Planning Service Peer Challenge

Fylde Borough Council

On-site 5th to 7th October 2022

Feedback Report
January 2023

Contents

1. Background & Context

1.1   On 8th June 2022 Fylde Borough Council Planning Committee agreed the scope for a Planning Advisory Service (PAS) review of the Planning Service. PAS set out the process for a Peer Challenge in a proposal letter on 27th June 2022. The PAS proposal was agreed on 14th July 2022 and the on-site dates for the peer challenge agreed as 5th-7th October 2022. This report is a summary of the findings of the peer challenge.

1.2   Peer challenges are managed and delivered by the sector for the sector and are aimed at helping planning services review what they are trying to achieve; how they are going about it; what they are achieving; and what they need to improve. They are tailored to meet individual Councils' needs and designed to complement and add value to a Council's own performance and improvement activity.

1.3   The PAS peer team challenged the planning service in a constructive and enabling way including the role planning plays in delivering the council's corporate objectives, how planning links to other parts of the council, how it delivers customer service, decision-making processes, enforcement, and approaches to working with its communities.

1.4   The peer challenge team assessed the service using a series of pre-agreed areas of focus linked to five main themes:

Theme	Areas of focus*
Vision and leadership - how the authority demonstrates leadership to integrate planning within corporate working to support delivery of corporate objectives	• Leadership, Management & Administration – the operational practices, processes, and reporting procedures • How well is the planning service supporting local priority outcomes? • Is there a clear and locally distinctive planning vision for the area together with a clear delivery strategy?
Service Delivery & Performance Management - the effective use of skills and resources to achieve value for money, and the effectiveness of processes (and the roles of officers and members) in decision-making on development proposals.	• Does the council provide a good service to users? • Does the council have up to date planning policies in place that support and deliver the vision and priorities of the council and the local community? • Decision Making – the processes and 'flow' in place for decision making • Performance against statutory / internal targets • Enforcement – an examination of the policy / approach to enforcement • Training and support for planners
Community and Partnership Engagement – how the authority understands its community leadership role and community aspirations and uses planning to help deliver them. how the	• Engagement and communication with town/parish councils and the public throughout the planning process • Training and Support for community groups • How well the council work with statutory consultees, other councils, agencies, and communities to coordinate where necessary and work productively

authority works with partners to balance priorities and resources to deliver agreed priorities.	• Does the council engage effectively with neighbouring planning authorities to resolve strategic cross boundary and sub-regional issues?
Achieving outcomes - how well the service leverages national and Local Planning policy to deliver the sustainable development and planning outcomes its community requires.	• Role planning plays in delivering the council's corporate ambitions (e.g. linked to the Corporate Plan) • Delivery of the Local Plan vision and outcomes

* The areas of focus are based on the scope set out in the Fylde Planning Committee Information Item No.9 on 8th June 2022 (see Appendix A)

2. Executive Summary

2.1 The council communicates its corporate priorities well. The priorities are well understood by staff and members. The Leader and Chief Executive emphasise 'Efficiency' and 'Customer service' as over-arching objectives. Continuous improvement and the empowerment of staff and members are key people-based priorities.

2.2 Fylde adopted its reviewed Local Plan in 2021. It is clear about the role of spatial planning in the delivery of the council's corporate objectives. The Local Plan received high levels of member engagement during its production. It is also well-referenced by planning committee members in decision making.

2.3 Fylde is delivering an impressive portfolio of development projects. Funds are being leveraged in for regeneration and infrastructure projects. There are successful partnerships with neighbouring councils to deliver two Enterprise Zones. Design plays an important role in Fylde. The service has produced supplementary planning documents (SPDs) to guide good design. There are numerous examples of good design in housing, retail, and commercial developments.

2.4 Planning, Housing & Regeneration teams enjoy good relationships. The new structure is an opportunity to embed Planning earlier in corporate projects. This will ensure that solutions to planning issues happen on time rather than as surprises late in the process. The council recognises the importance of strengthening the governance of projects and programmes. To achieve this, and alongside the new structure, the council needs a process for delivering corporate projects. This will achieve:

- the agreement of priorities
- prioritisation of activities
- resources going to the right corporate priorities in the event of competing demands
- reduced miscommunication between service areas and
- supporting a culture of good risk management and learning.

2.5 The Council's Leadership are now looking at how Fylde will develop over the next 15-20 years. Some of Fylde's growth ambitions sit slightly uncomfortably with other corporate priorities. There is a tension between growth and protecting the environment and heritage. It is therefore important to establish a process to co-ordinate, capture and agree the focus for the Local Plan beyond 2032 and being clear about the alignment of growth and environmental ambitions.

2.6 The planning service is performing well against statutory targets. The council consistently exceeds its housing and affordable housing targets. It is comfortably passing the Housing Delivery Test (HDT). It processes over 90% of planning applications within statutory time targets, but this is reliant on a normalised approach to agreements to extend decision times. Despite this the customer experience is mixed and there is underlying customer dissatisfaction. This is largely based around the timeliness, clarity, and consistency of communications. Also, the development management processes often result in 'bottlenecks' that slow down decision-making.

2.7 The Development Management Service appears to be adequately resourced for the volume of work it handles, however there needs to be clearer processes and responsibilities to ensure that resources are allocated more efficiently. "Delegating Up" is a phrase heard directly and implied on several occasions. Decisions, queries, complaints, and validation issues end up with senior officers. This results in additional work. It raises questions of whether responsibilities and empowerment are in the right places. It also reduces the capacity available for reviewing and improving planning processes.

2.8 There are opportunities to streamline, improve and de-risk the processes. Particularly the application assessment and decision sign-off processes. This is recognised by the planning teams. They are keen to consider efficiencies such as:

- reducing double-handling/sign-off procedures
- root cause analysis of validation issues
- more focused report writing and presentations for the Committee.

A process review is excellent opportunity to review how resources are allocated and the roles and responsibilities within the team. It is also an opportunity to develop and find ways to empower staff. This is a key corporate objective.

2.9 Some stakeholders report feeling that they are "*held at arms'- length*". Others feel "*neutralised by responses they receive from the planning department*". The result is that planning process becomes less transparent and this result in frustration and gaps in knowledge. It affects stakeholder and community ability to engage in the process. The relationships with town and parish councils are important. The Town and Parish councils would benefit from regular and formalised communication (e.g. re-thinking the planning elements and timing of the current Quarterly Parish Liaison Meetings) and training. This would build a shared understanding of the issues faced by each group. We understand that work is underway to deliver this.

