

Key Agencies

Planning Survey

August 2025

Introduction

Our Programme for Government commits to rapid audits of planning teams within key agencies to reduce complexity, cost and speed up the planning application determination processes. The project, initiated in July, is taking a proportionate approach by focusing on the five agencies most active in planning applications:

- NatureScot
- Scottish Environment Protection Agency
- Scottish Water
- Transport Scotland
- Historic Environment Scotland

The project will focus on activity relating to all stages of processing planning applications. It will not cover the role of agencies within the development planning process.

Over July and August, the Lead Reviewer is taking evidence from agencies and stakeholders to establish potential areas for improvement activity and by December will set out recommendations for relevant parties to deliver.

Wider agency involvement in planning

Whilst the audit process is focused on 5 agencies, a number of other agencies have an important role to play in the planning process. Those agencies which are listed as statutory agencies in planning regulations are:

- Scottish Enterprise
- Highland and Islands Enterprise
- South of Scotland Enterprise
- Regional Transport Partnerships
- Crofters Commission
- Health Boards

There are also other organisations that support the planning system and are part of the [Key Agencies Group](#), including:

- Forestry Scotland
- Marine Scotland
- Architecture and Design Scotland
- British Geological Survey
- SportScotland
- Visit Scotland
- Improvement Service
- Planning Aid Scotland

Whilst the agency audit work will not look at these wider agencies, the project provides an opportunity to gather data on their involvement in the planning process and to share good practice on areas of improvement. This information will inform

any future reform work and assist the key agency group in their shared work programme.

Completing this Survey

The purpose of this survey is to gather information to help explore both current improvement efforts and any commonly shared issues that are impacting on speed of planning application determination timescales.

The relevance of the survey to each agency will differ due to their various roles and responsibilities. The request is answer only where it is considered relevant and in a manner that is the most appropriate for your agency (i.e. referencing existing material as responses to questions).

Please send completed surveys to DirectorPAR@gov.scot by 10 October.

Survey

Overview

1. What responsibilities does your agency have in supporting the planning system, including specifically the planning applications process?

Ans: The British Geological Survey (BGS) is not a statutory consultee in the planning application process and is not directly involved in individual planning applications. However, the BGS provides data that can be or should be used as an evidence base for the Local Development Plans (LDPs), and which may be used for individual planning applications, although this is – we understand – ultimately the responsibility of the Local Planning Authorities (LA's).

A crucial dataset that BGS maintains and provides is the UK Radon data, which is licensed via the Scottish geospatial Board and should be available to all LAs. However, there are other geological datasets that are potentially relevant for planning purposes, e.g. relating to geohazards, flooding, and sustainable drainage options.

2. Can you provide statistical information on your agencies involvement in the planning application process. Example data may include:
 - a. Number of planning cases consulted on per annum.
 - b. Number of members of staff engaged in planning activity.
 - c. Development types or broad category of cases engaged in.
 - d. Geographic distribution of the services offered.
 - e. Average response times and numbers or proportion of cases that met target timescales.
 - f. Number of cases receiving objections from your agency.

- g. Number of cases that involve pre-application discussions and/ or involve processing agreements.

Ans:

BGS is not a statutory consultee in the planning application process, so we cannot provide this information.

3. In the last 3 years, are there good practice examples of improving the efficiency of the planning process and procedures either within your agency or progressed by other agencies?

Ans:

Over the past year, BGS has participated in a series of meetings and a workshop facilitated by the Improvement Service to identify which BGS datasets are most relevant to the planning process, explore options for data access, and promote knowledge exchange. These meetings were very insightful for BGS. Productive discussions have also taken place with the Scottish Geospatial Board. There is potential for several BGS datasets to be incorporated into the UK-wide Public Sector Geospatial Agreement (PSGA), which would align BGS data availability with that of Ordnance Survey. A decision is anticipated by December 2025.

4. Reflecting on the complexity, speed and efficiency of the planning process and your agencies involvement, what parts of the process could be improved? Example considerations include any parts of the service that regularly cause complexity/ delay; duplication of effort; tools or systems that lack functionality; communication barriers; or processes that add little value.

