
Report to Planning Committee

Date of Meeting: 12th March, 2026

Subject: National Planning Improvement Framework - Self-Assessment Report

Report by: Pauline Elliott, Interim Chief Planner

1.0 Purpose

- 1.1 The Planning Act (Scotland) 2019 introduced the National Planning Improvement Framework (NPIF) initiative, led from within the Scottish Government's Improvement Service. This places a duty on every Planning Authority in Scotland to produce a self-assessment of their performance, together with improvement actions, in advance of submission to the planning minister. The Authority must then deliver regular updates showing how service standards are being improved and sustained.
- 1.2 This report sets out the background to the process including comments received at a Peer Review Workshop event on January 26th, 2026 and asks Planning Committee members to comment on and approve the self-assessment prior to its submission. The draft is attached as Appendix 1 to this report.

2.0 Recommendations

- 2.01 That Planning Committee comments on and approves the draft self-assessment in advance of its submission to the planning minister.

3.0 Considerations

The template for the self-assessment asks Planning Authorities to score themselves against 12 attributes, broken down into 5 themes. These themes are:

3.01 People

- the planning authority has sufficient resources and skills and has a valued and supportive workforce

3.02 Culture

- the planning authority has embedded continuous improvement, has sound governance and effective leadership

3.03 Tools

- the planning authority has a robust policy and evidence base, makes best use of data and digital technology and effective decision-making processes

3.04 Engage

- the planning authority has good customer care and effective engagement and collaboration with stakeholders and communities

3.05 Place

- the planning authority supports the delivery of sustainable, liveable and productive places and consented development

4.0 Scoring

4.01 The self-assessment required officers to score each of the 12 attributes and say how they intended to put in place improvements moving forward. Scoring is on a scale of 1 to 5, with 5 meaning no progress and 1 meaning making excellent progress. Officers had scored themselves mainly 4s and 3s, making limited or fair progress. This was largely approved by the attendees at the Peer-Review Workshop. Appendix 2 to this report shown the scores by officers, compared with the scores by the peers and this is also contained within the self-assessment.

4.02 The workshop was run in an interactive way, with brief presentations followed by discussion groups. Workshop participants consisted of planning officers, internal colleagues/consultees from Roads, Environmental Health, Economic Development, Sustainability and Legal, Elected Members, Community Councils, planning officers from West Dunbartonshire Council (our peer partners) and also representatives from the Improvement Service - including the Government's National Planning Improvement Champion, Craig McLaren. The Improvement Service representatives also helped with the facilitation of the break-out groups.

4.03 The consensus both from officers and peers was that improvements have been made to the Planning Service in the past 6 to 8 months, with a full complement of staff now in place and progress against several issues discernible as a result. Improvements are demonstrated in several areas – processing applications more efficiently, publishing an enforcement charter, reintroducing pre-application planning advice and recommencing work on the Local Development Plan after a 14-month hiatus.

4.04 However, there was also a real concern that if staff numbers and investment were not maintained long-term, things could deteriorate, especially since at time of the workshop, some members of staff were on temporary contracts.

4.05 Below are some of the key points of the 5 themes discussed at the workshop. There is some inevitable overlap in some of the areas.

4.06 People

- Plan for succession- recruit apprentice/student planners and retain more experienced staff
- Collaborate with other departments (a positive example is the joint Planning-Economic Development work on the Alloa Town Centre Masterplan)
- Use consultants to fill gaps in resource, especially if statutory duties are not being met

4.07 Culture

- Invest in staff and embed planning at the corporate centre so colleagues are aware of its importance in delivering positive outcomes for Clackmannanshire
- Amend Scheme of Delegation to enable Principal Planners to sign-off delegated applications and omit “single point of failure”
- Empower staff and invest in training so they can become future leaders
- Ensure that the Chief Planner (a statutory role) is at a senior level in the Council

4.08 Tools

- Invest in LDP resource and involve elected members
- More effective use of the Uniform system to improve efficiency
- Investigate using AI – learn from other Councils who are already using it
- Revisit team structure – possibly bring in one graduate to support Development Management and one to support LDP

4.09 Engage

- Restart Community Council forum
- Continue to invest in member training e.g. sessions on enforcement and energy applications have been held recently – positive for officer/member understanding/collaboration
- Look to hold joint events with internal consultees in Roads, Environmental Health, Sustainability, Economic Development

4.10 Place

- Need for overall corporate buy-in when looking at positive place-making
- Alloa Town Centre Masterplan work is a good opportunity for internal and external co-operation to bring positive benefits and investment to the town

- Need to promote good examples – such as infrastructure funding achieved via Section 75 agreements

4.11 The discussion at the workshop was very productive with participants enthused and engaged and with a real willingness to see the Planning Service continue to improve.

4.12 The self-assessment was amended following the workshop to pick up on the input from peers and this updated version is the one before Committee.

5.0 Sustainability Implications

5.01 There are no direct sustainability issues from the approval of the self-assessment but a well-resourced and high –performing Planning department is a key element in the delivery of sustainability in Clackmannanshire.

6.0 Resource Implications

6.01 The delivery of a highly performing planning service requires staff resources to be maintained at 2025/2026 levels

7.0 Financial

7.01 The delivery of a highly performing planning service requires staff resources to be maintained at 2025/2026 levels

8.0 Staffing

8.01 If improvements across the attributes listed in the self-assessment are to be driven forward and sustained, it will be necessary to retain a full staff compliment across the Planning Service as well as sufficient resources to buy in additional specialised support and advice when needed.

8.02 The current structure is a Service Manager (who is also the interim Chief Planner), a Team Leader, 2 Principal Planners and a Planning Officer. A staff compliment of at least this size will be necessary to ensure continuous improvement.

9.0 Financial Details

9.01 The full financial implications of the recommendations are set out in the report. This includes a reference to full life cycle costs where appropriate.

Yes

9.02 Finance have been consulted and have agreed the financial implications as set out in the report.

Yes

10.0 Exempt Reports

10.01 Is this report exempt? Yes (please detail the reasons for exemption below) No

11.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

(14) Our Priorities

Clackmannanshire will be attractive to businesses & people and ensure fair opportunities for all

Our families; children and young people will have the best possible start in life

Women and girls will be confident and aspirational, and achieve their full potential

Our communities will be resilient and empowered so that they can thrive and flourish

(2) Council Policies

Complies with relevant Council Policies

12.0 Impact Assessments

12.01 Have you attached the combined equalities impact assessment to ensure compliance with the public sector equality duty and fairer Scotland duty? (All EFSIAs also require to be published on the Council's website)

Yes

13.0 Legality

13.01 It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes

14.0 Appendices

14.01 Please list any appendices attached to this report. If there are no appendices, please state "none".

Appendix 1 NPIF draft performance assessment

Appendix 2 Scoring sheet

15.0 Background Papers

15.01 Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered)

Yes (please list the documents below) No

Author(s)

NAME	DESIGNATION	TEL NO / EXTENSION
Pauline Elliott	Interim Chief planning Officer	

Approved by

NAME	DESIGNATION	SIGNATURE
Kevin Wells	Strategic Director	

Equality and Fairer Scotland Impact Assessment (EFSIA)

Summary of Assessment

Title:

National Planning Improvement Framework (NPIF) Self-Assessment Report

Key findings from this assessment (or reason why an EFSIA is not required):

An EFSIA is not required because the self-assessment report would not in itself change the experience of people who share protected characteristics in any way to their detriment

Summary of actions taken because of this assessment:

The draft NPIF self-assessment report will be considered at relevant Council Group and committee meetings, in the light of the Recommendation made by the relevant Service (Planning Services, Place Directorate)

Ongoing actions beyond implementation of the proposal include:

- Publication of self-assessment following Planning Committee, provided Committee endorses it
- Submission to the Scottish Government's Planning Minister

Lead person(s) for this assessment:

Pauline Elliott (Interim Chief Planner)

Senior officer approval of assessment:

Kevin Wells, Executive Director (Place)

DATE: 12 March 2026

Equality and Fairer Scotland Impact Assessment (EFSIA)

An Equality and Fairer Scotland Impact Assessment (EFSIA) must be completed in relation to any decisions, activities, policies, strategies or proposals of the Council (referred to as 'proposal' in this document). The first stage of the assessment process will determine the level of impact assessment required.

