

REPORT TO:	Executive Board
REPORT NO:	CE/13/22
DATE:	8 March 2022
LEAD MEMBER:	Councillor David Kelly (Organisation - Planning and Corporate Service)
CONTACT OFFICER:	Ian Bancroft, Chief Executive (Tel. 292101)
SUBJECT:	Planning Performance Review - Initial Findings and Recommendations
WARD:	All

1. PURPOSE OF THE REPORT

- 1.1 This report seeks Executive Board approval of the recommendations made by the Planning Advisory Service (PAS) following its independent review of the Planning Committee and Planning Control ('Development Management') Service and of the associated action plan to take forward those recommendations.
- 1.2 To the extent that one of PAS's recommendations falls within the responsibility of Council rather than the Executive Board, the report seeks Board endorsement of that recommendation to Council.

2. EXECUTIVE SUMMARY

- 2.1 In response to concerns raised by Elected Members and some local residents regarding the Council's performance in the area of Planning, the Executive Board approved the scope and terms of reference of a review at its meeting on 8 June 2021 (Ref. CE/23/21).
- 2.2 With support from the WLGA, the Council appointed the Planning Advisory Service (PAS) to undertake elements of the performance review, therefore giving an independent assessment and conclusions in relation to the Planning Committee and Planning Control. The independent work also included the engagement exercise to ensure that this was seen to be totally unbiased. The third element of the review – lessons learnt from the LDP – must await the conclusion of the LDP Examination in Public, which has been delayed by the issue of phosphorus.
- 2.3 In the autumn of 2021, PAS undertook a series of key stakeholder engagement events and meetings, including with Members, service users and

key stakeholders (a full list is included in the PAS reports at **Appendix 1**) and comparative analysis of performance based against best practice in Wales and England.

- 2.4 PAS's final report (attached as **Appendix 1**) concludes that the Planning service's performance is creditable in the face of financial constraints over several years, but makes a number of recommendations to improve both the Planning Committee and Development Management Service.
- 2.5 The most significant recommendations are:
- a reduction in the number of Councillors on the Planning Committee to 12
 - investment in a new back-office computer system to replace the outdated one in use
 - a review of staff resources
 - other procedural improvements
 - mandatory Member training to ensure clarity around role and the importance of representing Borough-wide and the public interest as well as taking into account local views
- 2.6 It is recommended that PAS's recommendations be implemented in full to achieve the necessary improvements and meet Member and public expectations of the Planning Committee and Planning service, subject to the necessary financial resources being in place to achieve them in a time of financial constraint and competing financial priorities.
- 2.7 **Appendix 2** provides an action plan in order to respond to the report in full. It has been considered by the project group involving Lead Members and the Chair and Vice Chair of Planning Committee.

3. RECOMMENDATIONS

- 3.1 **That the Executive Board agrees the report and recommendations made by the Planning Advisory Service.**
- 3.2 **That the Board approves the Action Plan devised in response to PAS's recommendations.**
- 3.3 **That the Board receive 6-monthly progress reports on the implementation of the action plan and the impact of actions on performance.**
- 3.4 **That the Board supports in principle the reduction in size of the Planning Committee, and asks the constitutional working group to consider in advance of the Council AGM in May (when a decision will need to be made), their views on the proposal to reduce to 12 members in line with the PAS recommendations.**

REASONS FOR RECOMMENDATIONS

- (i) To enable the Planning Committee and Development Management service to make improvements, better to serve the people of Wrexham and the wider public interest.

4. BACKGROUND INFORMATION

- 4.1 The Planning Advisory Service (PAS) is part of the Local Government Association and was approached by the WLGA to deliver Wrexham's Planning review. PAS provides high quality help, advice, support and training on Planning and service delivery to councils. Its work follows a 'sector led' improvement approach, whereby local authorities help each other continuously to improve their services.
- 4.2 PAS undertook key stakeholder engagement (assisted by 'Member peers') and comparative analysis of the Planning Committee and Planning service, based on best practice.

Planning Committee

- 4.3 PAS's main findings with regard to the committee are as follows:
- Overall, the meetings appear to be well managed and demonstrate good teamwork from the Committee Chair, Planning Officers and the Governance staff. The administration of the meeting is carried out professionally. The Governance staff ensure that the technology and processes are working and planned, and all participants are able to engage effectively in the virtual meeting. However, the report identifies areas where improvements could be made. Whilst processes are clearly set out it remains important that they are consistently applied in practice.
 - Agendas would benefit from shortening in their length which would allow greater focus on strategic decision-making and to reviewing performance, whilst a reduction in the size of the Committee would enable more focussed debate and training for elected members.
 - Officer presentations are professional and proportionate, although wider officer attendance and better visual material would improve their clarity and effectiveness of officer advice.
 - The report identifies concerns around the quality of decision-making, associated with a lack of ownership of the development plan and also the weight being given to local opposition. This is said to be having an adverse impact upon investment decisions in the Borough.
 - Whilst behaviours at the meeting are in the most part appropriate, there is a general acceptance that relationships between some Councillors and officers have deteriorated.
 - A programme of training should be designed for both officers and Councillors as part of a package of key measures to address the key concerns raised in the report.
- 4.4 PAS make 9 key recommendations for the improvement of the function of the committee, including a reduction in its size to 12 well-trained Members, enhancing the scheme of delegation, mandatory training and enforcement of the Planning code of conduct and appointment of consultants with regard to decisions made contrary to officer advice.

Development Management Service

- 4.5 PAS's main findings with regard to the Planning Control or 'Development Management' Service are as follows:
- The Service has faced ongoing challenges with the recruitment and retention of staff, a difficult Local Development Plan (LDP) process and some high profile and controversial planning applications. The challenges have been exacerbated by the need to modernise key systems and processes, and the Covid-19 pandemic.
 - The emerging LDP has raised local concerns around some key issues including House in Multiple Occupation (HMO's), Gypsy and Traveller sites and housing allocations. Difficulties in the process have delayed adoption and as a result some applications on sites in the emerging plan have been granted permission on appeal because the Council has not been able to demonstrate a 5 year housing land supply. Although the planning process was sound, these applications have been seen as premature and have undermined confidence in the planning process for some people.
 - The current back office software is outdated and lacks the functionality of a modern system, This leads to significant inefficiencies in the process and makes workflow management difficult.
 - Financial pressures over recent years have led to reductions in staffing levels in the normal establishment. Furthermore, in common with many authorities, Wrexham has experienced problems in recruiting and retaining staff, particularly suitably qualified planning officers. This has meant that staff have been working under significant pressure and where staff have changed roles to deal with peaks in workload, the problems have been exacerbated by a lack of continuity. More recently these staffing issues have been recognised, and some changes to the staff establishment have been agreed.
 - The political background in the area is complex, with a mix of different parties and groups in the Council and elsewhere. Many of the Members saw their role as representing the views of their residents and advocating for them when it came to decisions on planning applications. While this is wholly appropriate for Ward Members, it is not the correct position when it comes to sitting on the Planning Committee and determining planning applications. Planning Committee is a quasi-judicial body and the role of Committee Members is to assess planning applications against planning considerations and planning policy, and to make decisions on behalf of the whole Borough. The lack of appreciation of the different roles of Ward Members and Committee Members has been a significant factor in a worsening of the relationship between some Members and Officers.
 - In spite of the challenges the planning authority has managed to maintain a creditable level of performance, although this has had a significant impact on staff.
- 4.6 PAS make 14 recommendations for the improvement of the service, including investment in the back-office ICT system and Planning web-page and associated workflow procedures, and a review of staffing levels/structures.
- 4.7 The Planning Service was reduced in size and resources to be able to provide a basic value for money service in response to the financial circumstances following the recession. To improve it, better to meet Member, and therefore public, expectations requires investment. Proposals are being, and will be, put

forward for future revenue and capital budgets to increase the resilience of the staffing structure and ICT/back-office systems. A further report should be brought to Executive Board with resource changes to implement the plan in September 2022.

- 4.8 As well as the proposed report in September 2022, further reports will be brought forward as follows regarding:
- lessons learnt from the LDP (when the process has finished)
 - an annual review of progress against the recommendations and actions
- 4.9 A member workshop took place on 1 March to review the full content of the PAS reports and consider views about Planning Committee.

5. IMPLICATIONS

- 5.1 **Policy Framework** – The review took account of agreed Planning policy and procedures
- 5.2 **Budget** – The review identifies additional costs (both one-off for ICT and continuing for staffing, training and ICT) if the service is to improve and meet Member expectations. Provision for the potential cost implications will be considered as part of the 2022/23 budget proposals.
- 5.3 **Legal** – There are no legal implications.
- 5.4 **Staffing** - The review identifies the need to extra staff resources to support improvements in the service.
- 5.5 **Equality/Human Rights** - Members are advised of their duty to consider the full Equality Impact Assessment which is available at EIA00472/2021. Members of the public can request a copy of the full Equality Impact Assessment from the Contact Officer named in the header box of this report. A summary of the Equality Impact Assessment is attached as **Appendix 3**, but, in essence, the action plan has no impact on equality, per se.
- 5.6 **Risks** - If the action plan, including the necessary resources, is not approved, the service will not be able to meet Members' expectations, but operate at a statutory minimum level, only.

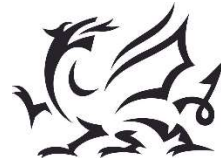
6. CONSULTATION

- 6.1 In undertaking the review, PAS consulted directly with the many key stakeholders identified in its report (**Appendix 1**).

7. EVALUATION OF OPTIONS

- 7.1 **Option 1** - Implement the Action Plan, and associated investment, with resultant improvements in the function of the Planning Committee and Development Management Service
- 7.2 **Option 2** – Not implement the Action Plan – with no improvements in the function of the Planning Committee and Development Management Service

BACKGROUND PAPERS	LOCATION	WEBSITE INFO.



Wrexham County Borough Council: Review of Planning Committee

1 INTRODUCTION

- 1.1 The Welsh Local Government Association (WLGA) and the Welsh Government have a long-track record of working together in shaping and supporting self and sector-led improvement in Wales, in terms of policy design, development of legislation and delivery of improvement support to local government.
- 1.2 Sector-led improvement is recognised as an effective approach to driving, owning, sharing, and sustaining improvement within local government and is an established approach in Wales, England and Scotland.
- 1.3 The Planning Advisory Service (PAS) is part of the Local Government Association and were approached by the WLGA to deliver the Wrexham Planning review. PAS provides high quality help, advice, support and training on planning and service delivery to councils. Its work follows a 'sector led' improvement approach, whereby local authorities help each other to continuously improve.
- 1.4 The consultant appointed to lead the Planning Committee review is Tim Burton, who is a Chartered Town Planner who works as a contractor for PAS, having previously been Head of Planning at two district authorities in Somerset. Tim has extensive experience of carrying out Planning Committee reviews and regularly provides training on good decision-making for Planning Committee members. Working alongside Tim is Cllr Mike Haines from Teignbridge Council who is Chair of the Planning Committee, having held this role periodically for more than 10 years since the mid-1990s. He has also been Cabinet member for Planning for 5 years in between, and Chair of Overview & Scrutiny for a further 6 years. Mike is the National Lead Member Peer for the LGA Independent Group and has participated in Planning reviews at several Councils. Tim and Mike helped facilitate the workshops and carried out the interviews, in addition to viewing recordings of the Planning Committee. Fellow PAS Member peers Councillor Bryony Rudkin from Ipswich Borough Council and Councillor Dale Birch from Bracknell Forest Council have also reviewed several Planning Committee meetings and provided feedback and evidence for this report.
- 1.5 This review was commissioned by the Council and funded by the WLGA via their Improvement Support Offer. The Executive Board authorised a review of Planning in response to concerns raised by some Elected Members and some local residents. The scope of the review includes the Planning Committee, the Planning service (Development Management) and lessons learned from the Local Development Plan process. This report is prepared in response to the first of these three workstreams.
- 1.6 The review work has included assessment of Planning Committee agendas, application data and other reports and protocols. Recordings of recent Committee meetings have been reviewed. Interviews via Zoom were conducted with key Councillors, officers and stakeholders including local developers or their agents.

