



Planning Peer Challenge **Arun District Council**

6th - 8th June 2018

Feedback Report



Executive Summary

Arun District Council is entering an interesting and crucial period for the council, the planning service, the planning committee and the area. With the adoption of the new local plan, a significant increase in planned development and changing national planning requirements the authority has recognised this challenge and through the commissioning of this review are looking to respond to the demands that this places on the service.

The publication of the new National Planning Policy Framework (NPPF) and other national legislative changes will bring new challenges, particularly around housing delivery through the new Housing Delivery Test and local plan production.

The council is a key strategic area in the Sussex region with a large percentage of the present population for West Sussex being based in the authority. The authority contains both town and parish councils and has areas that are within the South Downs National Park. The authority works well within these partnerships as well as with others across the region and sub-region.

After extensive effort from the council, adopted their new local plan on 18th July, occurred after the review team were on site. The planning service and leadership should be congratulated and celebrate the adoption of the local plan; it is a key and important document in setting the strategic framework for the future development of the area.

With the adoption of the local plan the council will be facing the challenge of delivering the framework which includes over 19,000 homes over the plan period. The plan highlights 9 key strategic sites across the borough each being expected to deliver between 300 and 3000 homes up to 2031.

The housing target or plan requirement has significantly increased over the period that the plan has been produced, practically doubling from early housing need requirements to the new local plan target of delivering on average 1000 houses a year over the plan period. This requirement is staggered over the initial 5 year period (2011-16) of the plan to just over 600 homes per year in the initial stage of the plan which has already passed which has been achieved, rising up to 930 per year for the next period (2016-21), and then rising to 1310 for the next period (2021-26) and then dropping to 960 per year for the final plan period (2026-31). These are very challenging delivery numbers to achieve and will take a combined effort of the council, partners and development industry to deliver.

This increase has brought some challenges to the authority in respect of their reliance on a high number of key strategic sites in the local plan, issues with key infrastructure delivery and the council's relationships with some town and parish councils.

Delivery of the local plan will bring an increase in the level of development in the area through the delivery of the key strategic sites and an increase in volume of strategically important applications. This will affect how the planning service works including the work of the planning committee and the role of ward councillors. The service is already starting to respond to this challenge through the work of the Strategic Development Team and the Strategic Site Advisory Groups.

The proposed introduction of a national Housing Delivery Test will require the authority to actively engage with developers, land owners and other partners within the key strategic sites before, during and after the planning application stage to get the sites and the allocated plan numbers delivered.

The leadership of the service and the council has a very good reputation with external partners. It is recognised as being “open for business” with a proactive nature of “getting things done”.

The local town and parish councils, actively supported by the district council, were early and enthusiastic adopters of the neighbourhood planning process. There are 17 town and parish designated neighbourhood areas, with 15 of these having made plans. The dramatic increase in housing provision and development areas that are in the new local plan has challenged the content of some of the made neighbourhood plans that progressed under assumptions of previous housing requirements. This change, though recognised by many parish and town councils as not being of the authorities making, has strained and even broken some of the district council’s relationships with their towns and parishes. The district council has done a lot to engage with the town and parishes through the regular briefings on the progress of the local plan and training and engagement in key development sites and this should be commended but more still needs to be done to rebuild some of the strained relationships between the council and town and parishes, with both planning officers and members recognising the key role that town, parish and community groups can play as partners in the delivery of the local plan and council’s ambitions.

The new local plan will bring a challenge for the local authority and town and parish councils in how they take forward the reviewing and updating of the made and progressing neighbourhood plans. It does however, also provide an opportunity to discuss how communities can help lead the development of their place and the required infrastructure.

The authority has been subject to a steady increase in the number of planning applications over the last few years, particularly with the number of major applications received. The increased development activity in the new local plan will add more activity and pressure to the system.

The authority is presently performing well against the national planning targets of appeals and handling times of major and non-major applications. The authority has recognised that it is using a high number of Planning Performance Agreements (PPA) and Extensions of Time to make decisions on applications and the agents and developers that we interviewed generally spoke highly of the use of PPAs and their engagement with the service. Whilst the high use of PPAs and Extension of Time is not a direct concern as, particularly with PPAs, they can allow for an improved service and relationship between applicant and the council, we do think that there is an over reliance on these with many simply extending the decision making period at no added value or justifiable reason. Such a process will inevitably run the risk of increasing caseloads as work potentially remains in hand for longer periods of time.

We found the planning service staff to be generally loyal to the service and hardworking but with some very concerning low levels of moral and stress. There is an issue of high

active caseloads within the service which brings pressures on the staff. It was noted that there have been some long term vacancies within the service and repeated attempts to fill them. This is a challenge that is being seen across the local authority planning sector and might mean that the authority has to think about alternative answers to the resourcing challenge whilst attempting to fill these vacant posts through the prioritising of key work. It is however acknowledged that the authority has already utilised a number of options to help mitigate the staffing issues, and that the recruitment of suitably qualified planning staff is a national issue and certainly not unique to Arun.

