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| Consultation on Planning Performance Framework for Northern Ireland | 27 th September 2017 |
| Planning Committee | |

| Linkage to Council Strategy (2015-19) | |
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| Strategic Theme | Protecting and Enhancing our Environments and Assets; Innovation and Transformation |
| Outcome | Pro-active decision making which protects the natural features, characteristics and integrity of the Borough. Embrace new technologies and processes where they can bring about better experiences for citizens and visitors. |
| Lead Officer | Head of Planning |
| Cost: (If applicable) | N/A |

1.0 Background

1.1 The Department for Infrastructure (DfI) commissioned Mark Hand, Head of Planning at Monmouthshire Council to work with the 11 Planning Authorities to devise and agree a set of indicators for planning in order to develop a Planning Performance Management Framework (attached at Appendix 1). The objective was to make recommendations for a framework to measure performance in a proportionate and meaningful way and to use the data collected to help drive service improvements.

2.0 Details

2.1 The report was previously presented to Planning Committee at the meeting held on 28th June 2017. Members determined that a workshop should be held to discuss the detail of the proposed Planning Performance Management framework before detailed response issues.

2.2 The workshop took place on 17th August 2017 and comments put forward have been enclosed in the draft letter of response attached at Appendix 1.

3.0 Recommendation

3.1 **IT IS RECOMMENDED** that the Committee agree the attached response to DfI reflecting the Committees comments on each performance indicator.

Ms Fiona McCandless
Deputy Secretary
Planning, water & DVA
Department for Infrastructure
71 Ebrington Square
Derry-Londonderry
BT47 6FA

Date: 27th September 2017
Your Ref:
Our Ref:
(Please quote at all times)
Tele: 0300 200 7830

Dear Ms McCandless

Planning Performance Management Framework

I refer to the above proposed Planning Performance Management Framework and thank you for the opportunity to provide comment.

Further to our letter of 10th July 2017 advising that we would not be in a position to respond to the proposed Planning Performance Management Framework within the requested timeframe, I am pleased to advise that Council's Planning Committee have now had the opportunity to fully consider the proposed Framework.

As a preliminary point, Council would raise concerns about the intention of DfI to publish the information collected under the Management Framework on a quarterly basis. Members consider that by publishing the raw data in this format it could mislead the public in terms of performance as comparison between other Council Planning Departments is not comparing like with like.

For example, PI9: percentage of applications determined under delegated powers – each Council has a different Scheme of Delegation in operation with varying percentages of applications determined by the Planning Committee; how does this reflect quality of performance? The number of applications determined by the Planning Committee is for each Council to determine and does not reflect on the quality of performance. Likewise PI1 and 2, each Council will determine how quickly it will progress its local development plan subject to a number of factors such as how up-to-date the current development plan is? By answering yes or no – how does this reflect a quality performance?

With reference to the detailed performance indicators, Council's Planning Committee would make the following points in relation to each:

PI1 and PI2: red and green colouring gives the perception of success or failure when in fact publication may still be in line with the agreed Timetable. It is suggested that this should be amended to reflect whether the plan-making is in accordance with the agreed Timetable and different colouring applied.

PI3-PI6: Clarification is required on what defines 'improve', 'fair' and 'good'. Again colouring gives perception of failure. In terms of timeframes for both major and local applications, those applications subject to an Environmental Statement (ES) or Further Environmental Information (FEI) should be calculated similarly to Regionally Significant Applications where the time commences on receipt of ES or FEI. There should be no distinction in terms of time commencing for any EIA application where an environmental statement is required. Furthermore, no consideration has been given as to environmental designations; whether the application is subject to a Habitats Regulation Assessment (HRA); and, how this impacts on the processing of applications. It would therefore be useful for proper comparison of performance to indicate the number of applications subject to a HRA.

PI9-PI13: Again these indicators do not compare like with like.

In terms of PI9, each Council has differing Schemes of Delegation and this is a matter for each Council.

PI10, how does this statistic indicate quality decisions? It does not take into account the fact that the Council area may have a large number of environmental designations or flood areas? Furthermore, unsure of what benefit this would be to the public - is a high approval rate necessarily an indicator of quality decision-making?

PI11, this should be removed as it is not an indicator of quality. Decisions can be overturned at Committee as a result of amended plans / further supporting information being presented post Planning Committee Report writing.

PI14-PI15: Again colour gives the perception of failure when it is entirely up to each Council to determine the protocol for their Committee meetings. Clarification required in terms of the definition of 'improve' and 'good'.

PI16: Again colour gives the perception of failure and require definition of 'improve', 'good' and 'fair'.

PI17: The time for processing applications should be on a level with Councils in that all applications which require an environmental statement, whether local, major or regionally significant should be measured from the date the environmental statement or further environmental information is received or from date received. Those submitted to the Department should not have the advantage of the time commencing at a different stage to those submitted to Council.

PI18: The provision of this information by Council is time consuming and onerous. There is no provision within the existing Planning Portal to record this information. The extraction of this information is manifestly unreasonable in that it will require

staff time (of which resources have not been provided for) to extract this information manually from each application. This indicator should be removed.

Causeway Coast and Glens Borough Council appreciates this opportunity to provide comment on the proposed Planning Performance Management Framework and trusts that you take the above comments on board before finalising the Framework.

Yours sincerely

Denise Dickson
Head of Planning