

SHETLAND ISLANDS COUNCIL PLANNING PERFORMANCE FRAMEWORK ANNUAL REPORT 2022



SHETLAND
ISLANDS COUNCIL



Heads of Planning Scotland

PLANNING PERFORMANCE FRAMEWORK

**Shetland Islands Council
2022**

INTRODUCTION

The Planning Performance Framework (PPF) is the Planning Authorities annual report on the planning service. The PPF was developed by the Heads of Planning Scotland (HOPS) and the Scottish Government to provide a document with a range of qualitative and quantitative indicators to document planning activities.



Drone photographs: John Carolan

SECTION 4 – Guidance Notes and Templates

Case Study Title:	
Use of Virtual Town Hall for LDP engagement	
Location and Dates:	
On line – March 22	
Elements of a High-Quality Planning Service this study relates to (please select all that apply):	
<ul style="list-style-type: none"> Quality of service and engagement 	
Key Markers (please select all that apply):	
<i>Note which key markers 1-15 this case study relates to</i>	
Key Areas of Work (please select the main area of work covered - 1 to 2 options maximum):	
<ul style="list-style-type: none"> Design Climate change Conservation Biodiversity Regeneration Environment Greenspace Town Centres Masterplanning Local Develop Plan & Supplementary Guidance Housing Supply Affordable Housing Economic Development Enforcement Development Management Processes Planning Applications 	<ul style="list-style-type: none"> Interdisciplinary Working Collaborative Working Community Engagement Placemaking Design Workshops/ Charrettes Place Standard Performance Monitoring Process Improvement Project Management Skills Sharing Staff Training Online Systems Data and Information Digital Practice Transport Active Travel Other (<i>please note</i>)
Stakeholders Involved (please select the main stakeholders - 1 to 2 options maximum):	
<ul style="list-style-type: none"> General Public Hard to reach groups Local Developers Key Agencies 	<ul style="list-style-type: none"> Planning Committee Authority Planning Staff Authority Other Staff Other (<i>please note</i>)
Overview:	
On line engagement (see attached document)	
Goals:	
Successfully engage with the wider community in a period of COVID restrictions	
Outcomes:	
<p>What went well?</p> <ul style="list-style-type: none"> Our main tool for community engagement We received a lot of complements on the Virtual Hall The virtual hall proved to be an excellent and easy way to set out consultation information Most users found it easy to navigate around and easy to find the information they were seeking The community hall set-up, placed the user in a familiar environment and added to the ease-of-use and site experience Compatible with all devices – phones, tablets, desktops, therefore increasing accessibility The template provided by AECOM was easily customisable using PDFs we had already set up and PDFs that could also be used elsewhere (advertisement etc) The client support from AECOM was excellent 	

SECTION 4 – Guidance Notes and Templates

- Additional information and updates were added to the virtual hall posters during the consultation period, in response to feedback on content

What could be better?

- Some users found it hard to navigate around
- Some users found the content of the posters to be difficult to understand

1. Live Chat Function

What went well?

- The Live Chat function was presented to CMT on 11 January 2022, as part of our consultation toolbox
- Proved to be an excellent way of answering questions and providing a duty officer service
- We found it to be easy and functional for staff to use
- Enabled us to be responsive and efficient with queries
- One community councillor mentioned the Live Chat function had been very useful
- We had checked with other local authorities (Aberdeenshire, for example) who use this function and had used this function during their (award-winning) community consultation on their next Local Development Plan
- We agreed that the Live Chat function was a modern and up-to-date service we should provide

What could be better?

- We incorrectly thought, as with other local authorities, that users of the Live Chat function would be directed to the council's own Privacy Statement and would tick the 'I have read the Council's privacy statement' box, before they were allowed to use the Live Chat function
- A Live Chat function becomes part of the suite of consultation tools available to council services, provided that it complies with all council ICT and communications requirements
- Possibly more information – or an information package – available to help guide staff/sections in terms of what we can and cannot do
- The Live Chat function was set up by AECOM, but was provided by a separate company. AECOM (the provider of the Virtual Hall) did not therefore take responsibility for any data protection issues.