The number of cases per officer for the service is high but not exceptional compared to other LPAs even with the vacancies that the authority has. However, the very high numbers of active cases per officer and the high use of PPAs and Extensions of Time we believe is highlighting an issue that decisions on some applications are just not being made, which is not a sustainable position.

We believe that the service is going to have to make some changes to be able to deliver the increased activity required in the new local plan and delivering great places for the area. This could mean recognising where the service brings most impact and making sure that the limited resources of expertise and time that the service has are placed in undertaking these important activities and allowing less effort to be spent on low risk areas of work. This will also mean giving support to staff to build confidence to make decisions, helping to develop both their experience and professional confidence. The transformational change will also need to include working with developers after the decision has been made on major applications to ensure that delivery of key sites will come forward as planned for in the council's local plan.

Some authorities are looking at the possibility of using *delivery agreements* similar to PPAs with developers to aid delivery of development after a planning application decision has been made. There is an opportunity for the authority with its good experience of PPA use and good relationship with developers to embrace this opportunity and help manage the key challenges of delivery of development in the area.

The council's planning committee is a key part of the planning process. It is one of the most visible windows of the council's decision making to the public, in what can be a complex process within its challenging quasi-judicial role; which makes it a vital and challenging council process to have working well. To be able to have the attending members of the public understand the decision making process and outcome is challenging but vital to build confidence in the process.

Committees should be using the knowledge and skills of the committee members and the extra resource of officer time to be making decision on the most strategically important applications at committee. We appreciate that the scheme of delegation has recently been reviewed, after a previous earlier review, for councillors to be able to request householder applications to come to committee, and parish council's having the ability to call in applications for Planning Committee consideration. With regard to the later we noted that some parishes indicated that the call in was a 'last resort' and they acknowledged that this was not a particularly effective way of resolving their concerns. With the potential increase in planning applications of key strategic importance to the authority we are concerned that the committee will not be focused on the most important applications. All committee members will need to know, understand and own the policies of the new local

plan for it to be delivered. This will require training of all committee members. The reflections of regular users of the council's planning committee was that it was comparable to other committees in the area with some apprehension that sound decisions would be made.

During the review we managed to observe two planning committees which included discussions on some very challenging applications. The committee was well managed between the chair and supporting officers. The layout, visuals, sound and roles of individuals were clearly understandable. There was a good introduction of the decision making process. It was concerning to see some of the discussions by committee members were not around material planning issues and discussions and decision making became confusing for the watching public. We appreciate that this is a challenging role and area of work for councillors and officers but it is of vital importance decisions made at committee are made well, especially with the key growth agenda of the new local plan. In order to improve the customer experience at committee it would be advantageous to clearly announce the decision as each application is determined.

With the national shift of emphasis in planning away from control to a more enabling/delivery function where place shaping is a key activity as opposed to simply regulatory control, we feel that there is an opportunity to refresh the role of the Planning Committee to reflect this new attend as well as the strategic growth challenges. The general term used is 'Development Management' as opposed to 'Development Control'. We believe that this will enable Councillors to be more effective in their role as Planning Committee members and give them a greater influence as district wide community leaders.

The planning service is well supported and recognised as being of key importance by the council's corporate centre. With the key developments coming up, the service should take the opportunity to recognise the returns on investment that the planning service brings in, regularly reporting on funding that is accessed for key infrastructure and developments and developer contributions, service provision fees such as application and pre application advice fees, plus the delivery of new homes bonus money, new council tax receipts and new business rates and projected across the local plan period.

The authority has delivered some very good development such as the improvements to the public realm around the seafront and the replacement leisure centre in Littlehampton, and there are some great ambitions of development in the near future with the regeneration schemes around the park and the seafront of Bognor Regis.

Key recommendations

There are a range of suggestions and observations within the main section of the report that will inform some 'quick wins' and practical actions, in addition to the conversations onsite, many of which provided ideas and examples of practice from other organisations. The following are the peer team's key recommendations to the council:

1. Celebrate the adoption of the new local plan
2. Use the portfolio holder to led the delivery agenda
3. Consider how the adoption of a Community Infrastructure Levy (CIL) might unlock infrastructure delivery, re-engage parish councils

