makers balance competing demands to deliver sustainable, inclusive growth. We will strengthen our support for place-based approaches and continue to make the case for preventative spend on greenspace.

We will also ensure that our Planning Service supports the government response to the climate emergency and help to tackle the drivers of biodiversity loss. This will include input to the next National Planning Framework and the review of Scottish Planning Policy.

Given the changing demands and our reducing resources, we will improve our services in 2019/20 to:

- provide advice that enables good development in new, more efficient and targeted ways. For example, we will place greater store on standing advice in support of development that has low risk to natural heritage interests of national importance;
- use new technology and communication media to share knowledge and build capacity amongst local authorities and industry sectors. For example, we have developed a new series of webinars to share our knowledge in a dynamic and efficient way;
- target engagement with business interests, to work with those best placed to shape future investments in natural capital through their strategic plans and funding streams. For example, we will increase our work with Scottish Enterprise and the Scottish Land Commission on the derelict and Vacant Land Commission, and support SCDI on their climate change business leadership plan;
- prepare recommendations for post-EU support mechanisms to deliver green infrastructure, paths and landscape partnerships;
- develop a framework of spatial priorities and projects to deliver more focused action to support placemaking activity across Scotland;
- seek efficiencies through further work on roles, responsibilities and interactions with Marine Scotland;
- help implement a new approach to aquaculture regulation, including strengthened regulation for wild salmonids and Acoustic Deterrent Device use that secures improved outcomes;
- Increase engagement with key partners (marine industries, enterprise bodies, regulators) to better understand their aspirations and improve understanding of marine natural heritage issues;
- change the way we deliver our onshore development management advice service by:
 - reducing demand for our advice and making its delivery more efficient;
 - using more targeted responses to consultations;
 - adopting new approaches such as greater reliance on standing advice and less detailed input;
 - ending input to casework where outcomes are less significant.

- reduce the need for our bespoke advice on some types of marine development through capacity-building, guidance production and the use of standing advice and model wording in collaboration with Marine Scotland;
- begin work on redeveloping our Casework Management System to provide us with more effective reports on our input to the Planning System and improve our service to customers.

We will also continue our journey of digital transformation improving engagement with the people of Scotland; and investing in technologies including Earth Observation and Remote Sensing.

We will increase the sharing of our knowledge, information and data, making sure we provide information at the right time to inform decisions about nature, and work to further enhance our evidence base.

We will identify alternative funding streams to achieve greater investment in nature and support delivery of [Connecting People and Nature](#).

Collectively, we hope that these changes will transform the way engage in the Planning System: supporting an increasingly enabling and targeted approach; and by encouraging smarter, more flexible, dynamic and collaborative working, to help developers identify opportunities for investment that will sustain future prosperity.

Appendix: Consultation Statistics

Table 1

Number of consultations	2014/15	2015/16	2016/17	2017/18	2018/19
Development plans					
Statutory consultations on Main Issues Reports	10	14	9	8	6
Non-statutory consultations on Main Issues Reports ¹	18	8	19	15	10
Statutory consultations on Proposed Plans	46	58	15	10	42
Non-statutory consultations on Proposed Plans ²	59	37	72	51	25
Total no. of consultations	133	117	115	84	83
SEA					
Pre-screening and screening	185	150	106	176	166
Scoping	37	38	31	25	34
Environmental Reports	51	51	40	28	36
Total no. of consultations	273	239	177	229	236
Planning applications					
Applications subject to EIA	254	152	110	103	97
Non-EIA application consultations	788	568	535	594	655
Pre-application consultations	522	468	459	424	349
% of all applications subject to pre-application advice	30%	32%	27%	25%	25%
Total no. of application consultations	1042	720	645	697	752

Table 2

Planning application response types	2014/15	2015/16	2016/17	2017/18	2018/19
Outright objection	9 (0.9%)	5 (0.7%)	6 (0.9%)	5 (0.7%)	2 (0.3%)
Conditioned objection	61 (6%)	40 (6%)	47 (7%)	48 (7%)	65 (9%)
Holding objection	34 (3%)	36 (5%)	41 (6%)	35 (5%)	32 (4%)
Advice only	782 (75%)	592 (82%)	499 (77%)	564 (81%)	591 (79%)
No comment	156 (15%)	47 (7%)	52 (8%)	45 (6%)	62 (8%)

Table 3

Average response times ³	2014/15	2015/16	2016/17	2017/18	2018/19
Development plans					
Statutory consultations on Main Issues Reports	61 days	53 days	46 days	75 days	35 days
Non-statutory consultations on Main Issues Reports	28 days	27 days	25 days	19 days	8 days
Statutory consultations on Proposed Plans	25 days	30 days	16 days	17 days	40 days
Non-statutory consultations on Proposed Plans ²	17 days	19 days	25 days	32 days	17 days
SEA					
Pre-screening & screening	11 days	11 days	7 days	6 days	9 days
Scoping	23 days	24 days	25 days	22 days	26 days
Environmental Report	40 days	45 days	39 days	44 days	40 days
All SEA consultations	18 days	20 days	14 days	7 days	16 days
% of responses by required date	99%	98%	100%	98%	96%
Planning applications					
EIA consultations	21 days	27 days	21 days	24 days	28 days
Non-EIA consultations	13 days	13 days	12 days	11 days	13 days
Pre-application consultations	16 days	15 days	16 days	15 days	15 days
All planning consultations	14 days	14 days	13 days	12 days	13 days
% of EIA responses provided within 28 days	70%	60%	68%	65%	55%
% of non-EIA responses provided within 14 days	64%	64%	66%	66%	63%
% of responses provided by required date (including agreed extensions to statutory deadlines) ⁴	96%	95%	96%	95%	94%
% of all responses subject to an agreed extension to statutory timescale	15%	16%	15%	16%	18%

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.