Planning Applications

19th November 2021

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Distribution

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Important

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1.   Executive Summary

2.   Introduction

2.1   Stroud District Council (the Council) is the area's local planning authority. Development Management is a statutory regulatory service. It has a duty to carry out specific functions such as determining whether planning and other related applications are suitable and in accordance with local and national policy. National government is keen to ensure continuing improvement in the planning system, and measures the Council's performance on the speed and quality of decisions on applications for Major, Minor and Other developments.

2.2   The actions of the Development Management service are governed by the Town and Country Planning Acts, National Planning Policy Framework, Planning Practice Guidance, and the Council's Constitution. Decisions must be made in accordance with the Stroud District Local Plan 2015 unless other material planning considerations indicate otherwise. Planning and other related applications must be made in accordance with legislation contained within the:
    i.   Town and Country Planning (Development Management Procedure) (England) Order 2015;
    ii.   Town and Country Planning (General Permitted Development) (England) Order 2015;
    iii.   Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) 2012 (as amended); and
    iv.   Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

2.3   Planning applications have a statutory determination regulatory period dependant on the type of development. For Major developments this is 13 weeks (unless an application is subject to an Environmental Impact Assessment, in which case a 16-week limit applies). And eight weeks for Minor and Other developments. Prior notifications, prior approvals, and other types of applications may be subject to shorter determination periods

2.4   Planning applications are documented and processed onto the Idox Enterprise for Uniform System (Uniform).

2.5   The number of planning applications are increasing per year, as detailed below:[1]:

    1st April 2021 to 15th October 2021 (date of audit): 1,626;
    1st April 2020 to 31st March 2021: 2,897; and
    1st April 2019 to 31st March 2020: 2,736.

3.   Audit Scope

3.1   To review the effectiveness of the arrangements for accepting, validating, and determining planning applications for Major, Minor and Other developments, to ensure these are recorded and processed with:

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[1] Figures exclude pre-application advice

i.   Decisions being made within the statutory determination period; and
ii. Planning conditions are discharged in a timely manner.

3.2   Adequate performance management and reporting arrangements are in place and these are operating effectively.

3.3   This review commenced in March 2020, but delivery was halted during the period March 2020 to December 2020 due to the pandemic. The audit was picked up again with the aim of reporting the outcome to the Audit and Standards Committee at the next committee meeting following the end of the 2020/2021 financial year.

3.4   During the end of the fieldwork stage of this review, the Audit and Standards Committee requested Internal Audit to undertake an objective and independent review of the Planning Enforcement Service. As part of the development of the terms of reference for that review, Internal Audit undertook a series of consultation meetings with officers and Members. These included those identified by the Audit and Standards Committee, and others identified as the planning engagement process progressed. The principles of the issues raised around three key themes: decision making, record keeping, and communications respective to the scope of this review have been considered. And in doing so, our focus being placed on forward-looking, offering opportunities to strengthen the current arrangements and drive service improvements.

4.   Key Findings

4.1   The service is performing highly against the national performance metrics for determining planning applications. Calculated over a 24-month period from July 2019 to June 2021 the Government's published figures show:

i.   94% of decisions for major developments being made within the statutory determination periods; and
ii. 94.7% of decisions for non-major developments being made within the statutory determination periods.

4.2   Performance management information is presented every six months to the Strategic Director of Place, the Development Control Committee, Environment Committee, and all Members.

4.3   There is the opportunity for the service to strengthen its arrangements for management oversight through:

i.   Formalising the quality assurance process for two of the key stages, accepting and validating applications;
ii. Future consideration for a single repository or digital platform for all communication flows; and
iii. Further development of service performance metrics.

4.4   Whilst some risks are captured and monitored, the service should review the inherent key risks and the internal controls in place to mitigate these in respect of the end-to-end process for administering and determining planning applications.

4.5   The process for accepting, validating, and determining planning applications is captured at a high level in the form of a flowchart. The end-to-end process, including procedures, roles, and responsibilities should be formally documented in a Procedures Manual. This document should also define the arrangements for retention of key documents and communications.

4.6   Issues were identified within the Validation process that impair consistency of process, record keeping and the gathering of compliance information for determination, and the transparency of the internal audit trail. Two of these stem from system issues within Uniform.

4.7   The Council is currently running a project to review and develop Corporate Standards for Customer Service. This will provide an opportunity for the Council to consult both internally and with Members, and to engage with the community to enhance and develop these standards. The Development Management service aim to implement these in accordance with the corporate rollout.