4. Move Development “Control” Committee to Development “Management” approach & culture
5. Undertake committee training on local plan content, taking ownership of it and its delivery and making sound defensible decisions.
6. Planning Committee
 - a. tighten remit & strip out non-strategic work
 - b. review call in process – but ensure that members have greater scope to influence early in the process & reconsider role of Parish Councils to add value
 - c. Refresh the Planning Committee and consider shift towards development management style of operation, and provide tailored member training accordingly.
7. We support the council on setting up the strategic site Advisory Groups and the Growth Board as a vehicle to aid delivery of key strategic sites – particularly post planning application decision.
8. Embrace the opportunity to lead and deliver at strategic level with the sub region
9. Use the opportunity of the new local plan to engage in discussions with LEP around the future aims and challenges for the authority
10. We support the council’s proposed actions to regularly meet parish clerks
11. Undertake effective engagement developer engagement training for parishes working with ward councillors
12. Introduce parish council training with Arun specific case
13. Produce a clear strategy to review made neighbourhood plans highlighting which neighbourhood plan policies have weight in light of the new local plan and which are redundant
14. Undertake a further process review to incorporate a quick review at validation/registration stage to allow a proportionate approach to be taken to individual applications, using the limited staff resources in priority areas & establish optimum staff resource.
15. Culture shift of the service to Development Management with resource/process improvement and strongly consider the need for a business manager to lead this work
16. Empower individuals by positively supporting their development & building trust
17. Clearly define the leadership roles within the service, developing the leadership and management skills & attributes
18. Review both the internal and external communications approach including the use of IT/digital/social media/website to facilitate improved self-service through the suggested business management role
19. Invest in Staff Development
 - a. accessing the training budget
 - b. apprenticeship planners in place already very positive
20. To deliver the major growth agenda will require stopping doing some things – in some low risk areas having a “not perfect but good enough” approach
21. Corporate project work needs to be aligned to help achieve local plan outcomes
22. Achieving outcomes through the joint commissioning of master plans with the council controlling the process with councillor & parish involvement, the council having a programme manager role and engaging cross service input into the master planning process – particularly with an urban design focus

Summary of the peer challenge approach

The peer team

Peer challenges are delivered by experienced elected member and officer peers. The Planning Advisory Service (PAS) is a key partner and leader in delivering a programme of support to councils to drive forward improvement in plan making and development management. The planning peer challenge is part of this support, which also includes learning and improvement packages for officers and members of planning authorities.

The make-up of the peer team reflected the authorities requirements and the focus of the peer challenge. Peers were selected on the basis of their relevant experience and expertise and agreed with the council. The peers who delivered the peer challenge at Arun District Council were:

- Andrew England: Head of Planning, Transport & Regulation, Bournemouth Council
- Nicola Stinson: Senior Manager: Strategic Development , Council of the Isles of Scilly
- Cllr Stephen Parker: Hart District Council
- Rachael Ferry-Jones: Principal Consultant, PAS, LGA
- Stephen Barker: Peer Challenge Manager, PAS, LGA

Scope and focus

The main purpose of the peer challenge will be to help provide a service overview for the council. The council welcomed a robust external challenge by 'critical friends' and wanted the peer challenge to give the authority further confidence by validating the approach it is taking, and help to test, stretch and further evolve thinking for the future.

The peer team considered the following five questions which form the core components looked at by all Planning Peer Challenges. These are the areas we believe are critical to planning performance and improvement:

1. Leadership - how the authority demonstrates high quality leadership to integrate spatial planning within corporate working to support delivery of corporate objectives
2. Partnership engagement and working – how the authority has planned its work with partners to balance priorities and resources to deliver agreed priorities
3. Community engagement – how the authority understands its community leadership role and community aspirations and how it uses spatial planning to deliver community aspirations
4. Management and service delivery - the effective use of skills and resources to achieve value for money, accounting for workload demands, ensuring capacity and managing the associated risks to deliver the authority's spatial vision
5. Achieving outcomes - how the authority and other partners are delivering sustainable development outcomes for their area

In addition to these questions, the council also asked the peer team to consider/review/provide feedback on:

- the effectiveness of the Council's engagement with local town and parish councils,
- is the service well placed to cope with the influx of major development proposals to ensure that it can maintain the required delivery of the approved housing and providing quality places in terms of design and function ?
- if the Council is working effectively and efficiently to deliver the housing in the new local plan; working across the council, the service area and in co-operation with its partners?
- whether the extent of Councillor involvement overall, or in certain areas in the Planning process is appropriate and consistent with best practice?
- whether the level of resourcing is appropriate for the scale and type of development the Council will be addressing over the next 10 years at a level of performance which is appropriate?
- whether they consider the Council to be well placed to deal with the Policy challenges of the future.

The above bullet points are addressed within the report under the principal five themes.

Exploring these areas will help provide reassurance and an indication on the organisation's ability and capacity to deliver on its plans, proposals and ambitions. It will also allow the peer team, where appropriate, to comment on the council's track record and achievements, helping to demonstrate its journey of improvement.

The peer challenge process

Peer challenges are improvement focused and tailored to meet individual councils' needs; they are not an inspection. The planning peer challenge helps planning authorities to review: what they are trying to achieve and what they are actually achieving; how they are going about it; and the areas to address to gain further improvement.

