

PLANNING SERVICE IMPROVEMENT PLAN

“Improving the customer experience”

September 2022



NORTH
NORFOLK
DISTRICT
COUNCIL

1. Introduction

The planning profession has faced enormous change and challenge over recent years, not least the pandemic and resultant process changes, introduction of different ways of working and engagement opportunities with local authorities. Customer requirements and expectations have also shifted.

Town and Country Planning is a local authority front line service and generates significant levels of public interest and participation. It is therefore befitting that performance and the level of service provided should be subject to continuous review and improvement.

In March 2022, the Council's Overview and Scrutiny Committee supported the production of a 'Planning Service Improvement Plan' (PSIP), aimed at addressing key issues, namely:

- Speed of decision making.
- Communication with stakeholders and Members.
- The provision and access to information, and
- Alignment of planning and sustainable growth interests.

The recommendation of the Director for Place and Climate Change was that the planning service should aim to within the top 25% performing local planning authorities within the next 24 months and that the PSIP should set out the steps necessary to achieve this, whilst actively addressing the identified issues above. The Committee supported this aspiration.

The PSIP is formed of two parts, firstly the 'Strategy' element, e.g., this document, which sets out the strategic themes and areas of focus. The second part will be formed of a detailed Action Plan, which is to be produced in draft form for Scrutiny by Committee in December 2022. This Action Plan will set out a range of actions across all themes aimed at delivering on the strategic aims.

The PSIP is primarily aimed at the Development Management (DM) function, although there is cross over with other service elements, including building control. As such, the content of the Plan will be limited to primarily addressing the identified DM related issues. Other aspects of service area reform will of course be subject to ongoing review alongside this process, but the scope of this Plan needs to be more focused in order for it to be deliverable in the necessary timescales.

This Strategy has been prepared by the Director for Place and Climate Change.

2. The Vision

In seeking continuous improvement for the service, it is considered that a clear vision is necessary, to be read alongside the Councils corporate vision. To this end, the proposed vision for the North Norfolk Planning Service is:

- to be recognised for being an innovative and effective planning authority, who positively and proactively engages with communities and stakeholders to enhance places and enable sustainable growth, and
- to have an up-to-date and joined up spatial planning framework; effective infrastructure planning; high performing development management, planning enforcement and building control functions and integrated and engaging specialist planning and design services.

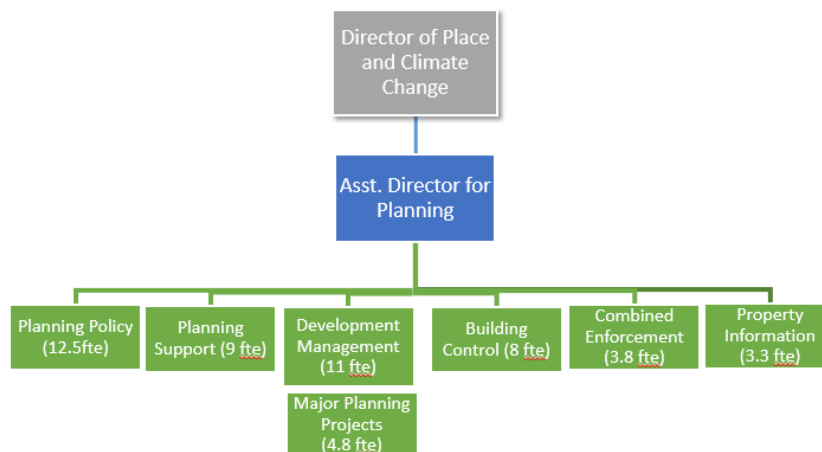
3. Current Position and performance

During 2020 the Planning and Sustainable Growth service areas combined to form one single directorate, as part of the management restructure, under the newly created Director for Place and Climate Change role.

The planning service presently employs 54.6FTE and has responsibility for maintaining and improving the district's natural and built environment. The role of the service is to:

- determine all forms of planning and other related applications.
- deliver a Local Plan and planning policy.
- protect and enhance conservation areas and listed buildings.
- deal with tree preservation order applications and reviews.
- provide general planning and related advice to the public.
- deal with planning appeals.
- undertake planning enforcement.
- provide Land charges, Street naming and numbering and property data services

The service comprises of the following structure:



Development Management Performance

The performance of local authorities in deciding applications for planning permission is considered crucial in achieving the enabling of development to deliver new homes and sustainable growth.