4.8   There is an opportunity for management to explore potential options for improving the level and timeliness of responses from internal and external statutory and non-statutory consultees. It is noted that the Council has a greater opportunity to influence the timeliness of responses from internal consultees whilst this would be more difficult for external consultees.

4.9   The Council's website provides comprehensive guidance to ensure relevant information is accessible to the public. It also provides a search facility of historical applications and decision notices. Adoption of a Development Management Charter would further support transparency of the service offer, service standards, and management of public and consultee expectations.

4.10   Audit testing confirmed full compliance with the expected control environment and a high level of performance against national metrics for determining planning applications as follows:

  i.   From a review of all 411 planning applications received between 1st April 2021 and 30th June 2021 that had a planning application number ending with either FUL, HHOLD, COU, ADV, LBC, TEL or CPE[2] it was found that parish and town councils were consulted in line with Government regulations;
  ii.   The sample of five planning applications selected for review within the period 28th October 2021 and 3rd November 2021, were approved in line with the officer Scheme of Delegation (in this instance Sub-Delegations);
  iii. For a sample of five planning conditions assigned to five separate planning applications, all had been reviewed and discharged as expected; and

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[2] FUL and COU: - both reflect planning permissions including Changes of Use, HHOLD: Household, ADV: Advertisements, LBC: Listed Building Consent, TEL: Notifications Telecom, CPE: Certificates of Lawfulness of existing developments

iv.   From a sample of 15 planning applications (across major, minor, and other developments) received between 1st January 2021 and 30th April 2021, 12 (80%) all were determined either within the statutory determination period or by the agreed extension date[3] for decision-making.

5.   Conclusion

5.1   Development Management have a framework in place for accepting, validating, and determining planning applications. Performance against national metrics for determining planning applications for the period under review demonstrate that the service is performing well against these.

5.2   There are opportunities for the service to explore options for improving communications, transparency of the service offer, service standards, and management of public and consultee expectations.

5.3   Internal Audit has made nine medium priority recommendations to further strengthen the internal control environment, risk, and performance management arrangements.

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[3] Agreements to extend the time for determination can be made for Major, Minor and Other applications that would normally be determined within eight or 13 weeks. The agreement must be in writing between the applicant and the Council.

6   Audit Opinions on Risk Management and Control

6.1 The Public Sector Internal Audit Standards require Internal Audit to provide an independent opinion on the adequacy and effectiveness of the risk identification processes which management has put in place within the area under review, and a sound framework of controls is in place to sufficiently mitigate those risks. This opinion feeds into the Head of ARA's annual opinion on the overall adequacy and effectiveness of the Council's governance, risk management and control environment, which supports the Annual Governance Statement.

6.2 Each report will provide a statement on the levels of assurance that can be given within these two areas, evaluated by applying the following criteria:

Assurance Levels	Risk Identification Maturity	Control Environment
Substantial	**Risk Managed** Service area fully aware of the risks relating to the area under review and the impact that these may have on service delivery, other services, finance, reputation, legal, the environment, customer/partners, and staff. All key risks are accurately reported and monitored in line with the Corporate Risk Management Strategy.	• System Adequacy – Robust framework of controls ensures that there is a high likelihood of objectives being achieved. • Control Application – Controls are applied continuously or with minor lapses.
Satisfactory	**Risk Aware** Service area have an awareness of the risks relating to the area under review and the impact that these may have on service delivery, other services, finance, reputation, legal, the environment, customer/partners, and staff. However, some key risks are not being accurately reported and monitored in line with the Corporate Risk Management Strategy.	• System Adequacy – Sufficient framework of key controls for objectives to be achieved, but control framework could be stronger. • Control Application – Controls are applied but with some lapses.
Limited	**Risk Naïve** Due to an absence of accurate and regular reporting and monitoring of the key risks in line with the Corporate Risk Management Strategy, the Service area has not demonstrated an adequate awareness of the risks relating to the area under review and the impact that these may have on service delivery, other services, finance, reputation, legal, the environment, customer/partners and staff.	• System Adequacy – Risk of objectives not being achieved due to the absence of key internal controls. • Control Application – Significant breakdown in the application of control.

6.3   Taking account of the issues identified in this audit, in our opinion, **Satisfactory** assurance can be provided that the risk identification arrangements operating within the area reviewed are operating as intended. **Satisfactory** assurance can be provided that these risks which are considered to be material to the achievement of the services objectives for this area under review are adequately managed and controlled.