The process is not designed to provide an in-depth or technical assessment of processes, plans and proposals. The peer team has used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and material they read.

The peer team prepared for the peer challenge by reviewing a range of documents and information in order to ensure they were familiar with the council and the challenges it is facing. The team then spent 3 days onsite at Arun, during which they spoke to more than 90 people including a range of council staff together with councillors and external

partners and stakeholder. In addition they gathered information and views from more than 40 meetings, attending two planning committee meetings and additional research and reading.

This report provides a summary of the peer team's findings. It builds on the feedback presentation provided by the peer team at the end of the on-site visit on Friday 8th June. In presenting feedback, they have done so as fellow local government officers and members, not professional consultants or inspectors. By its nature, the peer challenge is a snapshot in time. We appreciate that some of the feedback may be about things the council is already addressing and progressing.

Feedback

Leadership:

Political Leadership & Councillor Decision Making

The council leadership is held in high regard by partners both inside and outside of the area. The senior politicians and officers are considered to give good effective "business like" leadership. There is a culture from the top of the organisation and service that "gets things done" and gives a positive message that Arun District Council is "open for business".

The planning service is well supported by the corporate centre with good relations between the director level and chief executive and senior politicians particularly at portfolio holder level, with good general member-officer relations.

The challenge of getting the local plan through examination has taken strong leadership from both the senior councillors and officers. The adoption of the local plan should be celebrated for the challenging work that both officers and councillors have undertaken to produce the plan. The local plan is a key and important document delivering the future of the local area and the council. The positive role of the planning portfolio holder in bringing the plan to the stage of adoption was particularly highlighted by many people through the review. It should not go unnoticed that other authorities without up to date plans are under threat of losing plan making powers through the intervention of central government.

The authority should think about how the portfolio holder can be best used now the primary aim of producing the local plan has been achieved.

We feel that there is an opportunity for the portfolio holder to take a leadership role in the key challenge of now delivering the local plan and the proposed new Housing Delivery Test; working with fellow councillors and officers to aid the progress of strategic sites being delivered, post decision delivery and maintaining performance against the proposed housing delivery trajectory.

The whole council ownership and championing of the new local plan is critical for its delivery. This will require strong leadership as well as detailed briefings and often additional advice to help local members to own and lead and not fight the delivery of the plan.

There is also a question over the future role of the local plan steering group/sub-committee. The council has other important and challenging planning policy documents to

be produced with the small sites development plan document and the challenging Gypsy & Traveller policy which this sub-committee can lead. The small sites development plan document will have particular importance in helping the authority towards delivering the required homes targets of the local plan.

This will be returned to later in the report but we think the council should reconsider whether to adopt a Community Infrastructure Levy (CIL) to aid the provision of infrastructure across the area. Members would be required to have a key leadership role in engaging with communities and the governance of spending the collected levy.

The council's planning committee is a key part of the planning process. It is one of the most visible windows of the council's decision making to the public, in what can be a complex process within its challenging quasi-judicial role; which makes it a vital and challenging council process to have working well. To be able to have the attending members of the public understand the decision making process and outcome is challenging but vital to build confidence in the process. Committees should be using the knowledge, skills and time of its members and the significant extra resource of officer time required to take applications to committee and support the committee to be making decisions on the most strategically important applications for the council.

We appreciate that the scheme of delegation has recently been reviewed and altered, after a previous earlier change limiting the applications that go to committee, for councillors to be able to request householder applications to be considered by committee. With the increase in planning applications of key strategic importance to the authority we are concerned that the committee will not be focused on the most important applications. If there is not an immediate appetite to change the scheme of delegation again, we suggest that the authority keeps this under review as the number of applications of strategic importance increases. The process should be reviewed to ensure that ward members and town and parish councils have a greater opportunity to engage earlier in the planning process to add influence rather than raising challenges that bring applications to committee. Embedding a procedure to allow local issues to be resolved locally rather than at planning committee might help. A ward councillor could call a site meeting with a case officer to mediate local objections and allow a delegated decision to be made. This would enhance the leadership role of the local ward members with the support of the case officer and engagement with the town and parish councils. Cornwall Council operate a similar procedure for locally raised issues.

All committee members will need to know, understand and own the policies of the new local plan for it to be delivered. The new policies are a large part of the fabric of the decision making framework used by committee members. The delivery of the new growth agenda could highlight the potential conflict of role of ward councillors and committee members and will need to be addressed. This ownership and understanding of the new policies will require extensive training of all committee members.

The reflections of regular users of the council's planning committee was that it was "on par" to other committees in the area. It was noted that decisions made at the committee were not always defensible and in line with the council's agenda, which brought some uncertainty about the delivery of the required strategic growth of the new local plan particularly if faced with vocal public opposition.