Interviews were undertaken between 15th and 29th November 2021. Two Councillor workshops were also held on 16th and 29th November 2021.

- 1.7 This report analyses the processes and procedures associated with the Council's Planning Committee, as well as its workload and composition. It also assesses the way decisions are made and how that impacts upon relationships between officers and elected members. It considers Councillor and officer training and how additional support to Councillors could improve the Planning Committee's performance.
- 1.8 All those interviewed have engaged fully with the process and are thanked for providing their honest opinions and feedback.

EXECUTIVE SUMMARY

Overall, the meetings appear to be well managed and demonstrate good teamwork from the Committee Chair, Planning Officers, and the Governance staff. The administration of the meeting is carried out professionally. The Governance staff ensure that the technology and processes are working and planned, and all participants are able to engage effectively in the virtual meeting. However, the report identifies areas where improvements could be made. Whilst processes are clearly set out it remains important that they are consistently applied in practice.

Agendas would benefit from shortening in their length which would allow greater focus on strategic decision-making and to reviewing performance, whilst a reduction in the size of the Committee would enable more focussed debate and training for elected members.

Officer presentations are professional and proportionate, although wider officer attendance and better visual material would improve their clarity and effectiveness of officer advice.

The report identifies concerns around the quality of decision-making, associated with a lack of ownership of the development plan and also the weight being given to local opposition. This is said to be having an adverse impact upon investment decisions in the Borough.

Whilst behaviours at the meeting are in the most part appropriate, there is a general acceptance that relationships between some Councillors and officers have deteriorated.

A programme of training should be designed for both officers and Councillors as part of a package of key measures to address the key concerns raised in the report.

KEY RECOMMENDATIONS

- R1 Establish a programme of regular compulsory training for Members of the Planning Committee. Areas to cover to include: the role of Committee members and how that differs from other Councillor roles; the role of and weight to be given to the development plan in good decision making; how to balance considerations effectively and evidence-based decision making; and how to engage in the planning process whilst avoiding predetermination.
- R2 Deliver training to ward and community councillors to help them engage with and assist their residents' engagement in the planning process.

- R3 Deliver training on presentation skills and behaviours to officers who may need to attend Planning Committee meetings.
- R4 Review the size of the Planning Committee with a view to reducing membership to 12 members.
- R5 Review the scheme of delegation both in terms of which items are considered by committee and the level of delegation amongst officers to ensure that decisions are made at the appropriate level and the Committee is not overburdened and frees up time for other matters, such as training, reviews of performance and appeal decisions.
- R6 Provide a regular report to committee providing information on planning applications handled in relation to Welsh Government targets, appeal decisions, awards of costs, and details of enforcement cases and successful outcomes.
- R7 Review officer attendance at Committee meetings in order to manage workloads and to improve effectiveness of advice.
- R8 Review how officers and Councillors interact outside of the Committee forum to enhance their wider involvement in the planning process without risk of predetermination.
- R9 Ensure that the code of conduct is always followed when Members reach a decision contrary to officers' advice and an appeal is submitted in these cases, although Members can make a contribution to appeals to explain their decisions, an external consultant should be appointed at an early stage to represent the council where this will involve appearing in person at a Hearing or Inquiry.

2 THE COMMITTEE PROCESS

- 2.1 The Council has a single Planning Committee, which meets once per month. The Committee comprises of 20 members. The meetings are attended by the Planning Control Manager, as well as an officer to provide legal advice and a member of the governance staff. A member of the Highways team also attends regularly.
- 2.2 As a result of Covid 19 related restrictions, all Planning Committee meetings are now held remotely using Zoom. They are also live streamed via Public-i. Zoom is the preferred platform as it allows all the contributors to be visible during the meeting and the streaming allows both security and good public viewing of the committee. Whilst the review team have not reviewed any face-to-face meetings, feedback during interviews on previous arrangements at the Guildhall indicated that whilst the venue was suitable for its purpose, the audio is poor and the technology available is not fit for purpose. This is something that should be addressed before any resumption of face-to-face meetings.
- 2.3 At the start of each meeting, the Chair sets out clearly how the meeting will be conducted and advises on use of Zoom and contingencies in the event of failure. Connectivity for Councillors appears to be satisfactory, and no such issues arose during the meetings observed.
- 2.4 A protocol is provided for those members of the public wishing to access the session. It is clear and those attending are provided with the support necessary to join and contribute to the meeting. Feedback received on the administration of the meeting was generally positive.

- 2.5 The overall impression from viewing the meetings was that they are well managed and are a product of teamwork on the part of the Committee Chair and the officers in attendance.
- 2.6 The Council allows one speaker in support and one speaker against each application in addition to the ward Councillor. This is an approach taken by many Councils and is reflective of good practice.
- 2.7 For the purposes of this review, recordings of Planning Committees have been viewed via the Public-i recording rather than through joining the Zoom call. Comments on the appearance of the production are made accordingly. Sound and visual appearance of participants was considered to be reasonable, although it is suggested that all participants should be labelled consistently on screen, including identifying whether they are a Councillor, officer or other participant. Some Councillors could also benefit from advice on how they appear on screen (e.g. camera positioning) and use of backdrops should be standardised.
- 2.8 The Public-i recording currently only displays the person who is speaking. The ability to see all Councillors on screen at one time is not generally available to those viewing the live stream. This is something that the Council may wish to consider adapting if meetings are to continue to be held virtually. It is important that viewers can see that all Councillors are present and attentive at all times, as they would at an in-person meeting. This is currently not possible. The Council may wish to view other Planning Committees which demonstrate best practice in delivering virtual and streamed meetings. PAS can signpost to relevant examples.
- 2.9 As has already been stated, the move to a virtual Planning Committee has been successful and no evidence was found to suggest that the quality of decision making has suffered as a result of the meeting going on-line. Based upon the Committee meetings viewed, the Committee members are able to make decisions safely based upon viewing information provided by officers (both in reports and verbally at the meeting) and hearing representations, as would be the case if the meeting was held in person. However, as stated elsewhere in this report the presentation of visual material could be improved (whether meetings continue to be held virtually or equally should they return to being held at the Guildhall).
- 2.10 Whilst the scope of this review does not enable detailed analysis of the individual decisions made, there is a comparatively high number of officer recommendations that are overturned by the Committee. This is considered in more detail elsewhere in this report. However, there was no evidence from the meetings observed, that the move to a virtual Planning Committee has had any impact upon the outputs from the meetings or is a contributory factor towards the number of overturns being made.
- 2.11 It is considered that the split of duties between the Legal and Governance Officers could benefit from reassessment and greater clarity, with the Governance Officer being responsible for all matters relating to the management of the meeting including the recording of voting, leaving the Legal Officer to provide legal advice and support, together with ensuring that decision-making is sound. Voting is currently undertaken via a roll call. Many Councils now use electronic voting, which would be helpful in terms of improving efficiency and transparency.
- 2.12 The Chair is widely seen as being effective in carrying out his role. He manages the meeting well and ensures that the business of the meeting is generally enacted in an efficient manner. However, it is vital that the meetings continue to be managed in an

effective way in the longer term. Therefore, it is important that succession planning for this role is put in place.

- 2.13 As stated above, the Chair manages the meeting in a manner which expedites the business efficiently. However, it is important that there is consistency in terms of process around order of speakers, timing and how points of clarification are handled. Motions should be made at an appropriate point in the debate and be clear. This did not always appear the case during the meetings viewed. Whilst the Chair uses his discretion to adapt the agenda to move those items where there are no public speakers present to the end of the agenda, it would be helpful to those viewing if the revised running order was set out by the Chair at the start of the meeting.
- 2.14 Accurate minutes of decisions made are particularly important where the decision is not based upon the recommendation set out in the planning officer's report. Committee minutes are quite succinct and, in the light of a recent High Court decision (*Cross v Cornwall County Council*), a review of the procedure at Committee and of the detail of Committee minutes would be appropriate to ensure that procedures are clear and robust and that minutes are sufficiently precise and detailed.
- 2.15 The Council operates a process where applications can be deferred for a site inspection prior to a decision being made. However, this only occurs following an initial referral to the Planning Committee meeting. This approach introduces a delay into the process and takes up valuable Committee time and the need to schedule additional meetings. It has also been suggested that a significant proportion of Committee members do not regularly attend the site visits. A more effective approach would be for the Chair and Vice Chair (in consultation with officers) to identify those sites where a site inspection may be necessary in advance, allowing site inspections to take place prior to the meeting and the decision to then be made at the scheduled meeting.

3 THE COMPOSITION OF THE PLANNING COMMITTEE AND ITS WORKLOAD

- 3.1 From a study of agendas and the recordings of meetings viewed it is apparent that the length of Committee agendas, and therefore the length of the meeting itself, varies greatly. A large number of applications are often to be determined at each meeting. Both officers and Councillors admitted that meetings were at times too long, which is not in the interests of good decision-making. Whilst the proportion of applications being determined by Councillors has reduced since recent changes to the scheme of delegation, a significant proportion of those applications being referred to the Committee are still neither strategic nor truly controversial. This is a consequence of a threshold for referral of only three representations. Minor applications are still taking up valuable Committee time. There is little added benefit derived from Councillor scrutiny of minor or householder applications. Raising of this threshold to raise the number of delegated decisions to around 95% (which is often considered as best practice in decision-making) would result in shorter meetings and/or the freeing up of capacity, which will enable greater focus on proposals that truly deserve Councillor scrutiny. Potentially, it could also provide more time to brief Councillors on important matters and to review performance and previous decisions made.
- 3.2 A Planning Committee comprising twenty members is large when compared to the majority of others in Wales (and across the wider UK). Only two Councils in Wales have larger Committees (Ceredigion and Powys). A smaller Committee of around 12 members would enable more focussed debate to take place and would provide encouragement to a more informed and trained membership. It would also free up

other Members to focus on the important role of representing their ward in planning related matters.