Name of key officer
Suzanne Shearer

SECTION 4 – Guidance Notes and Templates

Checklist for Part 2: Qualitative Narrative and Case Studies

Each authority should add this very short tick box table to reference the case studies presented in Part 1. Please note that there is no requirement to cover every single topic listed below. This is designed to be collated by HOPS and issued to all authorities after the submission of the PPF. The goal is to have an easy to reference list of topics covered in the PPF to allow other authorities planners easier access PPF case studies on issues that they are dealing with. This supports the promotion of collaboration and knowledge sharing amongst planning authorities.

Case Study Topics	Issue covered by case study (pg no.)	Case Study Topics	Issue covered by case study (pg no.)
Design		Interdisciplinary Working	
Climate change		Collaborative Working	
Conservation		Community Engagement	x
Biodiversity		Placemaking	
Regeneration		Design Workshops/ Charrettes	
Environment		Place Standard	
Greenspace		Performance Monitoring	
Town Centres		Process Improvement	
Masterplanning		Project Management	
Local Develop Plan & Supplementary Guidance	x	Skills Sharing	
Housing Supply		Staff Training	
Affordable Housing		Online Systems	
Economic Development		Data and Information	
Enforcement		Digital Practice	
Development Management Processes		Transport	
Planning Applications			
Other: please note			

SECTION 4 – Guidance Notes and Templates

Part 3: Service improvements

Template for Part 3: Service Improvements

In the coming year we will:

- Work with external partners , our ICT and Legal Services colleagues to resolve issues with on line chat function for community engagement
- Work with colleagues across the Council to deliver on line engagement in order to deliver SIC Best Value Audit recommendations
- Update our guidance on Local Review and implement the additional improvements identified by our recent Audit.
-

Delivery of our service improvement actions this year

Committed improvements and actions	Complete?
Work with Promote Shetland on a new recruitment drive to look at different approaches <ul style="list-style-type: none">• Adverts, case study videos and interviews with staff as part of recruitment process• Three new staff recruited	Yes
Update our guidance on Local Review and implement the additional improvements identified by our recent Audit.	No
Plan and deliver online engagement as part of LDP2 <ul style="list-style-type: none">• See case study	yes
Monitor number of marine planning applications and works licence applications subject to pre-application advice 67% of planning applications and 14% works licences subject to pre-application	yes

SECTION 4 – Guidance Notes and Template

Part 4: National Headline Indicators (NHI)

The National Headline Indicators (NHI) are a detailed list of work programme information that each planning service needs to collate in-house. They are designed by HOPS to allow for ongoing measurement of performance. The template below allows for 2018/19 and 2019/20 to be recorded in the same manner as it has been in previous years. Additional guidance on completion is included in the coloured sections within the template itself.

A: NHI Key outcomes - Development Planning:

Development Planning	2021/22	2020/21	Guidance on what to include
Local and Strategic Development Planning:			
Age of local/strategic development plan(s) at end of reporting period <i>Requirement: less than 5 years</i>	7 years 6 months	6 years 6 and months	<i>Number of years and whole months passed starting from date(s) existing local or strategic development plan(s) were adopted /approved.</i>
Will the local/strategic development plan(s) be replaced by their 5 th anniversary according to the current development plan scheme?	N	N	<i>Using the development plan scheme in force on 31st March at the end of the reporting year, is the expected adoption/ approval date of each plan less than 5 years after the date the current plan was adopted/approved?</i>
Has the expected date of submission of the plan to Scottish Ministers in the development plan scheme changed over the past year?	later	later	<i>Comparison of the development plan scheme at the start of the reporting period with the one in force at the end of the reporting period</i>
Were development plan scheme engagement/consultation commitments met during the year?	Y	Y	<i>Both the timing and nature of engagement should be considered here. Exceeding the commitments given in qualitative terms should not be seen as requiring a negative response. However, commitments missed by more than a month should be reported and justified.</i>

