

REPORT OF THE SCRUTINY PANEL

SUBJECT: Does the Brecon Beacons National Park Authority provide an effective pre-application planning service in terms of:

- **Cost/Value for Money**
- **Public Perception / Customer satisfaction**
- **Comparison with other organisations**

Purpose of Report

To consider the evidence presented and make recommendations to the National Park Authority

Foreword

As lead member for this particular scrutiny study I would like to extend my personal thanks to all those people externally who contributed either by direct participation on the Panel or by providing written or verbal evidence to the Panel. Our scrutiny processes rely on these external contributions to ensure that our studies are rigorous and external facing. I would also like to pay tribute to my fellow Authority members and all the officers who have contributed to this report without whom my task would have been an impossible one.



Cllr Geraint Hopkins, Deputy Chair BBNPA
Lead member

“An active and responsive planning system is vital for the growth of the economy and the development of thriving, healthy, sustainable communities where people want to work, shop, live or visit. It helps to protect our natural and historic environment and supports individual citizens in improving their homes and property while protecting from over-intensive or inappropriate development.”

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Reports to the Authority on planning excellence (30 March 2012, 17 December 2012)
BBNPA - Pre Application Charging Advice Note April 2010
BBNPA - Planning Services Customer Survey 2012-2013
Welsh Government Report 'Realising the Potential of Pre Application Discussions
Planning Advice Service – A Material World – Charging for Pre Application Planning Advice

I. INTRODUCTION

In common with any public body - we are required by the Wales Audit Office (under the Local Government (Wales) Measure 2011) to identify objectives each year – what we are going to do and what resources we will allocate. We have to publish these each year in our Business Improvement Plan. Out of these objectives we have to identify some that we consider to be priorities – called improvement objectives.

The Wales Audit Office audits us against these, so we have to produce evidence that we have done what we set out to do. Sometimes we can evidence this through statutory measures, called performance indicators, but sometimes the objective is more subjective, less linked to service than perception, and these are more difficult to evidence. The Authority has opted to review two improvement objectives each year, one from the previous financial year and one from the current financial year using its scrutiny process. The topic of this scrutiny review is **Improvement Objective 1: The Authority provides an excellent planning service**, which was one of the improvement objectives from 2012-13. The area for study was narrowed to *the pre-application advice service provided by the Brecon Beacons National Park Authority as Local Planning Authority*.

I.1 Selection of improvement objectives for scrutiny

Members and senior officers debate our improvement objectives annually, initially in a workshop and then in Audit and Scrutiny Committee, for final approval by the Authority.

From this year (2013) the public are able to ‘vote’ on the website for which improvement objectives they think should be the subject of scrutiny. This was taken into consideration before the Authority approved its new topics for scrutiny. It is hoped that as this process continues, those who live and work in our National Park will have more involvement in the scrutiny process.

The selected improvement objective is a strategic one which is broken down into more achievable components. Members opted to consider the pre-application process, in particular the paid service, as this has been in operation for three years now and it is considered timely and appropriate to review it.

2. BACKGROUND

2.1 What is an Excellent Planning Service?

In its 2012-13 Business Improvement Plan the Authority stated its aims for the improvement objective ‘The Authority provides an excellent planning service’:

Why we are focusing on this Improvement Objective.	What we will do.	How will we do it.
<p>We want to:</p> <ul style="list-style-type: none"> • Protect the National Park’s environment and special qualities • Inspire public and business confidence in the planning service. • Enable appropriate development that meets the public need 	<p>We will:</p> <ul style="list-style-type: none"> • Review with our Members our targets and redefine what is perceived as an excellent service. • Produce a communications strategy which will be based on the results of the public consultation exercise. • Establish a level of customer confidence in the service. Implement plans to monitor any changes in these indicators. 	<p>By:</p> <ul style="list-style-type: none"> • Undertaking public consultation with customers and user groups which will include agents, consultees, community and town councils, residents, clients and contractors. • Continuing to provide the customer service survey. • Publishing the results summary of all feedback, surveys and consultations undertaken.