The aim of this assessment is to allow you to critically assess:

- the impact of the proposal on those with protected characteristics and, where relevant, affected by socio-economic disadvantage (referred to as 'equality groups' in this document);
- whether the Council is meeting its legal requirements in terms of Public Sector Equality Duty and the Fairer Scotland Duty;
- whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.

The Fairer Scotland Duty requires public authorities to pay 'due regard' to how they can reduce inequalities of outcome caused by

socio-economic disadvantage, when making **strategic decisions**. Strategic decisions are key, high-level decisions such as decisions about setting priorities, allocating resources, delivery or implementation and commissioning services and all decisions that go to Council or committee for approval.

Step A – Confirm the details of your proposal

1. Describe the aims, objectives and purpose of the proposal.

The NPIF process was introduced by Scottish government in the 2019 Planning Act (Scotland). Its purpose is to enable Planning Authorities in Scotland to review their performance and have it tested and scrutinised by peers with the aim of introducing improvement actions. The monitoring of the actions are intended to embed planning at the corporate centre of the Council and deliver a good service to local customers and communities, contributing to accessible, attractive and sustainable places and improving the quality of lives of those who live, work and visit the area.

2. Why is the proposal required?

Producing the assessment and improvement plan is a duty placed on Scottish Planning Authorities

3. Who is affected by the proposal?

The NPIF process will impact on customers of the planning authority as well as those who live in, work in or visit Clackmannanshire by contributing and delivering continuous improvements to the delivery of sustainable development in the County.

4. What other Council policies or activities may be related to this proposal? The EFSIAs for related policies might help you understand potential impacts.

Other relevant policies are National planning policies contained in NPF4 and policies in the Clackmannanshire Local Development Plan (LDP) as well as those in the emerging LDP2 are linked to this proposal

5. Is the proposal a strategic decision? If so, please complete the steps below in relation to socio-economic disadvantage. If not, please state why it is not a strategic decision:

Whilst the self-assessment may have an impact on local communities, it does not constitute a strategic decision in itself. Instead, the assessment and improvement actions provide a framework for how the Planning Service will manage improvement moving forward.

Step B – Consider the level of EFSIA required

You should consider the available evidence and data relevant to your proposal. You should gather information in order to:

- *help you to understand the importance of your proposal for those from equality groups,*
- *inform the depth of EFSIA you need to do (this should be proportionate to the potential impact), and*
- *provide justification for the outcome, including where it is agreed an EFSIA is not required.*

6. What information is available about the experience of those with protected characteristics in relation to this proposal? Does the proposal relate to an area where there are already known inequalities? Refer to the guidance for sources of evidence and complete the table below.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Age	Population Estimates webpage (Clackmannanshire Council) 2023 <u>Population estimates</u>	The assessment and improvement actions provide a framework for how the Planning Service will manage improvement moving forward. These improvements will affect the impact of the Planning Service across all protected characteristic groups equally.
Disability	Scottish Census 2022	The assessment and improvement actions provide a framework for how the Planning Service will manage improvement moving forward. These improvements will affect the impact of the Planning Service across all protected characteristic groups equally.
Race	Scottish Census 2022	The assessment and improvement actions provide a framework for how the Planning Service will manage improvement moving forward. These improvements will affect the impact of the Planning Service across all protected characteristic groups equally.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Sex	Scottish Census 2022	The assessment and improvement actions provide a framework for how the Planning Service will manage improvement moving forward. These improvements will affect the impact of the Planning Service across all protected characteristic groups equally.
Gender Reassignment	Scottish Census 2022	While there is limited information available on the experiences of this protected characteristic both locally and nationally, the very small number of transgender individuals in Clackmannanshire suggests that this group is unlikely to be impacted by the proposals within this policy. If it is, the assessment and improvement actions provide a framework for how the Planning Service will manage improvement moving forward. These improvements will affect the impact of the Planning Service across all protected characteristic groups equally.
Sexual orientation	Scottish Census 2022	According to the 2022 Census, 1,343 individuals (3.12%) aged 16 and over in Clackmannanshire identify as LGBTQ+. The assessment and improvement actions provide a framework for how the Planning Service will manage improvement moving forward. These improvements will affect the impact of the Planning Service across all protected characteristic groups equally.
Religion or Belief	Scottish Census 2022	According to the Scottish Census 2022, Clackmannanshire included 626 individuals identifying as Muslim, 11,246 individuals affiliated with the Church of Scotland, 4,191 affiliated with the Roman Catholic faith and 30,204 individuals reporting no religion. Overall, 58.3% of Clackmannanshire's population reported having no religion. The assessment and improvement actions provide a framework for how the Planning Service will manage improvement moving forward. These improvements will affect the impact of the Planning Service across all

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
		protected characteristic groups equally.
Pregnancy or maternity	Poverty and Income Inequality in Scotland 2017-20	According to the Poverty and Income Inequality in Scotland statistics, single women with children experience the highest poverty rates, with 38% of all single-women households living in poverty. National trends also show a significant increase in the number of single parents claiming Universal Credit, rising by 41.1% between 2021 and 2024. The assessment and improvement actions provide a framework for how the Planning service will manage improvement moving forward. These improvements will affect the impact of the Planning Service across all protected characteristic groups equally.
Marriage or civil partnership (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)	-	Not a characteristic that would be affected by improvement in planning services, not applicable to this proposal.
Socio economic disadvantage (if required)	SIMD 2020/2023	40.3% of Clackmannanshire residents live in areas ranked in the three most deprived deciles nationally. This means about 4 in 10 people in the council area live in neighbourhoods among the 30% most deprived in Scotland. The assessment and improvement actions provide a framework for how the Planning service will manage improvement moving forward. These improvements will affect the impact of the Planning Service across all protected characteristic groups equally.

7. Based on the evidence above, is there relevance to some or all of the equality groups?

Yes

Step C – Stakeholder engagement

This step will help you to address any gaps in evidence identified in Step B. Engagement with people who may be affected by a proposal can help clarify the impact it will have on different equality groups. Sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your proposal on equality groups.

8. Based on the outcome of your assessment of the evidence under Step B, please detail the groups you intend to engage with or any further research that is required in order to allow you to fully assess the impact of the proposal on these groups. If you decide not to engage with stakeholders, please state why not:

Further engagement will continue through ongoing collaboration with internal services, a Community Council forum, continued Member training sessions, and joint working events with internal consultees.

9. Please detail the outcome of any further engagement, consultation and/or research carried out:

As the NPIF self-assessment is a service improvement framework rather than a policy change affecting access to services, no additional targeted equality consultation is required at this stage. Any future service improvement actions will be subject to equality consideration at implementation stage.

Step D - Impact on equality groups and steps to address this

10. Consider the impact of the proposal in relation to each protected characteristic under each aim of the general duty:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

If relevant, consider socio-economic impact.

Age	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	

risk of discrimination	X			The improvement actions have potential to advance better engagement, clearer processes and improved service standards. The implementations will improve effects on the risk of age discrimination by improved communication.
potential for developing good relations	X			Potential positive impacts include improved customer care, clearer decision-making processes, strengthened governance, enhanced digital systems, and re-established community engagement mechanisms. This has the potential to improve good relations.
potential to advance equality of opportunity	X			Potential positive impacts include improved customer care, clearer decision-making processes, strengthened governance, enhanced digital systems, and re-established community engagement mechanisms. This has the potential to promote equality of opportunity.

Disability	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	The improvement actions have potential to advance better engagement, clearer processes and improved service standards. The implementations will not affect the risk of disability discrimination.

potential for developing good relations	X			Potential positive impacts include improved customer care, clearer decision-making processes, strengthened governance, enhanced digital systems, and re-established community engagement mechanisms. This has the potential to improve good relations.
potential to advance equality of opportunity	X			The improvement actions have potential to advance equality of opportunity through better engagement, clearer processes and improved service standards. This has the potential to promote equality of opportunity.