2.10 Engagement on important applications with Members should happen earlier in the decision-making process. This would give more confidence to communities, developers, and investors.

2.11 The planning service is keen to show that it has acted on the recommendations from a peer challenge in 2012. None of the 2012 recommendations have been ignored. The actions taken, and the outcomes have not been well recorded or communicated. This needs to change when taking forward and communicating actions on the recommendations from this peer challenge. The peer challenge team summarised its review of the 2012 recommendations as follows (during the verbal on-site feedback session):

2.11.1 None if the recommendations have been ignored
2.11.2 The actions taken and subsequent outcomes have not been communicated
2.11.3 Some recommendations have moved on e.g. following the delivery of the Local Plan
2.11.4 The following recommendations would benefit from continued attention:

2.11.4.1   DM Committee arrangements (R3, R4)

2.11.4.2   DM Process and procedures review (R5)

2.11.4.3   Planning's corporate role (R7)

2.11.4.4   Understanding the views of service users (R11)

2.11.4.5   Re-promotion of Neighbourhood Planning (R12)

2.12 Fylde is facing a significant period of structural change. The Boundary Commission concluded that residents should be represented by 37 councillors. This is fourteen fewer than current arrangements. Following local elections in 2023 the Borough will contain 17 wards. One single-councillor ward, twelve two-councillor wards, and four three-councillor wards. The council has impressed with its preparations for these changes. For Planning, this is an opportunity to review and refresh its processes. It is an opportunity to create a new cohort of members actively involved in the planning process.

3. Key Recommendations

This section summarises the key/priority recommendations. More detail on each one can be found in the main body of the report. The recommendations are numbered to sequentially flow through the four thematic areas, as opposed to being ranked in any priority order.

It is important that the Planning Service integrates these recommendations into its own service plan and is clear about 'what success looks like'. This will help to ensure that the recommendations in this report are in context and aligned to a clear set of outcomes and measures. It is also important that senior members and officers sign up to and support the implementation of the recommendations.

R1	**Set up a politically representative board of councillors and one for senior officers to oversee and input into the production of the next Local Plan period beyond 2032.** There is a tension between growth and protecting the environment and heritage. It is therefore important to establish a process to co-ordinate, capture and agree the focus for the Local Plan beyond 2032. A formal governance structure will help to set the vision and longer-term aspirations. It will provide clarity and manage the tensions between economic growth, the environment and preservation. It will also strategically address the housing and homelessness challenges. Obtaining clarity on key strategic issues as early as possible in the plan production process is a critical factor in making the process resilient to changes to the planning system and election cycles. *(Paragraphs 7.7 – 7.10)*
R2	**Strengthen the governance structure to give Planning earlier and better strategic oversight of major development schemes.** Embedding Planning input much earlier in corporate projects will help promote planning as an enabler rather than a blocker to development. This will give senior leadership comfort that projects are moving forward positively. It will improve risk management and ensure processes and protocols are followed. The governance arrangement could consist of 2 'Boards'. A Planning and Regeneration Board (officers) - this holds more operational / professional focused conversations across service areas. The other board operates at a strategic level. It focuses on bringing the politics and regional considerations together. The operational Board reports to the strategic Board. This ensures that political and strategic considerations feedback directly. This will help keep the Planning Service aligned with the political landscape. *(Paragraphs 7.11 – 7.13)* Planning should not work in isolation. It should be formally involved from the beginning so that solutions to planning issues are found in a timely manner rather than appearing as surprises later in the process. *(Paragraphs 7.14 – 7.15)*
R3	**Delegate decision making among a greater number of staff.** The planning department has experienced and competent staff at all levels. The service can be confident and allow decision making across a greater number of staff. This will help reduce failure demand resulting from process

	'bottlenecks' and communications issues. It will empower staff; create capacity and support career development. *(Paragraphs 8.4, 8.5)*
R4	**Create a clear set of processes for the Development Management Service.** It is unclear where responsibility lies for different parts of the process. This is creating inconsistencies and an imbalance in the work of senior officers. "Delegating Up" is common. Decisions, queries, complaints, and validation carried out by senior officers. This raises questions of whether responsibilities and empowerment are in the right places. This affects senior officers' capacity for reviewing and improving planning processes. *(Paragraphs 8.6)*
R5	**Continue to review processes as part of 'business as usual'.** Often improvement work can become a one-off project - project – Fylde planners are embedding process reviews as part of their regular team meetings. This creates opportunities to streamline and improve processes. The focus should be on reducing double-handling/protracted sign-off procedures and addressing validation issues. See also Recommendation R8. *(Paragraphs 8.7)*
R6	**Reduce the reliance on Extensions of Time (EoTs).** Linked to Recommendation R5. A key outcome of service improvement work should be the reduction of Extensions of Time (EoT). EoTs often result in a build-up of applications without a decision. This has a negative effect on the customer experience and service. (Paragraph 8.4.2)
R7	**Work through the** PAS Development Management (DM) Toolkit. **as part of ongoing process and service improvement work.** Linked to Recommendation R6 above. The toolkit provides a series of improvement challenges for the development management service. It includes ideas for what an 'excellent' DM service looks like. This could complement a service improvement plan and ongoing process improvement work. *(Paragraph 8.8)*
R8	**Produce a Planning Service Plan that has clear and direct links to the corporate priorities.** The Planning Service needs a clearer sense of its own objectives and priorities. These need a direct link ("golden thread") to the corporate priorities. This will allow officers to better allocate their limited time. The staff appraisal process should also provide a clear link back to the service plan. An outcome-focussed service plan will build upon the good work that the Service is already delivering and including service standards will help reflect the more pro-active approaches to customer service that the Council desires. *(Paragraph 8.9)*