In the backward looking draft Business Improvement Plan for 2012-13, the Authority has highlighted the following progress against these objectives:

4. Did we deliver what we set out to achieve in 2012-2013 (Improvement Objectives)?

4.1 IO 1 - The Authority provides an excellent planning service

- We said we would know if we were achieving an excellent planning service if:
- a) There was an improvement in service levels
 - b) There was an increased understanding of the role of planning
 - c) There was improved understanding of what is meant by an excellent planning service
 - d) Establishing and meeting the criteria that we set based on the understanding set out in BIP1 for this financial year

What we achieved:

- We established a baseline for the recording of public consultation exercises which demonstrates progression from previous years. In 2012/2013, 31 public engagements on planning were undertaken. A consultation exercise was also undertaken on 31st January 2013 with statutory and non-statutory consultees and Community Councils. A Communications Strategy is expected in 2013/2014 on completion of the residents' survey.
- The percentage of customers that rate the planning service as satisfactory or better was 91% against a target of 80%¹. This shows an increase from the previous year of 88% against a target of 76%.
- The percentage of customers who have confidence in the planning service was 83%. Although this was lower than the previous year (94%) it was higher than our agreed target of 80%.
- The number of planning applications over 13 weeks old at the end of the period (backlog) reduced from the previous financial year from 43 to 42. This demonstrates an improvement on the previous year but it was short of the target of 35.
- The percentage of minor planning applications determined during the year within 8 weeks was 53.59%. This did not meet the Authority target of 60% and was slightly down on the figure for the previous year (60%).
- The percentage of householder planning applications determined during the year within 8 weeks was 70.90% against a target of 85% and was slightly down on the figure for the previous year (75%).
- The percentage of all other planning applications determined during the year within 8 weeks was 53.84% against a target of 60% and was slightly down on the figure for the previous year (61%).
- The percentage of minor, householder and other applications determined within 8 weeks was 60.80% against a target of 70%. This was down on the figure for the previous year (67%).
- The percentage of applications for development determined during the year that were approved was 85% and met its target of 85%. This was slightly up on the figure for the previous year (84%).
- 4 appeals were determined that upheld the Authority's decision in relation to planning application decisions at 50% against a target of 80%. This was down on the figure for the previous year (85%).

We believe we have made good progress in our aspiration to deliver an excellent planning service. Despite a 9.1% increase in planning applications on the previous year we have exceeded our target for customer satisfaction and improved on the previous year. We also exceeded our target for customer confidence in the service. Although we reduced our backlog of cases over 13 weeks old we acknowledge that we have not met our targets for the year and there is work to do in this area. We have also not met our target regarding the number of cases determined within 8 weeks in all categories and to recognise this we have restructured the Planning Service to ensure we can address this issue in time for next year's review.

¹ Note slightly different wording to the measure identified in BIPI which states “% of customers that rates the planning service as good or better”. The change was required to keep the measure consistent with the previous year's measure.

While not making specific reference to the pre-application advice service, this gives the context for the Authority's continuous improvement of its planning function.

As part of working towards providing an excellent planning service, the Authority has developed a realistic and measurable set of standards against which this work can be measured, which were approved by the Authority on 30 April 2012 (See report at [Annex 2](#)). The following quantitative and qualitative notions and measures help define excellence and are supported by appropriate methods of measurement (given in brackets below):

No.	Planning Excellence Criteria	Measurement
1	Achieving the Welsh Government's target for determining planning application within 8 weeks	Target of 65%
2	Providing timely and professional pre-application advice and validation guidance	Counting the number of applications subject to pre-application discussions and measuring the percentage that has subsequently been approved where the initial advice has been followed.
3	Conceptualising and Visualising 'Added Value' through the pre-application and submission of application process	Design and Access Statements to provide qualitative evidence of what an excellent planning service can provide
4	Additional 'Added Value' Notions	Number of planning obligations secured through Section 106 Agreements which detail benefits accruing to communities, the landscape, biodiversity and sustainability.
5	Number of appeals won	Current target for winning appeals is 80% (unfortunately, this will not be achieved this year due to some anomalous decisions from the Planning Inspectorate)
6	Monitoring of customer contact and satisfaction	Level of contact with users and turnaround time for issuing decision notices, also level of complaints
7	Community Engagement	Training sessions held for the public and feedback analysed
8	Procedure	Data on electronic submissions and comparisons with other authorities

The first report on progress against these measures was presented to the Authority on 17 December 2012 ([Annex 3](#)). Subsequent reports will be made at the end of each financial year.