During the review the team observed two planning committees which contained discussions on some very challenging applications. The committee was well managed between the chair and supporting officers. The layout, visuals, acoustics and roles of individuals were clearly understandable and there was a good introduction to the decision making process.

It was concerning to see that some of the discussions by committee members were not around material planning issues. There was confusion by members of the public attending one of the meetings about the discussions and the decisions made. We would suggest that the chair reminds members of the procedure for proposing and voting on motions and provides a summary of each decision so that this is understood by the public present. This will also assist officers when drafting reasons for the decision on decision notices.

We appreciate that this is a challenging role and area of work for councillors and officers but it is of vital importance that the decisions made at committee are made well, especially with the key growth agenda of the new local plan. The council should take the opportunity to undertake refresher courses for all committee members around planning decision making.

It is always a useful exercise for members of a planning committee to take the opportunity to view other planning committees in action, either live or view webcasts to aid self-improvement. The report includes some links to other authorities webcasts that the committee members might want to take the opportunity to view and compare them self with.

The council's titled *Planning Control Committee* should be considered as it suggests a service of development control rather than a development management process. The council should take the opportunity to modernise the approach and culture of the committee to a development management process, which is more than just a change of name, and in line with the wider agenda of the authority.

Service Leadership

The leadership of the planning service is held in very high regard by developers and partners. Key partners and developers are highly complementary of the work of the director of the service, he is considered to be proactive in supporting development, someone "gets things done" but also challenging and constructive with his input; particularly compared to external partners and developers experiences from other LPAs. He is considered to be a key element in the delivery of the growth agenda of the area.

The challenge of delivering the growth agenda of the council is considerable. The director needs to maintain this external and cross authority focus with support from other individuals within the service, having confidence that the processes of proactive and positive engagement, decision making and support are being delivered by the collective service. Building the confidence and experience across the service to proactively work with and challenge development partners will be key to delivering the growth agenda.

The planning service is well supported and recognised as being of key importance by the council's corporate centre. With the key developments coming forward the service should continue to highlight and share the returns on investment that the planning service brings

in to the council. They should regularly report on funding that is accessed for key infrastructure and developments and developer contributions; service provision fees such as application and pre application advice fees; the delivery of new homes bonus money; new council tax receipts and new business rates that are projected across the local plan period. This information should be used to evidence the important role of the planning service within the authority but also to promote the positive impact that development can have for the communities.

Recommendation

- Celebrate the adoption of the new local plan
- Use the portfolio holder to lead the challenging delivery agenda
- Consider how CIL might unlock infrastructure delivery
- Move Development “Control” Committee to Development “Management” approach & culture
- Undertake committee training on local plan content, taking ownership of it and its delivery and making sound defensible decisions.
- Planning Committee
 - tighten remit & strip out non-strategic work
 - review call in process – but ensure that members have greater scope to influence early in the process & reconsider role of Parish Councils to add value

Partnership working & regional working

Arun DC is a key strategic area in the Sussex region with a large percentage of the present population for West Sussex being based in the authority. The authority contains both town and parish councils and also has areas that are within the South Downs National Park. It works within these partnerships and others across the region and sub-region.

The Council should be commended for the work that it has undertaken in setting up the development partnerships through the Growth Board and Advisory Groups for the key strategic sites within the authority. Many of the partners noted the key role that the council has played in progressing this work.

These partnership groups with key public and private sector organisations are a great response to the challenge of delivering often complex strategic sites gaining common consensus around delivering key developments, to proactively engage across organisations to support the delivery from pre application, decisions making and especially delivery, giving up to date information on progress and opportunities to keep delivery on track to the timely requirements set out in the new local plan and the housing delivery test.

We feel that there is some scope for the council to embrace opportunities at the strategic level within the sub-region, particularly leading around future challenges from new national planning requirements. A number of authorities across the Sussex area will be reviewing and updating their local plans as their plans move towards being considered out of date. The authority should take a lead in the new requirement of producing a sub-regional Statement of Common Ground, highlighting the cross boundary strategic issues across the area and an agreement of how they will be tackled.

The area's very large Coast to Capital Local Enterprise Partnership (LEP) can be an important partner in supporting future funding and development. The LEP is keen to better understand the aims and agenda of the council's new local plan and this opportunity should be taken to help build the relationship and standing of the authority within the LEP area.

Recommendations

- We commend the council on setting up the strategic site Advisory Groups and the Growth Board
- Embrace the opportunity to lead and deliver at strategic level
- Use the opportunity of the new local plan to engage in discussions with the LEP around the future aims and challenges for the authority

Community engagement - Parish Engagement

The council, both corporately and within the leadership of the service, has recognised the importance of their partnership with the community and has actively engaged with both parish councils and partners in the area.