SECTION 4 – Guidance Notes and Templates

Effective Land Supply and Delivery of Outputs ¹			
Established housing land supply	1414units	1414units	<p><i>This indicator will usually be captured by a Housing Land Audit on an annual basis. The most up-to-date figure should be given, with the base date also being reported. All housing tenures should be included.</i></p> <p><i>Established housing land supply: the total housing land supply including both unconstrained and constrained sites. This will include the effective housing land supply, plus the remaining capacity for sites under construction, sites with planning consent, sites in adopted local development plans and where appropriate other buildings and land with agreed potential for housing development</i></p> <p>Circular 2/2010 Glossary http://www.scotland.gov.uk/Resource/Doc/212607/0103970.pdf</p>
5-year effective housing land supply programming	1028 units	1028 units	<p><i>This indicator will usually be captured by a Housing Land Audit on an annual basis. The most up-to-date approved figure should be given, with the base date also reported. All housing tenures should be included.</i></p> <p><i>Effective housing land supply: the programming of that part of the established housing land supply which is free or expected to be free of development constraints, and will therefore be available for the construction of housing in the next 5 years. This is influenced by the rate of delivery.</i></p> <p>Circular 2/2010 Glossary http://www.scotland.gov.uk/Resource/Doc/212607/0103970.pdf SPP(2014) para 110 & 125 http://www.scotland.gov.uk/Resource/0045/00453827.pdf</p>

¹ Audit Year

Please provide the housing land audit year utilised and state whether draft or final. The most up to date audit available at the time of submitting the PPF should be utilised which will either be the draft 2020 or final 2019.

SECTION 4 – Guidance Notes and Templates

5-year effective land supply total capacity	n/a units	n/a units	<p><i>This indicator will usually be captured by a Housing Land Audit on an annual basis. The most up-to-date approved figure should be given, with the base date also report. All housing tenures should be included.</i></p> <p><i>Effective housing land supply total capacity: this is the total remaining capacity of the part of the established housing land supply which is free or expected to be free of development constraints, and will therefore be available for the construction of housing in the next 5 years. For example, if a site of 110 units is delivering 20 units per annum, the 5-year effective land supply is 100 units and the 5-year effective land supply total capacity is 110 units.</i></p> <p><i>Circular 2/2010 Glossary</i> http://www.scotland.gov.uk/Resource/Doc/212607/0103970.pdf SPP(2014) para 110 & 125 http://www.scotland.gov.uk/Resource/0045/00453827.pdf</p>
5-year housing supply target	710 units	710 units	<p><i>This is the total number of additional homes (all tenure) that the development plan seeks over the following 5-year period. Under SPP (2014) this is called the housing supply target, although previously this was often referred to as the housing requirement. However, for the avoidance of doubt, it is not the housing land requirement which includes a margin of flexibility to ensure the housing supply target can be met. If the target is updated in light of historic completions, this should be specified.</i></p>
5-year effective housing land supply (to one decimal place)	7.3 years	7.3 years	<p><i>Calculation of the 5-year supply using the figures provided above (5-year effective housing land supply & 5-year housing supply target) using the following formula:</i></p> $= \left(\frac{\text{5-year effective housing land supply (units)}}{\text{5-year housing supply target (units)}} \right) * 5$ <p><i>SPP (2014) para 110 & 125</i> http://www.scotland.gov.uk/Resource/0045/00453827.pdf</p>

SECTION 4 – Guidance Notes and Templates

Housing approvals	184 units	60 units	<i>Total number of units (all tenures) consented during the reporting period.</i>
Housing completions over the last 5 years	334 units	367 units	<i>Total number of new homes (all tenures) completed over the preceding 5-year period.</i>
Marketable employment land supply	147.35 ha	149.2 ha	<p><i>This indicator will usually be captured by a business or employment land audit on an annual basis. The most up-to-date figure should be given, with the base date also reported.</i></p> <p><i>Marketable employment land – land which as well as meeting business requirements, such land should have a secure planning status, be serviced or serviceable within 5 years, and be accessible by walking, cycling and public transport.</i></p> <p>SPP (2014) para 101 (http://www.scotland.gov.uk/Resource/0045/00453827.pdf).</p>
Employment land take-up during reporting year	1.85 ha	0 ha	<i>Quantity of land removed from the marketable supply due to the start of work on site during the reporting year (or the most recent 12-month period available), specifying the period concerned.</i>

SECTION 4 – Guidance Notes and Templates

B: NHI Key outcomes – Development Management:

Development Management:	2021/22	2020/21	Guidance on what to include
Project Planning			
Percentage and number of applications subject to pre-application advice	40 - 13 %	23 9.5 %	<i>Planning applications decided during the year on which the planning authority had provided pre-application advice to the applicant normally including written advice. A number and percentage for this indicator is required.</i>
Percentage and number of major applications subject to processing agreement	0 %	0 %	<i>Applications decided during the year for which there had been a processing agreement, shared and understood and agreed between the applicant and planning authority, including a scheduled timetable for handling of the application. A number and percentage for this indicator is required.</i>
Decision Making			
Application approval rate	99.3%	%	<i>Percentage figures; to be provided by the Scottish Government (Analytical Services), drawn from the data provided by planning authorities.</i>
Delegation rate	99%	%	<i>Percentage figures; to be provided by the Scottish Government (Analytical Services), drawn from the data provided by planning authorities.</i>
Validation	20%	%	<i>The percentage of applications which are validated upon first receipt.</i>
Decision-making Timescales			
Major Developments	54.1 weeks	weeks	<i>Average number of weeks from receipt of a valid planning application to decision. Figures to be provided by the Scottish Government (Analytical Services), drawn from the data provided by planning authorities. The figures used in the PPF report should be based on 'all applications' and not 'post – August 2009 applications'.</i>
Local developments (non-householder)	16.1 weeks	weeks	-
Householder developments	12.6 weeks	weeks	-
Legacy Cases			
Number cleared during reporting period	3	#	<i>Applications which are more than one-year-old. Provide details of the number of legacy cases cleared during the reporting period and the number remaining (as at 31 March).</i>
Number remaining	3	#	-

SECTION 4 – Guidance Notes and Templates

C: Enforcement activity

	2021/22	2020/21	Guidance on what to include
Time since enforcement charter published / reviewed Requirement: review every 2 years	2 years 6 months	1 year months	<i>Position as at 31 March. The number of months since the authority's enforcement charter was last published or reviewed and re-published.</i> https://www.shetland.gov.uk/downloads/file/1425/planning-enforcement-charter .
Complaints lodged and investigated	84	92	<i>Total enquiries made or complaints lodged about possible planning breaches which have been investigated.</i>
Breaches identified – no further action taken	1	0	<i>Potential breaches of planning control investigated.</i>
Cases closed	74	65	<i>Cases closed within this timeframe.</i>
Notices served	0	0	<i>Formal notices served including; enforcement notices; breach of condition notices; planning contravention notices; stop notices; temporary stop notices; fixed penalty notices, and Section 33 notices</i>
Direct Action	#	#	<i>Cases where direct action has been taken to resolve the breach</i>
Reports to Procurator Fiscal	0	0	<i>Reports passed to the Procurator Fiscal</i>
Prosecutions	0	0	<i>Number of prosecutions on planning enforcement activity led by the authority</i>

SECTION 4 – Guidance Notes and Templates

D: NHI Key outcomes – Commentary

Commentary	Guidance on what to include
Failure to achieve a robust and credible Housing Needs and Demands Assessment over several years meant we could not deliver on an “old style “ LDP and now await NPF4 and LDP Regulations to deliver on new style LDP for Shetland	

SECTION 4 – Guidance Notes and Template

Part 5: Scottish Government Official Statistics

Scottish Government Official Statistics are drawn from quarterly returns by planning authorities. They are collated into an annual set of figures that is published on the Scottish Government website. The template below allows the information from these returns to be recorded in a consistent format. Additional guidance on how to access the statistics is included within the template itself.

A: Decision-making timescales (based on 'all applications' timescales)

Timescales	2021/22	2021/22	2020/21	Guidance on what to include
Overall				
Major developments	2	54.1 weeks	weeks	<p>Decision-making timescales Information on decision-making timescales for planning and other applications will be provided by the Scottish Government (Analytical Services), drawn from the data provided by planning authorities. The figures used in the PPF report must be based on the 'all applications' timescale. You can simply copy/paste in the 2017-18 full year table we publish for the authority on the Scottish Government website. You can use the information you receive prior to its publication on the web.</p> <p>https://www.gov.scot/collections/planning-statistics</p> <p>It is important that the statistics give an accurate and reliable account of the timescales for handling applications. There will be an opportunity for planning authorities, when providing their data to the Scottish Government, to highlight particular cases where substantial, and clearly unavoidable, delays have occurred. Additionally, the planning authority should highlight at that time any applications where there has been written agreement between the authority and the applicant that no action should be taken on the application during a specified period. The figures provided by the Scottish Government for</p>
Local developments (non-householder)	168	16.1weeks	weeks	
<ul style="list-style-type: none"> Local: less than 2 months Local: more than 2 months 	21(12.5%) 147(87.5%)	7.3 17.4		
Householder developments	74	Weeks	weeks	
<ul style="list-style-type: none"> Local: less than 2 months Local: more than 2 months 	11(14.9%) 63(85.1%)	5.7 13.8		
Housing Developments				
Major	1	45.3weeks	weeks	
Local housing developments	54	18.4weeks	weeks	
<ul style="list-style-type: none"> Local: less than 2 months Local: more than 2 months 	1% 53%	1.9 98.1		
Business and Industry				
Major	1	62.9 weeks	weeks	