Race	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			The improvement actions have potential to advance better engagement, clearer processes and improved service standards. The implementations will improve effects on the risk of race discrimination by improved communication.
potential for developing good relations	X			Potential positive impacts include improved customer care, clearer decision-making processes, strengthened governance, enhanced digital systems, and re-established community engagement mechanisms. This has the potential to improve good

				relations.
potential to advance equality of opportunity	X			The improvement actions have potential to advance equality of opportunity through better engagement, clearer processes and improved service standards. This has the potential to promote equality of opportunity.

Sex	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	The improvement actions have potential to advance better engagement, clearer processes and improved service standards. The implementations will not affect the risk of sex discrimination.
potential for developing good relations	X			Potential positive impacts include improved customer care, clearer decision-making processes, strengthened governance, enhanced digital systems, and re-established community engagement mechanisms. This has the potential to improve good relations across all sexes.
potential to advance equality of opportunity	X			The improvement actions have potential to advance equality of opportunity through better engagement, clearer processes and improved service standards. This has the potential to promote equality of opportunity.

Gender Reassignment	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	Given the very small number of individuals who identify as transgender across Clackmannanshire overall, it is unlikely that the policy will have an impact on this protected group.
potential for developing good relations			X	It is unlikely that the proposals within this policy will have a direct impact on this protected characteristic.
potential to advance equality of opportunity			X	Given the very small number of individuals who identify as transgender across Clackmannanshire overall, it is unlikely that the policy will have an impact on this protected group.

Sexual Orientation	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	Given the very small number of individuals who identify as LGBTQ+ across Clackmannanshire overall, it is

				unlikely that the policy will have an impact on this protected group.
potential for developing good relations			X	<p>It is unlikely that the proposals within this policy will have a direct impact on this protected characteristic. However, the Housing Service is committed to fostering positive relationships between tenants and staff through the implementation of a person-centred approach.</p> <p>This approach focuses on early intervention in preventing and addressing rent arrears, with the aim of reducing any negative impact on tenancy sustainment. By prioritising communication, support, and tailored assistance, the Service seeks to maintain good relations and promote successful, long-term tenancies.</p>
potential to advance equality of opportunity			X	Given the very small number of individuals who identify as LGBTQ+ across Clacks overall, it is unlikely that the policy will have an impact on this protected group.

Religion or Belief	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	Not a matter that would be affected by improvement in planning services, not

				applicable to this proposal.
potential for developing good relations			X	Not a matter that would be affected by improvement in planning services, not applicable to this proposal.
potential to advance equality of opportunity			X	Not a matter that would be affected by improvement in planning services, not applicable to this proposal.

Pregnancy/maternity	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	Not a matter that would be affected by improvement in planning services, not applicable to this proposal.
potential for developing good relations			X	Not a matter that would be affected by improvement in planning services, not applicable to this proposal.
potential to advance equality of opportunity			X	Not a matter that would be affected by improvement in planning services, not applicable to this proposal.

Marriage/civil partnership	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your
	Positive impacts	Negative impacts	No impact	

				justification to not make changes
risk of discrimination (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)			X	Not a matter that would be affected by improvement in planning services, not applicable to this proposal.

Socio-economic disadvantage	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Yes	No	No impact	
(If required) Will the proposal reduce inequalities of outcome caused by socio-economic disadvantage?	X			The improvement actions have potential to advance inequalities of outcome through better engagement, clearer processes and improved service standards. This has the potential to address advance inequalities of outcome.

11. Describe how the assessment might affect the proposal or project timeline?

Examples of the items you should consider here include, but are not limited to:

- **Communication plan:** do you need to communicate with people affected by proposal in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach certain groups?
- **Cost:** do you propose any actions because of this assessment which will incur additional cost?
- **Resources:** do the actions you propose require additional or specialist resource to deliver them?
- **Timing:** will you need to build more time into the project plan to undertake research, consult or to complete any actions identified in this assessment?

The Equality and Fairer Scotland Impact Assessment is not expected to materially affect the timeline for submission of the NPIF Self-Assessment Report to the Planning Minister.

The NPIF process relates to service performance review and improvement planning rather than the introduction of new policy, service eligibility criteria or statutory change. As such, no additional consultation exercises or extended engagement periods are required beyond the stakeholder engagement already undertaken through the Peer Review Workshop and ongoing service collaboration.

Communication Plan

No additional or specialist communication formats are required specifically as a result of this assessment. The self-assessment will be published in accordance with Council requirements. Any future improvement actions arising from the NPIF (for example changes to digital systems, engagement methods, or AI investigation) will require accessibility and inclusive communication considerations at the point of implementation.

Cost Implications

No additional costs arise directly from this EFSIA. However, the Committee report recognises that sustaining improvement actions identified through the NPIF process will require maintaining an appropriate staffing complement and, where necessary, specialist support. These resource considerations sit within wider service planning and budget processes rather than arising from the equality assessment itself.

Resources

The assessment does not require additional staffing or specialist equality resources at this stage. Any future structural or service changes identified through improvement actions will be subject to further equality assessment and resource consideration where appropriate.

Timing

No additional time is required within the current project plan as a result of this assessment. Monitoring and review of equality impacts will be aligned with the regular NPIF reporting cycle and ongoing service performance monitoring.

12. Having considered the potential or actual impacts of your proposal, you should now record the outcome of this assessment. Choose from one of the following:

Please select (X)	Implications for the proposal
X	No major change Your assessment demonstrates that the proposal shows no risk of

	<p>unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
	<p>Adjust the proposal and/or implement mitigations</p> <p>You have identified ways of modifying the proposal to avoid discrimination or to better advance equality of opportunity or foster good relations. In addition, or alternatively, you will introduce measures to mitigate any negative impacts. Adjustments and mitigations should be recorded in the tables under Step D above and summarised in the summary sheet at the front of the document.</p>
	<p>Continue the proposal with adverse impact</p> <p>The proposal will continue despite the potential for adverse impact. Any proposal which results in direct discrimination is likely to be unlawful and should be stopped and advice taken. Any proposal which results in indirect discrimination should be objectively justified and the basis for this set out in the tables under Step D above and summarised in the summary sheet at the front of the document. If objective justification is not possible, the proposal should be stopped whilst advice is taken.</p>
	<p>Stop the proposal</p> <p>The proposal will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>

Step E - Discuss and review the assessment with decision-makers

- 13. You must discuss the findings of this assessment at each stage with senior decision makers during the lifetime of the proposal and before you finalise the assessment. Record details of these discussions and decisions taken below:**

The findings of this assessment have been discussed with the Interim Chief Planner and Executive Director (Place) and will be considered by Planning

Committee as part of endorsement of the NPIF self-assessment prior to submission to the Planning Minister.

Step F – Post-implementation actions and monitoring impact

It is important to continue to monitor the impact of your proposal on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

14. Record any post-implementation actions required.

Monitoring will take place through regular NPIF progress updates to Scottish Government, internal performance monitoring, and continued stakeholder engagement. Any future policy or structural changes arising from improvement actions will be subject to further equality assessment where required.

15. Note here how you intend to monitor the impact of this proposal on equality groups.

Monitoring will take place through regular NPIF progress updates to Scottish Government, internal performance monitoring, and continued stakeholder engagement.

16. Note here when the EFSIA will be reviewed as part of the post-implementation review of the proposal:

Monitoring will take place through regular NPIF progress updates to Scottish Government, internal performance monitoring, and continued stakeholder engagement. Any future policy or structural changes arising from improvement actions will be subject to further equality assessment where required.

Step G – Assessment sign off and approval

Lead person(s) for this assessment:

Signed: 

Date: 16/02/2026

Senior officer approval of assessment:

Signed:

Date:

All full EFSIAs must be published on the Council's website as soon as possible after the decision is made to implement the proposal.

Step C – Stakeholder Engagement

Engagement has formed a core part of the NPIF self-assessment process. A Peer Review Workshop was held on 26 January 2026 involving planning officers, internal consultees (Roads, Environmental Health, Economic Development, Sustainability and Legal), Elected Members, Community Council representatives, planning officers from West Dunbartonshire Council (peer partners), and representatives from the Improvement Service including the National Planning Improvement Champion.