- 3.3 Whilst it was suggested during the interviews that there could be advantages in having an earlier start time to accord with the timing of other Council meetings, the consensus amongst interviewees was that a 4pm start remained appropriate.

4 OFFICER REPORTS AND PRESENTATIONS

- 4.1 The officer presentations viewed appeared as being professional and proportionate. However, the presentations currently lack any visual material for those viewing the meeting on the live stream or Zoom, with the only visual input being in the printed report. Officer presentations would be much more effective, and the subsequent debate would be better informed by the inclusion of photographs and plans into the presentation that can be shared by the presenting officer through screen sharing.
- 4.2 Many interviewees also identified the poor quality of screens to display material when the meetings were held face to face. This is something that should be investigated with the aim of being able to facilitate hybrid or face-to-face meetings in future.
- 4.3 It would be preferable if the officer were to present the item before the Chair invites other participants to speak. This would provide Committee Members with context before hearing representations.
- 4.4 Having a single officer presenting, advising and responding to questions is putting too much pressure on one individual. An alternative where one or more officer presents (a Senior and or Principal Planning Officer) with the Head of Service Development Management attending to provide any strategic advice would be a more effective way of supporting the meeting. This would also have the added benefit of enabling wider engagement between officers and Councillors which should help reduce tensions that are potentially partly a result of the current arrangement.
- 4.5 The attendance of other experts (e.g. highways or NRW) should be assessed on the basis of the composition of each agenda and whether technical expertise is likely to be required in these areas, rather than requiring a Highways officer to attend all meetings.

5 DEBATE AND DECISION-MAKING

- 5.1 Whilst the Chair expedites matters where he perceives there is general consensus around the officer recommendation and no one is present to speak against, in other cases debate is encouraged and generally debates do not become protracted. However, at times the size of the Committee does militate against this, with a large number of Councillors wishing to speak on an individual item.
- 5.2 The basis of decision-making should be to start with the policies in the development plan, then consider any other relevant policy context as is set out in the assessment of the report prepared by professional officers. However, this would not always appear to be the case as is evidenced by the number of applications where the Committee has not followed officer advice and their decision has then not been upheld at appeal. There have also been instances where costs have been awarded against the Council in such circumstances, which indicates that the Council has acted unreasonably.
- 5.3 A contributory factor in this is that at times a significant proportion of Committee members appear to be preferring to act as community champions. Whilst this an entirely legitimate role for a Councillor, it is not appropriate when making decisions as

a member of the Planning Committee. Planning Committee members should determine proposals in the public interest on behalf of the Borough as a whole. However, it appears that many decisions are made based upon local opposition without the evidence necessary to support the decision.

- 5.4 The relationship between some other Members and officers is not without tension as is set out in more detail in the following section. It appears that this is sometimes related to Members finding it difficult to separate their role as Ward Councillors representing the views of those residents who have made representations, and their separate role as Members of the Planning Committee where their role is to weigh up the planning considerations of a scheme in the light of planning policy and to make decisions on behalf of the whole Borough.
- 5.5 These tensions have come to a head with a number of controversial applications that have been decided recently. One of these was a residential site on land that is not allocated for development in the out of date Unitary Development Plan (UDP), but is intended to be allocated in the emerging Local Development Plan (LDP). The process for adopting the LDP has been difficult for the authority and has taken longer than planned, and its progress is likely to be further delayed because of the need to address the issue of phosphates in relation to site allocations. The application was refused by the Committee but subsequently allowed on appeal. A key consideration for the Inspector was the fact that because the UDP is out of date the authority was unable to demonstrate a five year housing land supply, and the application was considered on its individual merits. The planning process was sound, but the development is an ongoing cause of complaint from local residents and the process has, to some extent, damaged public and some Member confidence in the processes for plan making and the determination of planning applications. The need to accommodate a significant number of new housing sites through the emerging Local Development Plan (LDP) has proved controversial. Whilst Councillors' reservations are understood, the plan is prepared on behalf of the Council and must be the starting point for planning decision-making and only set aside where there are material considerations that indicate otherwise.
- 5.6 The review process has included a workshop with agents and developers who regularly submit applications to the Council. A lack of compliance with policy and guidance in decision-making has led developers and their agents to conclude that Wrexham is an authority that is more difficult to deal with than others in the region. They suggested to the review team that this lack of consistency is having a negative impact upon investment decisions. The overall perception of agents and developers was that whilst officers are providing sound advice, if applications go to Committee 'it then becomes something of a lottery'.

6 OFFICER/MEMBER INTERACTION

- 6.1 One of the reasons for the review of the service is the perception that there has been a deterioration in the relationships between officers and Elected Members.
- 6.2 Little evidence has been found of poor or inappropriate behaviour during the Planning Committee meetings viewed, where both Members and officers appeared courteous towards each other. Whilst such incidents may be isolated, it remains important that Councillors always treat their officers with due respect at all times. The majority of Councillors interviewed consider officers to be providing appropriate advice and they recognise the resource issues that the department currently faces. However, a minority questioned the capability of individual officers. The review team have seen no evidence to suggest that this is the case. Whilst not widespread, Councillors did at

times challenge officer's professionalism during meetings viewed which is not appropriate. It is legitimate at times for Councillors to come to a different conclusion to officers based upon the balance of planning considerations at play, but Councillors should still respect the officer's recommendation when doing so.

- 6.3 Councillors are rightly concerned about predetermination. However, there would appear to be insufficient understanding of the difference between predetermination and predisposition, which is leading to nervousness on the part of Councillors and therefore a lack of interaction with officers outside of the Committee setting. It is entirely appropriate for Councillors to express predisposition and to discuss proposals with officers on an informal basis. Whilst Covid restrictions may have temporarily exacerbated this problem, it is still an issue that would benefit from being addressed.
- 6.4 The Chair and Vice-Chair have regular briefings with officers. However, there are advantages in briefing the wider Committee, particularly in respect of complex proposals, in advance of their formal consideration. Increased contact between all Planning officers and Councillors in this way would help resolve the tensions outlined.
- 6.5 It has been suggested by a small selection of those interviewed that the service could defend itself more robustly at appeal when members overturn officer recommendations at committee. Whilst the scope of this review did not allow this aspect of appeals to be looked at in depth, it is generally considered to be good practice to appoint consultants to work with the service to defend appeals in such circumstances, particularly where they are to be determined by Hearing or Public Inquiry. This approach should help to improve trust between Councillors and the Council's Planning Officers.

7 TRAINING AND DEVELOPMENT

- 7.1 Councillor training for Planning Committee members is currently intermittent and insufficient and is inevitably a contributory factor in issues identified elsewhere. The ad hoc approach to training, which has traditionally been linked to the carrying out of Site Inspections is inadequate and it is suggested that even this was often poorly attended. This issue has been exacerbated by the impacts of Covid as well as an influx of new Councillors on the Committee. Staff capacity to support training has undoubtedly also been a contributory factor. It is concluded that a programme of training sessions should be developed to include: the role of Committee members and how that differs from other Councillor roles; the role and weight to be given to the development plan in good decision making; how to balance considerations effectively and evidence-based decision making; and how to engage without predetermination.
- 7.2 Training should also be provided for ward members and community councillors to assist them in engaging with the planning process.
- 7.3 Agents and developers who regularly submit planning applications have a perception that the applications they submit to other councils in the region are subject to more informed input and debate at committee than they receive at Wrexham.
- 7.4 Previous decisions and in particular appeals are not being revisited. This would assist Councillor understanding around assessing the planning balance and the need for sound evidence when making decisions. However, reporting back on appeal costs needs to be done sensitively to avoid it being divisive. The focus of reporting needs to be around identifying issues of unreasonableness.
- 7.5 Whilst the previous section of this report identified the benefits of greater interaction between Councillors and Council officers, on balance there may be benefit in using

external facilitators to minimise issues around perceptions of trust and that officers might seek to use training to 'threaten' Councillors into particular outcomes.

- 7.6 Planning Officers do not currently receive training on issues relating to their presence at Planning Committee. In association with recommendations around officer presentations and widened exposure of officers to Committee work, there would be benefit in developing a programme of relevant training for all officers who attend Planning Committee.

8 CONCLUSIONS

- 8.1 Whilst the Planning Committee is well managed and administered effectively, there are areas, particularly around decision-making and officer/member interaction where there is need for improvement. This is having an adverse impact upon the reputation of the Council as a local planning authority and is also seemingly having a detrimental impact upon investment in the Borough.
- 8.2 To address the issues raised in this report a package of key recommendations are made. These include a programme of Councillor training, including revisiting earlier decisions; amendment to the scheme of delegation to enable greater focus upon strategic decision-making; a review of officer attendance; reduction in the size of the Committee; and strengthening of officer/elected member interaction throughout planning process. It is important that these actions are considered as a package which together will improve the quality of decision making and enhance the Council's reputation. Other recommendations to improve the efficiency of the meetings are also made.

January 2022

PC Appendix 1

List of Planning Committee Review Interviewees (as per invitations)

All interviews were conducted jointly by Tim Burton and Councillor Mike Haines

Date	Time	Attendees	Role
Mon 15 th November	9.00am	Dominic Jones	Highways Officer
	10.00am	Cllr Michael Morris	Planning Committee Chair
	11.30am	Cllr Michael Dixon	Planning Committee Vice Chair
	1.30pm	Lawrence Isted	Chief Planning & Regulatory Officer
	2.30pm	Natalie Roberts	Committee Legal Officer
	4.15pm	Cllr Mark Pritchard	Council Leader
Tues 16 th November (pm)	1.30	Bob Dewey	Agents invited
		J10 Planning	
		Roger Parry & Partners	
		SG Estates	
		Castle Green Homes	Developers invited
		Bellway	
		Wales & West	
		Clwyd Alyn	
	4.00pm	Mr & Mrs Filce	
Weds 17 th November	10.00am	David Kelly	Lead Member for Organisation - Planning & Corporate Services
	11.30am	John Griffiths	Gresford Community Council
Thurs 18 th November	1.30pm	Matthew Phillips	Interim Head of Service Development Control
	2.30pm	Bryn Bolton John Kerr Mared Rees-Jones Sharon Holman	Planning Officers
	4.00pm	Helen Coomber	Committee Services Lead
Mon 29 th November	10.00	Hugh Jones	Group Leader Conservatives

Wrexham County Borough Council

Development Management Review

November 2021

1.0 INTRODUCTION

1.1 The Council is undertaking its own review of the planning function in the authority and approached the WLGA to support this via its dedicated Improvement Support Offer. The Planning Advisory Service (PAS) was then brought in to provide an independent review of the Planning Committee and the Development Management Service. PAS is part of the Local Government Association (LGA) and provides high quality help, advice, support and training on planning and service delivery to councils, primarily in England. Its work follows a 'sector led' improvement approach, whereby local authorities help each other to continuously improve. This report relates to the review of the Development Management Service.

1.2 The review was undertaken by Allan Archer, appointed by the Welsh Local Government Association (WLGA) and Raymond Crawford appointed by PAS. Raymond has over 30 years' experience in Development Management in local authorities, including as Planning Manager at Hastings Borough Council. For the last 6 years he has worked with PAS providing a range of support to over 40 local planning authorities, including service reviews, committee reviews and Member and Officer training.