Initial feedback on the pre-application advice service received as part of this scrutiny study is presented in the concluding section of this report.

2.2 What is Pre-application Advice?

As the Local Planning Authority, the Authority provides advice to planning applicants in the following ways:

- Through appointments at weekly/bi-weekly planning surgeries (between 9.30am and 2pm every Wednesday at Brecon and between 2pm and 3pm every other Tuesday at Abergavenny) where free advice is given by Planning Officers to members of the public on minor proposals/householder extensions etc.
- Ad hoc informal advice via email, telephone or face to face with Planning Officers
- Through the paid pre-application service provided by the Development Control team.

Advice is also freely available via the Authority's website (www.beacons-npa.gov.uk/planning).

It should be noted that whenever this advice is given, a written confirmation is also provided as confirmation to avoid later confusion and a record placed in the appropriate file. This forms part of the wider planning improvement programme introduced in 2009/10

While the Authority has provided, and will continue to provide, free advice via Planning Officers and planning surgeries, the paid service is a relatively new initiative which was developed as part of the same improvement programme. A report to the National Park Authority in October 2009 outlined the aspirations for this ([Annex 4](#)).

The anticipated benefits of providing this service were perceived as:

- Avoiding incomplete applications that cannot be registered
- Reducing the number of unsuccessful planning applications
- Saving time and money

“By working together on a project from the early stages developers and local planning authorities can achieve better outcomes for the community and for stakeholders. Open and constructive pre-application discussions, working jointly to create development that will provide a valuable resource for us all, can save time and optimise the potential of a site.”

Report to NPA – 16 October 2009

“Well organised and corporate pre-application discussions can be demanding of staff resources. However, the benefits to a developer of consistent, reliable and up to date advice tailored to a specific project and site provides a degree of certainty that is likely to result in cost savings through the avoidance of delays and abortive work.”

Report to NPA – 16 October 2009

- Reducing confrontation in the planning system
- Raising the quality of developments
- Gaining community acceptance and support
- Securing satisfaction with the planning process

The Panel considered these in their final deliberations.

The payment of a fee was seen as being linked to the delivery of a thoroughly professional, comprehensive and timely service without incurring any extra cost on the taxpayer.

The proposals were the subject of a consultation exercise where a total of 20 responses were received from 163 letters sent out. The responses are reproduced at [Annex 5](#) and should be compared with the views expressed at the recent focus group with planning agents (some of whom contributed both in 2010 and 2013). The proposed advice scheme was approved by the Authority on 22 January 2010 for a trial period from 1 February 2010 for 12 months.

“The Council feels this to be a retrograde step and that planning informal discussions prior to application should not be billed. It was questioned where members of the public would find out information. These charges were therefore objected to.”

Response by a community council to proposals –
January 2010

A report was made to the Authority on 8 April 2011 outlining the results of the first year of operations ([Annex 6](#)). The service had generally been well received by the general public although some agents still felt that advice should be free. The service had generated more than double the anticipated income of £5000.

A further report was made on 17 December 2012 ([Annex 3](#)) on planning excellence including the pre-application service, which will be reviewed later in this report.

2.3 Expected Outcomes from the Scrutiny Review

The Scrutiny Panel wished to review the pre-application advice processes and consider any existing data on performance, efficiency and customer satisfaction with a view to establishing whether any changes were needed to improve or consolidate the service. Importantly the Panel also wished to review whether this represented value for money for the customer and the Authority. They anticipated that this would give a good indication of performance against the excellence criterion (No. 2 above) and against performance targets set out in the Business Improvement Plan.

To help them carry out the review they developed the following research questions.