Government introduced their approach to measuring the performance of authorities in the Growth and Infrastructure Act 2013, with this being based on assessing local planning authorities' performance on the speed and quality of their decisions on applications for major and non-major development. Where an authority is designated as underperforming, applicants have had the option of submitting their applications for major and non-major development (and connected applications) directly to the Planning Inspectorate (who act on behalf of the Secretary of State) for determination. This threat of designation therefore provides a clear incentive for authorities to meet the performance standards to retain control over decision making in their areas and avoid reputational harm.

The Government defines the criteria for assessing local planning authority performance in determining planning applications. Performance is assessed against:

- The speed of determining applications for major development
- The quality of decisions made by the authority on applications for major development
- The speed of determining applications for non-major development;
- The quality of decisions made by the authority on applications for non-major development.

In situations where a local planning authority is consistently underperforming against these measures, the risk of a local planning authority can be designated only if the Secretary of State considers that there are respects in which the authority are not adequately performing their function of determining applications. Recently an authority in Essex has faced such a designation.

Development Management performance is regularly reported to Development Committee.

Most recent statistics indicate that 87.5% of major applications are determined within the statutory time limits (including extension of time agreed periods). This is well above the 60% Government target. Similarly, non-major application applications are currently at 80%, also above the 70% target. Therefore there is no current threat of designation by Government, although this level of performance can, and will improve so that a figure of at least 90% is sustained over a rolling 24 month period.

Image 1 below depicts the number of major planning applications subject to an agreed extension of time. As will be observed, the total number has increased over the past two years, whereas the mean figure across the eastern region notices a decline on the reliance of extensions of time over the past year. Although the performance statistics reported will show a positive figure in terms of speed of decision, this statistic does indicate that applications are taking longer to process than is desirable.