1.3 Allan Archer is a Chartered Planner and Independent Planning Consultant and has been engaged by the WLGA to support the review. Allan has extensive senior management experience with local Planning authorities in Wales and has also worked in corporate policy, performance and programme management roles. More recently, Allan was for 8 years a Welsh Government appointed Member of the Pembrokeshire Coast National Park Authority and is an independent external Planning advisor to the Ombudsman in Wales.

1.4 The review was based on the PAS Development Management Challenge Toolkit which has been updated and amended for use by Welsh planning authorities. The toolkit aims to provide a 'health check' for Planning Authorities and act as a simple way to develop an action plan for improvements to their Development Management service. Although the discussions were open and wide ranging, this report broadly follows the sections set out in the toolkit.

1.5 Interviews were held with a range of officers involved in the Development Management (DM) process along with Borough and Community Councillors, consultees, planning agents and local residents. All those interviewed were friendly and welcoming and engaged fully with the process and are thanked for providing their honest opinions and feedback.

1.6 This report should be read in conjunction with the report on the Planning Committee Review.

2.0 EXECUTIVE SUMMARY

2.1 Wrexham County Borough Council Development Management Service has faced ongoing challenges with the recruitment and retention of staff, a difficult Local Development Plan (LDP) process and some high profile and controversial planning applications. The challenges have been exacerbated by IT issues and the Covid 19 Pandemic.

2.2 The emerging LDP has raised local concerns around some key issues including House in Multiple Occupation (HMO's), Gipsy and Traveller sites and housing allocations. Difficulties in the process have delayed adoption and as a result some applications on sites in the emerging plan have been granted permission on appeal because the Council has not been able to demonstrate a 5 year housing land supply. Although the planning process was sound, these applications have been seen as premature and have undermined confidence in the planning process for some people.

2.3 The current back office software is outdated and lacks the functionality of a modern system, This leads to significant inefficiencies in the process and makes workflow management difficult.

2.4 Financial pressures over recent years have led to reductions in staffing levels in the normal establishment. Furthermore, in common with many authorities, Wrexham has experienced problems in recruiting and retaining staff, particularly suitably qualified planning officers. This has meant that staff have been working under significant pressure and where staff have changed roles to deal with peaks in workload, the problems have been exacerbated by a lack of continuity. More recently these staffing issues have been recognised, and some changes to the staff establishment have been agreed.

2.5 The political background in the area is complex, with a mix of different parties and groups in the Council and elsewhere. There is no suggestion that votes on planning decisions have been made along party lines, indeed the Council's Planning Code of Practice prohibits Planning Committee members from voting on the basis of a political whip. However, the disparate groups are likely to sometimes make it a challenge to reach a consensus on issues before the Council. Many of the Members saw their role as representing the views of their residents and advocating for them when it came to decisions on planning applications. While this is wholly appropriate for Ward Members, it is not the correct position when it comes to sitting on the Planning Committee and determining planning applications. Planning Committee is a quasi judicial body and the role of Committee Members is to assess planning applications against planning considerations and planning policy, and to make decisions on behalf of the whole Borough. The lack of appreciation of the different roles of Ward Members and Committee Members has been a significant factor in a worsening of the relationship between some Members and Officers.

2.6 In spite of the challenges the planning authority has managed to maintain a creditable level of performance, although this has had a significant impact on staff.

KEY RECOMMENDATIONS

R1 Source a replacement back office computer system with up to date workflow, better functionality and performance management and reporting capabilities, and to allow effective remote working. Improve planning content on the Council's website.

R2 In conjunction with recommendation 1, review working practises and procedures to ensure they are as effective and efficient as possible, minimising the number of handovers, avoiding bottlenecks, and ensuring highly skilled staff only deal with matters that nobody else could deal with. For example allowing Lead Officers to sign off some applications.

R3 Having regard to recommendations 1 and 2, review the permanent staff structure to make sure there are sufficient people in place with the right skills to enable the council to provide a consistent and reliable high quality planning application service and to facilitate individual development and career progression. If recruitment proves to be a challenge consider trainee posts and on the job training to upskill existing staff, potentially with a post or posts sitting between the Support Team and Planning Officers.

R4 Establish a programme of regular compulsory training for Members of the Planning Committee. Provide planning training for Ward and Community Councillors to help them engage with and assist their residents' engagement in the planning process.

R5 Review the scheme of delegation both in terms of which items are considered by committee and the level of delegation amongst officers to ensure that decisions are made at the appropriate level and the Committee is not overburdened and frees up time for other matters, such as training, reviews of performance and appeal decisions.

R6 Ensure that there are regular casework meetings to consider applications early on in the process, probably at around week 4. The meetings should provide some certainty of direction for case officers and applicants and should aim to deal with straightforward applications as soon as possible after the end of the consultation period.

R7 Ensure that there are regular team or service meetings, including case officers, enforcement and support staff to discuss any issues affecting the Planning Control team, including any problems and suggestions for service improvements.

R8 Reinstate enhanced paid-for planning services as soon as practical to provide a better service and to maximise income. For example fast-tracked householder applications or the development team approach.

R9 Provide a regular report to committee providing information on planning applications handled in relation to Welsh Government targets, appeal decisions, awards of costs, and details of enforcement cases and successful outcomes.

R10 Review the information associated with planning applications that is published on the website. Notwithstanding the issues of data protection and the redaction of personal information, publishing comments from members of the public and Community Councils would make the process more open and transparent.

R11 Arrange periodic forums with regular planning agents to share updates and to develop a good working relationship.

R12 Review and update the enforcement policy and publish a list of priorities online.

R13 Ensure that the code of conduct is always followed when Members reach a decision contrary to officers' advice and an appeal is submitted. In these cases, although Members can make a contribution to appeals to explain their decisions, and they should be encouraged to do so, an external consultant should be appointed at an early stage to represent the council where this will involve appearing in person at a Hearing or Inquiry.

R14 Change the service name from Planning Control to Development Management to make clear that DM staff, and Members' role in the service, is not just about control but should be proactive in improving development schemes and facilitating development in accordance with the development plan and the Council's strategic development goals.

3.0 PERFORMANCE MANAGEMENT

3.1 If a planning authority is to achieve the best possible planning outcomes it is important that performance is monitored and managed. This would include Welsh government targets in terms of the efficiency and quality of decisions, public engagement and enforcement as well as the views of service users, and the performance of individual members of staff.

3.2 In the All Wales Planning Annual Performance Report 2018-19 Wrexham is above average and performance is identified as "good" for the percentage of major applications and percentage of all applications determined in the time period allowed, and credit should be given to all the staff involved in achieving this. When looking at the average time to decide these applications Wrexham is below average and performance is identified as "fair". This is likely to be because either a high proportion of applications are being decided very close to the deadline, or where applications are not determined in time they are decided after a very long time. Performance in relation to average times could be improved with improved case management. The relevant tables are included in Appendix 1, and a summary table in Appendix 5.

3.3 From the discussions it appears that staffing levels and a lack of continuity of staff roles, along with the impact of the Covid pandemic have significantly impacted upon performance management. Regular case conferences and team meetings enable managers to monitor performance in a fairly informal way but these meetings have largely fallen away. Where a team is working under pressure group meetings can seem like an unnecessary burden, but if they are well organised they can be an effective way of sharing issues and learning from each other, and provide a degree of support, structure and certainty for case officers.

3.4 There was a good awareness amongst officers of the 8 week deadline for determining planning applications and the use of extensions of time, but this seemed to be largely self policing. The back office computer system does not make it easy to monitor ongoing performance data and a more up to date computer system could make this a lot easier.

3.5 One of the reasons the Council is undertaking their review is because of a perception that the planning service has not been performing well. However, there does not appear to

be an established process for gathering opinions of the service from users. Notwithstanding the fact that a user's opinion of the service is likely to be coloured by the planning decision, an online customer satisfaction survey could provide useful data.

3.6 Furthermore there does not appear to be a system in place for regularly reporting performance to the committee. A regular report, in the public arena, covering things like performance against government targets, enforcement action and appeal performance would help to focus attention on how well the service is functioning. It could help to identify areas where action might be needed to improve performance, and give credit where performance has been good.

4.0 FINANCIAL MANAGEMENT

4.1 There has been enormous pressure on local government finance for many years, and income from planning applications is uneven and sometimes hard to predict, and this inevitably impacts on the resources available to provide the service. There are areas where additional services can be provided and charged for, although for smaller authorities it can sometimes be difficult to generate enough income to support additional staff resources. The practical difficulties of operating through the Covid pandemic have meant that some additional paid for services have been suspended which will have had a negative impact on income.

4.2 Over a number of years the staffing levels in the planning service have been actively reduced due to the financial pressures facing the authority, although it has now been acknowledged that there is a need for additional staff and it is anticipated that these will be funded through fee income. Many authorities are struggling to recruit experienced planning officers and the council will need to carefully consider internal processes to make the best use of the skills that the staff have to ensure the best value for money. Consideration will also be given to the financial implications should it not be possible to recruit to some posts. Temporary staff may be required to maintain a functional service.

4.3 In recent years a number of experienced officers have left the authority and where there have been gaps in the staff structure officers have moved around. This has disrupted continuity and will have had a negative impact on the operation of the service.

5.0 WORKLOAD MANAGEMENT

5.1 Effective management of workloads is key to achieving the most efficient and effective service, and maintaining staff welfare, particularly where resources are limited.

5.2 Staffing in all areas has reduced over the years resulting in greater pressures on remaining staff and this has meant that there is little or no capacity for more proactive work. It is a credit to the staff that performance against government targets has been as good as it has been, but there is no real resilience in the team and there is a risk that performance could deteriorate very quickly if, for example, a staff member was sick, or a post remained vacant for a significant length of time. In addition the depletion of specialist resources within the council has impacted on workloads. For example there is no internal specialist advice available on landscaping, and the authority has lost the delegated powers from CADW associated with listed buildings. The loss of a Business Support Manager has impacted on

the management of the website and back office systems, and these are areas where effective systems could reduce workloads elsewhere.

5.3 It is good that staff have been flexible and have responded to workload pressures where staff have left. However, although this approach does keep work moving, it is reactive rather than proactive, and it is disruptive to the teams involved, because it lacks continuity.

5.4 The back office computer system seems to lack any meaningful workflow management tools which makes it difficult to monitor and manage workloads amongst the team. A more up to date system could greatly improve the management of workflow through the application process.

5.5 There has recently been some work comparing staffing levels with neighbouring authorities which has led to an acceptance that more staff should be recruited. This PAS review has not made an in depth study of staffing levels and workloads, but the figures quoted in the report demonstrate that compared to the other authorities Wrexham has been operating with significantly lower staffing levels. If all the agreed posts are filled it is likely that the Council will be able to maintain the statutory minimum level of service. Investment in a more comprehensive benchmarking exercise with similar authorities could provide a valuable insight into different working practises and procedures which could help inform revised procedures at Wrexham to make the most effective use of the resources and skills available. Such a review would also guide consideration of the staff numbers and skills that would be required to provide a good and sustainable service. The staff reductions in the past have adversely impacted on service delivery and the welfare of the staff themselves, and needs to be addressed by the Council.

