

## **Planning Agent: Validation Session Q&A - Your Questions, Answered**

### **Q1. Is there any particular procedure for S36 applications? Do you like to have a voluntary PAN?**

- There is no requirement for a voluntary PAN and preference is to only submit PANs when required (i.e. for major development). The majority of planning applications for renewable energy developments are dealt with by us. However, responsibility for authorising new electricity generation plants over 50 megawatts and new hydro plants over 1 megawatt, under [Section 36 of the Electricity Act](#), lies with the Scottish Ministers. Decisions are reached, based on an assessment of the project against the relevant development plan and input requested by us or Scottish Ministers, from a variety of consultees. Appeals against refused applications are heard by the [Scottish Government's Directorate for Planning and Environmental Appeals](#).
- Further information on our website: [Renewable energy - planning process - Perth & Kinross Council](#)\*

### **Q2. What happens following validation within your team and how quickly do you assign to an officer?**

- Once an application is valid, the case is passed to Business Support who issue a validation acknowledgement, process adverts, neighbour notifications and run all identified consultations. Once Business Support tasks are completed, the case is then typically allocated to a Planning Officer within 1-3 days.
- Further information on the planning application process is set out on our website: [Application process - Perth & Kinross Council](#)\* webpage and in the 'What happens to my planning application?' pdf guidance document.

### **Q3. Would change of use applications fall under the same category of minor works and therefore no need for location plan?**

- Should a planning application be required in such a scenario, a location plan is still required to identify and plot the site, to allow Business Support to process neighbour notification(s) and for the general public to clearly identify the site. Location plans are required for all formal applications and are also very useful in relation to pre-application enquiries.

### **Q4. It feels post Covid council members are more difficult to get on the phone to discuss applications and letter/emails slow down applications.**

- *Planning Officer contact phone details are included on all email signatures and, once an application is valid, the Planning Officer's name can be found on Public Access. Once the case has been allocated to a specific Technician or Officer, to make first contact you can also phone our Customer Service Centre (CSC) should you wish to speak to the specific Officer or Technician. Within the 'What Happens to My Planning Applications?' pdf guidance document, we promote that a Planning Officer is not contacted during the*

statutory determination period to allow concentration on assessing the application. You will be contacted if further consideration to a particular issue or extension to the determination period is required.

- This information can be found on our website: [Application process - Perth & Kinross Council](#)\*

**Q5. Is it possible to receive the planning fee 'cheat sheet' as in previous years?**

- We are not aware of a 'cheat sheet' but we do ensure the planning fee webpages are updated as soon as planning fees are revised by Scottish Government. We publish proposed increases on our website when we become aware.
- This information can be found on our website: [Planning and development news - Perth & Kinross Council](#)\*

**Q6. Could there be a 2-stage process for more minor/technical invalidation decisions to have a case officer input on whether invalidation is necessary?**

- An informal 2-stage process is in place where Validation Technicians often discuss the relevance of minor and/or technical details, with Planning Officers or Team Leaders, whenever in doubt. This has to be an informal process and when workloads allow.

**Q7. Some councils have set up that the keyword 'escalate' will automatically flag to team leader. Is this in place within PKC?**

- Should any concerns need to be escalated to a Team Leader, we advise to first make contact with the Planning Officer direct. If there are remaining issues or concerns, you can contact our Customer Service Centre (CSC) where colleagues can take your details and escalate to the specific Officer's team leader.
- Further information can be found on our Customer Service Charter for an indication of response times: [Customer Service Standards - Perth & Kinross Council](#)\*

**Q8. Are officers area based?**

- Validation Technicians nor Conservation Officers operate in geographical areas. Planning Officers in the Householder Development team operate on a monthly rotational geographic basis. Planning Officers in the Local and Major Development teams do not operate on a geographic basis. Enforcement Officers operate in static geographical areas. Planning and associated applications are allocated specifically if there is relevant planning history.

**Q9. At what point in the validation process is an application reference generated? Could that be automatically sent to agent to streamline payment references?**

- The application reference is generated once downloaded from the ePlanning portal and registered by Business Support. If the planning fee is known at the point of ePlanning submission, payment can be made in advance by using the ePlanning reference ending in -001 which is pulled through to our planning record.

**Q10. Inconsistency between council and council makes it difficult for repeat clients working in different areas to accept the inconsistency in information asked.**

- We appreciate the frustration that each Council operates somewhat differently. It is important for us to remain consistent in our validation practices. We do have planning validation checklists that are regularly reviewed, available for public view. We are looking to review, streamline and update our checklists in the near future. We will advise of any changes through the Planning & Development News webpage.
- Key webpages include: [Planning application validation checklists - Perth & Kinross Council](#)\* and [Planning and development news - Perth & Kinross Council](#)\*

**Q11. Some planning authorities in Scotland and regularly in England accept hybrid planning applications. Was advised in a pre app that hybrid works here but wasn't?**

- There used to be a hybrid application in cases where planning permission and listed building consent were required (prefix PPLB) but is no longer used in practice. We do not accept hybrid applications but Planning Permission in Principle (PPiP) applications can include elements of detail, though it remains a PPiP with associated constraints for commencement of development.

**Q12. Are validation decisions audited for consistency?**

- There is no formal audit in place. Should any concerns be highlighted and raised, externally or internally, standards or particular issues are discussed at regular team meetings with the intention of sharing knowledge and improving consistency in practice.

**Q13. Do site photos help process applications?**

- They can be a great help. Although not a validation requirement, yes, frontloading your site photos would assist the Planning Officer with their assessment. Site photos could also be inserted into your plans and drawings. Be mindful about not including sensitive information such as car number plates, etc.