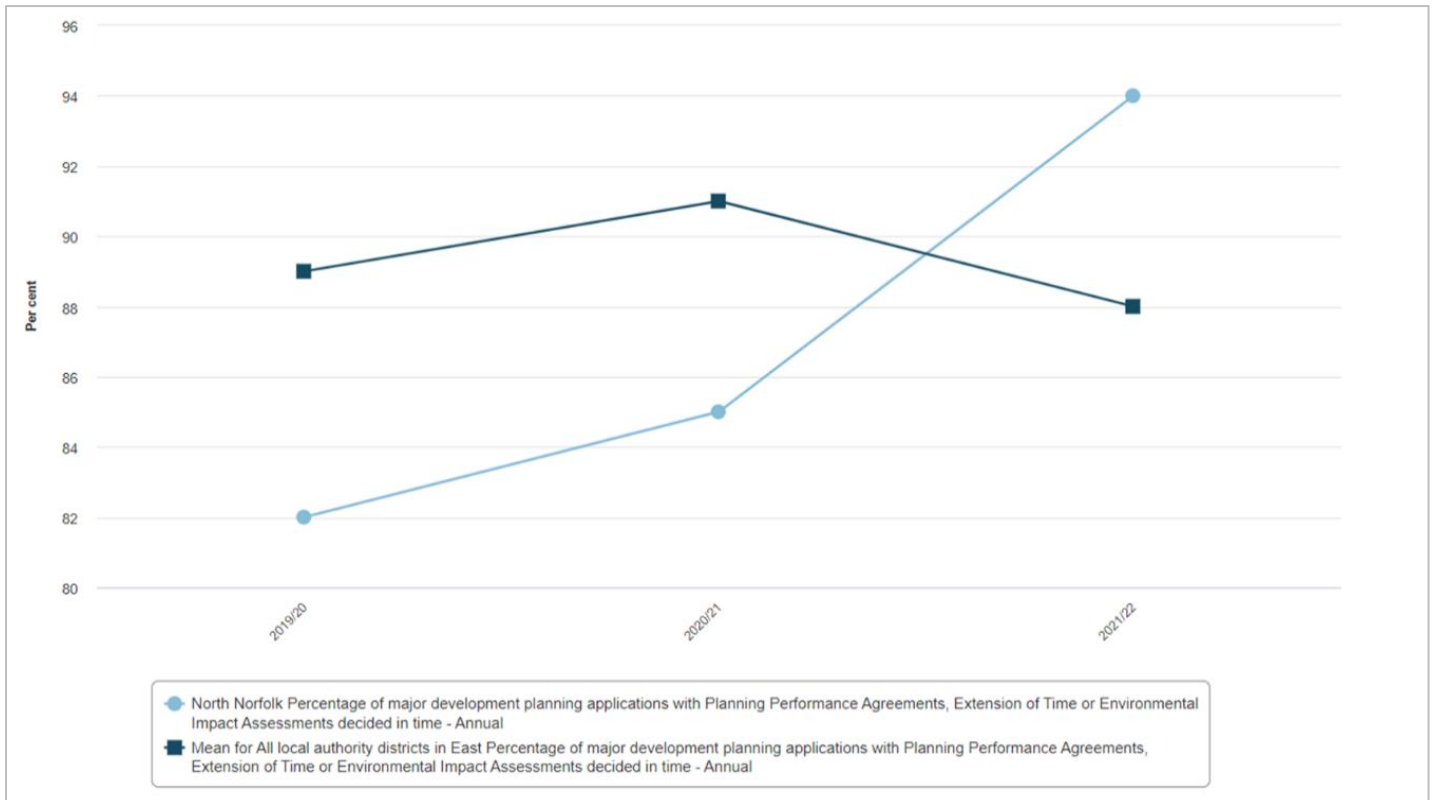


Image 1: % of major planning applications with Extensions of time in place

For recent comparative purposes, the following table 1 indicates how North Norfolk District Council compares to other LPAs within the eastern region in terms of performance and cost.

| Measurable | NNDC | Eastern region average |
|---|-------------|-------------------------------|
| % Of major applications with EoT determined in time 2021/22 Q4 | 100% | 80% |
| % Of minor applications with EoT determined in time 2021/22 Q4 | 93% | 88% |
| % Of other applications with EoT determined in time 2021/22 Q4 | 95% | 92% |
| Total expenditure – Planning and development services per head of population 2021/22 GBP per person (circa) | £38 | £55 |

Table 1: NNDC performance relative to other Eastern region LPAs

North Norfolk generally compares favourably with other local planning authorities across the eastern region, with performance higher than the mean and a lower total expenditure per head of population. NNDC performs less well when considering its greater reliance on extensions of time, which although agreed with applicants, does demonstrate performance needs to be improved to meet the normal (and expected) timescales of either 8 or 13 weeks.

Of course, there is still significant room for improvement and a need to sustain high levels of performance and customer satisfaction over the longer term, with these aims being paramount to this Planning Service Improvement Plan.

Challenges to this centre around clearing some historic applications, which once determined, results in reducing the rolling performance figure. Therefore, only a sustained period of high performance can make a significant difference to this rolling assessment, it therefore follows that there is no quick fix, but rather, it is important that the foundations are in place so that high performance becomes the norm.

Staff levels is a significant concern, with recent departures at the senior level highlighting the fragility of planning staff rosters. The national shortage of planners is accentuated in North Norfolk with recruitment (and retention) being particularly difficult in comparison with the larger or more urban authorities.

Resourcing and performance issues are also evidenced at the national level with the Planning Inspectorate facing a shortage of Inspectors and continued underperformance, with significant delays to appeals being scheduled or held and subsequent delays to determination.

4. National Context

NNDC is not alone in the challenges it faces but it is acknowledged that perceptions may have altered because of the changes in working practices brought about during the lock down periods of the pandemic.

Negative perceptions may have also been compounded by the Nutrient Neutrality guidance, which has effectively frustrated decision making in the short terms, resulting in customer dissatisfaction and uncertainty. Whilst NNDC is not responsible for this, it is being proactive alongside our neighbouring authorities in seeking solutions.