The workshop included presentations and facilitated breakout discussions structured around the five NPIF themes: People, Culture, Tools, Engage and Place. Feedback from this session informed amendments to the draft self-assessment prior to Committee consideration.

Further engagement will continue through ongoing collaboration with internal services, re-establishment of a Community Council forum, continued Member training sessions, and joint working events with internal consultees.

As the NPIF self-assessment is a service improvement framework rather than a policy change affecting access to services, no additional targeted equality consultation is required at this stage. Any future service improvement actions will be subject to equality consideration at implementation stage.

Step D – Impact on Equality Groups

The NPIF self-assessment does not introduce new policy, charging regimes, eligibility criteria or service restrictions. It is a framework for continuous improvement of the Planning Service.

No direct negative impacts on protected characteristics have been identified. The improvement actions have potential to advance equality of opportunity through better engagement, clearer processes and improved service standards.

Protected Characteristics Assessment

Age, Disability, Race, Sex, Gender Reassignment, Sexual Orientation, Religion or Belief, and Pregnancy/Maternity: No adverse impacts identified. The self-assessment does not alter service access or introduce differential treatment.

Potential positive impacts include improved customer care, clearer decision-making processes, strengthened governance, enhanced digital systems, and re-established community engagement mechanisms. These improvements support inclusive participation and equitable access across all protected groups.

Marriage/Civil Partnership: Not applicable as this is not an employment policy change.

Socio-economic disadvantage: The NPIF self-assessment is not itself a strategic resource allocation decision. However, a well-resourced and high-performing

Planning Service contributes to sustainable economic development, regeneration, community participation and reduction of social exclusion.

Impact on Proposal Timeline

The EFSIA does not alter the timeline for submission of the NPIF self-assessment to the Planning Minister. Improvement actions will be delivered through service planning and corporate budget processes.

No additional costs arise directly from this EFSIA. Sustaining improvement will require maintaining a full staff complement and appropriate resourcing as outlined in the Committee report.

Step E – Discussion with Decision Makers

The findings of this assessment have been discussed with the Interim Chief Planner and Executive Director (Place) and will be considered by Planning Committee as part of endorsement of the NPIF self-assessment prior to submission to the Planning Minister.

Step F – Post-Implementation Actions and Monitoring

Monitoring will take place through regular NPIF progress updates to Scottish Government, internal performance monitoring, and continued stakeholder engagement. Any future policy or structural changes arising from improvement actions will be subject to further equality assessment where required.

The EFSIA will be reviewed as part of the next NPIF reporting cycle or earlier if substantive service changes occur.

Outcome of Assessment

No major change. The assessment demonstrates no risk of unlawful discrimination. It supports opportunities to advance equality of opportunity and foster good relations through improved governance, engagement, workforce investment and service quality.

Appendix I

NATIONAL PLANNING IMPROVEMENT FRAMEWORK

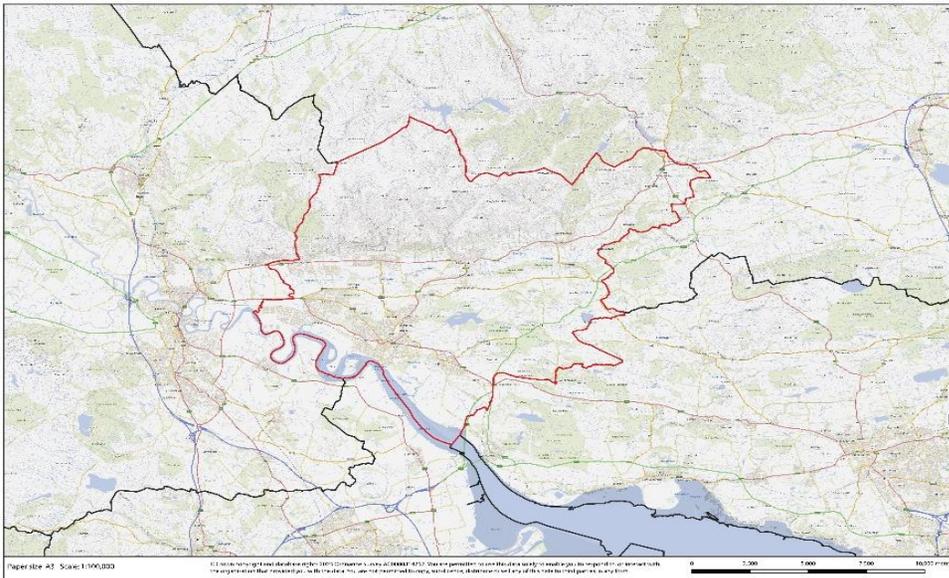
Draft Performance Assessment

1. Please use this document as a template for the self-assessment. If you can please state which planning authority you are and your lead officer below.

Planning Authority:	Clackmannanshire Council
Lead officer:	Pauline Elliot
Email:	planning@clacks.gov.uk
Phone number:	01259 450000

Introduction

Clackmannanshire, Scotland’s smallest county, sits right at the heart of Scotland, bordered by the Council areas of Perth and Kinross, Stirling, Falkirk and Fife, and situated against the northern backdrop of the Ochil Hills.

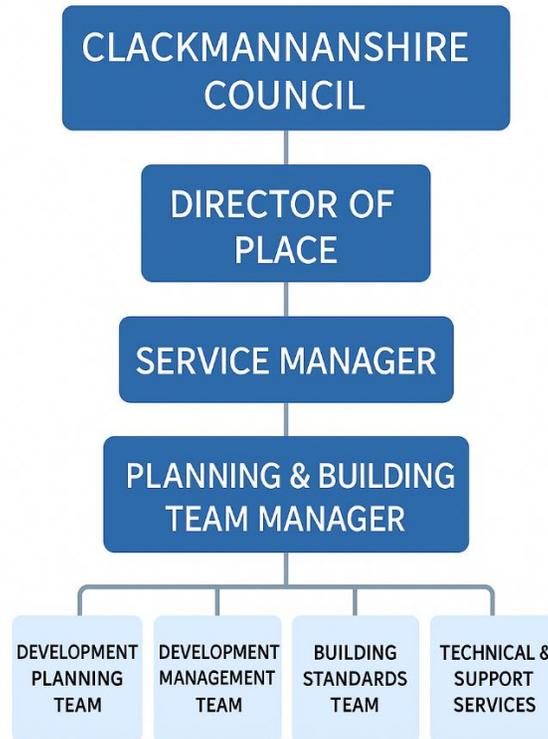


Boundary of Clackmannanshire Council

The most recent census estimates a population of 52,110 as of June 2024. It is anticipated that the projected population will stay the same until 2032 and then fall slightly to 49,924 by 2043. The largest settlement is Alloa with a population of 20,750. Other main settlements include Tillicoultry, Clackmannan, Alva, Menstrie, Coalsnaughton, Sauchie, Dollar and Muckhart.

Alloa train station provides regular services across the central belt, and the area is also easily accessible by road via Stirling to the west and the Clackmannanshire and Kincardine bridges to the east. The County is well served by buses, with routes run by a variety of different operators.

Service Structure



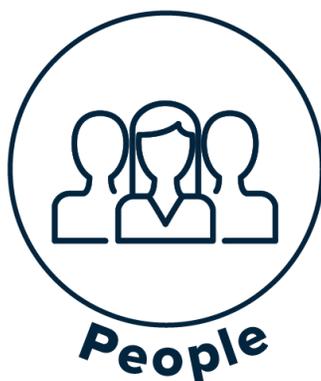
Planning and Building Standards sit within the Place Directorate. The Chief Planner for Clackmannanshire is the Planning and Building Standards Team Leader. The Service sits alongside other place-based services- i.e. Environmental Health, Sustainability and Climate Change, Roads and Transportation and Economic Development.

In 2025/25, the Service received 442 planning and related applications each year via ePlanning.