Ans:

Several Councils have invited BGS to review their evidence base for Local Development Plans (LDPs). This exercise has revealed that not all Local Authorities (LAs) have access to—or make use of—the most accurate and up-to-date datasets. In some instances, key datasets were omitted entirely; in others, only low-resolution versions were referenced. We observed that even where high-resolution data sets have been licenced by the Scottish Government and should be readily available to all LAs, such as the UK Radon dataset, the data is not consistently used. Enhancing clarity around dataset availability and streamlining access to BGS resources could significantly improve the planning process, specifically in terms of robustness of geohazard risk assessments.

Resourcing

5. What are the main resourcing, skills and capacity constraints for your service or for the planning applications process as a whole?

Ans:

As the national geological survey, BGS serves a broad spectrum of stakeholders including Local Authority (LA) planners. However, we do not have a statutory role in the planning application and hence have limited insight into the detailed workings of the planning process. Maintaining direct contact with planning departments across all 32 LAs is not possible with our current role and resources. The Improvement Service has played a valuable and constructive role in helping to bridge this gap. However, the current ad hoc, council-by-council licensing approach means that access to BGS data sets across councils remains inconsistent. A Scotland-wide—or UK-wide via the Public Sector Geospatial Agreement (PSGA)—licensing model would offer a more efficient and consistent means of delivering BGS data to LAs and other government bodies.

Improvement Opportunities

6. What parts of the planning process would you most like to see simplified AND/OR if you could change one thing to improve how your planning team or the process works, what would it be?

Ans:

BGS is not positioned to answer this question from the perspective of a planning team. However, it is evident that improved and more rapid access to data would be beneficial.

A recurring issue raised in recent discussions with planning officials (?) concerns the point at which specific subsurface hazards become material planning constraints, potentially requiring action from Local Authorities (LAs). In essence, BGS cannot necessarily judge the *impacts* of certain subsurface hazards in the context of planning decisions as the products are not specifically designed to address Scottish Government planning policy. Conversely, LA planners may lack the in-house expertise to accurately evaluate the risks posed by certain subsurface hazards. Moreover, planners may not be sufficiently empowered to make informed, case-by-case decisions regarding subsurface hazards. Such limitations can reduce the practical value of BGS data, even when it is accessible.

A notable exception is the UK Radon Map, which benefits from clearly defined thresholds in policy and/or legislation—triggering mandatory action by LAs when exceeded. A potential solution would be for the Scottish Government to issue clear guidance within planning policy on which subsurface hazards (beyond radon) should be considered, along with threshold levels that necessitate intervention.

Any other comments

7. Please provide any further comments that you wish to capture.

Ans:

BGS would like to highlight the opportunity for wider use of their data in the planning process to better support decision making related to subsurface hazards.

Beyond the UK Radon dataset, there are several other BGS datasets that could support planning decisions specifically in relation to the identification of subsurface-related hazards. These include:

- **BGS Geological Indicators of Flooding**

This dataset identifies the presence of flood deposits, indicating areas affected by flooding in both historic and prehistoric times. Its methodology differs fundamentally from that of SEPA's flood risk maps, and ideally, both datasets should be considered when assessing flood-prone areas.

- **BGS Non-Coal Mining Hazards**

While the Mining Remediation Authority (formerly the Coal Authority) provides data on coal mining hazards—critical for subsidence risk—BGS holds data on non-coal mining hazards such as historic limestone and oil shale mining. These hazards are less widely known, and relevant Councils often do not include them in their evidence base.

- **Subsurface Hazard Susceptibility Assessments**

BGS offers a range of assessments that provide insight into ground instability (e.g. landslides, natural subsidence), coastal and river erosion, and infiltration drainage suitability for Sustainable Drainage Systems (SuDS). For a comprehensive overview of available datasets and their potential applications, please refer to the [BGS Product Portfolio](#) and [BGS Product webpages](#).

- **Emerging Datasets**

New datasets continue to be developed. A notable example is the UK Geothermal Platform, created through collaboration between DESNZ and BGS. While potentially valuable for planning, there is currently no clear mechanism for effectively communicating the availability and relevance of such new datasets to Local Authority planners.