The council were one of the front runners in actively supporting communities to produce neighbourhood plans and is one of the most active areas of the country for neighbourhood plan adoption, with 15 made neighbourhood plans and two further areas progressing plans. This should be applauded.

This high level of activity has also brought some challenges particularly as these neighbourhood plans have been produced ahead of the production of the recently adopted local plan. The dramatic increase in the required housing provision for the area that has come forward over the period that neighbourhood plans and the local plan have been produced will mean that potentially many of the made neighbourhood plans are now out of date and will need to be updated. This has provoked a significant loss of confidence from the community in the value of the neighbourhood planning process, impacted on the relationships between the authority and some parishes and breaking some community relationships. This change, though recognised by some as not being of the authorities making but driven by central government requirements, was not clearly understood by all.

The district council has proactively engaged with the town and parish councils through the regular briefings on the progress of the local plan and training and engagement in key development sites and we commend the council's proposed actions to regularly meet parish clerks.

It was highlighted however that there were inconsistent levels of engagement and support. There was a perception that support was more readily accessible for larger Town Councils compared with rural areas. Some Parishes found the planners very approachable & helpful when asked, with others seeing no support and so fighting applications at the planning committee – and even acknowledging that this is an ineffective way to engage.

The offer of training that was made available to the parishes was well received. It was noted by all the parish representatives that they wanted "Arun specific day to day cases" to

learn from and less generic training. This is an opportunity to help rebuild some of the confidence and relationships with Parishes.

The Parishes we spoke to would like opportunities to engage in early pre-application discussions with the council and prospective developers.

However some parish councils were perceived by the development industry as being very difficult and unproductive to work with and so agents are reticent or have stopped engaging with them.

To instigate a programme of early engagement between prospective applicants and parish councils would require some provision of training on how the parishes can engage effectively. This could be an opportunity to include ward councillors as a key role in this process.

The district council will require a clear strategy to review and highlight which neighbourhood policies still have weight in relation to the new local plan. If neighbourhood policies need to be updated, what is required and who is going to undertake this work?

We think that the council should look to introduce a CIL – making it a priority to introduce the 25% local neighbourhood CIL proportion to Town and Parish councils where they have made neighbourhood plans (and 15% for those areas that do not, capped at £100 per council tax paying dwelling per annum) – recognising the key infrastructure requirements of local areas. Although this may be a small amount and concession it might help to restore confidence in the value of the neighbourhood planning process.

Rebuilding some of the strained relationships between the council and town and parishes maybe challenging but it is an opportunity to engage with communities on how they can help lead the development of their place and the required infrastructure and we recognise and commend the council for the actions to date.

Recommendations

- We support the council's proposed actions to regularly meet parish clerks
- Effective engagement training – to include ward councillors
- Introduce training with Arun specific case for parishes and consider introducing a case review process.
- Need a clear strategy to review which NP policies have weight in light of local plan
- Work with parishes on introducing CIL and the consideration of the best use of the neighbourhood CIL proportion

Management and service delivery

After extensive effort from the council the Local Plan was adopted on 18th July 2018..

With the local plan in place the council is now facing the challenge of delivering the new plan housing numbers which includes the delivery of over 19,000 homes over the plan period up to 2031.

The plan highlights 9 key strategic sites across the borough delivering between 300 and 3000 homes.

The housing target, or plan requirement, has significantly increased over the period that the plan has been produced practically doubling from initial objectively assessed need figures to the new local plan target of on average 1000 houses a year over the plan period.

Though this requirement is staggered over the initial 5 year period (2011-16) of the plan to just over 600 homes per year, which has already passed and has been achieved, rising up to 930 per year for the next period (2016-21), then rising to 1310 for the period following this (2021-26) and then dropping to 960 per year for the final plan period (2026-31). These are obviously very challenging delivery numbers to achieve and will take a combined effort of the council, partners and development industry to achieve.

There is already a consistent recognition of the challenge to deliver this major growth from the local plan and a recognition that this is already a clear corporate driver.

This increase has brought some challenges to the authority with a reliance on a high number of key strategic sites in the local plan, key infrastructure delivery and the council's relationships with some town and parish councils which we have already covered earlier in the report.

The extent of anticipated development will increase the volume of strategically important applications. This will affect how the planning service works including the work of the planning committee and the role of ward councillors.

The proposed introduction of the new national Housing Delivery Test will require the authority to actively engage with developers, land owners and other partners within the key strategic sites before during and after the planning application stage to get the sites and the allocated plan numbers delivered. The council's level of housing will make this challenging for the authority but as already mentioned, the work of the strategic site Advisory Boards could be a good vehicle to keep on top of the delivery timetable, but the regular engagement will need to be resourced and managed.

The authority has been seeing a steady increase in the number of planning applications over the last few years, particularly with the number of major applications received. The increased development activity in the new local plan will add even more activity and pressure to the system.