7   Appendix A – Action Plan and Management Response

7.1 This section contains the findings for each audit objective along with any recommendations made by Internal Audit to strengthen the control environment. The recommendations are categorised as follows:

Priority	Description
High	Critical/Major risk exposure which materially impact on the assets, reputation, service delivery and objectives of the Council.
Medium	Moderate risk exposure that impacts on the assets, reputation, service delivery and objectives of the Council.

Objective: To determine the effectiveness of the arrangements for accepting, validating, and determining planning applications for major and non-major developments, to ensure these are recorded and processed with
i.   Decisions being made within the statutory determination period; and
ii   Planning conditions are discharged in a timely manner.

Procedural Guidance

7.2   The process for accepting, validating, and determining planning applications is documented at a high level in the form of a flowchart. The end-to-end process, procedures, roles, and responsibilities have not been documented in a Procedures Manual to support officers with processing applications in a consistent and timely manner. It is also important that the expectations for the retention of key documents and communications are clearly defined and documented.

7.3   Internal Audit have been advised by the Head of Development Management and the Development Team Manager that they have started developing guidance for the end-to-end planning process.

No.	Recommendation	Risks	Agreed Action	
1 (M)	Develop full guidance to set out the expected procedures to include officer roles and responsibilities, for the various stages of processing planning applications. This document should also define the arrangements for retention of key documents and communications. Provide training to officers on the guidance once developed.	A lack of defined and agreed procedures could negatively impact upon the accuracy and timeliness for processing planning applications through to determination. An inconsistent or incomplete approach could be taken leading to poor service delivery, complaints, and damage to the Council's reputation.	We will continue our programme of documenting and standardising procedure notes. Training will be provided to Officers once complete.	
			Person Responsible	**Due Date**
			Team Leader Planning Support	30th September 2022

Receipt and Acceptance of Applications

7.4   The Planning Support Team are responsible for receiving and accepting planning applications. Due to the lack of available documented procedural guidance Internal Audit established the current process in operation with the Planning Support Officer. From discussions held, no key control weaknesses were identified within this stage of the process. No compliance testing was undertaken in this area.

Validation of Applications

7.5   The Technical Team are responsible for reviewing and validating planning applications. Uniform automatically generates a checklist customised for the type of planning application, and can include items such as 'Archaeological Assessment', 'Biodiversity Survey' and 'Flood Risk Assessments'. Officers review each item on the checklist and make a decision on whether it is Satisfactory, Unsatisfactory or Not Applicable. Audit testing identified an inconsistent approach by officers as well as system errors, these being:

i.   Inconsistency of recording validation actions undertaken by officers within the checklist held in Uniform; and
ii.   Instances when Uniform has either automatically locked (which is the preferred process as it evidences this part of the process is complete) or not locked, or deleted the checklist once the application was validated (system error).

7.6 In addition, Internal Audit found that when more than one parish council is consulted the Uniform system does not always store each letter of correspondence. An email audit trail is available though, thus evidencing that parish councils had been appropriately corresponded with.

7.7 Internal Audit has brought this to the attention of the Systems Processing Officer who is investigating these issues. The Development Team Manager has advised that to fix such issues assistance may be required from corporate IT or the software provider. The Head of Development Management has advised Internal Audit that it is her experience that where such issues in the system have been previously identified and raised with the software provider, that fixes are not always forthcoming.

No.	Recommendation	Risks	Agreed Action	
2 (M)	Formalise the quality assurance process to provide management oversight that the processes at each stage: accepting and validating have been followed correctly and in a timely manner.	Errors or omissions within the processing of planning applications are identified late in the process.	This follows on from Recommendation 1 and will introduce sampling every six months.	
			Person Responsible	Due Date
			Team Leader Planning Support	31st July 2022

No.	Recommendation	Risks	Agreed Action	
3 (M)	Investigate and remedy the Uniform system errors. Should these not be able to be remedied through software updates or similar, alternative arrangements to ensure accurate record keeping should be implemented.	Impaired audit trail within the planning application process. Incomplete record keeping.	System issues to be raised with IT and software provider.	
			Person Responsible	Due Date
			Systems Processing Officer	30th April 2022 (this post is currently vacant)

Determination of Applications

7.8   The Uniform system includes a dashboard that allows Officers and Managers to monitor the progress of planning applications. This enables officers to have oversight of those applications approaching the determination period. This monitoring tool, if utilised by officers as intended, should prevent decisions from being made after the statutory, or agreed determination period.