5.6 Currently delegated reports are considered by the DM Manager or the Policy manager in their absence. This level of delegated authority is relatively senior compared to many authorities and puts pressure on the person in that post, and causes a potential bottleneck in the signing off process which could impact on decision times. It would be appropriate for the Lead Officers to have the authority to sign off a range of applications, apart from their own cases which should still be signed off by their manager. This could speed up the process and would give the team a greater sense of ownership and responsibility.

6.0 PROCESSES, IT AND ADMINISTRATION

6.1 It is fair to say that the planning service is not well served by its current back office systems and, although there have recently been some improvements, a lack of easily available information on the councils website results in calls being made to staff to deal with relatively straightforward questions. The fact that the support team were unable to work from home for approximately 3 months at the start of the pandemic, meant that no new applications could be registered, which led to a significant backlog developing.

6.2 Amongst other things, in the discussions, reference was made to system instability, poor integration with mapping software, difficulties with measuring plans, time consuming procedures for uploading photographs and selecting neighbours for consultations, and a general lack of functionality. It is understood that the software is either no longer being supported, or that will happen very soon, so there is an urgent need to purchase a replacement system. The impact of the introduction and proper implementation of a new

software system will have on the day to day work of the service should not be underestimated. During the implementation period it will involve a lot of staff resources and it will inevitably be disruptive, but in the medium term it would offer the opportunity to work much more efficiently. It is important that the implementation stage is adequately resourced.

6.3 On a positive note, the rapid introduction of MS Teams, Zoom and Skype were seen as positive and enabled people to keep in touch. There are also good links with the Building Control service, assisted by the fact that the service sits within the same office area.

7.0 POLITICAL LEADERSHIP

7.1 One of the reasons for the review of the service is the perception that there has been a deterioration in the relationships between Officers and Elected Members. It is at the Planning Committee where relationships can sometimes be tested, and this is considered in more depth in the report on the Committee review. Nevertheless the relationship between Officers, Ward Members and Committee Members impacts the whole of the planning application process.

7.2 The working relationship between the Chair, Vice Chair and Officers seems to be good, and there are regular briefings before the Committee. The relationship between some other Members and Officers is not without tension, and it seems that this is sometimes related to Members finding it difficult to separate their role as Ward Councillors representing the views of those residents who have made representations, and their separate role as Members of the Planning Committee where their role is to weigh up the planning considerations of a scheme in the light of planning policy and to make decisions on behalf of the whole borough.

7.3 These tensions have come to a head with a number of controversial applications that have been decided recently. One of these was a residential site on land that is not allocated for development in the out of date Unitary Development Plan (UDP), but is intended to be allocated in the emerging Local Development Plan (LDP). The process for adopting the LDP has been difficult for the authority and has taken longer than planned, and its progress is likely to be further delayed because of the need to address the issue of phosphates in relation to site allocations. The application was refused by the Committee but subsequently allowed on appeal. A key consideration for the Inspector was the fact that because the UDP is out of date the authority was unable to demonstrate a five year housing land supply, and the application was considered on its individual merits. The planning process was sound, but the development is an ongoing cause of complaint from local residents and the process has, to some extent, damaged public and some Member confidence in the processes for plan making and the determination of planning applications.

7.4 In addition to initial induction training, in the past there were regular short Member training sessions scheduled to coincide with committee meetings but the impact of the Covid pandemic, and meetings moving online, has meant that these have not happened recently. There was a general acknowledgement amongst Members that more regular, and more in depth training would bring benefits. Advice and support on the best way to represent the views of local residents, while still making defensible decisions, the importance of making decisions in accordance with policy and the overriding presumption in favour of sustainable development would be helpful. Some planning training should be provided for all

Members, not just those who sit on Committee, to enable ward Members to support and advise their residents.

7.5 There was general agreement that it would be beneficial for regular performance updates to be provided to the Planning Committee. Appeal results and any awards of costs were mentioned specifically, and this information could assist Members in making future decisions and explaining their position to residents.

7.6 The scheme of delegation at Wrexham led to more applications being reported to the Committee than most other authorities in Wales, which has had an impact on workflow and workloads. Previous research by PAS has indicated that the resources needed for an application to be decided by a Committee is approximately ten times the resources needed for a delegated decision. The scheme at Wrexham was adjusted at the start of the pandemic to allow more decisions to be made by Officers and these temporary arrangements have reduced the number of applications being considered by committee, but this has not universally been considered a positive move. Over the four quarters ending 30 September 2021 91.63% of applications were determined by officers. This is significantly higher than the level in the preceding few quarters. (Appendix 2). This level of delegation is fair, but many authorities successfully operate with a level of delegation above 95%.

7.7 Some Members expressed a concern that in dealing with pre-application enquiries Officers could become too close to developers. There was some lack of member awareness of the statutory requirements for the pre-application process applying to the authority which led to some viewing the process as officers and applicants sorting things out prior to application submission. Better information on the website clarifying the role of officers could be helpful.

7.8 Some Members commented that it can sometimes be difficult to make contact with Officers, although this view was not held by everybody. This review has not quantified this, but it is, perhaps, an area where further engagement between Officers and Members could be beneficial.

7.8 The Code of Conduct for Members is comprehensive and detailed covering all matters relevant to good decision making, although the section 9 provisions does put the onus on the Chairman to see that principles are followed, rather than it being the responsibility of all members of the Planning Committee. The document is generally good, but it could benefit from being reviewed, possibly alongside some Member training.

8.0 TEAM MANAGEMENT

8.1 The Covid pandemic and working from home has made team working more difficult, although staff were supportive of each other and understood the pressures they were working under.

8.2 Regular team meetings and casework meetings have not been happening and these should be reinstated to provide some structure, support and certainty to the team. In addition to the impact of the pandemic, application workloads and staff taking on different duties has probably contributed to this. Officers have been supporting each other, and have access to DCP online for legal information, but there is a risk of staff feeling isolated.

8.3 The limited functionality of the back office system severely limits managers ability to monitor and manage workloads and workflow which has made the situation more difficult.

8.5 The line management arrangements for the support team was an area of concern, leading some to feel isolated from the officers dealing with applications. A more integrated team would provide more opportunities for staff to progress from the support team into the applications team, enabling the authority to “grow their own” planners which could help address future recruitment pressures.

9.0 TRAINING

9.1 Training for staff can improve skills and deliver better planning decisions and can also contribute to staff progression and retention. For example, as mentioned above, training support team members could help address recruitment pressures in the future. The Committee review has identified presentation skills as an area of possible training for officers.

9.2 Training was not identified as a particular issue in the discussions, although time constraints were identified as limiting professional development activity. There are active officer networks in both north Wales and across the principality and these were seen to be helpful and supportive.

10.0 PRE APPLICATIONS

10.1 The situation in Wales is different to England in that the Welsh Government has introduced statutory requirements for pre-application advice services and, in certain cases, for pre-application consultation. The aim is to identify issues prior to submission of an application and, where necessary, to allow a prospective applicant to consider amendments to proposals prior to submission.

10.2 There was a good understanding of the process amongst officers and there is some useful information on the Council website, although this could be expanded. Officers were conscious of the benefits of keeping Members updated. However, as stated above, there is room for some clarification of the process and Officers’ role for some Members and the public.

10.3 The impact of the pandemic has meant that enhanced services such as a development team approach, fast tracking and Planning Performance Agreements (PPA's) have all been suspended for the time being. It would be beneficial to review these services once the impact of the pandemic has passed.

11.0 RECEIPT AND VALIDATION

11.1 The key to providing an excellent receipt and validation service is to undertake the task quickly and accurately so there are no further delays later in the consents process due to procedural faults or omissions or deficiencies in the submission.

11.2 Receipt and validation in Wrexham is undertaken by the support team, and no particular procedural issues were identified in the discussions. However the support team is small, and there are potential resilience issues should any post be vacant. Where new staff have joined the team support has been provided by more experienced team members. It was suggested that regular meetings with case officers would be of benefit in reviewing processes and problems to ensure the service operates as efficiently and effectively as resources allow.

11.3 The back office system does not make the registration process easy and it is far more time consuming than would be the case with a more modern system. The limitations of IT meant that at the start of the pandemic the support team were unable to work from home and a backlog of applications waiting to be registered developed. This backlog has since been cleared and timescales appear to be comparable to other authorities.

12.0 CONSULTATIONS AND ALLOCATION OF CASES

12.1 Cases are allocated on the basis of an officer's experience and workload. Although no particular problems were identified, the process could be simplified if the back office system was more effective and was able to give a live overview of the situation for managers.

12.2 There are significant issues with the initiation of the neighbour consultation process, where identifying addresses using address point is time consuming with a risk of error. There would be considerable benefits in time saving and accuracy from a more up to date system with a properly integrated GIS system linked to the land and property gazetteer.

12.3 Because of concerns about data protection and difficulties with redacting personal information the decision was taken not to publish comments from the public on the website. This was identified by some people as an area which could be improved to give greater transparency to the process, and it is something that could be reviewed in the future as better software is available.

12.4 Statutory consultees are initiated by the support team and picked from a list. The interviews with consultees within the Council revealed opportunities to streamline processes to avoid unnecessary work, for example avoiding the need for a manager to endorse simple uncontroversial technical comments thus avoiding a bottleneck. This is an area that should be followed up by the service.

12.5 Relationships with other Councils appear to be good, although there was some concern about the move to a paperless system for consultations and the challenge this created for some Community Councils. The benefit of further training for these councils, in particular developing an understanding of how their comments affect the decision making process was identified by some.

12.6 Although the publicity and community engagement policy and customer charter from 2014 appeared on the old website, it seems to be missing from the updated site. It would be useful to review this because publishing the information on processes, policy and legislation online would improve public awareness and potentially reduce enquiries submitted to staff.

12.7 Planning agents who often submit applications to the Council would welcome regular Agents Forums to share information.

13.0 CONSIDERING THE APPLICATION

13.1 Officers were conscious of the 8 week deadline for determining applications and agreeing extensions of time, although the computer software was not helpful in managing this. There does not appear to be a mechanism to enable simple uncontroversial applications to be easily picked out and determined as soon as the consultation period is over, rather than all applications being dealt with in date order. Without such a mechanism in place many straight forward applications are likely to be decided much later than they could have been.

13.2 While there had been weekly case conferences in the past these had not taken place recently, although officers were able to seek advice on an ad hoc basis there was a view that regular meetings would be preferable. There was also a desire for regular team meetings to discuss wider issues.

13.3 The team is facing a number of challenges in dealing with applications and bringing forward development. These include the uncertainty over phosphates, delays with the separate SAB drainage approvals, the reduced availability of specialist advice and long lead in times for the committee agenda, and associated lengthy addendum reports..