There have been several changes in the service in recent years with long-standing and experienced planners leaving and the structure operating with a reduced number of staff. Alongside this Clackmannanshire, like most other planning authorities, has found it difficult to recruit, especially to more senior posts. At time of writing the Service Manager post, and two of the Principal Planner posts are being filled by agency staff. This move was made to strengthen the service and its ability to fulfil its statutory duty, initially on the development management side and then in autumn 2025 to kick start the Local Development Plan (LDP). The LDP role has been filled by an agency staff member with a financial contribution from the Scottish Government's Planning Hub.

Please use the below matrix when determining what score you are giving each attribute. We ask that if you score a 1 or 2 that you provide a good practice example, a separate template for this will be provided.

 PRIORITISE	 REVIEW	 DEVELOP	 BUILD UPON	 CONSOLIDATE
No progress	Making limited progress	Making fair progress	Making good progress	Making excellent progress
5	4	3	2	1
Prioritise fundamental review and revisit approach taken. Engage with NPI Learn from others	Review ambition Review approach taken Inform NPI Learn from others	Increase ambition in targets Review and improve implementation	Increase ambition in targets Share learning with others	Share learning with others



A high performing planning authority needs to have the right number of people to do the work expected of it with the rights skills set. It also needs to have a strategy to ensure that it retains and recruits the right staff in the future. It supports staff to upskill and to be prepared for changes in policy, legislation, and new circumstances.

ATTRIBUTE 1: THIS PLANNING AUTHORITY HAS SUFFICIENT RESOURCES AND SKILLS TO MAXIMISE PRODUCTIVITY

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have the sufficient level of staff to carry out all activities within the required timeframes?

- Does the planning authority have the ability to carry out all activities within the required timeframes with its current budget?
- Does the planning authority have the ability to carry out all activities within the required timeframes with its current income?
- Does the planning authority received responses from consultees within the prescribed timescale when assessing planning applications?
- Does the planning authority have the ability to access the appropriate advice, expertise, evidence and data it requires?

Narrative

The performance of the Planning Authority from the official figures is likely to appear poor for the year 25/26 however this is due to the clearance of a backlog of legacy applications which has taken place during this period.

The Planning Authority has been short staffed for some time and efforts to recruit to vacant posts has been challenging. There is a lack of planning professionals within the sector and significant competition from other organisations which has led to a low number of applicants.

As a consequence, the Planning Authority has for a time had to reduce some of its discretionary functions to focus on meeting its statutory obligations and the Authority would come much closer to fulfilling its statutory duties and other discretionary Planning Services if it was fully staffed.

The Planning Authority usually receives responses from consultees within the prescribed timescale when assessing planning applications. As it is a smaller authority it is often easier to have closer working relationships with internal consultees, and the Authority also has established communication channels with external consultees. The Planning Authority could be clearer in what information it requires and the timescale in which this information is required which would improve the speed and quality of the responses.

The Team consists of a small number of highly qualified and experienced officers. There are, however, no dedicated in-house specialists and all functions are managed by the Core Team which has little resilience. Where specialist advice is required on issues such as biodiversity, energy, heritage, landscape design and trees, help and expertise needs to be procured either from colleagues elsewhere in the Council or externally. The team also manages the enforcement process and planning obligations. Complex cases can take up a lot of officer time which can pull officers away from other duties.

Officers would benefit from spending time with other parts of the Council, making them more aware about the need to supply input to the planning process and their role within it. It is hoped that the NPIF process will help in that regard which would position planning higher on the corporate agenda.

At the time of writing there are 3 agency staff working in the service although this is expected to fall to two in early 2026, as we have recently successfully filled a vacant Principal Officer post with a permanent member of staff. Although agency staff are more costly than permanent staff members, the need for capacity, additional knowledge and expertise provided by agency workers has proved fruitful. Several matters including the processing of a large windfarm application, the adoption of an updated Planning Enforcement strategy, moving on complex S75s and progress on the LDP2 have advanced because of the capacity provided by agency staff.

ATTRIBUTE 2: THE PLANNING AUTHORITY HAS A VALUED AND SUPPORTED WORKFORCE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have a workforce planning strategy in place?
- Does the planning authority have the ability to support staff development and upskilling and send staff on relevant courses?
- Does the planning authority have a deliverable commitment to support staff health and wellbeing?

Narrative

The Planning Authority follows the corporate strategies in respect of workforce planning. There is an interim Workforce Strategy in Place for 2023 – 2025 which follows on from the Strategic Workforce Plan. It is designed to ensure that the Council has the right people, with the right skills, at the right time, in the right place.

There is a transformation exercise taking place across the Council, but no formal strategy exists regarding recruitment and retention.

The Team is encouraged to undertake regular training, to develop and upskill, but this is largely focused on free training opportunities provided by partners including the Improvement Service and the RTPi. There have, however, been significant time constraints, but the recruitment of more staff should make this more feasible for staff to attend.

The Council has a deliverable commitment to supporting staff health and wellbeing, however, the pressures of work and lack of capacity in the service have had an impact on morale - especially towards the end of the 24/25 financial year. Morale and productivity both improved with the arrival of additional staff from summer 2025.

The team are looking to assist with organising training/work experience days with Masters Planning students in spring 2026. This will be beneficial to the students but also enable officers to give a positive impression of the variety of work in a small planning authority and will hopefully assist with future recruitment.

The team has sought opportunities to share expertise and pool resources with neighbouring authorities, including Perth and Kinross, Falkirk, and Stirling Councils, particularly in relation to securing specialist advice to inform the Local Development Plan (LDP). While practical collaboration has so far been limited, apart from co-operation with Perth and Kinross Council on a cross-boundary windfarm application, the intent to build stronger partnerships remains a priority.

The recent appointment of the new LDP Officer in October 2025 has strengthened the team's capacity for engagement with peers across the wider region. The officer is now participating in policy forums and joint officer meetings with these neighbouring councils to promote knowledge exchange and identification of opportunities for joint procurement of specialist advice where possible. It is worth noting that neighbouring authorities are currently at different stages of their LDP preparation making direct collaboration challenging, these relationships are developing positively.

Improvement Action Plan (People theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
The planning authority has sufficient resources and skills to maximise productivity	3
The planning authority has a valued and supported workforce	4

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
Identify gaps and recruit staff	Director/Chief Planner	High	1 year	Core budget, fee income, Scottish Government Planning Hub
Cost benefit analysis between buying in resource and recruiting permanently	Director/Chief Planner	Medium	2 years	As above
Try to get neighboring authorities to share resources and achieve shared solutions	Chief Executive/Director	Medium	2 years	Time – attending meetings and forums with key partners



A high performing planning authority has a positive culture through ensuring it has sound governance, effective leadership and a commitment to continuous improvement. The authority has an identified chief planner, who is supported by a strong leadership group to advise on decision-making, policy and operational management.

ATTRIBUTE 3: THIS PLANNING AUTHORITY HAS EMBEDDED CONTINUOUS IMPROVEMENT.

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Has the planning authority undertaken an annual assessment of its performance and acted upon areas previously identified as in need of improvement?
- Has the planning authority achieved recognition at relevant awards or through performance accreditation frameworks?
- Has the planning authority engaged in peer review, good practice exchange or improvement activities?
- Has the planning authority addressed any complaints upheld by the Scottish Public Services Ombudsman and have evidence of this and that it has learned from valid cases?

Narrative

The authority has provided statutory returns on performance.

Clackmannanshire has been recognized for national awards in previous years for its work in the Town Centre, for example the Scottish Home Awards Excellence in Accessibility & Inclusion Award for Primrose Place, 2024. Although there has continued to be good work in many of the county's areas, there has been a lack of capacity to ensure that this has been properly rewarded and recognised and insufficient time to enter awards.

Peer review as part of the NPIF process, and good practice exchange from other authorities is just starting but making good progress. Clackmannanshire is involved in HOPS at various levels and is extending its networking. We are being supported by West
Dumbartonshire Council our peer partners on our self- assessment process and this good relationship will continue moving forward.