R9	**Provide additional investment in the planning service to bring it up to date with the technology and cyber-security needs of a modern planning service.**
	Officers need to be confident in the new back-office IT system. It needs investment to get it fully functioning. There is presently a potential data-gap risk in the system. There are also processes and technology that need updating. This includes access to digital plans, telephony, and web-access kit available off-site. Some staff use their own technology; this represents a potential data-security risk.
	(Paragraphs 8.11, 8.12)
R10	**Establish an Agent's/Developer's forum, with an external chair.**
	A Developer Forum will help communication between the Planning Service and its customers. A Forum allows discussion/resolution of issues. All can agree on a specific and timetabled number of issues / standing items to work on and co-produce. These arrangements require year-on-year commitment to get them working well. Consider various formats that work for all involved and encourages attendance and engagement.
	(Paragraph 8.14)
R11	**Enforcement priorities and protocols need to be made clear.**
	Members and town/parish councils are unclear about how enforcement works and why some things are not considered important enough to enforce. The service needs to help stakeholders understand the process, the priorities, and the practicalities of carrying out enforcement action so that expectations are clear and can be managed. The service should refresh and make available the Enforcement Policy statement, setting out what types of planning breach are a high priority and what options there are to resolve breaches.
	(Paragraph 8.15)
R12	**Optimise the council's webpages as an engagement tool and promote it as such.**
	The council website can provide service users with up-to-date information on planning applications. The website is not used by agents as much as it could be. Keeping it up to date and relevant, will drive more traffic to it and away from planning officers. It needs to be promoted to agents and customers.
	(Paragraph 8.16)
R13	**Committee practices and procedures should be kept under review. This will ensure an ongoing, open, and engaging experience for the public.**
	Planning Committee is the service's 'shop window'. It demonstrates how planning and place-shaping decisions are made. The Fylde Planning Committee observed was exemplary in many ways (see Paragraphs 8.16-8.21). There are 'continuous improvement' opportunities that will allow more time for the strategic, larger, and more contentious schemes. Paragraphs 8.25 – 8.26 contain suggestions for items to keep under review, including:

	• A proportionate approach to the detail contained in officer reports and presentations. This will allow officers and members more time to focus on and debate the main issues. • Getting member's valuable input outside of the committee setting. e.g. in pre-app discussions, through technical briefings or developer's forums. Each well before an application comes to committee. • The boundary changes represent opportunities to broaden the planning experience and knowledge of a wider group of members. • Opportunities for junior case officers to gain experience by presenting at Planning Committee. This is also an opportunity to free up senior officer time. • Reviewing the application call-in terms. Resolve Parish /Town Council issues through discussion or the provision of information (rather than at committee). *(Paragraphs 8.10, 8.25)* Recording and broadcasting the Planning Committee live will encourage a wider audience for planning decisions. This is standard procedure at most councils. It will help make the process much more transparent for stakeholders and communities. Having access to recordings can also serve as a good improvement and training tool. *(Paragraph 8.26)*
R14	**Introduce a more structured approach to obtaining and using customer feedback.** The Planning Service's approach to feedback should align with the corporate approach. The evaluation of customer feedback should form part of the performance reporting process. Doncaster Council has a customer feedback survey that goes out on individual decisions. An agent/developer Forum is another way of obtaining customer feedback (see Recommendation R10). *(Paragraph 9.9)*
R15	**Take proactive steps to improving working relationships with Town and Parish Councils** Interaction with Town and Parish Councils is important. It helps ensure effective community interaction with the Planning system. The need for better communication between the council and its communities is recognised. The council is keen to improve things. The recommendations in this report will help improve customer service. The Peer Challenge process should also be a catalyst for: • Providing training for council and Town/Parish Council Members. • Facilitating community involvement early on in master planning, and/or through Neighbourhood Plans. • Establishing a pro-active and structured approach to engaging with Town and Parish Councils. A re-think is required to the purpose and outcomes of the current regular Town and Parish Council Forum alongside an annual training programme. *(Paragraphs 9.11 – 9.13)*

R16	**Review the approach to developer contributions.**
	Fylde does not operate the Community Infrastructure Levy (CIL). It relies on Section 106 (S106) developer contributions. The Levelling Up & Regeneration Bill (LURB) has a provision for an 'Infrastructure Levy'. The Infrastructure Levy will operate similarly to CIL in that it will be for infrastructure requirements across the borough, rather than a site-specific S106 agreement (it is also proposed that S106 may operate only on large schemes). *(Paragraph 10.9)*
R17	**Deliver the recommendations of the review/audit of Section 106 arrangements carried out in September 2022.**
	The Levelling Up & Regeneration Bill (LURB) is proposing changes to developer contributions. The way Section 106 operates may change. As well as Recommendation R16, the council should also implement the recommendations of the Section 106 audit. The priority recommendations include: • continuity/resources (just one member of staff is currently involved in monitoring payments and spend) • better documented procedures • better monitoring of the collection and status of section 106 monies *(Paragraph 10.10)*
R18	**Investigate how closer working relationships can be forged with the Housing Team.**
	Fylde's Housing Team expressed a desire to work more closely with Planning to address a rapidly growing homelessness problem. This is a corporate issue and links into the Borough's *Homelessness and Rough Sleeping Strategy 2020-2025.* *(Paragraph 10.8)*

4. Scope of the review

4.1. Fylde Borough Council requested that the Planning Advisory Service (PAS) carry out a peer challenge of its planning service. The over-arching objective of the peer challenge was to consider how well the planning service is focusing on and assisting in delivering the organisation's short, medium, and long-term strategic priorities.

4.2. The PAS peer challenge is carried out by fellow planning professionals with extensive local government experience and a senior councillor.

4.3. The peer challenge focuses on four key areas as they relate to the Planning Service:

- Vision & Leadership
- Performance and Management
- Community & Partnership Engagement
- Achieving Outcomes

4.4. It is important to stress that the peer challenge process is not an inspection. It is improvement focussed and designed to complement and add value to a council's own performance and improvement plans. The review is not designed to provide an in-depth or technical assessment but for the peer team to use their experience and knowledge to reflect on the information presented to them by people they met, things they saw and material that they read while on site.

4.5. This report is a summary of the peer team's findings. By its nature, the review represents a snapshot in time. We appreciate that some of the feedback in this report may touch on things that Fylde Borough Council is already addressing and progressing.

4.6. The PAS review team has presented a verbal summary of its initial findings and recommendations to officers and members, the Corporate Director, the Council's Chief Executive and Leader.

4.7. The PAS review team would like to thank the community representatives, councillors, staff, customers, and partners for their open, honest and constructive responses during the review process. All information collected is on a non-attributable basis. The team was made to feel very welcome and would especially like to mention the invaluable assistance and excellent onsite support provided by the Fylde Planning team.

5. Planning Advisory Service (PAS)

5.1. PAS is a Local Government Association (LGA) programme which is funded primarily by a grant from Government.

5.2. It is our principal mission to ensure that Local Planning authorities (LPAs) are continuously improving in their execution and delivery of planning services.