The recent change in stance on Nutrient Neutrality in putting responsibility on the water companies and Natural England is a positive step but will take time before real progress is made.

Nationally, local planning authorities have observed the following.

- A drop in the speed of application decision making (with the average being less than 60% are determined within time - DULHC)
- Increased use of Extension of Time
- Slower validation times (some over 8 weeks)
- Increase in householder applications
- Cuts to planning service resources
- Increased scrutiny of applications/work of officers
- Hostility – objections increasing

The Levelling-up and Regeneration Bill was published in May 2022 and proposes several significant changes. As far as these relate to development management, these include a new route to varying planning permissions, increasing the weight afforded to development plans, the monitoring of build out rates and raising of planning fees. There are also proposed changes to the enforcement regime with longer time frames for action.

The raising of fees in particular provides the potential for significant change, with the reinvestment of income into increasing resources and technological improvements. This in itself would lead to significant improvement increases through increased capacity and resilience.

The Bill is currently going through the Committee stage in the House of Commons. The service is awaiting the outcomes and officers will react and advise accordingly as the Bill progresses.

5. The challenge

In conjunction with the issues identified by O&S, there are also a wider set of challenges that need to be considered via this Plan. Namely:

- The perception of the service (and the Town Planning profession generally)
- Expectations of stakeholders versus the reality – management of expectations
- Statutory consultee response timings – common cause of delay
- Constant Government changes to the planning and building control systems
- Continuing impact of the pandemic e.g., working practices, capacity, and financial position
- Recruitment and retention – very challenging recruitment market
- Nutrient Neutrality (hopefully only over the shorter term but experience elsewhere in England suggests possibly longer)

While many of these are not within the control of the local planning authority, it is necessary to consider these challenges and ensure this Plan meets these challenges with solutions where possible.

The Action Plan will take these challenges into account and put forward measures that will address the perception, encourage more timely consultee responses, provide mechanisms to try and affect Government planning policies and to ensure that a well trained and motivated workforce can be recruited and maintained.

Officers within the service have recently undergone a series of workshops with a view to identifying issues and opportunities pertaining to service delivery. This will be supplemented by the results of the intended Agent Forum, Town and Parish Council workshops and customer engagement surveys as those results are made known.

The officer workshops identified areas of potential improvement - some of which can be achieved in the very short term, with others requiring further investigation and consideration.

Key matters affecting performance that were identified included:

- Technical and IT related issues, leading to duplication of efforts
- Lack of focus on customer service, insular approach to work
- Insufficient training when new software was originally introduced
- Bottlenecks and inconsistencies in communication around processes
- Timeliness around consultee responses, including internally

It is anticipated that the external scrutiny will identify similar themes.

This Planning Service Improvement Plan provides the correct mechanism to bring about change and attention to these key matters.

6. The Strategy

The Strategy itself is straightforward. Essentially it involves information gathering, followed by evaluation and then identification of measures that can be implemented straight away. Further to this, and most importantly, an Action Plan detailing the full extent of proposed actions is to be produced for ratification by O&S before implementation. Collectively these two phases comprise the Planning Service Improvement Plan.

The Strategy Timetable:

| Activity | Timescale | Comments |
|--|----------------|---|
| Staff Engagement | Aug 2022 | <i>Across all levels</i> |
| Customer Engagement | From Sept 2022 | <i>Dependent on Nutrient Neutrality progress</i> |
| Service level processes, structure, and customer journey review | Sept/Oct 2022 | <i>PAS DM Challenge Toolkit approach to ensure best practice</i> |
| Undertake identified quick wins | Ongoing | <i>Implement improvements ASAP</i> |
| Develop Action Plan | Oct / Nov 2022 | <i>To address O&S / DM Toolkit findings</i> |
| Agree Action Plan | Dec 2022 | <i>O&S Meeting 14th Dec 2022</i> |
| Implement Action Plan | Jan 2023 | <i>Roll out from new year. Aim to fulfill majority of actions by March 2023</i> |
| Annual Monitoring | Dec 2023 | <i>O&S Updates on annual basis or as requested</i> |

Activity Commentary:

Staff Engagement

Since conception of the Improvement Plan, staff have been fully engaged in its inception. This has included a whole service meeting to discuss the strategic and political aims, followed by a number of team level meetings and individual representations. This engagement has highlighted several areas requiring attention that would lead to improved performance. Staff have considered the service from a customer perspective also and this has been factored into the responses and matters discussed to date.