**Q14. If we can have the technician's contact details, why can't we have the planning officer contact details as standard?**

- The assigned Validation Technician's name and contact email can be found within the Invalid Letter. Planning Officer details would only be available post-validation and once allocated (within 1-3 days). Once allocated you can check Public Access for the allocated Planning Officer's name and be put through if available. We will review any possible process changes.
- Further information can be found on our website: [Application process - Perth & Kinross Council](#)\*

**Q15. Do you know if there any plans to replace the advert in local paper with something more accessible?**

- It is a legislative requirement for us to advertise in local press. Planning site notices, weekly validation lists and weekly decision lists are available on our website. Site notices are also with TellMeScotland. We will review any possible process changes.
- *Further* information can be found on our website: [Application process - Perth & Kinross Council\\*](#) and via [tellmescotland](#).

**Q16. Upload through the portal: is it helpful to email drawing directly to the planning officer as well?**

- Upload of Post-Submission Additional Documents (PSAD) via the ePlanning portal is the standard first approach unless otherwise agreed with the Planning Officer or Technician. Please don't send/submit both at the same time as this can create confusion and double-handling efforts.

**Q17 (email). Can we speak to someone (at time of submission) to confirm the application fee amount as we've found that the online fee calculator doesn't always help. Some clients pay the fee quickly, but some don't and we have to chase which in turn delays the validation. So, it would be helpful if we can confirm the exact amount for the fee with the reference as this could speed up the payment by the client.**

- Prior to submission, our Planning Technicians can clarify an estimated planning fee if plans and drawings have been drawn up and provided as part of a pre-application enquiry sent to [DevelopmentManagement@pkc.gov.uk](mailto:DevelopmentManagement@pkc.gov.uk). In the first instance we would direct to the planning fee webpages which are kept up-to-date. We will review any possible process changes.
- *Further* information can be found on our website: [Planning application fees - Perth & Kinross Council\\*](#)

## **Further Comments**

***C1. The planning validation process is designed for urban contexts and is impractical and inconsistent for rural applications, particularly due to difficulties with suitable location plans and unclear requirements.***

- The validation process applies to all contexts whether urban or rural. The introduction of a 'rural location plan' is to ensure that properties or sites within rural contexts can be clearly identified. A Planning Technician would advise whether a rural location plan is necessary on the site-specific case via the Invalid Letter.
- *Further information on the rationale behind Rural Location Plans can be found within our webpage: [Planning application validation checklists - Perth & Kinross Council](#)\**

***C2. Minor technical standards are inconsistent (in particular line styles for site boundaries) without clear published guidance.***

- As noted within HOPS guidance ('A guidance note on the national standards for the validation and determination of planning applications and other related consents in Scotland') "the application site should be edged clearly with a solid red line and include all the land necessary to carry out the proposed development. E.g. land required for access, visibility splays, car parking and landscaping." We will review any possible process changes and update our webpages in the interests of clear guidance and consistency.
- Key webpages include: [Planning application validation checklists - Perth & Kinross Council](#)\* and [Planning and development news - Perth & Kinross Council](#)\*

***C3. Validation requests include non-essential information at an early stage, creating unnecessary delays and costs by blurring the line between validation requirements and matters addressed later in the planning process. Elsewhere, such information is requested only where relevant and often via condition — much like bat surveys, which are not required for every application "just in case."***

- All requests issued on an Invalid Letter are always 'valid' validation requests. Any additional information is clearly noted as "Although not a validation requirement" simply to highlight an opportunity to front-load information to support efficiency consultation and assessment processes during the Determination stage of the application post-validation. The requirement of a Bat Survey should be identified and actioned pre-submission. Failure to provide a required Bat Survey may mean you need to withdraw the application and resubmit, or it may be refused thus causing significant delays for your client.
- Key webpages include: [Planning application validation checklists - Perth & Kinross Council](#)\* and [Planning and development news - Perth & Kinross Council](#)\*. More information on Bat Survey requirements can be found on our website, particularly the 'bat survey guidance' .pdf document and Annex A & B: [Planning Guidance - Planning & Biodiversity - Perth & Kinross Council](#)\*

**C4. Provide accessible, upfront guidance on rural validation requirements to reduce unnecessary back-and-forth and improve efficiency.**

- When submitting an application in a rural context, you can check our planning validation checklists against the type of development being proposed. Each case is site-specific and therefore a Technician may, even in pre-validation discussion with a Planning Officer, identify additional validation requirements if deemed necessary (e.g. site cross-sections or datum spot levels for development on undulating ground).
- Further information can be found within our webpage: [Planning application validation checklists - Perth & Kinross Council](#)\*

**C5. Make the validation process consistent and aligned with standard practice across Scotland. Remove or reduce requirements for full floor plans and roof plans for simple house extensions and avoid invalidating applications over negligible measurement discrepancies.**

- We appreciate the frustration that each Council operates somewhat differently. Currently there is no identified singular approach across Scotland. It is important for us to remain consistent in our validation practices. Although plans and drawings should measure accurately at 100%, we do operate a degree of flexibility on scale bar accuracy. Plans can also be updated to show annotated measurements to assist Planning Technicians and Officers to identify intended distances. We will query discrepancies if there are many or are inconsistent. We are looking to review, streamline and update our checklists in the near future. We will review any possible process changes and update our webpages in the interests of clear guidance and consistency.
- Key webpages include: [Planning application validation checklists - Perth & Kinross Council](#)\* and [Planning and development news - Perth & Kinross Council](#)\*