5.3. To achieve this, the PAS work programme focuses on:

a) Helping local government officers and councillors to stay effective and up to date by guiding them on the implementation of the latest reforms to planning.

b) Promoting a 'sector-led' improvement programme that encourages and facilitates local authorities to help each other through peer support and the sharing of best practice.

c) Providing consultancy and peer support, designing and delivering training and learning events, and publishing a range of resources online.

d) Facilitating organisational change, improvement and capacity building programmes - promoting, sharing and helping implement the very latest and best ways of delivering the planning service.

5.4. PAS also delivers some of its services on a commercial basis including change and improvement programmes for individual and groups of planning authorities in England, Scotland, Wales and Northern Ireland.

6. The peer challenge team

6.1. The peer team is made up of serving council officers, a serving councillor and a PAS review manager:

- Helen Martin, Director of Regeneration & Enterprise, Dudley Council
- Richard Purcell, Assistant Director of Planning, North-East Derbyshire District Council
- Councillor Linda Robinson, Vice-Chair of Planning and Regulatory Committee, Worcestershire County
- Garreth Bruff, PAS Principal Consultant, Peer Challenge Team member
- Martin Hutchings, PAS Principal Consultant, Review Manager

7. Theme 1: Vision & Leadership

7.1. The Leader and Chief Executive provide strong and visible leadership. They share a consistent vision for Fylde based on the 4 pillars of the corporate plan - to grow the economy, protect the environment, and promote efficiency and tourism.

7.2. There is a clear ambition for modernisation. Investments in new systems and the changes to the executive structures should create capacity and foster closer working relationships across the council functions. This is an important factor in bringing the Planning service to the front and centre of delivering the council's strategic development projects.

7.3. There is clear ownership of the current vision across departments. This includes a good understanding of the fundamental role that the planning and regeneration teams play in delivering it. The Leader is particularly clear about planning taking a more 'hands-on' role in taking future development opportunities forward.

7.4. Fylde's Local Plan is up to date. It was reviewed and adopted in 2021. The plan clearly articulates the vision for Fylde. It enjoys high levels of member engagement both in its production and its application in decision making. It articulates well the role spatial planning plays in contributing to the delivery of the council's corporate objectives.

7.5. There are positive officer/member relationships. There is a clear respect for each other's roles. There is a clear sense of pride in the area and the service provided for Fylde's communities. Members are keen to become more involved and to work with officers to achieve the best planning outcomes for their communities.

7.6. There is a clear 'customer-first' ethos and focus throughout the organisation. The expectation that customers are at the heart of everything Fylde does is clearly understood by officers and members. Whilst individual commitment to the customer first ethos is clear, there is work to be done in regard to planning processes, communication, and corporate working to make sure that this translates as well as it could operationally.

7.7. The leadership is now looking beyond the current Local Plan period to consider how Fylde will develop over the next 15-20 years. Fylde's growth ambitions sit slightly uncomfortably in places next to other corporate priorities such as protecting the environment and heritage. This is evidenced by some mixed messages politically on the desire for, and implications of, future growth.

7.8. The last Local Plan had some significant hurdles to overcome. This makes it important that the council establishes a formal process to co-ordinate, capture and communicate the early thinking that will shape the next Local Plan period beyond 2032. It should set up a politically representative board of councillors and one for officers (from across the council e.g. Planning, Place & Culture, Environment, Regeneration). This board will take ownership of, oversee and input into the production of the next Local Plan.

7.9. Early and structured involvement in the plan-making process, especially from senior members, will help to set the vision and longer-term aspirations. It will provide clarity and manage the tensions between economic growth, the environment and preservation. It will help to strategically address the housing and homelessness challenges. Obtaining clarity on key strategic issues as early as possible is a critical factor in making the process resilient to changes to the planning system and election cycles.

7.10. There is also evidence of mixed messaging about how new development opportunities are considered and managed. For example, while new employment opportunities are

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welcomed, there needs to be a better process for bringing these opportunities before planners and members much earlier. This will ensure that the sites proposed are appropriate and that the impact of required/associated housing growth that accompanies them is fully appreciated.

7.11. Work should continue establishing a formal process for delivering corporate projects. The council recognises that an important part of its structure is to ensure that strong governance of projects and programmes is embedded. There are good signs of things developing positively in this respect; the Project Initiation Process/Document for corporate development schemes is a positive step. Clearer communications and change request procedures would also benefit the larger projects. There is evidence that stakeholders may approach planners for information, and where this isn't successful, they may contact members. Messages can get confused or lost. It is vital to have clear communications channels and a clear change request process that all can follow to ensure to ensure that there is corporate support for projects and that changes are agreed and signed off at an appropriate level.

7.12. Strong governance will give senior leadership oversight and comfort that projects are being moving forward positively. It will protect officers from ad hoc and competing/conflicting requests and avoid confusion or abortive activity. It will also improve risk management and ensure processes and protocols are followed. With the right support and appropriate checks and balances there is scope for greater cross-service working and increased member and parish councillor involvement. Getting this right will share the load and minimise duplication of contact.

7.13. A strong governance process will also allow the prioritisation of activities and ensure that resources are directed to the right corporate priorities. This will give individual members of the planning team a clearer sense of the priorities for their own time in the event of competing demands. It also supports good risk management at a corporate level which needs to be owned at all levels of the organisation. Key to developing this is ensuring that the links between the corporate plan and the Local Plan are well set out and communicated and that the role of the Local Plan as the delivery mechanism for achieving the corporate priorities is fully understood. The council must continue to look at ways to embed planning much earlier in corporate projects and promote planning as an enabler. While there is a clearly understood and accepted role for planning in delivering the corporate priorities, it is still considered by other parts of the council to be in a 'necessary silo' that appears at the later stages of a project – created by virtue of the quasi-judicial statutory role that it has.

7.14. While it is important to ensure the autonomy of decision making in planning and probity in the process, this appears to have created a situation whereby planning is currently still on the periphery. This can result in planning being a 'blocker'. When Planning is brought into the decision-making process late, the raising of perfectly legitimate planning issues and questions can appear as 'getting in the way'. It is important that planning, regeneration, and economic development are all part of one holistic process working together to achieve a common end goal. Planning should not work in isolation and should be formally involved from the beginning so that solutions to planning issues are found in a timely manner rather than appearing as surprises later in the process.