7.9   The adopted officer Scheme of Delegation means that the majority of applications are determined under officer delegated powers, leaving the Development Control Committee (DCC) to consider the more contentious applications. Minutes for the Development Control Committee are published on the Council's website.

7.10   From June 2021 a new process has been implemented to support referrals to the Development Control Committee (DCC). This was introduced to ensure that all requests for referral to the Chair of the DCC are properly recorded and help mitigate against planning applications referred to DCC being determined under officer delegated powers. Internal Audit sampled one such referral and found that the new process had been complied with.

7.11   A Delegated Panel that consists of six officers, who on a rota basis (two officers each day) review and assess the information presented in support of the case officer's planning application recommendation. The review by Panel officers offers independent oversight and consideration of the comprehensiveness of the information being presented to support approval of decisions. Factors considered, for example, (as evident from review of the case officer's report) includes historical applications, consultee feedback, biodiversity reports, the Local Plan, and regulatory requirements.

7.12   Internal Audit sampled five planning applications that went to the Panel between 28th October 2021 and 3rd November 2021. Internal Audit confirmed for the five planning applications two officers of the Panel had reviewed them, and these officers were on the list of Sub-Delegations. Internal Audit found no evidence that decisions were made by default and not without due consideration.

7.13   The Town and Country Planning (Development Management Procedure) (England) Order (Article 25 and Schedule 4d) states that parish and town councils should be consulted. This would occur when a '*development, in relation to which an application for planning permission has been made to the Secretary of State under section 293A of the 1990 Act (urgent Crown development: application)(a), where that development is likely to affect land in the area of the parish council*'. In all other cases the Council should notify a parish council when an application is received that could affect land in the respective area. In determining the application, the Council must take into account any representations received from the parish council and must not make a determination before either:

i.   The council of the parish inform them that they do not propose to make any representations;
ii.   Representations are made by that council; or
iii. The period of 21 days of the notification to them has passed.

7.14 Validation includes checking that the correct fee has been received, that there are no errors in the required paperwork and the right type of application has been submitted. The verification process could determine that an application is invalid and therefore it would not be in the public interest to share information before the validation process is complete. Statutory Consultees are therefore consulted once the planning application has been validated. They can request an extension to the 21 days to respond which will be considered by the Case Officer.

7.15 Internal Audit reviewed all 411 planning applications received between 1st April 2021 and 30th June 2021 that had a reference ending with either FUL, HHOLD, COU, ADV, LBC, TEL or CPE[4] and found that parish and town councils were consulted in line with Government regulations.

7.16 Between 1st April 2021 and 30th June 2021 there were 729 planning applications of which 675 included the requirement to either notify or consult with a parish or town council. Of these 675:

i.   263 (39%) responded within 21 days;
ii.   208 (31%) responded but took longer than the 21 days; and
iii. 204 (30%) did not respond (It should be noted, not commenting is an acceptable response to the consultation).

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[4] FUL and COU: - both reflect planning permissions including Changes of Use, HHOLD: Household, ADV: Advertisements, LBC: Listed Building Consent, TEL: Notifications Telecom, CPE: Certificates of Lawfulness of existing developments

No.	Recommendation	Risks	Agreed Action	
4 (M)	Management should explore perhaps through the Parish and Town Council Forum (if reinstated), or alternative avenues, potential options for improving the level and timeliness of responses to planning applications from respective councils.	The planning decision-making process may be less informed. The Parish and Town Council Forum may not be represented by all town and parish councils, in particular those that choose not to respond.	Development Management will engage in the Parish and Town Council Forum, should it be re-established. Furthermore, we will analyse data on applications where a response is not received from the parish or town council to identify trends and investigate barriers with these councils.	
			Person Responsible	**Due Date**
			Development Team Manager	31st December 2022

7.17 To support the Council to meet the Government's requirement for statutory determination regulatory periods or for Development Management to present reports to Committee, it is important that consultees respond to communications within 21 days. If a statutory consultee does not respond within the prescribed period the Council can proceed to make a decision on the planning application, although they are often reluctant to do so without their required specialist input and expertise, especially on Major applications. Internal Audit sampled 13 planning applications received between 1st Jan 2021 to 31st June 2021 to determine whether statutory consultees (excluding town and parish councils) responded within 21 days and found (see Table 1 below):

i.   54% responded within 21 days;
ii.   21% took longer than 21 days to respond; and
iii. 25% did not respond.