ATTRIBUTE 4: THE PLANNING AUTHORITY HAS SOUND GOVERNANCE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have an effective scheme of delegation in place?
- Have all councillors who exercise a planning function undergone statutory training and is there is evidence of ongoing training for members?
- Have more than x % of officer recommendations have been overturned by councillors at committee or Local Review Body.

Narrative

At times the scheme of delegation has been ineffective. There has been a nervousness from elected members to delegate to more junior officers, however reorganisation and the staff make-up and structure has at times created a single point of failure as only the Team Leader could approve applications. There have been points where the Council has been unable to make a delegated decision on a planning application due to staff sickness, holiday, and vacant posts. In addition, if a planner was appointed to the Service Manager post on a permanent basis that would mean more than one chief officer could sign off applications which would add capacity and resilience. At time of writing the Service Manager (interim appointment) is a planner and this is giving more resilience at least in the meantime. Officers are looking at taking a report to Council in late 2026, asking for minor applications to be delegated to Principal officers.

The service provides annual training at the start of each municipal year, to refresh existing members and to introduce new members. Specific training and complex topics e.g. section 36 applications, new legislation, and enforcement training has been provided this financial year.

Officers plan to ask elected members what areas of planning they would most like to be trained on and look at putting together a training programme from early 2026. This will include a session on the new LDP in the early part of the new year and there is some funding corporately to bring in external trainers to assist and support this.

There were no appeals in 24/25. Historically, the number of overturns is low as there is an appetite to work with applicants, to achieve consentable schemes.

ATTRIBUTE 5: THE PLANNING AUTHORITY HAS EFFECTIVE LEADERSHIP

Please consider the following when thinking about this attribute and how you have performed over the

last year:

- Does the planning authority have an identified Chief Planning Officer in place?
- Does the Chief Planning Officer advise on corporate decision making and policy within the broader organisation?
- Is the planning authority's Chief Planning Officer a member of the Royal Town Planning Institute?
- Does the Chief Planning Officer advise and support external bodies through engagement in organisations' committees, advisory groups or working groups?
- Does the planning authority have a strong leadership team that supports a culture of continuous improvement?

Narrative

There was an Interim Chief Planner (from June 2025). This post has now been filled with full handover planned by March 2026.

Although the Planning Service does attend corporate groups, with regular meetings with housing, education and energy, other input is ad-hoc and there is some work required to embed Planning at the corporate centre of the Council.

The Chief Planner does advise and support external bodies and actively engages in committees, advisory groups and working groups. These include HOPS, SEPA, Community Councils, the Energy Consents Unit (ECU) and elected members. There is also liaison between neighbouring authorities and given the nature of the small team, workload and responsibility is shared amongst all team members.

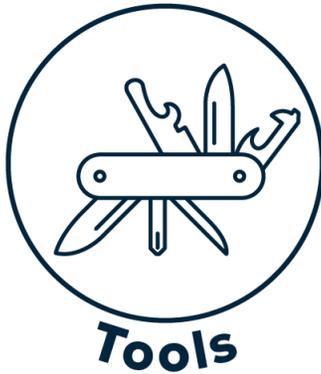
Although the structure of the Team has improved significantly, following a big turnover of staff and transition at all levels including outwith Planning under the leadership of a new Director of Place, the improvements and staff need to be sustained. At the time of writing there are still three interim planners - although is likely to fall to 2 by early 2026. We have recruited a new principal planner on a permanent contract and there is a principal planner post due to be backfilled due to internal recruitment. The Team Leader is also looking at a slightly amended structure which may include bringing in graduates. Not only could the authority “grow its own planners” it is likely to be easier to recruit to more junior posts.

Improvement Action Plan (Culture theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
This Planning Authority has embedded continuous improvement	3
This Planning Authority has sound governance	3
This Planning Authority has effective leadership	3

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
Sustain/consolidate the Team	Director/ Chief Executive	High	Short Term	Core budget vs fee income Scottish Government
Training Programme for members	Team Leader	High	Short Term	Core budget Corporate training budget
Alter delegation of minor application	Planning	High	Medium	Core



A high performing planning authority needs to have an effective local development plan and other strategies in place to provide a vision for the future of the area. It needs to be able to set and deliver on policy ambitions and priorities by clearly informing decision making and providing certainty and predictability for communities, developers and investment. The authority’s development management systems need to be effective in making the right decisions about development and be efficient as possible in doing this. The planning authority makes best use of digital technology and how it manages and uses data.

]

ATTRIBUTE 6: THE PLANNING AUTHORITY HAS A ROBUST POLICY AND EVIDENCE BASE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have an up-to-date Local Development Plan in place and/ or is on track to adoption?
- Does the planning authority have an up-to-date Regional Spatial Strategy in place/ or on track to adoption?
- Has the planning authority’s Local Development Plan Evidence Report been approved by the Department of Planning and Environmental Appeals and/ or on track for approval?
- Have the application of the Local Development Plan’s policies been found to be deficient at appeal or judicial review?

Narrative

At present, the planning authority recognises that the robustness of its policy and evidence base requires strengthening. The Council’s Local Development Plan (LDP) policies are out of date, primarily due to a prolonged vacancy in the sole LDP post, which remained unfilled for 14 months between August 2024 and October 2025. This has resulted in vulnerabilities in the policy framework, and in some cases, successful planning challenges—particularly in relation to affordable housing—where supporting assessments were found to be deficient.

Currently, the Council does not have an up-to-date LDP. Resource constraints over a sustained period have limited the progress in this area. In the interim, National Planning Framework 4 forms the prevailing part of the Development Plan. However, the existing LDP refers to superseded national policy (such as the former Scottish Planning Policy), meaning that parts of its evidence base and policy rationale are no longer fully aligned with current national planning guidance. This has been highlighted in recent appeal decisions, where elements of the LDP have been found to lack sufficient evidential support.

To address this, and as referenced previously, the Council—supported by partial funding from the Scottish Government Planning Hub—has secured a dedicated staff resource for an initial 12-month period commencing October 2025 to progress the preparation of LDP2, starting with the Evidence Report. The newly appointed officer is currently developing a project plan and timetable, identifying priority evidence work, capacity gaps, and opportunities for collaboration across internal Council services, external consultants, and neighbouring authorities.

While one year of funding will be insufficient to complete the new LDP, this initiative marks a significant step forward in rebuilding the Council’s policy and evidence base. The service is already making positive progress, and it is anticipated that as the work gains momentum, further resources will be secured to sustain this capacity in the longer term. The Council fully acknowledges the strategic importance of an up-to-date LDP and is actively addressing the ongoing challenges of recruiting and retaining planners with specialist policy expertise to deliver this work.

ATTRIBUTE 7: THE PLANNING AUTHORITY MAKES BEST USE OF DATA AND DIGITAL TECHNOLOGY

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Has the planning authority encouraged and promoted planning applications to be submitted through the e-development portal?
- Does the planning authority have a data governance strategy in place for the management of planning data?
- Does the planning authority have the ability to use interactive web-mapping, GIS and spatial data?
- Does the planning authority have the ability to use digital approaches to engagement, including website, social media and other platforms?

Narrative

Clackmannanshire Council prefers people to submit planning applications through the online e-Planning portal and 99% of applications are submitted this way. Other ways of submitting applications are now limited.

The Council has created a data governance strategy to manage how it handles data. By June 2025, the first “discovery” stage of this work was completed. A Data Advisory Group has also been set up to oversee data-related projects and guide future improvements. These steps are part of the Council’s move towards a new Data Target Operating Model for managing data in 2025–26.

The planning service also uses other sources of data for its daily work. However, these are not fully supported, so information from them often needs to be checked against other systems, and access to this data can sometimes be restricted.

The Council uses interactive mapping (GIS) and spatial data tools, through its corporate GIS platform, supplied by Cadcorp. This system helps with mapping, data visualisation, and spatial analysis.

There is also an interactive online map available to the public that shows the current Local Development Plan (LDP). Internally, the Council uses spatial data to help with decisions, site assessments, and planning policies. The GIS officer supports the planning team by creating maps, analysing land use data, and managing datasets. However, this officer only works one day per week, so capacity is limited.

The Council knows its interactive mapping for the public needs improvement and plans to review this as part of the next LDP work programme.