SECTION 4 – Guidance Notes and Templates

Local business and industry developments <ul style="list-style-type: none"> Local: less than 2 months Local: more than 2 months 	16 1(6.3%) 15(93.8%)	19.5weeks 7.4 20.3	weeks	<p><i>this section may therefore have been reasonably adjusted to provide a more accurate marker of performance.</i></p> <p><i>For applications where the authority and applicant have agreed a timescale different from the 2 month and 4 month targets, for example where there are processing agreements in place, the statistics on decision times will be adjusted to reflect these agreements.</i></p>
EIA Developments	0	weeks	weeks	
Other Consents <ul style="list-style-type: none"> <i>As listed in the guidance(right)</i> 	73	14.3weeks	weeks	<p><i>Consents and certificates: Listed buildings and Conservation area consents, Control of Advertisement consents, Hazardous Substances consents, Established Use Certificates, certificates of lawfulness of existing use or development, notification on overhead electricity lines, notifications and directions under GPDO Parts 6 & 7 relating to agricultural and forestry development and applications for prior approval by Coal Authority or licensed operator under classes 60 & 62 of the GPDO.</i></p>
Planning/legal agreements <ul style="list-style-type: none"> Major: average time Local: average time 	# #	weeks weeks	weeks weeks	<p><i>Legal obligations associated with a planning permission; concluded under section 75 of the Town and Country Planning (Scotland) Act 1997 or section 69 of the Local Government (Scotland) Act 1973</i></p>

SECTION 4 – Guidance Notes and Templates

B: Decision-making: local reviews and appeals

Type	Total number of decisions No.	Original decision upheld				Guidance on what to include
		2021/22		2020/21		
		No.	%	No.	%	
Local reviews	3	1	33			Information on local review and appeal decisions will be provided by the Scottish Government (Analytical Services), drawn from the data provided by planning authorities.
Appeals to Scottish Ministers						

C: Context

Use of remote agency staff allowed us to reduce backlog and improve performance generally

Part 6: Workforce Information

Workforce information should be a snapshot of the authorities planning staff in position on the **31st of March 2022**. The information requested in this section is an integral part of providing the context for the information in parts 1-5. The template below allows the information to be recorded in a consistent format, additional guidance on what to include is within the template itself.

	Tier 1 <i>Chief Executive</i>	Tier 2 <i>Director</i>	Tier 3 <i>Head of Service</i>	Tier 4 <i>Manager</i>	Guidance on what to include
Head of Planning Service			1	3	

Staff Age Profile	Headcount	Guidance on what to include
Under 30	1	Approximate age profile of the staff noted above
30-39	4	
40-49	8	
50 and over	7	

RTPI Chartered Staff	Headcount	Guidance on what to include
Chartered staff	9	Approximate numbers of staff which are MRTPI

Staff Structure	Structure Diagram	Guidance on what to include
Noting the roles and job titles of staff within the planning authority hierarchy		

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Part 7: Planning Committee Information

The template below allows the information on the number of meetings and site visits during the reporting period to be recorded in a consistent format, additional guidance on what to include is within the template itself.

Committee & Site Visits	Number per year	Guidance on what to include
Full council meetings		
Planning committees	8	<i>References to committees also include National Park Authority Boards.</i>
Area committees		<i>Where relevant</i>
Committee site visits	0	<i>Number of sites (i.e. applications) visited by committee.</i>
Local Review Body	5	<i>This relates to the number of meetings of the LRB. The number of applications going to LRB are reported elsewhere.</i>
LRB site visits	0	<i>Number of sites (i.e. applications) visited by the LRB.</i>

SECTION 5 – Performance Markers

National oversight of the performance of the Scottish Planning System is taken by a High-Level Group, chaired by the Minister for Local Government and Communities. Heads of Planning Scotland sit on this group alongside COSLA and the RTPI. In 2013 the group agreed a set of "Performance Markers" which allow the Scottish Government a consistent basis to consider performance.