Table 1: Analysis of Responses from Consultees (excluding town and parish councils)
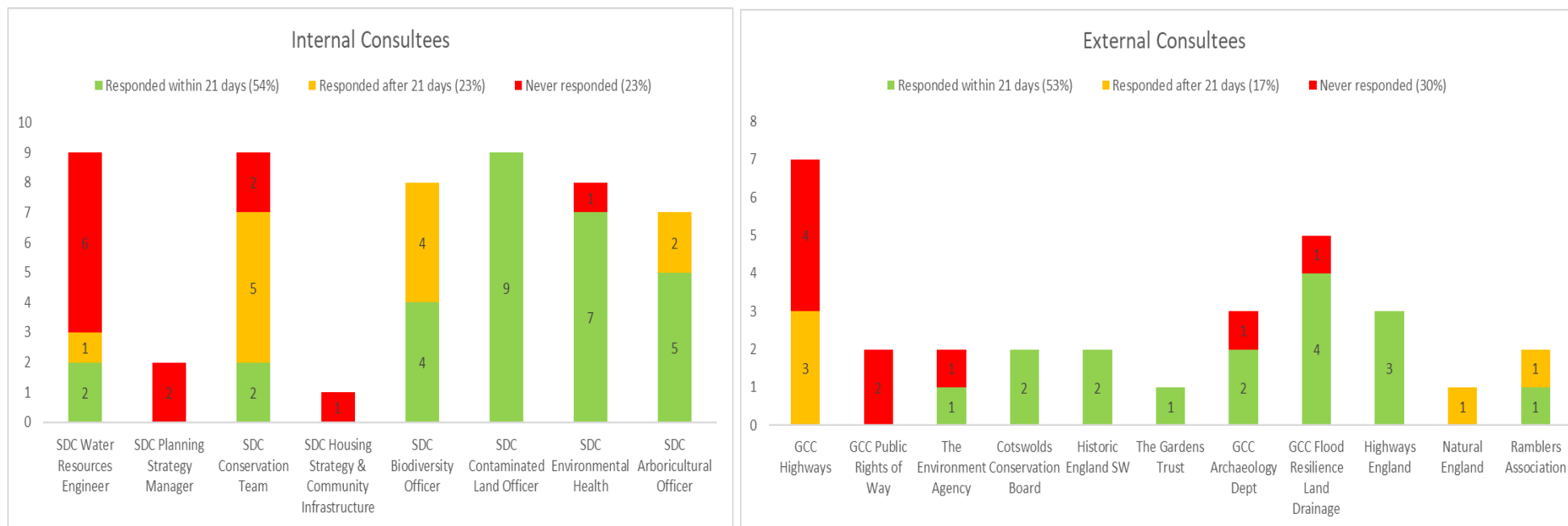
7.18 Audit testing highlighted delays from both internal and external statutory consultees. Internally, the key outliers being the Biodiversity Officer, Conservation Team, Water Resources Engineer, Planning Strategy Manager and externally, the Gloucestershire County Council Highways Team and Public Rights of Way. The Development Team Manager advised Internal Audit that the outcomes for timely responses from internal statutory consultees may be skewed. These responses are often provided verbally, or via email and are not always subsequently captured within Uniform. The service is in the process of ensuring that all consultees are signed-up to the newly launched Public Access website. This requires responses to be channelled through this route, therefore going forward this issue should be addressed and record keeping improved. During the interim period, management should ensure that all such responses are formally documented and retained.

7.19 It is noted that the Council has a greater opportunity to influence the timeliness of responses from internal consultees whilst this would be more difficult for external consultees. The Head of Development Management informed Internal Audit that the issue of delays in receipt of responses from external consultees has been escalated in the past to the previous respective Strategic Director. It is acknowledged however, that this issue is still ongoing and when explored previously was fundamentally due to external staff resource issues. In addition, the Head of Development Management advised that the Government have mooted that the current option for requesting an extension of time for determinations may be abolished going forward. It is therefore important for this issue to be pursued once again.

No.	Recommendation	Risks	Agreed Action	
5 (M)	Management should engage with the respective internal and external statutory consultees to further explore viable solutions that could support the return of timely communications (within the prescribed 21-day period). Ahead of this and moving forward management should ensure that all responses are in writing and documented within Uniform.	The planning decision-making process may be less informed and effective.	For internal consultees, we shall continue the implementation of public access, monitor, and evaluate response times, and raise with service leads as necessary. We shall monitor and evaluate response times for external consultees against the 21-day target. Where continued issues of poor response times are identified communication with external consultees may be required at Strategic Director of Place level.	
			Person Responsible	Due Date
			Head of Development Management	30 April 2022

7.20   Responses provided by consultees are considered by officers however they are not automatically replied to. This is in line with the Council's website statement "It is not our policy to acknowledge or enter into correspondence on comments made relating to planning applications". Internal Audit established from discussions held with the Development Team Manager that this is a statement of procedure and will be reviewed as part of the Corporate Standards for Customer Service project.