Customer Engagement

As of the 1st of August, all applicants (planning applications and pre-applications), when receiving acknowledgement of their applications have been notified of our intention to request the completion of a customer survey, with the option to 'opt out'. This will be a standard letter clause so that annual monitoring can take place without any infringement of GDPR.

The current nutrient neutrality issues mean that the full spectrum of applications is not being determined. This in turn would affect the survey outcomes if undertaken now. As such, and as previously indicated, a pause is in place until the optimum time. It is envisaged that this will be from the autumn, which would; allow for the initial results to form part of the Action Plan. Of course, any delay to this for set back the Strategy timetable.

Service level processes, structure, and customer journey review

This is a key element of the Strategy. A full review of the key development management practices is required to evidence, highlight, and address operational practices that prevent optimum performance. Examples include the Council's planning software, which was introduced without the benefit of full training for staff or a full range of templates to avoid the need for duplication of efforts.

The Planning Advisory Service introduced a development management toolkit in 2015, and this has recently been updated. It includes fifteen sections dealing with every aspect of development management and aids LPAs to define poor to excellent across a range of activities. In short, it is a health check that is used to inform improvement plans with example of best practice available in the areas reviewed. Officers conduct the evaluation on a non-hierarchical basis, which leads to a full debate on how to improve. This approach is to be undertaken to scrutinizing current practices and to inform any redesign.

In addition to the Toolkit, a review of the service structure will be undertaken to ensure it is fit for purpose. Furthermore, a full review of the 'customer journey' in relation to the application process will be conducted to ensure that our customers are at the heart of our decision making. The relationship and level of service provided to Members and Town/Parish Council is integral and will form a major component of the review and subsequent action. Moreover, how we communicate with stakeholders will be reviewed and improved.

Undertake identified quick wins

A number of easily implemented changes have been identified since this Plan work started. As the process unfolds there will be further opportunities and this strategy will ensure that these opportunities for positive change are undertaken now, and not stored to the end of the process. By the time this Strategy is considered by O&S Committee, a selection of structural and process changes will have already been implemented to address the immediate concerns raised by staff.

Action Plan

The Action Plan will be developed so that it addresses the issues identified and sets out a range of SMART actions and targets. All aimed at meeting the aspiration to be a high performing local planning authority, which is receptive and cognisant of customer requirements. The draft Action Plan is intended to be presented to Overview and Scrutiny Committee on 14th December for approval, with roll out of the agreed Action Plan to begin at the start of 2023. Beyond this, it is hoped that the majority of actions will be implemented by the end of the financial year, although software-based solutions may of course require additional time, given the likely reliance on external consultants etc. The need for rapid improvement needs to be balanced against long term sustainability, however, the focus is on as early a delivery of solutions as possible.

Annual Monitoring

Monitoring of progress and performance will be continual with annual reviews being made available to Overview and Scrutiny Committee, with resultant SMART measures to induce the necessary improvements to the key areas identified by Overview and Scrutiny Committee.

Day to day performance will remain a service management function with a clear focus on customer service and planning performance during all staff and management meetings.

7. Action Plan

The Action Plan will be developed following agreement of this Strategy and will cover a wide variety of improvements (set as SMART objectives) across the development management area, and these will be grouped under three key areas.

People – including customers, stakeholders, Members, and staff. Key elements will include how we communicate, accessibility to information, learning and development, the planning website, and a review of the customer journey collaborating with customer services to provide the best service possible to service users and stakeholders.

Process – including internal processes and development of the Uniform software. A review of ‘how and why we do things’ to work smarter and more efficiently. We will put in place a structure of support and training to empower officers to make decisions in a timely and confident manner with a focus on enabling quality decision making.

Performance – including a review of benchmarking opportunities, and smart performance measures around customer service and satisfaction.