13.4 The lack of an up to date LDP as a result of delays in the adoption of the emerging plan is a significant challenge, along with the lack of a five year housing land supply. As discussed above an application was granted on appeal for a site that was not allocated in the old UDP but was proposed in the emerging LDP. This has been particularly challenging because it has undermined the confidence of some people in the principle of a plan led planning system.

13.5 Houses in Multiple Occupation (HMO's) are an area of concern to some residents and Members, although compared to some other authorities they are not particularly numerous in Wrexham. These applications are challenging to deal with in part because of a disconnection between planning policy and the concerns of some residents and Members.

13.6 The Council has a shortened format for the simplest uncontroversial applications which is good practice. It would be beneficial to review these reports if new planning application software is purchased to ensure that as much information as possible is pre-populated and that the reports are no longer than absolutely necessary. Dealing with the simplest applications as efficiently as possible frees up time for planning officers to add value to the application process on more controversial or significant cases.

14.0 THE OFFICER REPORT

14.1 The use of a short format report for simple applications is good practice, and in general Members seemed happy with the more detailed reports that go before committee. Having said that, some members raised concerns about the use of technical language and the difficulty they felt in deciding applications where there was a difference of opinion between planning officers and consultees. Some raised a concern that the reports

sometimes seemed one sided and didn't fully discuss issues contrary to the officers' recommendation. No specific cases were cited so this issue has not been considered further as part of this review, but it is entirely appropriate for an officers report to lead Members through the planning issues towards their recommendation. It may be beneficial to have further discussions with Members about these particular issues.

14.2 The case officers' reports are forwarded to the DM Manager, who has delegated authority to sign off a range of applications. This level of delegated authority is relatively senior compared to many authorities and puts pressure on the person in that post, and causes a potential bottleneck in the signing off process which could impact on decision times. It would be appropriate for the Lead Officers to have the authority to sign off a range of applications, apart from their own cases which should still be signed off by their manager, to maintain a separation between the case officer role and the delegated decision making role. This could speed up the process and would give the team a greater sense of ownership and responsibility.

14.3 There was a view that it is important to have experienced officers at the committee meetings to address questions that may be raised.

15.0 THE DECISION AND CONDITIONS

15.1 An appropriate scheme of delegation ensures that decision makers' time and skills are focussed in the most effective way to ensure good decision making. In the most recent published data in the All Wales Planning Annual Performance Report 2018-19 Wrexham was shown to have a higher percentage of applications going to committee than most other Welsh authorities, with a level of delegation somewhat below the 95% that is common.

15.2 There has been a temporary change to the scheme of delegation to take account of the constraints imposed by the Covid pandemic. It was acknowledged that this has reduced the number of applications being reported to committee and there was some support for the changes to be made permanent. It would be appropriate to allow the revised scheme to continue for a reasonable length of time and to undertake a measured review of the scheme of delegation, both in terms of applications that are decided at committee and the level of delegation amongst officers.

15.3 The imposition of conditions was not identified as a particular area of concern, although the enforcement of those conditions is considered below. Section 106 Agreements are monitored by one person, and there could be a resilience issue here, although in a relatively small authority the number of agreements should be manageable.

15.4 Committee minutes are quite succinct and, in the light of a recent High Court decision (*Cross v Cornwall County Council*), a review of the procedure at Committee and of the detail of Committee minutes would be appropriate to ensure that procedures are clear and robust and that minutes are sufficiently precise and detailed.

16.0 MONITORING AND ENFORCEMENT

16.1 Enforcement was an area of concern for Members and additional staffing has been agreed. There was some frustration over the time that enforcement action can take, but the

Council follows the correct approach by first inviting an application where a breach is identified.

16.2 Non Material Amendments and applications to discharge conditions are handled by officers under their delegated powers. Although there is no requirement to consult residents on Discharge of Conditions applications they are published on the website. It is right that this happens but there have been issues where residents have lodged objections to the conditions, most likely because they were unhappy about the original approval. Although it would not be popular with some residents it would be appropriate to look at ways of disabling the ability to comment online for this application type.

16.3 Reference was made to an enforcement policy, but this appears to date back to the 2014 Customer Charter document. It would be beneficial to review this, in consultation with Members, and possibly set the protocol out in a separate stand alone document. A clear up to date set of agreed priorities would help officers manage cases, and would make it clear what residents and Members could expect. More advice about enforcement procedures on the website would reduce the enquiries made to officers.

16.4 There does not appear to be a routine for regularly reporting Enforcement work to the committee. Reporting enforcement performance and successful outcomes in the public arena would provide better awareness and improve the profile of the service.

16.5 One frustration for the Enforcement Officers is the restrictions on accessing Council Tax information which could expedite the issuing of notices.

17.0 APPEALS

17.1 Current problems with the computer system at the new Wales Planning Inspectorate have meant that it has only been possible to submit appeals by email. This has made it difficult for staff who are unable to keep track of appeal submissions and access or submit documents online as they used to be able to. This is a very stressful situation for staff because meeting deadlines is so critical. There is also concern amongst staff that the IT issues will lead to a surge in appeals once the system is functioning properly. The lack of clarity over the registering of new appeals is also causing problems for the Enforcement Team because it is not clear whether appeals against Enforcement Notices have been lodged.

17.2 The Council has a protocol for appeals set out in section 10 of the Code of Conduct which seems to be reasonable in recognising that an officer cannot make statements contrary to his or her bone fide professional opinion and allows for consultants to appear for the Council in cases where this is necessary. However, it has been suggested by a small selection of those interviewed that the service could defend itself more robustly at appeal when members overturn officer recommendations at committee. The scope of this review did not allow this aspect of appeals to be looked in depth, however it is generally considered to be good practice to appoint consultants to work with the service to defend appeals in such circumstances, particularly where they are to be determined by Hearing or Public Inquiry. This approach should help to improve trust between Councillors and the Council's Planning Officers. It would therefore be appropriate to routinely appoint external consultants to represent the Council in cases where Members have gone against officers' recommendations, to protect officers' professional integrity and to avoid any ambiguity at

Hearings or Inquiries. It would also be appropriate to encourage Members to appear at Hearings or Public Inquiries to explain their views. This would demonstrate that the appeals are being robustly defended.

17.3 During the discussions successful claims for substantial costs were mentioned. Costs are only awarded against a planning authority where they have been found to have acted unreasonably. The latest Welsh Government annual performance measure dates from 2018/19 when 13 out of 26 appeals were dismissed and 2 claims for costs were upheld, putting Wrexham amongst the worst performing authorities on this measure. In the three years from 2018/19 - 2020/21 costs were awarded against the Council on 8 occasions, 7 of which were decisions made by the committee. An analysis of the appeals performance over the three years is included in Appendix 3. The costs awarded amount to a very considerable amount of money for the council to budget for.

17.4 The All Wales Annual Planning Performance Report 2018-19 includes data for the number of decisions made contrary to Officers' advice, the percentage of appeals dismissed, and the number of cases where costs have been awarded against Councils. In all three of these indicators Wrexham has performed poorly and is near the bottom of the table when compared to the rest of Wales. For all three indicators the Council has been identified as needing improvement. (Appendix 4)

17.5 There is currently no routine reporting of appeal decisions to Members, although the Chair and Vice Chair and local members do see the decisions. It would be beneficial to regularly report appeal decisions to the Committee and to draw attention more widely to the appeal outcomes and costs. This is not solely an issue linked to Member overturns because decisions in line with officer recommendation are also appealed and are sometimes successful, although not as frequently as member overturns. The important point is for Members and Officers to learn from the outcomes. Considering these outcomes in the public arena would also help wider public awareness of the constraints facing the authority.

6.0 OVERALL CONCLUSIONS

6.1 The last few years have been challenging for the staff, with reductions in numbers, and an outdated computer system. Their difficulties have been exacerbated by the Covid 19 Pandemic, and they are to be congratulated on what they have managed to achieve in extremely difficult circumstances.

6.2 The working relationship with Members has, at times, been strained, with some controversial and unpopular planning applications which have fallen to be determined while the old UDP is out of date and the adoption process for the LDP has taken far longer than originally planned. Some Members have found it difficult to separate their Ward Member role, representing the views of their residents who have made representations, from their role at Planning Committee where they take on a quasi judicial role and have to make decisions on behalf of the whole Borough. This has led to a number of decisions being found to be unsound by the Planning Inspectorate when they were allowed on appeal and costs awarded against the Council.

6.3 There has been an acceptance that additional staff are required and a recruitment process has started. There was also an acknowledgement from both Members and Officers that additional training for Members would be beneficial.

6.4 A major challenge for the Council will be the pressing need to update the computer system. This will be costly and time consuming, but moving forward, if the service is to operate in an efficient and effective way it is essential that this is addressed. A modern computer system with better functionality would enable better case management, better communications, and would allow staff to spend less time on routine tasks and more adding value to the service.

6.5 During the discussions there were many detailed points raised which could lead to small operational improvements and save staff time and frustration. Once the new Head of Service - Development Management is in post he should be supported to review operational practice with staff and consultees, using the Toolkit as a benchmark, to identify beneficial operational improvements which could be easily and quickly implemented to ease pressures and provide some capacity for the implementation of the other recommendations.

DM Appendix 1

Extracts from the Welsh Government report on Planning Performance 2018-19

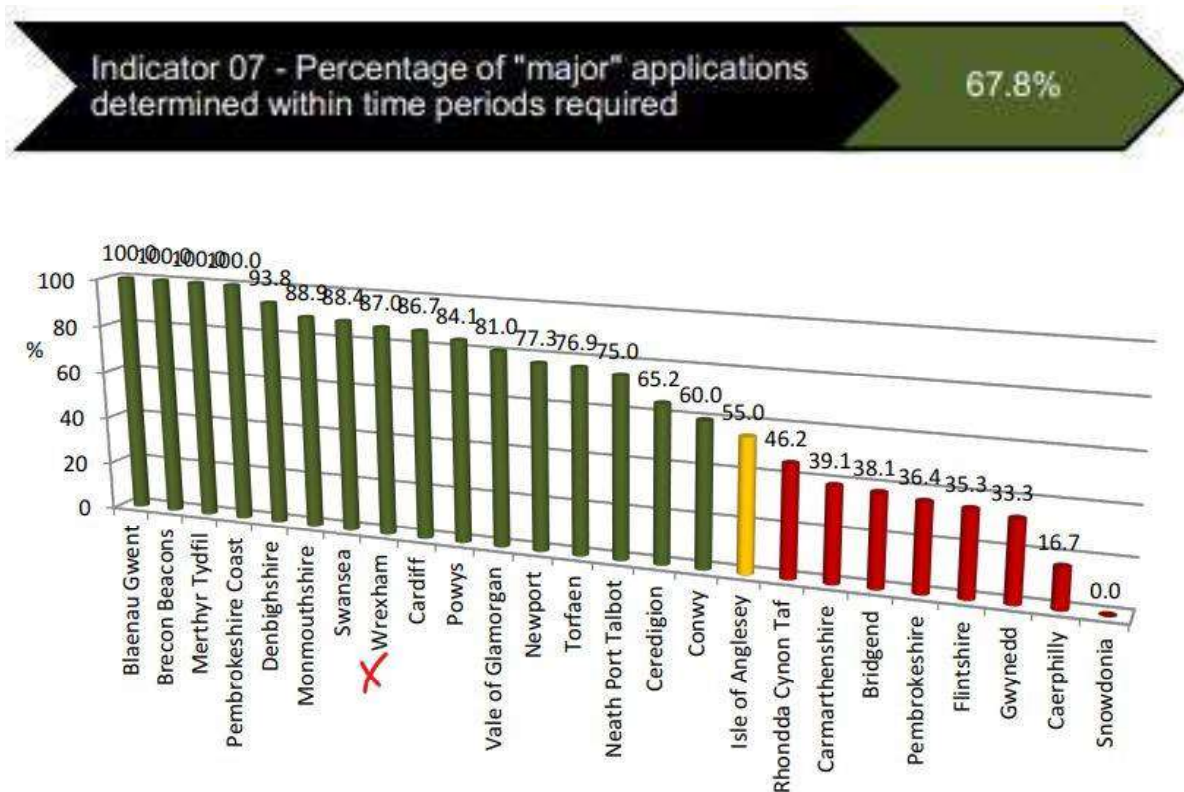


Fig 10 – Comparison of Local Planning Authority performance for determination of major planning applications