7.21   The Statement of Community Involvement encourages anyone who wishes to make a response to a planning application to do this either by:
i.   The public access system on the Council's website www.stroud.gov.uk;
ii.   Email: planning@stroud.gov.uk; or
iii.   Writing to: Planning, Stroud District Council, Ebley Mill, Stroud, GL5 4UB

7.22   Internal Audit is also aware of a fourth type of response method where emails are sent direct to a named officer. This mix of response options could lead to a delay in communications between the parties for various reasons, and offers the opportunity for there to be a lack of transparency as to who will respond and the ability for management to ensure oversight of appropriate and timely replies.

7.23   The service does not have a single repository or digital platform available for all communication flows, and therefore no service oversight or reporting metrics on timely communications currently exist.

No.	Recommendation	Risks	Agreed Action	
6 (M)	Management should consider options for strengthening the internal control environment for the management and monitoring of communication flows as part of the service redesign strand of the Council's Fit for the Future modernisation programme.	Lack of, or untimely, responses could have a negative impact on the Council's reputation.	1. The service will review its templates to address concerns over potential for multiple points of contact with a 'digital first' approach. 2. The service will engage fully in any improvements brought in through a digital platform or the Fit for the Future (FFF) programme, but this is beyond the direct influence of the service.	
			Person Responsible	**Due Date**
			1. Systems Processing Officer	1. 31st December 2022
			2. Team Leader Planning Support	2. to be determined by FFF programme

7.24 The Community Access and Engagement Manager is currently leading on a council wide project to review and develop Corporate Standards for Customer Service. The design, consultation process and delivery of the new Corporate Customer Service Standards provides an opportunity to consult both internally and with Members. There will also be an opportunity for the Council to engage with the community to enhance and develop these standards. The timeline for these to be in place for the Development Management service is could be early 2022 however delivery will be aligned with the corporate programme rollout. This should ensure going forward these are standardised, transparent, and measurable.

Discharge of Conditions

7.25   Although planning permission may be given there can be certain conditions that must be met before building work can commence, such as approval of external materials or landscaping and boundary schemes. Not all planning conditions require discharging, for example: a condition that building work takes place within three years. Through discussion with the Compliance Technician Internal Audit established the process in place for encouraging planning conditions to be discharged before building works begin, and where breached the onward referral to Planning Enforcement.

7.26   Internal Audit reviewed from the period 30th October 2013 to 21st February 2020:

   i.   One sample case for a walkthrough test. All documentation was available to view on the Uniform system, including referral of the case to the Enforcement Team; and
   ii.   Sampled five planning conditions assigned to five separate planning applications (that required discharging prior to building work starting) and found that planning condition information for all five were sent to the Council, reviewed, and discharged as expected.

Information, Advice and Guidance

7.27   The Council's website provides comprehensive guidance accessible to the public. It also provides a search facility of historical applications and decision notices. Adoption of a Development Management Charter would further support transparency of service standards, this could help manage expectations and better inform the public and consultees. Examples of such Charters are publicly accessible for the service to review and consider content for inclusion. (see Appendix B)

No.	Recommendation	Risks	Agreed Action	
7 (M)	The service should develop a Development Management Charter.	Misunderstanding and dissatisfaction from the public, leading to complaints and damage to the Council's reputation.	Following the publication of Corporate Customer Service Standards, the service will develop a Development Management Charter if necessary.	
			Person Responsible	Due Date
			Development Team Manager	31st December 2022

7.28 Internal Audit has established through discussions held with the Head of Development Management that prior to Covid-19 Development Management attended the Parish and Town Council Forum to provide support and advice on the planning application process. Once the current health restrictions allow, and should the Forum meetings be reinstated Development Management intend to continue to participate in these.

Risk Management

7.29 There are currently three operational risks on Excelsis, themes being: staffing, IT failures and Covid-19 however the inherent risks that could impact upon the end-to-end process for administering and determining planning applications have not been captured.