7.15. It is important to keep fostering a culture and overall approach of 'placemaking'. The council is fortunate to have an up-to-date Local Plan with land allocations, and a planning service that determines high quality development in a timely way. The council can continue to create the best places by bringing its development services together at the start of the journey of a project. Later involvement means potential delay, and additional projects costs e.g. for surveys that have not been factored in or trying to retrofit design improvements.

8. Theme 2: Service Delivery & Performance Management

8.1 Fylde has a professional and dedicated planning team committed to providing a better service to residents and developers. Staff support one another well and even those stakeholders critical of the council recognise the quality of individual staff and the high level of commitment to their responsibilities. Officers are well-respected and inter-personal relationships between officers and members are generally good across the council.

8.2 The planning service is properly resourced for the workloads it deals with and there are opportunities to make sure that responsibilities and empowerment are in the right places (see below). The service has an improvement 'ethos' and staff are keen to address the realities and perceptions around poor service and performance. Officers want to keep processes under review to help manage workflow, workloads, and reduce the reliance on the use of Extensions of Time (EoT).

8.3 The Local Plan was reviewed and adopted in 2021. The planning service's reported performance is excellent against National performance Indicators - notably in relation to the speed of processing planning applications and affordable housing delivery. The Council also has a 6+ year housing land supply.

8.4 Good performance figures (against statutory government performance targets) for processing applications quickly are to be commended and encouraged. Often, (as feedback from Fylde applicants suggests), and somewhat counter-intuitively, good performance figures can hide under-lying customer and community dis-satisfaction. This is because the processes that allow planning services to meet government performance targets, often add to the overall time that the customer experiences. In Fylde, the main issues affecting customer satisfaction are the timeliness, clarity and consistency of communications. Fylde's present Development Management processes are creating a lot of 'failure demand'. This happens where customers contact planners and very often Members to find out what is happening with/delaying their applications or enforcement action. The main process issues that could be contributing to customer dissatisfaction include:

8.4.1 Validation – a lot of applications arrive invalid due to missing information and need more work. The validation process and responsibilities are unclear and inconsistent within the DM team. Performance statistics hide these issues and delays as the performance 'clock' does not begin ticking until an application is made valid. For the applicant/customer their 'clock' began ticking when they submitted the application/paid their agent. (See 8.6 below).

8.4.2 Extensions of time. These are agreements made with applicants to extend the time to make the decision on an application. When used properly, an extension of time is a reasonable tool to make sure more complicated / major applications can be properly considered. However, like most councils, Fylde use extensions of time across most types of applications. In the last 4 quarters, extensions of time were used on 88% of major applications and on 45% of minor applications. This is a national issue where customers often reluctantly agree to them, and it can often feel that they are being arbitrarily asked to 'agree to a delay'.

8.4.3 Process 'bottle-necks'. To keep officers' time free to process planning applications and write reports, most queries, complaints, and problems end up with the development management senior managers. This often creates a bottleneck as the volume of issues builds up. At times this leads to queries being resolved and communications being sent 'out of hours'. This does not create confidence among

developers and other stakeholders who are concerned that their applications are not receiving the appropriate quality of time and attention of the planners.

8.4.4 Validation: understanding why so many applications are invalid on submission would be helpful. Measures can then be put in place measures to reduce them. Once the most frequent reasons are known, an information campaign can begin. This includes agent education, and even incentivising valid application submissions. The results will reduce officer time dealing with these system failings.

8.5 There are opportunities to streamline, improve and de-risk the application assessment and decision sign-off processes. These are recognised by the planning teams. They should be encouraged to consider efficiencies such as reducing double-handling/protracted sign-off procedures, re-designing/clarifying the validation process, and more focused report writing. Working arrangements and case management can be improved using the IT system to its full capability.

8.6 Clearer processes need to be set out for the Development Management Service. "Delegating Up" is a phrase heard directly and implied on several occasions. As mentioned in point 8.4, a lot of decisions, queries, complaints and often validation issues end up being carried out by senior officers. This raises questions of whether responsibilities and empowerment are in the right places. Importantly, the additional work pressures on senior officers caused by the current ways of working means that the overall capacity for reviewing and improving planning processes is reduced.

8.7 Process reviews are also an excellent opportunity to develop and empower staff. The planning department deals with a variety of work and has experienced and competent staff at all levels. The structure and processes should allow decision making to filter across a greater number of staff to create capacity, a more consistent and efficient service for customers, support career development, and increase staff confidence. Senior managers do not often overturn the decisions of less experienced officers, so with the right support and cover, decision-making could be spread out more evenly across the planning team. This would also have the associated benefit of identifying potential efficiency gains, reduced risk and make better use of resources.

8.8 Alongside a review of processes and structures, the planning service could also work through the PAS Development Management (DM) Toolkit. The toolkit provides a series of improvement challenges for the management and delivery of the whole development management service. It includes ideas for what an 'excellent' DM service looks like. This could be a useful way of putting together a service improvement plan. Reviewing operating procedures will also help inform what structure and resource level is needed.

8.9 The planning service would also benefit from having a clearer sense of its own objectives and priorities, and a more direct link between its own and the corporate priorities so that officers can better allocate their limited time. This would be achieved through the production of a Service Plan. A service plan should have a clear 'golden thread' to the Council's various corporate priorities and the specific actions identified in the pursuit of each. These should be outcome-focussed and build upon the good work that the Service is already delivering. The Service Plan should also focus on the 'how' as well as the 'what' and include a series of service standards that customers can expect and reflecting the more pro-active approaches that the Council desires. The staff appraisal process should also provide a clear link back to the Service Plan.

8.10 Significant officer time could be released by reviewing the application call-in terms. The service should ask itself which Town/Parish objections could be resolved through discussion

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or the provision of additional information, rather than having to be dealt with at committee. Adjusting the terms to make it clearer that objections based on non-planning issues will not be considered at committee would also help. This could also apply to applications being called in by members.

8.11   Officers are not as confident as they should be in the newly procured DEF planning administration system. A decision was necessarily taken to purchase and introduce this new "back office" system, but there is not currently resource in place to get it fully functioning and to support the service in all the areas it can. There is a service efficiency issue to having DEF underperforming. There is also a potential legal risk – where the system is not fully operational there may be information gaps (e.g. constraints layers) that put the quasi-judicial decision-making process at risk.