Majors within time

Green “Good” 8th out of 15

Above average

INDICATOR 07. Percentage of "major" applications determined within time periods required



Indicator 08 - Average time taken to determine "major" applications in days

231.8 days

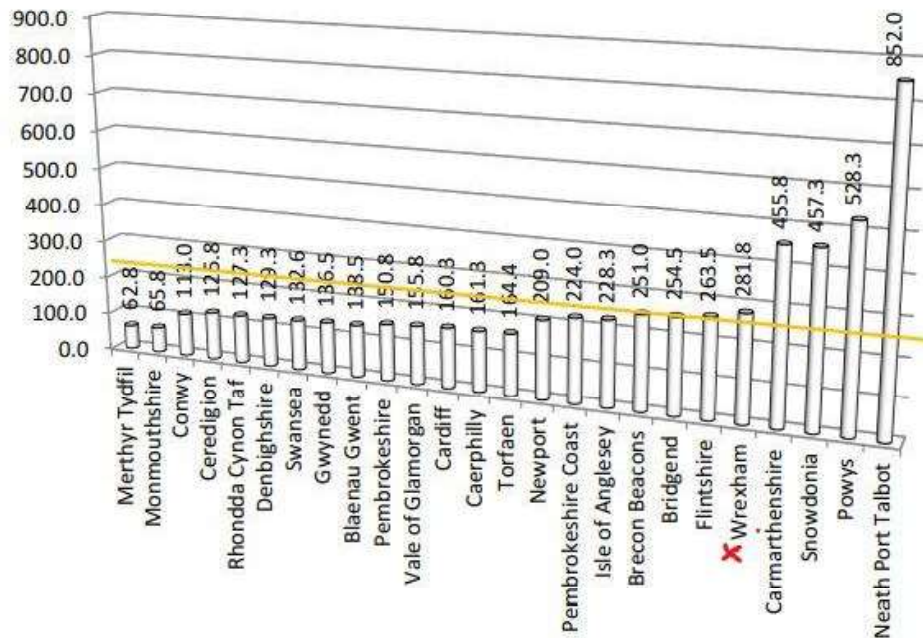


Fig 16 – Comparison of average time taken to determine major planning applications

Majors - Average Time

21st out of 25

Below average

INDICATOR 08. Average time taken to determine "major" applications in days



Indicator 09 - Percentage of all applications determined within time periods required

88.1%

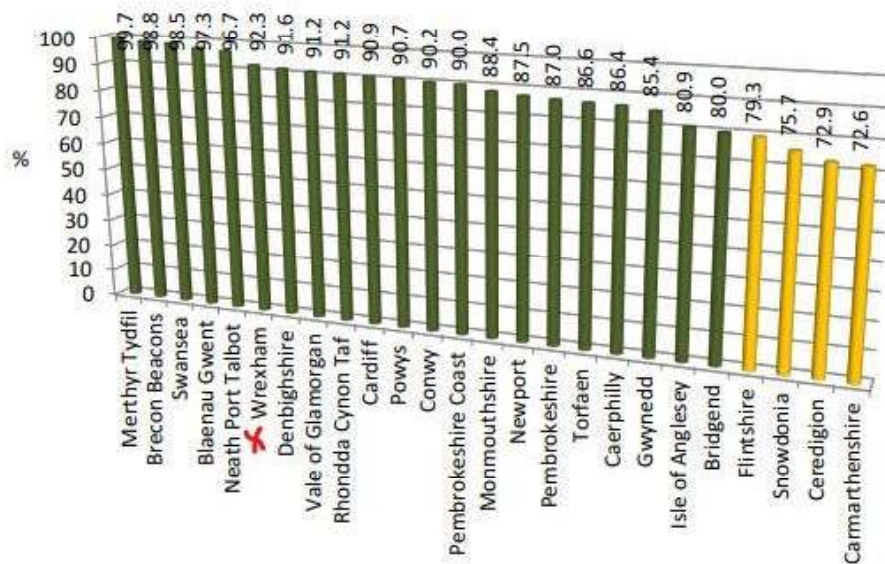


Fig 19 – Comparison of Local Planning Authority performance for determination of all planning applications

All Applications in time
Green “Good” 6th out of 25
Above average

INDICATOR 09. Percentage of all applications determined within time periods required



Indicator 10 - Average time taken to determine all applications in days

80.7 days

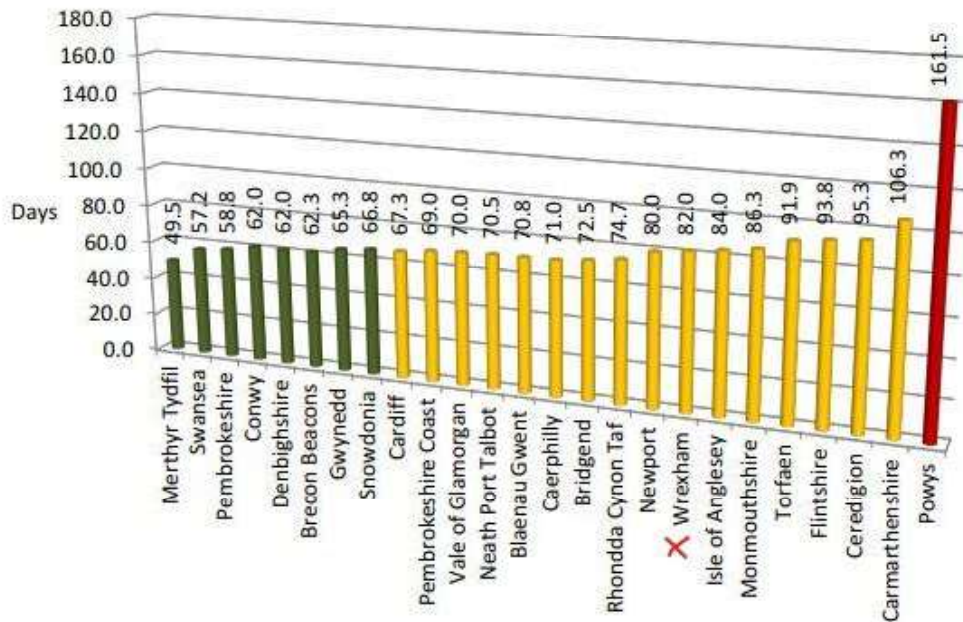


Fig 23 – Comparison of average time taken to determine all planning applications

All Applications - Average time

Yellow “Fair” 18th out of 25

Below average

INDICATOR 10. Average time taken to determine all applications in days



**DM Appendix 2 Percentage of Delegated
Decisions Up to 30 September 2021**

	19-20 Q4	20-21 Q1	20-21 Q2	20-21 Q3	20-21 Q4	21-22 Q1	21-22 Q2	Last 4 Q's
Total Decided	213	63	181	276	220	264	256	1,016
By Committee	86	21	23	20	16	22	27	85
Delegated	59.62%	66.66%	87.29%	92.75%	92.73%	91.67%	91.46%	91.63%

DM Appendix 3

Analysis of Appeal Decisions 2018/19 – 2020/21

Total No of Appeals in Each Year

2018/19	26
2019/20	35
2020/21	31

Split between appeals against delegated decisions as against Committee decisions

2018/19	15 delegated	11 Committee
2019/20	17 delegated	18 Committee
2020/21	25 delegated	6 Committee

Success rate – Delegated

2018/19	15 appeals	3 allowed	12 dismissed	80% success rate
2019/20	17 appeals	4 allowed	13 dismissed	76% success rate
2020/21	25 appeals	6 allowed	19 dismissed	76% success rate

Success Rate – Committee

2018/19	11 appeals	9 allowed	2 dismissed	18% success rate
2019/20	18 appeals	13 allowed	5 dismissed	28% success rate
2020/21	6 appeals	4 allowed	2 dismissed	33% success rate

Costs Awards

2018/19	0 delegated	2 Committee
2019/20	0 delegated	3* Committee
2020/21	1 delegated	2 Committee

Note:

* 1 of these was three appeals combined

RELEVANT WELSH GOVERNMENT PERFORMANCE INDICATOR:

INDICATOR 14. Applications for costs at Section 78 appeal upheld in the reporting period



36. "Costs awarded" means that the Inspector has found at a Section 78 appeal that the authority has acted unreasonably, either procedurally (relating to the process) or substantially (relating to the issues arising from the merits of the appeal), and has awarded costs to the applicant, in the reporting period.