No.	Recommendation	Risks	Agreed Action	
8 (M)	The key inherent risks associated with the end-to-end process for administering and determining planning applications and the internal controls in place to manage these should be captured and documented within Excelsis.	Poor controls (design, adequacy, or effectiveness) do not effectively manage risk, or reduce risk to an acceptable level. This could lead to a failure to achieve statutory requirements, corporate and service objectives. Key risks for the end-to-end process are not identified, meaning that effective controls may not be in place.	The service will continue to review risks as appropriate. However, many of the risks faced by the service (such as the number and type of applications) are subject to market forces and the legislative and fee arrangements are matters for central government.	
			Person Responsible	**Due Date**
			Head of Development Management	1st April 2022

Objective: To determine whether there are adequate performance management and reporting arrangements in place and that these are operating effectively.

7.30 The Council's service performance metrics for determining planning applications are aligned to the national data set parameters:

i. 60% of major developments will be determined within 13 weeks;
ii. 70% of minor developments will be determined within eight weeks; and
iii. 70% of other developments will be determined within eight weeks.

7.31   The service provides performance data to the Department for Levelling Up, Housing and Communities and Ministry of Housing and Communities and Local Government for inclusion in the national data set. Each quarter the Government publishes planning application performance statistics for English Councils calculated over a 24-month period. From July 2019 to June 2021 the published figures indicate that the service is performing highly with:

i.   94% of decisions for Major developments being made within the statutory regulatory determination periods; and
ii.   94.7% of decisions for Minor and Other developments being made within the statutory regulatory determination periods.

7.32   The Council's performance and risk management system (Excelsis) includes the three National Performance Indicators that quarterly measure whether planning applications were determined within Government targets. As of September 2021, Excelsis records that the service is continuing to perform well against these, as follows:

Government Target	Output
60% of Major developments will be determined within 13 weeks	86%
70% of all Minor developments will be determined within eight weeks	87%
70% of all Other developments will be determined within eight weeks	92%

7.33   Internal Audit sampled 15 planning applications (across major, minor, and other developments) received between 1st January 2021 and 30th April 2021 and found that 12 (80%) were determined either within the statutory determination period or by the agreed extension date[5] for decision-making. The disparity of the % figure in relation to the above table could be due to the size of sample selected. Internal Audit reviewed the quarterly government return (P2 Q3 20) for a sample of 15 applications and found no errors in the quality of data.

7.34   It is evident from a review of available prime documents, that for the period December 2020 and September 2021, the Strategic Director of Place, Development Control Committee, and the Environment Committee received Development Management statistics and reports. In addition, in April 2020 Development Management began circulating Development Management performance statistics to all Members, to provide an overview of the performance of the service. These figures are provided on a half yearly basis (April and October) via an information item on Development Control Committee, and then to all members via the Members Weekly Update and include 'Application and Enforcement Performance Statistics'.

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[5] Agreements to extend the time for determination can be made for Major, Minor and Other applications that would normally be determined within eight or 13 weeks. The agreement must be in writing between the applicant and the Council.

7.35 Going forward, there is an opportunity for the service to consider the benefits of further developing their performance management information through the introduction of additional metrics. The service could monitor, for example the efficiency and effectiveness of various aspects of the Development Management service delivery, and adherence to the future Corporate Customer Service Standards.

7.36 Internal Audit have been advised by the Development Team Manager that the service is engaging with the Planning Advisory Service (PAS) to commission a bespoke service to aid the development of the service. In addition, going forward the service may wish to consider utilising the PAS's recently refreshed (launched in August 2021) Development Management Challenge Toolkit. This would provide a 'health check' against current practice, and should any improvement areas be identified formulate an action plan to drive further service improvements. The Development Management Challenge Toolkit is based on what PAS learned from high performing councils. It is designed to challenge and improve a council's service and is structured to help engagement with staff, managers, councillors, and other stakeholders of the Development Management service.

No.	Recommendation	Risks	Agreed Action	
9 (M)	Management should consider the benefits of further developing the service's performance management information, through the introduction of additional metrics to aid management of the service and supervision.	The performance management arrangements do not support or demonstrate the delivery of corporate and service objectives, targets, and outcomes.	(1) Service is already working on improving performance management information and data sets. (2) PAS consultancy arranged.	
			Person Responsible	**Due Date**
			(1) Systems Processing Officer (post currently vacant)	(1) 31st December 2022
			(2) Head of Development Management	(2) 31st January 2022

7.37   At the end of October 2020, the service launched a 'Planning Application Service - Feedback' survey. This is sent to applicants and agents with the decision notice regardless of the decision type for example, permissions and refusals. It is currently limited to the most common types of applications and to date has not been rolled out for Prior Notifications or Pre-application services. Going forward the service will build upon the survey to further seek the opinions of their customers and use that feedback to shape and improve the service, and delivery.