8.12   Continued investment is required to bring the service up to date with the technology needs of a modern planning service and ensure it is optimised for the way that the service operates. Covid accelerated more homeworking and highlighted the need for technology to assist a more flexible way of working. Generally, the concept of remote and hybrid working arrangements has been embraced by the service but there are still processes and technology that need to 'catch-up'. The service relies on office-printed paper copies of plans and applications which delays officers as they are not always in the office. The telephony and web-access kit available to planning and enforcement officers for site visits is 'not up to the job' – officers are often using their own devices for site visits which also represents a potential cyber-security risk.

8.13   The planning service should consider whether there is a role for re-instating a 'Agent's / Developer's Forum'. A Forum will help open a key missing communication channel between the Planning Service and its customers. Through the forum, all can agree on a specific and timetabled number of issues / standing items to work on and co-produce. The feedback from the peer challenge could serve as a catalyst to set up a new forum. These arrangements should be set up with an appreciation that it takes year-on-year commitment to get these forums working well.

8.14   Enforcement priorities and protocols are not clear. Members and town/parish councils are unclear about how enforcement works and why some things are not considered important enough to enforce. The service needs to help stakeholders understand the process, the priorities, and the practicalities of carrying out enforcement action so that expectations are clear and can be managed. The service should refresh and making available the Enforcement Policy statement, setting out what types of planning breach are a high priority and what options there are to resolve breaches.

8.15   Customers and agents are not using the website for updates on their applications, and this is a source of frustration to / for officers. The council website can provide service users with up-to-date information on the progress and status of all planning applications. Being available 24/7 it should be a key source of / the 'go to' place for live planning application information. Officers dealing with phone calls and emails to provide this information is a failure demand brought about either by the website not being reliable or insufficient knowledge of what the website offers or how to navigate it.

Planning Committee

8.16   Planning committee is the shop window for the planning service and an opportunity to demonstrate a well performing planning service in practice. Given the council's desire to raise the profile of planning, to encourage more effective working across the council and better connection and communication with stakeholders, the peer challenge team took a specific

look at the planning committee. Fylde doesn't routinely make recordings of its planning committee available publicly' (see 8.27 below), so the PAS peer team's observations are based on attending one planning committee meeting alongside the views and feedback from a range of different stakeholders during our review exercise.

8.17   Overall, the committee demonstrates credibility; it presents clearly as a working meeting that is trying to get things done and fulfil its role without party politics or distraction from non-planning issues.

8.18   The work that officers put in to creating their presentations is to be commended. It is of a standard that the review team thought would not look out of place as an example of good practice being taught to planning students.

8.19   The thoroughness and analytical content of the presentations allowed planners to create a narrative that meant members could really understand the facts, why particular items were highlighted and the officer's thinking behind their recommendation.

8.20   Member contributions were of a high standard and constructive; avoiding irrelevant matters and despite some repetition of similar points, the discussions are generally focused on finding solutions and testing the implications of the decision on the place/residents and importantly on the Local Plan and the precedent being set.

8.21   Overall, members demonstrate a clear understanding and awareness of the planning system and demonstrate a balanced approach to the need for bringing development forward and getting the most for communities. This was demonstrated clearly on the Queensway Development – members were keen to establish the impacts of changes to developer's contributions (Section 106) on affordable housing; keen to ensure that their communities not losing out. Similarly, the Garden Cottage case illustrated the empathy members have with applicants balanced by an awareness that over-turning officer recommendation could set a precedent for Policy H7. This was a clear example of a planning committee doing its job; officers presenting the technical analysis and members asking the right questions and working to find a solution.

8.22   There are areas for development. There is scope to be more selective on items that make it on to the committee agenda. For example, one case presented to committee was for a minor highway access issue which was immediately resolved. Several stakeholders questioned the time that items such as this were adding to the length of committee meetings or whether it represented the best use of member's time. Items like this should be challenged and solutions sought earlier in the process without the need for them to come to committee

8.23   Instead, the planning committee should be concentrating on the biggest schemes or schemes that are important in policy and strategic terms. Being more selective on what makes it on to the committee agenda would have the benefit of making shorter meetings or fewer meetings, whilst also releasing management and senior officer time to work on the type of service, process and development issues discussed above.

8.24   As noted at 8.9, consideration should also be given to reviewing application call-in terms. There are regular occasions when Parish objections could be resolved through discussion or the provision of additional information rather than via committee. This could also apply to applications being called in by members.

8.25   There are several opportunities to get more from the planning committee process. The undoubted knowledge Fylde Planning Committee Members presents opportunities to

streamline things so that more time can be spent on the more strategic, larger, and contentious schemes. For example:

8.25.1 Length of reports: the length of reports should be kept under review – they are thorough but lengthy and although members receive the reports in good time before the meeting, reducing their length may make them easier to read and could have the knock-on effect of reducing the detail/length of the officer presentations at committee.

8.25.2 Broaden member input: looking to include other opportunities for member input outside of the committee setting and get more value from member's knowledge e.g. in Pre app discussions, through technical briefings or developer's forums well before an application comes to committee.

8.25.3 Boundary changes: the forthcoming boundary changes could be an opportunity to refresh the make-up of the planning committee as well as change the numbers of members that sit on it. It may also be an opportunity to encourage younger members to get involved by changing the meeting times) and have different members on the policy and decision-making committees. The overall aim should be to broaden the experience and knowledge of planning amongst a larger number of elected members, so that it more strongly embedded across the whole council.

8.25.4 Empower staff: a well-functioning committee such as Fylde's provides opportunities for more junior case officers to gain experience, with more case officers being brought in to and present at committee as part of their professional development. This is also another opportunity to free up senior officer time.

8.26   The council should record and broadcast their planning committee live. This is standard procedure at most councils. Making access available remotely can encourage a wider audience for planning decisions and help make the process much more transparent for stakeholders and communities. Having access to recordings can also serve as a good improvement and training tool.

9. Theme 3: Community Engagement & Partnership Working

9.1 Improving the engagement with and the satisfaction of customers and the community are a clear priority. These messages are reinforced in the Corporate Plan that clearly spells out the priorities in terms of delivering high quality service, adapting to customer needs, and enhancing the reputation of the council.

9.2 The review team were provided with evidence of several initiatives that the service has delivered to enhance community involvement in Planning and to help ensure that the needs of communities are met. Of particular note is the work of the 'Town Centre Working Groups' which started with support from the planning function and have since secured significant amounts of national funding.