The authority is presently performing well against the national planning targets of appeals and handling times of major and non-major applications. The authority recognises that it is using a high number Planning Performance Agreement (PPA) and Extensions of Time (EoT) to make decisions on applications and the agents and developers that we spoke generally spoke highly of the use of PPAs and their engagement with the service. Whilst the high use of PPAs is not a direct concern, as they can allow for an improved service and relationship between applicant and the council, we do think that there is an over reliance on these with many simply extending the decision making period at no added value or justifiable reason.

It was noted that there have been some long term vacancies within the service and repeated attempts to fill them and that these long term vacancies have led to an over reliance on the use of PPAs and EoT.

We have attempted to compare the level of activity of the council's development management service with other local planning service. We have recently undertaken a piece of work to compare the caseloads for a group of authorities across the Norfolk and Suffolk region. We also requested information from council's neighbouring Sussex authorities of which we only received data back from Horsham District Council shown in

Table 1: *Comparison LPAs DM Service Activities* below shows the number of planning applications received in a year (count), the number of Full Time Equivalent employees within the Development Management Service (All DM), the average number of cases per employee (cases1), the number of specific case workers with the DM service (caseworkers) and the number of cases per case worker (cases2).

Council	Count	All DM	Case 1	Caseworkers	Case 2
Kings Lynn	2229	15	149	14	159
Grt Yarmouth	757	6	126	5	151
Arun	1967	30.5	64	16.25	121
Broadland	1481	17	87	14	106
Horsham	1600	29.2	55	19.2	83
South Norfolk	1727	24	72	22	78
Ipswich	943	14	67	13	73
Suffolk Coastal	1880	26	72	26	72
Babergh	1419	22	64	20	71
Norwich	1107	18	62	16	69
West Suffolk	2245	33	68	33	68
Waveney	1098	17	65	17	65
Mid Suffolk	1541	25	62	24	64
Nrth Norfolk	1399	28	50	24	58

Table 1 – Comparison Local Planning Authorities DM service activities.

Arun DM service has 16.25 FTE officers working within the service including the work of FTE 2 apprentices and 4 vacancies. The authority has dealt with 1967 applications in 2017-18. Which as an indication would give the cases per officer of about 160 per year with the vacant posts taken into account or 121 case per officer with a full complement of DM officers. These numbers would put the authority at the top or higher end in comparison to the other authorities.

Obviously all these figures can only give an indicative steer as the time required on applications is dependent on the complexities of the applications received, if decisions are going to committee, etc.

The team felt that the service's staffing levels compared to annual applications received was not unreasonable compared to other LPAs, even with the vacancies that the authority has.

The authority has a very high number of active cases per officers with 40 per officer on the Strategic Development team and 70 per officer in the Area Teams.

As a comparison Bournemouth Council case officers have about 40 cases per officer, which is acknowledged as challenging. Arun's very high numbers of active cases per officer and the high use of PPAs and Extensions of Time we believe is highlighting an issue that decisions on some applications are just not being made in a timely manner.

We found the planning service staff to be generally loyal to the service and hardworking with some obvious good relationships within the teams. However we also found very concerning low levels of moral, high levels of reported stress and sickness. The high level of active cases, some perceived lack of support, lacking empathy for team members with staff not being empowered or allowed to make decisions is placing some staff members within the service under high levels of pressure. Rectifying this issue must be a priority.

We found the planning service was surprisingly “siloe” within its work teams and that this was leading to poor communication across the service, with some critical information not filtering down through the directorate.

It was also noted to the review team that there were limited opportunities for staff input to drive change.

As noted earlier in the report the senior leadership of the service at Arun is very highly regarded with good levels of communication with strategic stakeholders.

However some developers and stakeholders felt that there was less adequate levels of consistent communications underneath this senior level but it was recognised that the resourcing issue was probably limiting the capacity to communicate with them.

The challenge of filling vacant positions within planning departments is a challenge that is presently being seen across the local authority planning sector and is potentially not going to be getting any better soon. All authorities are having to look at innovative ways to recruit, grow or use their limited resources better. The service is going to have to think about how it can actively invest in staff development and training. It was great to see the apprenticeship planner programme in place and having a positive impact. We were all particularly impressed by the enthusiasm and drive from the apprentice planner that we met. The authority may also want to consider a “grow your own” programme with some support staff willing and able to train and develop their roles within the service, to deal with some householder applications.

In considering service capacity and looking at optimum use of resources it is worth considering the opportunities for collaboration with other councils. This is particularly so for those specialist areas that the council acknowledges can be difficult to recruit to such as enforcement and heritage. Shared service arrangements could include, for example, collaboration in commissioning local plan evidence, specialist services for example around historic buildings and conservation and evaluating what services the council may be best placed to offer other councils. The obvious advantages of such an approach is that it can include improved service resilience, more capacity and improved performance and cost savings.