Finally, the planning team uses digital tools for public engagement, including social media and Citizen Space on the Council's website.

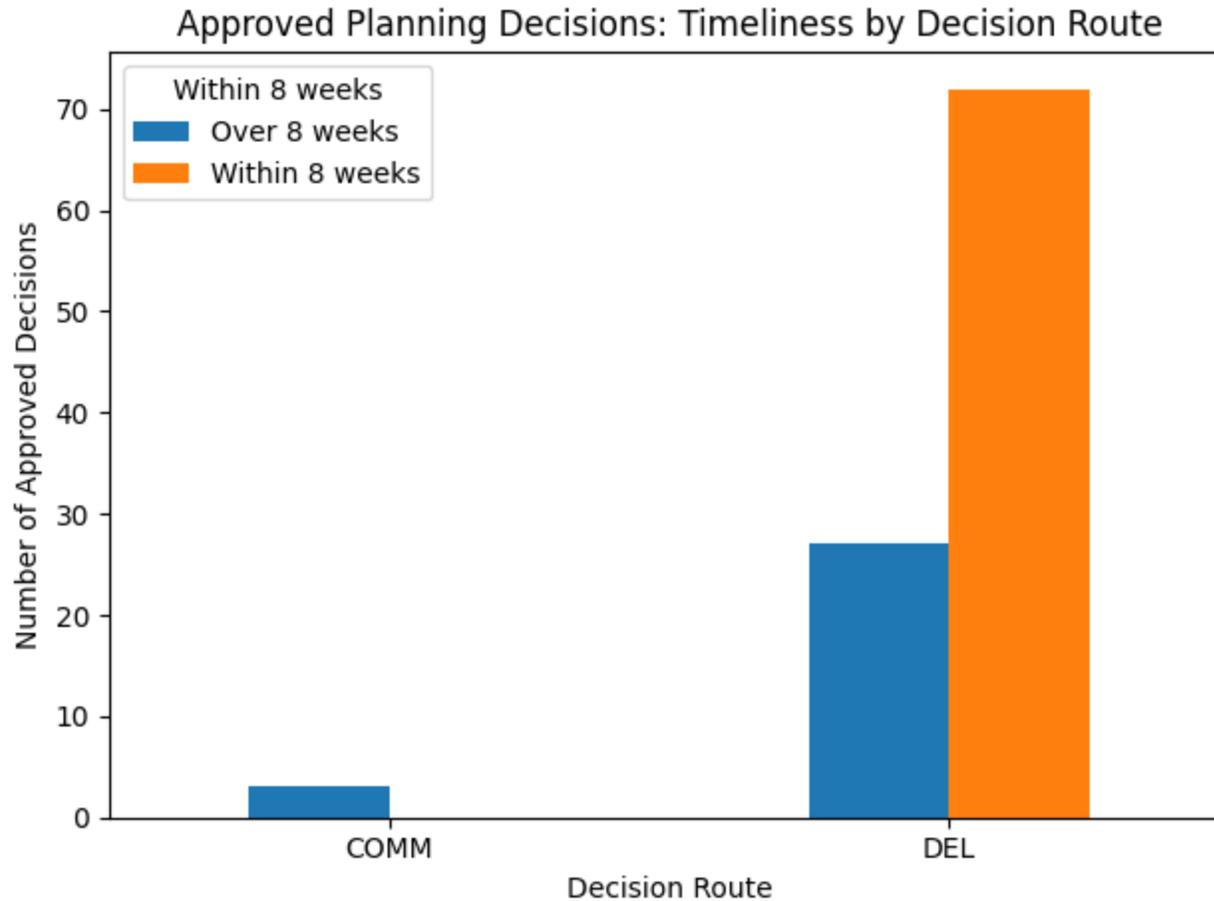
ATTRIBUTE 8: THE PLANNING AUTHORITY HAS EFFECTIVE AND EFFICIENT DECISION MAKING PROCESSES

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have the ability to make decisions on planning applications within the required timeframes?
- Are less than x% of planning decisions overturned at appeal or judicial review?
- Does the planning authority have an up to date Enforcement Charter in place?
- Does the planning authority have the ability to resolve enforcement cases?

Narrative

During the relevant period the planning authority was able to keep making some decisions within required timeframes, but with limitations due to staff resources for approximately 6 months. Performance was therefore below average for Clackmannanshire Council. Improvements have been continuing since interim staff were appointed in July 2025.



This table shows the time taken for decisions for the last 6 months of 2025.

The Enforcement Charter was not up to date during the relevant period for this exercise having last been updated in 2022, but in October 2025 it was updated and approved/published.

Clackmannanshire Council can provide adequate resources for the resolution of minor enforcement matters and has continued to, despite limitations, but is less able to do so in relation to major enforcement issues arising. Although largely a planning staff resource problem, there is not enough capacity throughout the council to absorb major planning enforcement issues, and we occasionally need to bring in external legal support.

A new permanent Principal Planner has been recruited, and he took up post in early December 2025. The officer will be processing more complex planning applications but also has extensive enforcement experience from larger authorities. This will be an asset to Clackmannanshire in future.

Improvement Action Plan (Tools theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
1. The planning authority has a robust policy and evidence base	4
2. The planning authority makes best use of data and digital technology	4
3. The planning authority has effective and efficient decision-making processes	3

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
Ensure new LDP planner is in post and has tools to undertake the work with full	Director/Team Leader/ Principal Policy planner	High	1	Planning budget/directorate budget,

efficiency, including digital support				Scottish Government Planning Hub
Keep datasets up to date and make data accessible to relevant users	Team leader/Principal Policy planner I.T	High	3	Planning/directorate I.T budget/Scottish government
Revise Scheme of Delegation for officers to allow Principal Officers to sign off minor applications. Noting that efficiency is improving due to increased number of team members.	Director/ team leader	Medium	3	Planning
Increase efficiency of use/application of Uniform and other systems for reporting at delegated and committee levels.	Corporate Centre All departmental users I.T	High	3	Planning/directorate I.T budget/Scottish government



A high performing planning authority should ensure a wide range of people are involved in shaping their future places. Engagement should be fair and inclusive, early, collaborative, meaningful and proportionate and should include difficult to reach groups. The authority should engage with a wide range of partners at a national, regional and local level to ensure a joined-up approach and that links are made across policies and programmes. The planning authority should demonstrate good customer care, transparency and effective communication.

ATTRIBUTE 9: THE PLANNING AUTHORITY HAS GOOD CUSTOMER CARE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have the ability to offer pre-application advice where it is requested?
- Has the planning authority held regular engagement events with developers and communities?
- Do the results from the customer and stakeholder survey show that customers are satisfied with the service offer by the planning authority?

Narrative

During the relevant period resources were limited, resulting in a temporary suspension of pre-application advice. From summer 2025, Clackmannanshire Council began providing pre-application advice and is moving towards a regime of discretionary charges for this service, starting in 2026/27.

Developer engagement such as developer forums have been inactive due to resource issues during the relevant period. The dedicated LDP staff resource from October 2025 is highly likely to provide a platform from which to kickstart developer and community engagement, for example through Call for Site and Ideas required as part of LDP process.

Regular engagement with stakeholders such as Community Councils has been constrained due to resource issues. This is an area for improvement which will improve as preparation for the new LDP gets under way, with local consultation and events required as part of the LDP process. A Community Council event is now in the diary for late February.

ATTRIBUTE 10: THE PLANNING AUTHORITY HAS EFFECTIVE ENGAGEMENT AND COLLABORATION WITH STAKEHOLDERS AND COMMUNITIES

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have a community engagement strategy and infrastructure in place to ensure engagement is early, collaborative, meaningful and proportionate?
- Has the planning authority undertaken community engagement, for example consistent and effective use of the Place Standard Tool, to inform decision-making processes? Has the planning authority encouraged and promoted planning applications to be submitted through the e-development portal?
- Has the planning authority engaged with a good representation of the community including young people, gypsies and travellers, people with protected characteristics, including disability, race, age, sex and sexual orientation, and including people from a range of socio-economic backgrounds?
- Has the planning authority supported the production of Local Place Plans when requested?
- Do the results from the customer and stakeholder survey show that stakeholders are satisfied with their collaboration with the planning authority?