1. **What is the number of applicants seeking pre application advice, via paid pre-application advice, ‘planning surgery’ or email?**
2. **How many applications which go through the pre-application advice process are subsequently approved?**
3. **What are the costs incurred by the public and the Authority in the provision of pre application advice?**
4. **What is the level of customer satisfaction evidenced through data, interviews and surveys?**

5. Does the pre application service provide value for money and meet the excellence criteria?
6. What are the agent experiences of similar processes at other Authorities?

“Advocated this for many years and feel this is a positive way forward that can save time and money in the long run as only good applications would go forward to survey and additional architectural fees.”

Response by local agent to proposals – January 2010

3. METHODOLOGY

For this scrutiny study, the Scrutiny Panel consisted both of BBNP Authority members together with representatives from a range of outside organisations who were invited² to join us in looking at how well we are doing in meeting this improvement objective³. BBNPA is grateful for their willingness to participate, their enthusiasm and contributions to this process and for the valuable external perspective they have provided during the study.

The Scrutiny Panel had its first meeting on 29 April 2013 and received a presentation on the Authority’s scrutiny process, the topic to be scrutinised and other background information.

The review built on methods used in previous scrutiny reviews which included:

- Review of secondary evidence, including policy and performance reports to the Authority, Pre-application advice note, Planning Advice Note 6 – Planning Surgeries/Advice Centres, Customer Satisfaction survey ([Tables 1, 2 and 3 in Annex 8](#))
- Questionnaires to other Local Authority planning officers
- Questionnaires to UK National Park Authorities
- Use of social media to promote the scrutiny topic (though this was subsequently removed as it was felt to cut across other major public consultation exercises being carried out during the period of this Scrutiny Review)
- Focus group with planning agents
- Interviews with Principal Planning Officers responsible for paid pre-application advice
- Telephone interviews with developers, housing associations
- Observing weekly planning surgeries where free advice is available – David Sharman attended the planning surgery in Brecon on 18 September 2013
- Desktop research comparisons in English exemplar authorities (Reading and Winchester)

² Anyone wishing to participate in future studies should contact Lora Davies (lora.davies@beacons-mpa.gov.uk)

³ For a full list of scrutiny panel members see Annex 1

As the panel was scrutinising one discrete aspect of the planning process there were fewer opportunities to involve the public as evidence could only be legitimately gathered from those who had actively used the service, although the point was made at the meeting with local Agents that the Authority could possibly promote the service more than they have done.

It is interesting to note that the apparent lack of promotion of our activities has arisen in other studies and this is an area that the Authority needs to address in its future communications plans.

Both Authority members and external members of the panel attended a range of evidence gathering sessions and were kept fully informed of outcomes by the Scrutiny Officer.

The panel experienced some difficulty in obtaining requested data from the planning directorate due to the workload of officers but also the extended sickness absence of a key officer. The evidence that has been provided by officers, however, has been invaluable in reviewing the service, and their willingness to give their views has been much appreciated by the panel.

LEARNING POINT 1: We need to take into consideration any other consultations ongoing so as to avoid duplication or confusion for the public

4. EVIDENCE

The evidence gathered will be reviewed under the headings of:

- Cost / Value for Money
- Public Perception/ customer satisfaction
- Comparison with other organisations

In addition, we will link to each of the original research questions posed by the panel and outlined above.

5. COSTS / VALUE FOR MONEY

Relevant Research Questions

Does the pre application service provide value for money and meet the excellence criteria? (Research question)

What is the number of applicants seeking pre application advice, via paid pre-application advice, 'planning surgery' or email? (Research question)

How many applications, which go through the pre-application advice process, are subsequently approved? (Research question)

What are the costs incurred by the public and the Authority in the provision of pre application advice? (Research question)

5.1 Evidence Base

- Charging Scheme (Advice note at [Annex 7](#))
- Charging Scheme – income – given in committee reports and below
- Officer hourly rates – Principal Planning Officers £281 per day/£38 per hour including all on costs
- Time spent by officers ([Table 4 Annex 8](#))
- 'Realising the Potential of pre-application discussions' – Welsh Government May 2012 ([Annex 9](#))
- Focus Group with agents. ([Annex 10](#))
- Developers' Feedback – telephone interviews. ([Annex 11](#))

5.2 BBNPA Charges

The guidance note follows that set out by the Welsh Government with proportionality of costs and consistency of service highlighted, and the Authority charges in line with this guidance note.