9.2 The service has assisted in the delivery of Neighbourhood Plans (two of which have been completed) and Fylde is delivering an impressive portfolio of housing, infrastructure, and town centre projects. Tourism plays a significant hand in the success of the local economy. There are regeneration schemes for the towns of St Annes and Lytham and heritage funding has been secured to continue the restoration of Fairhaven Lakes and Gardens.

9.3 The council is working successfully in partnership with neighbouring councils to deliver two Enterprise Zones (and has formulated Investment Zone bids in partnership with Blackpool and Lancashire County Councils). The council has been successful in bidding for funding for infrastructure projects such as the M55 Motorway link, the St Anne's Sea Wall flood defence and the Kirkham Future High Streets Fund.

9.4 On plan making, Fylde enjoys good working relationships with its neighbouring boroughs and other relevant bodies. This is evidenced by the Inspector's report following the examination of the Local Plan review in 2021 that: *'where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met'.*

9.5 Fylde is party to a Memorandum of Understanding between the three Lancashire Coastal authorities of Fylde, Blackpool and Wyre and Lancashire County Council. This formalises how the authorities work together on strategic issues and details the governance arrangements. In addition, Statements of Common Ground between Fylde and the other authorities have been formally agreed. These provide records of the engagement that has occurred on relevant strategic matters.

9.6 There is good evidence that political relationships are working well especially within Planning Committee where members work as a team to get the right outcomes for the community. The council needs to ensure that it has the right processes and mechanisms in place to replicate a council-wide approach once it begins the review of the Local Plan. This is especially important as the council addresses the multi-challenges of agreeing a vision and plan that balances the aspirations for growth, enhancing the environment and protecting heritage.

9.7 Fylde provides Legal services to Blackpool's planning Committee as well as operating a shared lettings scheme. Fylde is also working with Blackpool and Wyre on Gypsy and Traveller site requirements

9.8 The need for effective communications is clearly recognised and to support and strengthen its approach, the council it has set out its intentions in its Marketing and Communications strategy 2021-24. This includes a useful analysis of strengths and weaknesses and is a good platform for improvement.

9.9 The planning service would benefit from a more formalised strategy to obtain customer feedback. There are several ways the service could do this. The Planning Service should continue to make sure that it is aligned with/represented in the Council's Corporate Customer Feedback Process and build into its performance reporting process a method for evaluating customer experiences (for example Doncaster Council has a customer feedback survey that goes out on individual decisions). Thought should also be given to re-establishing an agent/developer Forum.

9.10   The Planning Service needs to champion itself more proactively and create a much more positive narrative around its role. As the corporate direction and priorities become clear and embedded, the service should take the opportunity to communicate internally / externally how the service is facilitating and delivering growth. This should include messages about how the many forms of income generated by growth contribute to the council overall.

9.11   Some stakeholders report feeling that they are "held at arms'- length", and "neutralised in terms of responses", with the result that the planning process becomes less transparent. This can result in gaps in knowledge and affects their ability to engage in the process and support communities in the process. Town and Parish Councils are an important part of ensuring that communities can effectively interact with the Planning system. The Service currently attend Town and Parish Forums when requested/when there are key messages that need to be communicated. However, in speaking with Town and Parish Council's there is a clear need for better communication and a more structured approach to engagement to help overcome the current view that communities are not properly listened to. The Head of Planning at Fylde has begun to address these issues positively beginning by offering training.

9.12   In addition to engagement on planning applications, Town and Parish Councils should also be encouraged to be involved in the early stages of master planning in their areas and/or to engage through the development of Neighbourhood Plans, particularly in the more rural Parishes (where interactions with Fylde planning is limited to specific applications). Parishes could be more constructively engaged through neighbourhood planning to set out the long-term ambitions for their area. Consideration needs to be given as to how this can be effectively achieved alongside the Local Plan engagement arrangements once the Local Plan review process starts.

9.13   The planning service should also consider ways that it can establish a pro-active and structured approach to engaging with Town and Parish Councils collectively on Planning matters. This could be achieved by setting up regular (e.g. quarterly) Town and Parish Council Forum to enable issues of general interest and service delivery matters to be debated and discussed. Another option is to work with the Town and Parish Councils on creating an annual training programme.

9.14   Members generally would like to be better equipped with the knowledge, skills, and information to allow them to be an effective conduit to the community, answering queries and playing a role in minimising issues at source.

10.   Theme 4: Achieving outcomes

10.1. Fylde's Local Plan is up to date having been reviewed and adopted in 2021. The plan articulates the vision for Fylde well and it enjoys high levels of member engagement both in its production and its application in decision making. It articulates well the role spatial planning plays in contributing to the delivery of the council's corporate objectives.

10.2. As part of its planning policy and delivery of the Local Plan, the service is addressing specific planning and community issues through the production of Supplementary Planning Documents (SPDs) to inform and explain specific elements of planning policy such as Affordable Housing, Design, and Biodiversity Net Gain (BNG).

10.3. Fylde has a history of developing and delivering high quality and award-winning developments and most recently it received an RTPI 'Healthy New Town' award. It is currently delivering an impressive portfolio of housing, infrastructure, and town centre projects. There are regeneration schemes planned for the towns of St Annes and Lytham and heritage funding has been secured to continue the restoration of Fairhaven Lakes and Gardens. The council is working successfully in partnership with neighbouring councils to deliver two Enterprise Zones (and has formulated a current Investment Zone bid in partnership with Blackpool and Lancashire County Councils). The council has been successful in bidding for funding for infrastructure projects such as the M55 Motorway link, the St Anne's Sea Wall flood defence and the Kirkham Future High Streets Fund.

10.4. Fylde champions good design, often through the Planning Committee. The Peer Challenge team were shown numerous examples of impressive design led developments. The Aldi supermarket development / town centre apartments is a testimony to the council's diligence in pushing design quality that is both sympathetic to the local context as well as innovative and original. Other examples include the Booth's retail development, the Travelodge/Marks and Spencer transformation project, Home Farm housing development, the Fylde FC stadium development, and the St Anne's sea wall flood defence scheme.

10.5. There are good monitoring mechanisms in place e.g. the council's capital programme monitoring report to track progress and delivery of the major schemers. The latest report comments on the effect of the Pandemic and the general economic slow-down on the progress of the delivery of several schemes where delays are being experienced and where higher-than-forecast inflation will require a review of the costs associated with a number of capital schemes.

10.6. Fylde enjoys good working relationships with its neighbouring boroughs and other relevant bodies. Fylde is party to a Memorandum of Understanding on joint strategic issues (including the provision of housing) between the three Fylde Coast authorities of Fylde, Blackpool and Wyre and Lancashire County Council.