Thus, the PPF feedback reports provided by the Scottish Government stem purely from an assessment of whether these markers have been met. It is therefore essential that your PPF report provides the information needed by the Scottish Government to consider your performance against the markers. The content of your PPF report is your opportunity to provide the evidence and explanations in support of the performance story illustrated by the statistics.

The template below is for information only, setting out these markers, shows the measure that Scottish Government will apply, the policy background to the marker being applied and suggests where in your PPF you can evidence that this marker has been met. It is up to each planning authority if they wish to include a similar table for ease of referencing their PPF report content to the Performance Markers.

A table noting where evidence can be found greatly helps Government colleagues providing feedback. This can be as simple as the table shown below a more detailed example can be found in [Fife Council PPF10 pg. 6](#).

Key Marker	Previous R.A.G. Rating	Source or Evidence
13. Sharing good practice, skills and knowledge between authorities	Previous rating e.g. Amber in PPF10	Evidence provided: Case studies 1 and 2 Council website [hyperlinked]

SECTION 5 – Performance Markers

	Performance Marker	Measure	Policy Background to Marker	Part of PPF report best suited to evidence this marker
DRIVING IMPROVED PERFORMANCE				
1	Decision making: authorities demonstrating continuous evidence of reducing average timescales for all development types	-	Official Statistics and PPF reports	NHI Scottish Government Official Statistics
2	Project management: offer of processing agreements (or other agreed project plan) made to prospective applicants in advance of all major applications <u>and</u> availability publicised on planning authority website	Y/N	Modernising the Planning System (Audit Scotland); SG website / template	NHI Quality of Service and Engagement;
3	Early collaboration with applicants and consultees on planning applications: - availability and promotion of pre-application discussions for all prospective applications - clear and proportionate requests for supporting information	Y/N Examples	White Paper; Delivering Planning Reform; Planning Reform Next Steps	NHI Quality of Service and Engagement
4	Legal agreements: conclude (or reconsider) applications within 6 months of 'resolving to grant' ³	Reducing number of live applications more than 6 months after resolution to grant (from same time last year)	Official statistics; PPF reports; evidence of delays to major developments	Quality of Service and Engagement Governance

SECTION 5 – Performance Markers

5	Enforcement charter updated / re-published	Within 2 years	Planning Act (s158A)	NHI
6	Continuous improvements: - progress ambitious and relevant service improvement commitments identified through PPF report	Progress on all commitments	Delivering Planning Reform; PPF Report	Culture of Continuous Improvement Service Improvement Plan
PROMOTING THE PLAN-LED SYSTEM				
7	LDP (or LP) less than 5 years since adoption	Y/N	Planning Act (s16); Scottish Planning Policy	NHI Quality of Outcomes Quality of service and engagement
8	Development plan scheme demonstrates next LDP: - on course for adoption within 5-year cycle - project planned and expected to be delivered to planned timescale	Y/N Y/N	Planning Act (s16); Scottish Planning Policy	NHI Quality of Outcomes Quality of service and engagement
9	Stakeholders including Elected Members, industry, agencies, the public and Scottish Government are engaged appropriately through all key stages of development plan preparation	Evidence of activity		Quality of Service and Engagement Governance

SECTION 5 – Performance Markers

10	No longer applicable – gap kept for data continuity			
11	Production of relevant and up to date policy advice	Evidence of activity		Quality of Service and Engagement
SIMPLIFYING AND STREAMLINING				
12	Corporate working across services to improve outputs and services for customer benefit (e.g. protocols; joined-up services; single contact; joint pre-application advice)	Examples from the year		Quality of Service and Engagement Governance
13	Sharing good practice, skills and knowledge between authorities	Evidence of activity to pass on and adopt good practice	Delivering Planning Reform; Planning Reform Next Steps	Culture of continuous improvement
DELIVERING DEVELOPMENT				
14	Stalled sites/legacy cases: conclusion/withdrawal of planning applications more than one-year-old	Reducing number of applications more than one-year-old (from same time last year)		Governance
15	Developer contributions: clear expectations - set out in development plan (and/or emerging plan,) and - in pre-application discussions	Y/N Examples		Quality of service and engagement



SHETLAND

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