With the present working levels and expected upturn in activity we believe that the service is going to have to make some changes to be able to deliver the increased activity required in the new local plan and delivering great places for the area.

The Local plan is already a clear corporate driver in aligning resources and project work to help achieve outcomes. This will mean recognising where the service brings most impact and making sure that the limited resources of expertise and time that the service has are placed in undertaking these important activities and allowing less effort to be spent on low risk areas of work. This could initially be through establishing a firm foundation at validation/registration stage with quick turnaround and a quick filter for minor works and using principal officers only for major works.

This will also mean giving support to staff to build confidence to make decisions, helping to develop both their experience and professional confidence. The review team appreciates that the planning application process was recently reviewed but with the present and future resourcing challenges the service needs to highlight how best to use the resources available to it potentially through a LEAN process review, with a greater emphasis on Development Management. It may also be worth revisiting the previous process reviews as it is not uncommon for processes to revert back to old systems unless the new processes are rigorously applied and enforced.

To address major growth will require stopping doing some things & increased corporate focus on planning objectives.

This might mean review call in process and deciding to tighten the remit and strip out non-strategic applications going to the planning committee but ensuring that members have greater scope to have influence early in the application process and consider how to get the most added value from the engagement of Parish Councils.

There were apparent "Development Control" process within the service which was out of line with service leadership approach and objectives of positive planning through a Development Management approach.

The required culture change programme to Development Management can go hand in hand with looking at the resourcing challenge. We strongly recommend that this work needs to be owned and driven by a business change manager - and not necessarily a planner. A transformational change programme will need to have some quick fixes plus some longer term changes.

The transformational change will also need to include working with developers after the decision has been made on major applications to ensure that delivery of key sites will occur as planned for in the council's strategy.

Some authorities are looking at the possibility of using delivery agreements similar to PPAs with developers to aid delivery of development after a planning application decision has been made. There is an opportunity for the authority with its good experience of PPA use and good relationship with developers to embrace this opportunity and allow help manage the key challenge of delivery of development in the area.

We were asked to look at the question of if the service is ready for the increase in major development & housing delivery? There are some really good initiatives and processes being embedded such as the strategic site Advisory Groups and the Growth Board, a strong corporate commitment to the agenda and leadership of the service, however some realignment of resources with delegated decision making to the most appropriate level, empowerment of staff and improved management of the service will be required to support the expected increase in strategic planning applications and managed delivery potentially at a corporate project level.

Recommendations

- Undertake a further process review & establish optimum staff resource.
 - eg at validation/registration stage: a quick turnaround with proportionate approach taken to applications
- Culture shift to DM with resource/process improvement and strongly consider the need for a business manager to lead this work
- Empower individuals by positively supporting their development & building trust

- Review delegation within teams
- Clearly define leadership roles within the service
- Develop leadership and management skills & attributes
- Review both internal and external communications approach including the use of IT/digital/social media/website to facilitate improved self-service through Business Management role
- Invest in Staff Development
 - accessing the training budget
 - apprenticeship planners in place already very positive
- To deliver the major growth will require stopping doing some things - maybe not perfect but good enough
- Planning Committee
 - tighten remit & strip out non-strategic work
 - review call in process – but ensure that members have greater scope to influence early in the process & reconsider role of Parish Councils to add value
- Corporate project work needs to be aligned to help achieve local plan outcomes

Achieving outcomes: Delivering homes & quality places

The authority has delivered some very good development such as the improvements to the public realm around the seafront and the replacement leisure centre in Littlehampton, and there are some great ambitions of development in the pipeline with the regeneration schemes around the park and the seafront of Bognor Regis, amongst others.

The review team believes that the council should look to reinforce the master planning process through joint commissioning of work through its good early partnership working with applicant and landowners and other parties. Helping to ensure the impact on the day to day working is planned in advance, allowing cross services input and councillor and town and parish involvement with a programme manager role.

The future for Arun District council will be challenging and interesting.

Recommendations

- Achieve through joint commissioning of master plans with the council taking a programme manager role
- Cross service input into the master planning process – urban design focus
- LPA controlled with councillor & parish involvement

Implementation, next steps and support

We are grateful for the support of the peer team and all the people who contributed to the review.

We appreciate the senior managerial and political leadership will want to reflect on these findings and suggestions in order to determine how the organisation wishes to take things forward.

As part of the peer challenge process, there is an offer of further activity to support this. The LGA and PAS are well placed to provide additional support, advice and guidance on a number of the areas for development and improvement and we would be happy to discuss this. There are a few offers of support that we think could be useful around officer mentoring support, committee training on defensible decisions, moving from a development control to development management culture, and access to other planning committees available online.

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