Narrative

Clackmannanshire Council does not currently have a community engagement strategy adopted across the council, however through the Family Wellbeing Partnership, a Community Voice Strategy is being created. This is an important component of

Clackmannanshire Transformation Space, which empowers local people to have more say in how public services are delivered and how funding is allocated.

The Place Standard Tool has previously been utilized in the past but not during the relevant period for this review. Places have been appraised in terms of their components and offers. Moving forward, consideration is being given to application of the tool on projects with colleagues, but this will be as and when resources and processes are developed.

Engagement with community groups has been on a reactive basis rather than proactive by the planning service. Collaborative work with other services including Housing is in the pipeline and the methodology used in that service’s engagement is one planning services is considering adopting.

No recent work has been undertaken by the Local Authority in relation to Local Place Plans due to lack of staff resources and potentially intensive nature of the work involved, but community groups have been undertaking work on their own initiatives. We received the Muckhart Community Council Local Place Plan at the end of 2025 and we understand the Dollar Community Council Local Place Plan is close to production.

Improvement Action Plan (Engage theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
4. This planning authority has good customer care	3
5. The planning authority has effective engagement and collaboration with stakeholders and communities.	4

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
Check for and use an engagement strategy or otherwise create.	Team Leader, Communities Team, if not already available at corporate level	High	Short Term	Time
Engaging with underrepresented groups	Team Leader and Principal Officer for the LDP.		Short Term	Hold local targeted events in conjunction with established group – I.e The Gate, Carsebridge Cultural, The Men’s Shed



A high performing planning authority should demonstrate place leadership by taking a collaborative place-based approach in line with the Place Principle. It should use the Place and Wellbeing Outcomes in decision-making processes, to achieve the three spatial principles outlined in NPF4: Sustainable places, where we reduce emissions, restore and better connect biodiversity; Liveable places, where we can all live better, healthier lives; and Productive places, where we have a greener, fairer and more inclusive wellbeing economy. The planning authority should seek to ensure that there are no impediments to delivering agreed development.

ATTRIBUTE 11: THE PLANNING AUTHORITY SUPPORTS THE DELIVERY OF SUSTAINABLE, LIVEABLE AND PRODUCTIVE PLACES

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Is the planning authority aware of the [Place and Wellbeing Outcomes](#), the evidence that sits behind them and is it using them in decision-making processes?
- Has the planning authority identified tools and approaches to delivering sustainable, livable and productive places and is implementing them?

Narrative

The planning authority continues to support and build established, livable and productive places by providing support through its planning policies and supplementary guidance. We are now offering a pre-application service which is currently free, and we are mapping out key places and resources within our neighborhoods to promote local living.

The tools that we have are NPF4, the LDP and the SG's. As mentioned previously, the LDP is now being updated to reflect recent changes.

Clackmannanshire's Local Outcomes Improvement Plan (LOIP) 2024-2034 is a 10-year strategy led by the Clackmannanshire Alliance to tackle inequality, poverty, and disadvantage by building a stronger, more equal community. Its core focus is on a Wellbeing Economy, driven by community involvement and shared partnership efforts. It is not at the forefront or embedded with Planning but is a product of our approach to creating sustainable, livable and productive places.

ATTRIBUTE 12: THE PLANNING AUTHORITY SUPPORTS THE DELIVERY OF CONSENTED DEVELOPMENT

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Has the planning authority provided clear and proportionate expectations of Section 75 agreements and set these out in the LDP and pre-application discussions and they are concluded within 6 months of resolution to grant?
- Does the planning authority take a proportionate approach to imposing conditions?
- Does the planning authority have an ambitious local housing land requirement that exceeds the Minimum All Tenure Housing land requirements in NPF4 and is it on track to support delivery?
- Are the number of processing agreements the planning authority has agreed with applicants increasing?
- Does the planning authority have an effective delivery programme in place that supports the delivery of development on the ground?

Narrative

The Local Development Plan set out a clear vision for the growth and development of Clackmannanshire until 2035, allocating a number of sites and a generous supply of land for the provision of new homes, including a range of tenures, for development in its communities. The Local Development Plan is requiring revision and progress is being made. Since the LDP was adopted in 2015, some of the local situations have changes and some of the site constraints have altered, particularly in respect of climate change. This means that some of the allocated housing sites may no longer be developable for their intended purpose or viable, however this is currently counteracted by a large number of new homes currently being built across Clackmannanshire by a number of providers, and it is considered that future housing demand, at least in the short term, is been exceeded and can be met in the coming years as these developments come on board.

Although the Planning Authority take a precautionary approach to developing sites, particularly for sensitive end-uses such as housing, they will work with developers to achieve the best outcome for all parties. All the major sites with planning permission are

accompanied by an indicative masterplan and where appropriate phasing is agreed to support the delivery of development on the ground.

The Planning Authority has supplementary guidance in place for developer contributions and Section 75 agreements, giving some indication to the likely expectations for developers. Although the contributions requested are proportionate and are discussed during pre-applications, the guidance is requiring updating as part of the Local Development Plan as there has been a successful challenge in relation to affordable housing and some of the local contexts have changed. Since the guidance was developed, new secondary education facilities have been introduced which means that most developments are no longer required to make contributions towards secondary education provisions, but pre-school places are now offered more widely on the back of government initiatives, and there are increased pressures on nursery and primary schools in the area. This was not identified at the time of the guidance been produced but has been successfully discussed with developers and contributions have been secured where necessary. In addition, doctors' surgeries are struggling for capacity and are now looking for contributions for any additional users. This until recently has not been requested but is vital infrastructure for the population as it grows.

In the past 12 months the Planning Authority has been able to secure several Section 75 agreements, but the figures have been skewed by legacy applications. Although the Planning Authority has not concluded section 75 agreements within a 6-month period, recent legal advice is that we should build this into our decisions to ensure that future legal agreements are undertaken in a timely manner. The Housing Emergency has played a part in speeding up decisions.

The Team at Clackmannanshire are well established in their roles and have a wealth of knowledge. Because the number of applications is low and the team are very well versed, there is no standard set of conditions or informatives. Until recently the team was made up of officers who had worked together for several years, but with new officers coming on board, more consistency in the conditions used may be of value. The intentions of the conditions are good and proportionate, but it may be possible for information to be sought prior to decisions to reduce work thereafter.

The Planning Authority does use planning processing agreements but there is no universal format and, in some cases, where agreements are in place these are not met. Although there are discussions within the team that processing agreements are not always the best option, the number of processing agreements is relatively low and stable. There is room to improve performance in this area, particularly in relation to majors.

Improvement Action Plan (People theme)

Attribute	Score (1=Making excellent progress, 5= No progress)
6. The planning authority supports the delivery of sustainable, liveable and productive places	3
7. This planning authority supports the delivery of appropriate development	3

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
Make processing agreements more public/more visible	Service manager, Team Leader	Medium	3 years	Continuing staff capacity
Standard conditions	Principal officer/team Leader	High	1 year	Staff- draft conditions in preparation

Below is a composite scoring sheet showing how officers scored the service and how peers scored the service at the workshop in January 2026.

Appendix II

NPIF – Scoring Sheet

Score each attribute from 1 to 4 (1 = making excellent progress, 2 = making good process, 3 = making fair progress, 4 = making limited progress, 5 = no progress).

Attribute	Score from officers	Score from peer workshop
1. Sufficient resources and skills to maximise productivity	3	4
2. A valued and supported workforce	4	4
3. Embedded continuous improvement	3	4
4. Sound governance	4	4
5. Effective leadership	3	4
6. A robust policy and evidence base	4	4
7. Best use of data and digital technology	4	4
8. Effective and efficient decision-making processes	3	4

Attribute	Score from officers	Score from peer workshop
9. Good customer care	3	3
10. Effective engagement and collaboration with stakeholders and communities	4	3
11. Support for delivery of sustainable, liveable and productive places	3	4
12. Support for delivery of consented development	3	3