As part of this Review, a National Park Authority member critically reviewed the guidance note and has made suggestions about how this could have been made clearer ([Annex 12](#)).

Only limited data was available for comparison with other planning authorities. From the data that is available it suggests that BBNPA charges are reasonable and in line with these.

A full list of charges is given in the Authority's Pre-application Advice Note at [Annex 7](#), with a summary below. While there was limited scope to compare this with other authorities some feedback is provided in the next section of the report.

Professional Agents—Replies to Written Requests for information on documents received from Solicitors, Developers or Professional Agents	£50 + VAT
Single dwellings - Site visits and written advice	£100 +VAT
Minor Residential Development (2-9 dwellings)	£500 + VAT Each additional meeting with Officers - £125 + VAT
Major Residential Development (10-49 dwellings)	£1,000 + VAT Each additional meeting with Officers £500 + VAT
If no numbers specified or mixed use/complex	Fee to be discussed and agreed
Other Minor development	Written advice - £75 + VAT Meeting with officers - £125 + VAT
Other Major development	Written advice - £250 + VAT Meeting with officers - £500 + VAT

5.3 Take up of the Paid Pre-application Service

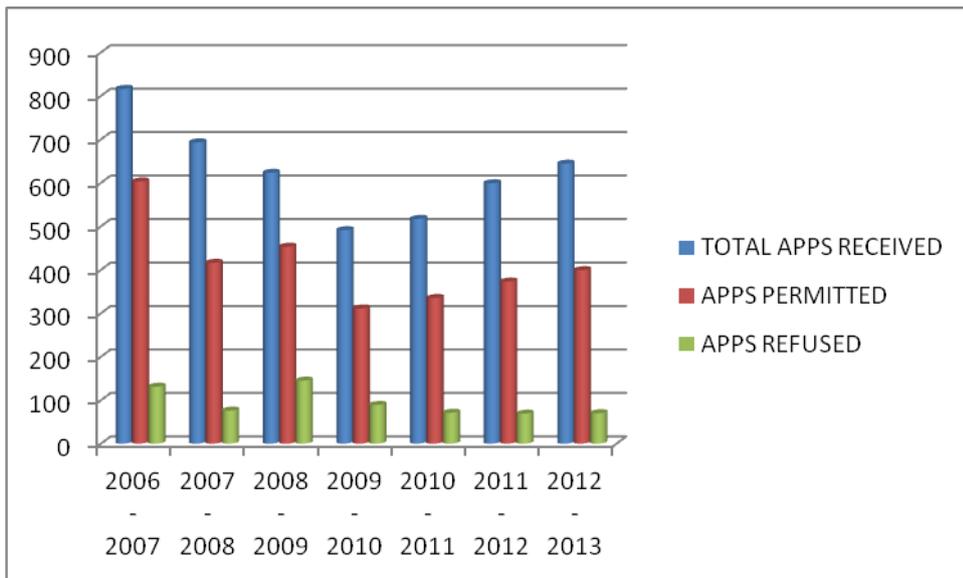
It is clear from the figures below that the reduction in the number of pre-application enquiries via planning surgeries correlates to the increase in take up of the paid service over the last three years which represents 20-25% of the total enquiries.

Year	No. of Surgery/email enquiries	% of total enquiries	No. of paid pre-application	% of total enquiries
2010/11	536	93%	40	7%
2011/12	295	75%	98	25%
2012/13	355	75%	89	20%

The year on year figure will fluctuate depending on the number of more complex application (possibly linked to the economic situation as well) but it will be useful to track the percentage figure over the next few years to monitor whether this percentage is maintained.

5.4 Impact of Paid Pre-application Service on Validation and Decision

Officers' views were that, in general, the service had resulted in fewer invalid applications. It is clear from the table below that since 2009 the number of applications approved has increased and the number of refusals has decreased or stayed the same despite the increased number of applications received, which suggests the actual percentage of refusals has decreased. However what is less clear is how far the paid pre-application service has contributed to this anecdotal evidence and officers' views are that it has.