7.38   At the July Audit and Standards Committee, Members had requested Internal Audit to consult with parish and town councils to gain their views of the Council's planning service. Internal Audit contacted five councils to ask:

   i.   What are the current strengths of Stroud District Council's planning service; and
   ii.   Do you have any suggested improvement areas?

7.39   At the date of issue of this report, Internal Audit had received responses from three parish councils. Comments received relating to the area under review concerning communications and decision making have been included within this report for consideration by management. A summary of these can be found at Appendix C.

8 Appendix B Examples: Development Management Charter

South Gloucestershire Council   https://www.southglos.gov.uk/Documents/PTE070404.pdf

Sandwell Metropolitan Borough Council www.sandwell.gov.uk/info/200275/planning_and_buildings/1081/development

East Northamptonshire Council   https://www.east-northamptonshire.gov.uk/downloads/file/3934/development_control_charter

Kirklees English Metropolitan Borough https://www.kirklees.gov.uk/beta/planning-applications/pdf/development-management-charter.pdf

Lichfield District Council: https://www.lichfielddc.gov.uk/planning/development-management-customer-charter/1

Harrogate Borough Council   https://www.harrogate.gov.uk/planning-development/planning-customer-charter

9 Appendix C: Parish Council Survey Responses

Category	Strengths	Improvement Opportunities
Communications	We are aware of the large number of parishes with whom SDC deals and before Covid found the planning service responsive and helpful.	During lockdown and currently, it has proved almost impossible to speak to anyone on the telephone.
	Their strength is their willingness to help parish councils with advice about planning documents. For example, Neighbourhood Development Plans, and Community Design Statements. And to give more general advice about obtaining grants, being successful with parish projects and schemes. The parish council have dealt with several different officers at different times, and they have all been really helpful. They are also helpful in explaining how to best use planning legislation and guidance for statutory comments. For example, a talk about changes to the view of 'pastiche' in listed building extensions.	It would help communications if the planning staff were back full-time in their offices at Ebley Mill. It is difficult to speak to them when they are working from home and email responses are not always timely.
		It is sometimes difficult to respond to planning applications in the time allowed. When requesting extensions, the parish council has experienced issues with getting the permission prior to the meeting.

Category	Strengths	Improvement Opportunities
Communications Cont'd		Being able to contact the planning officer is very difficult. Getting call backs when requested is not always the most reliable. Being able to talk to the relevant planning officer is even harder!
		On an infrequent number of occasions, the parish council has had to abandon its meetings due to access to the planning applications. It would be helpful if commenting wasn't switched off quite so rapidly passed the date to enable the parish council to add a response even after the deadline if the application is not decided. Residents have reported that the website is very difficult to manoeuvre around, this puts them off responding.

Category	Strengths	Improvement Opportunities
Decision Making	On standard planning applications for existing housing, SDC generally supports the view of the parish council that provides balanced decision making. It would be unrealistic to expect SDC planning to always agree with us on planning issues but, we find SDC generally gives the council a fair hearing and go out of their way to consult.	Regarding larger scale development, it is felt that SDC planning can be 'heavy handed' and dismissive and in these cases, it would be reassuring to have a more reasonable platform at the committee stage for presentation of issues affecting a parish.
	A strength is their commitment to keeping a local plan in place to avoid unwanted development across the district.	Their commitment to the environmental policies should be recognised.
		A number of applications had decided important factors associated with reserved matters and have not given the parish council sufficient opportunities to discuss matters related to these. We appreciate that reserve matters do come to the parish councils but feel that sometimes the main pointers have all been discussed at committees for the resolution, and it is very difficult to change by the time the reserved matters are put for resolution. The parish council would welcome the opportunity to discuss reserved matters in detail prior to decision.

Category	Strengths	Improvement Opportunities
Decision Making Cont'd		Sometimes the maps and plans provided by the developers are unreadable, a more consistent approach to acceptable plans could be delivered to support parishes.
		When a number of planning applications are applied for a whole road or area, it would be useful if SDC would consider them as a more united application rather than lots of little ones to ensure the infrastructure is delivered as required.
		Regard paid to comments by parish councils on planning applications or local plans. The planners do not give enough consideration to parish council comments or to local knowledge. It would help if the local knowledge was acknowledged or addressed as it can sometimes appear that it is being disregarded. For example, comments that the proposed site for development within the parish floods every year, and the council had an alternative suggestion, but it seems to have been completely ignored.