10.7. The council has strong performance in delivering the housing that the Borough requires (including affordable housing) and has a healthy (6.64 years) supply of land available for housing. Fylde's most recent Housing Delivery Test result is 194%. The council is successful at delivering its 30% affordable housing target supported through the Local Plan and an affordable housing Supplementary Planning Document.

10.8. Fylde's Housing Team expressed a desire to work more closely with Planning to address a rapidly growing homelessness problem exacerbated in part by a lack of temporary accommodation in Fylde Borough. Fylde is spending in the region of £160k a year putting families up in Bed and Breakfast accommodation (mainly outside the Borough). This is a corporate issue and links into the Borough's *Homelessness and Rough Sleeping Strategy*

2020-2025.

10.9. Fylde should continue to consider its overall approach to developer contributions both in terms of how it currently operates and looking to the near future. Fylde does not operate the Community Infrastructure Levy (CIL); it relies on Section 106 developer contributions. The existing funding systems for affordable housing and infrastructure are due to be replaced by provisions for an 'Infrastructure Levy' in the Levelling Up & Regeneration Bill (currently making its way through parliament). The Infrastructure Levy will operate closely to how CIL operates, with Section 106 operating only on the largest schemes. Fylde has some well-developed work on CIL that was produced in 2016/217. This work should be revisited and updated in line with the Infrastructure Levy as the requirements are published so that the council is ahead of the curve and ready to implement the new regime as soon as possible.

10.10. Fylde received a review/audit of its Section 106 arrangements in September 2022. The review concluded that the Fylde Local Plan has clear policies for the schemes that Section 106 agreements can be entered, has an 'adequate' system of internal control and mechanisms in place for recording and monitoring section 106 agreements and robust governance arrangements for the approval of Section 106 agreements. The main areas for improvement identified included (as a priority); continuity/resources (just one member of staff is currently involved), a lack of procedural documentation in place to guide the preparation, completion and enforcement of section 106 agreements, and better arrangements required for the monitoring of reporting around the collection and current status of section 106 monies.

11.   Implementation, next steps and further support

To be discussed with Fylde Borough Council.

The author of this report is Martin Hutchings (martin.hutchings@local.gov.uk), on behalf of the peer challenge team.

This report was finalised in agreement with the Council on 04/01/2023.

We are grateful for the support of everyone that contributed to this Peer Challenge.

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Appendix A (Fylde Planning Committee Information Item No.9). 8th June 2022.

(Extract referencing the scope of the Peer Challenge)

Information Officers are in discussion with the LGA to arrange a Planning Advisory Service review of the planning service at Fylde. The review is considered beneficial to the service because it offers an independent critical friend assessment of the service. Because the planning service deals with some of the most important strategic matters that shape the built environment and the local community, every opportunity to review and improve performance is explored. With significant post pandemic changes in working arrangements, workplace behaviour and attitudes in society a PAS review will have added benefit to the planning service and the council.

A peer challenge offers an in-depth look at the service offering a critical friend view of weaknesses and opportunities.

Accordingly, it has been agreed to invite PAS to carry out a review in the Autumn, the actual onsite dates have yet to be agreed. Planning is a vital service with the local plan delivering the longer-term spatial aims for the area, to the planning committee as a very public "shop window" of decision making of the council, and the challenge of delivering homes and businesses now and in the future, making sure the service is functioning at its best is always helpful.

A planning peer challenge offers an in-depth look at the service that can be focused on specific elements of the service or across the whole service, used as a baseline for the leadership and for places, thinking about the long- term health of the service or facing up to a new challenge.

Setting the Scope

The following themes are some examples of areas reviewed by PAS however, a review is bespoke, and PAS will shape the scope to fit local circumstances, it is essential that PAS are aware of what the council wants to achieve through the review.

• How well is the planning service supporting local priority outcomes?

• Is there a clear and locally distinctive planning vision for the area together with a strategy that sets out how the council will address planning needs for sustainable communities, housing, and the local economy?

 • How will the council enable citizens and communities to shape localities in a way that meets their needs and aspirations?

• Does the council provide a good service to users?

 • How will the council work with other councils, agencies, and communities to coordinate where necessary and work productively?

How a PAS Review Works

The scope is tailored to meet the specific needs of the service and the council. The onsite phase of the review takes place over three days and consist of the following stages:

- preparation of a position statement and timetable

- onsite work: principally interviews and discussion groups

- feedback on key findings and practical suggestions for accelerating improvement

- action planning session

- free follow up consultancy support.

The Review Team PAS take a flexible approach to ensure that they bring together the right team for the review at Fylde. The team will usually include the following:

- team leader – senior planning manager(head of service or director)

- member peer(s) – senior councillor with planning experience

- officer peer(s) – senior planning officer

- challenge manager – LGA manager

The Proposed Scope for the Fylde Review

Whilst the Fylde PAS review will primarily focus on the Development Management service, it will also need to consider the council's approach to planning policy. It is proposed that the PAS be asked to focus on the following areas:

- Does the council have up to date planning policies in place that support and deliver the vision and priorities of the council and the local community?

- Does the council engage effectively with neighbouring planning authorities to resolve strategic cross boundary and sub-regional issues?

- Engagement & Communication – how the service engages, communicates, and interacts with statutory consultees (town and parish councils, LCC, professional advisors, etc.) and the public throughout the application / planning process.

- Leadership, Management & Administration – examine the operational practices and procedures in place, the reporting style and process 'flow'

- Decision Making – the process and 'flow' in place for decisions, the scheme of delegation, opportunities for community engagement in the planning process, any 'bottle necks', reasons for delays and performance against statutory determination times.

- Enforcement – an examination of the policy / approach to enforcement, the appropriateness of action and no action and identifying any opportunities to learn from best practice. The PAS team will be asked to consider and advise on long standing enforcement issues.

- Training and Support – how the council provides training and support to stakeholders on planning i.e. parishes, elected members etc. and the training and support available to secure continuous improvement for the planning officers.

It was resolved at the meeting and recorded in the subsequent minutes that the following matters be added to clarify the scope of the proposed review.

▪ That, as part of the review of Engagement and Communication (bullet point 3, p 97), the Peer Review Team be specifically asked to meet with representatives of local Town and Parish Councils.

▪ That the Peer Review Team be asked to review and comment on the implementation of actions set out in the previous review which took place in 2012.