DM Appendix 4 Decision Making Performance

Extract from All Wales Planning Annual Performance Report 2018-19

Indicator 12 - Percentage of Member made decisions against officer advice

9.2%

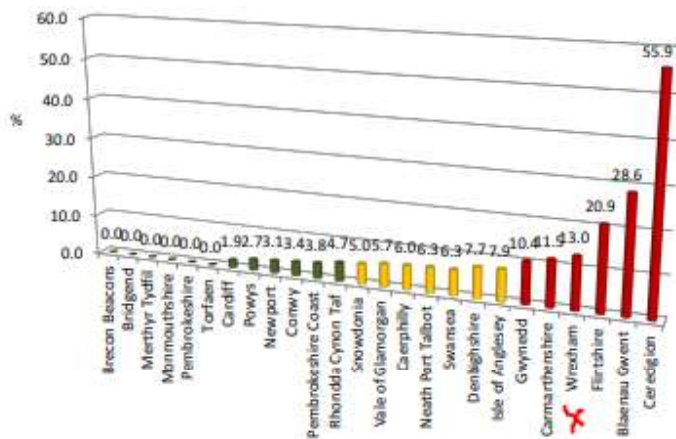


Fig 29 – Percentage of planning applications determined contrary to officer advice

Decisions against Officer Advice

22nd out of 25

Below Average

“IMPROVE”

INDICATOR 12. Percentage of Member made decisions against officer advice



Indicator 13 - Percentage of appeals dismissed

67.5%

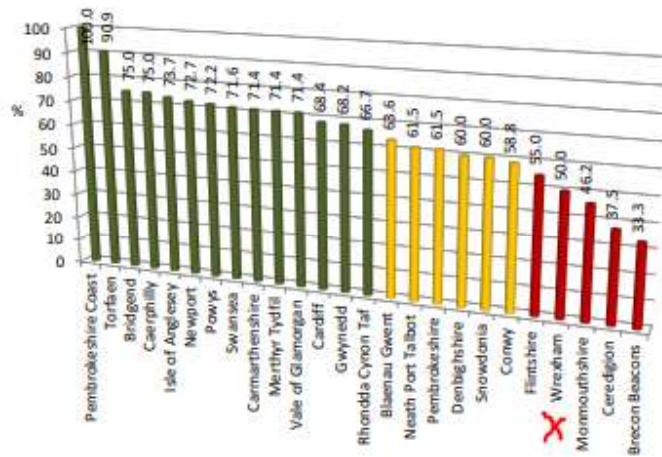


Fig 34 – Percentage of planning appeals dismissed

Percentage of Appeals Dismissed

22nd out of 25

Below Average

“IMPROVE”

INDICATOR 13. Percentage of appeals dismissed

IMPROVE

- Less than 55% of planning decisions are successfully defended at appeal

FAIR

- Between 55% and 66% of planning decisions are successfully defended at appeal

GOOD

- More than 66% of planning decisions are successfully defended at appeal

Indicator 14 - Applications for costs at Section 78 appeal upheld in the reporting period

0 (15 out of 25 LPAs)

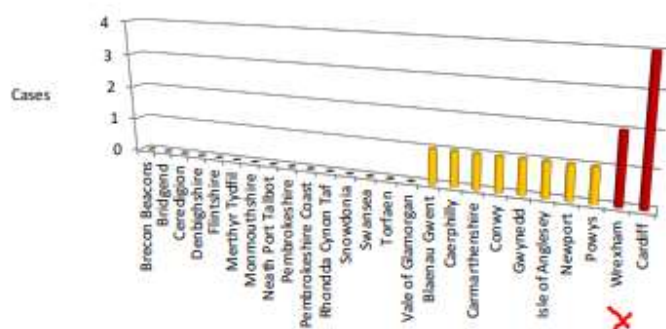


Fig 37 – Number of cases where costs have been awarded against the Local Planning Authority at appeal

Applications for Costs
24th out of 25
Below Average
“IMPROVE”



36. “Costs awarded” means that the Inspector has found at a Section 78 appeal that the authority has acted unreasonably, either procedurally (relating to the process) or substantially (relating to the issues arising from the merits of the appeal), and has awarded costs to the applicant, in the reporting period.

DM Appendix 5 Development Management Review Interviews

Date	Time	Attendees	Role
Mon 8 th November	10.00am	Simon Greenland	Planning System overview
Tues 9 th November	10.00am	Matthew Phillips	Interim Head of Service Development Control
Wed 10 th November	10.00am	Planning Officers	
Thurs 11 th November	10.00am	Enforcement Officers	

Date	Time	Attendees	Role
Tues 16 th November	10.00	All Members workshop	
	1.30	Bob Dewey	Agents invited
		J10 Planning	
		Roger Parry & Partners	
		SG Estates	Developers invited
		Castle Green Homes	
		Bellway	
		Wales & West	
		Clwyd Alyn	

Date	Time	Attendees	Role
Weds 17 th November	10.00am	Support Team	
	11.30am	Community Council Workshop	
Thurs 18 th November	4.00pm	Helen Coomber	Committee Services Lead

Date	Time	Attendees	Role
Mon 22 nd November	2.00pm	Kathryn Moore	Conservation Officer
		Jon Brewin	Aboricultural Officer
		Emma Broad	Ecology & Biodiversity Officer
	3.00pm	David Kelly	Lead Member for Organisation - Planning & Corporate Services
	4.00pm	Cllr Mark Pritchard	Council Leader
Tues 23 rd November	9.00am	Linda Roberts	Monitoring Officer
	10.00am	Ian Jones	Head of Service Public Protection
	2.00pm	Lawrence Isted	Chief Planning & Regulatory Officer
Weds 24 th November	9.00am	Dominic Jones	Highways Officer
	10.00am	Natural Resources Wales	
Fri 26 th November	10.00am	Cllr Michael Morris Cllr Michael Dixon	Chair and Vice Chair of Planning Committee
Mon 29 th November	11.00am	Cllr Hugh Jones	
	4.00pm	All Councillors workshop	
Wed 1 st December	10.00am	Mr & Mrs Filce	Local Residents

Appendix 2

Planning Advisory Service Planning Review (Planning Committee and Development Management) - Summary Action Plan

1. PAS recommendations for the Planning Committee	2021/22	2022/23				2023/24	2024/25	Additional Resource Implications	Lead Officer & Support
	March	Q1	Q2	Q3	Q4				
R1 Establish a programme of regular compulsory training for Members of the Planning Committee.		External trainer undertake compulsory Committee induction	Monthly bite-sized sessions delivered by officers			Annual event (external) and monthly bite-sized sessions (officers)		c£5k per for external trainers	Chief Officer (CO), Heads of Service (HOS) Development Management and Planning Policy
R2 Deliver training to ward and community councillors to help them engage with and assist their residents' engagement in the Planning process.		External trainer for councillor induction			Annual event (at Community Council Forum)	Annual Event (at CC Forum) Occasional officer attendance at Community Council meetings to discuss particular topics			
R3 Deliver training on presentation skills and behaviours to officers who may need to attend Planning Committee.		Team meeting to agree training needs and meet them				External and internal training as necessary			HOS Dev. Mng. and HOS Planning Policy
R4 Review the size of the Planning Committee with a view to reducing membership to 12 Members.	Constitutional Working group asked to consider views in advance of AGM in May	Institute with the new, post-election, Committee				12 month review			This report CO
R5 Review the scheme of delegation both in terms of which items are considered by committee and the level of delegation amongst officers to		Recommend to Council revised scheme of delegation			Annual Review	Annual Reviews			CO, HOS Dev. Mng. and HOS Planning Policy

ensure that decisions are made at the appropriate level and the Committee is not overburdened and frees up time for other matters, such as training, reviews of performance and appeal decisions.									
R6 Provide a regular report to committee providing information on planning applications handled in relation to Welsh Government targets, appeal decisions, awards of costs and details of enforcement cases and successful outcomes.		Institute quarterly reports	Quarterly Report	Quarterly Report	Quarterly report	Quarterly reports			HOS Dev. Mng., Planning Officers, Enforcement Officers, Business Support Officers
R7 Review officer attendance at Committee meetings in order to manage workloads and to improve effectiveness of advice.	Review and finalise	Institute new arrangement			Annual Review	Annual reviews			CO, HOS Dev. Mng, HOS Planning Policy
R8 Review how officers and Councillors interact outside of the Committee forum to enhance their wider involvement in the planning process without risk of predetermination.			Review. Implement new proposals			Annual reviews			CO, HOS Dev. Mng. HOS Planning Policy

R9 Ensure that the Planning code of conduct is always followed when Members reach a decision contrary to officers' advice and an appeal is submitted in these cases. Although Members can make a contribution to appeals to explain their decisions, an external consultant should be appointed at an early stage to represent the council where this will involve appearing in person at a Hearing or Inquiry.	Institute this practice for Inquiries immediately. Officers to advise Members of policy, degree of harm and evidence required. Members to attend hearings	Review and update the Planning code of conduct							c£20k per year for appeal consultants' costs	Chair of the Planning Committee, CO, HOS Dev. Mng. Legal Officer
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2. PAS recommendations for Development Management	2021/22	2022/23				2023/24	2024/25	Additional Resource Implications	Lead Officer & Support
	March	Q1	Q2	Q3	Q4				
R1 Source a replacement back office computer system with up to date workflow, better functionality and performance management and reporting capabilities, and to allow effective remote working. Improve planning content on the Council's website.		Create the project team and scope the project	Review available systems	Gain approval to go out to tender and procure	Install	Install		Additional £100k one-off cost , including transfer of data) and continuing annual ICT costs Additional £30k per year Additional impact on staff time	CO, HOS Dev. Mng, HOS Planning Policy, Planning Officers, Business Support Officers, ICT and Digital/Web Team officers, Finance & Procurement officers, Legal officers
R2 In conjunction with recommendation 1, review working practices and procedures to ensure they are as effective and efficient as possible, minimising the number of handovers, avoiding bottlenecks, and ensuring highly skilled staff only deal with matters that nobody else could deal with. For example allowing Lead Officers to sign off some applications.					Initial changes	Implement new workflow procedure		Additional impact on staff time to devise workflows	CO, HOS Dev. Mng, HOS Planning Policy, Planning Officers, Business Support Officers, ICT and Digital/Web Team officers

R3 Review the permanent staff structure to make sure there are sufficient people in place with the right skills to enable the council to provide a consistent and reliable high quality planning application service and to facilitate individual development and career progression. If recruitment proves to be a challenge consider trainee posts and on the job training to upskill existing staff, potentially with a post or posts sitting between the Support Team and Planning Officers.				Review and agree					Additional c£50k-100k per year depending on whether 1, 2 or 2 extra posts are necessary)	CO
R4 Establish a programme of regular compulsory training for Members of the Planning Committee. Provide planning training for Ward and Community Councillors to help them engage with and assist their residents' engagement in the planning process.		Arrange external trainer for compulsory Member induction	Monthly bite-sized sessions delivered by officers	Annual event (external) and monthly bite-sized sessions (officers)	c£5k per year for external trainers (this is a duplicate cost under R1 of the Committee Review)					CO, HOS Dev. Mng. and HOS Planning Policy

R5 Review the scheme of delegation both in terms of which items are considered by committee and the level of delegation amongst officers to ensure that decisions are made at the appropriate level and the Committee is not overburdened and frees up time for other matters, such as training, reviews of performance and appeal decisions.		Review	Seek Council approval for the revised scheme							CO, HOS Dev. Mng., HOS Planning Policy and Legal Officer
R6 Ensure that there are regular casework meetings to consider applications early on in the process, probably at around week 4. The meetings should provide some certainty of direction for case officers and applicants and should aim to deal with straightforward applications as soon as possible after the end of the consultation period.	Implement									HOS Dev. Mng.
R7 Ensure that there are regular team or service meetings, including case officers, enforcement and support staff to	Implement									HOS Dev. Mng. and HOS Planning Policy

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Please note, this is a summary of the assessment. Refer to the full text.

Department: Chief Executive's Services

Department Reference: Chief Executive's/EIA00472/2021

Responsible Officer: Ian Bancroft

Job Title: Chief Executive

Completed Date:

Positive Impacts	
Impact	Description
All	There are no impacts of the review recommendations or the action plan itself. Individual actions arising from the review will be subject to impact assessment.