Note: The figures in the table include all valid planning applications, i.e. householder, full, outline, advertisements, Listed Buildings, Prior Notifications, Certificates and does not include those applications which may have been withdrawn during the course of the application following Officer negotiation. The attached figures should not be compared with Welsh Government statistics as they only relate to PS1 applications defined as Householder, Full, Outline, Reserved Matters and Advertisement applications.

The new permitted development regulations which will require people to apply for Certificates of Lawfulness in order to prove (for example in the event of them selling the property) that works carried out to properties did not require planning permission will be in place from 30 September 2013. This is likely to require officers to carry out more site visits due to a need to identify the principal elevation of a property and will have a further impact

on resources. The possible knock on effect of this on the provision of a customer led pre-application service needs to be considered when reviews of officer time and any changes to the pricing structure are considered.

5.5 Income from Paid Pre-application Advice Service

A progress report was made to the Authority in April 2011 with a breakdown of application dealt with under the paid service during its first year of operation, and the income received. A full breakdown can be viewed at Annex, in summary:

Year	No. of Paid Pre App requests received	Income Generated
2010-11	37	£12,030.59
2011-12	98	£18,021.00
2012-13	89	£ 9,193.50

5.6 Costs to the Authority

In terms of cost to the Authority, the panel looked at the following summary:

Year	Number of Pre-application	Cost of officer time @ £38 per hour* (£)	Cost per application for the Authority (£)	Income received per application (£)	Income v Cost per application (£)
2010-11	37	7030	190	325	+135
2011-12	82	15,580	190	68	-122
2012-13	79	15,010	190	116	-74

* Based on an average of 5 hours officer time per application

They also looked at officer time ([Table 4 Annex 8](#)) which gives a snapshot of how much time officers spend dealing with the paid pre-application advice (just over five hours per week or approximately 16% of the total hours). They concluded that with the present scale of charges the income against the cost of providing the service does not present good value for the Authority and is not cost effective, and that officers should be encouraged to further analyse the figures to ascertain the true costs of the service.

During the interview with Principal Planning Officers the panel noted the following in relation to value for money (See [Annex 13](#) for the full transcript of the meeting):

- Numbers had dropped off in term of attendance at planning surgeries since the paid pre application service was introduced
- No negative responses were received to the closing of Llandovery surgery – people seem happy to come to Brecon for a speedy response

- Officers deal with emailed enquiries during planning surgery if there are pre-booked appointments so a good use of time plus the booking system has meant officers don't need to block off the whole day
- Officers spend some time pre-surgery doing research on the site to improve the quality and accuracy of the advice provided at surgery.
- The Planning Advice Note tells people what they need to bring or submit for both in the surgery and for the paid service.
- There is no set tariff for major developments. Fees are negotiated specifically for such developments at officer discretion but within a framework for which there is an advice note
- Officers try and give a quick response, especially if it is a 'no hoper' so developers/applicants can avoid the costs of submitting an application.
- Officers encourage applicants to use the paid service as this could save an application fee on a site that may not have a realistic chance of success in planning terms. However, it should be noted that the Local Planning Authority do not 'turn away' or refuse to determine applications where the original advice did not support the proposals.
- Planning fees haven't risen since 2008 – Wales lagging behind England.

5.7 Value for Money for Applicants

Planning Agents

The focus group held with planning agents (see [Annex 10](#)) showed that the majority of agents felt that the service was extremely good value for money, with the following positive comments:

- One particular agent had used the service 50-60 times over two years and had only experienced one delay which was in part due to his not chasing up an officer on a minor matter.
- The service provides access to advice on matters such as ecology, conservation and archaeology, which avoids sometimes lengthy, costly delays.
- It results in a more structured service with clear deadlines.
- In contrast to some other local authorities the BBNPA service has officers dedicated to the service which provides continuity and clarity.
- When further advice or information was needed after the initial meeting, no further charges were levied (when the original fee allowed for a series of meetings).
- One agent felt that all cases on which he had consulted the service had 'benefited significantly' from officer input.

During the course of the focus group one agent who had lodged a complaint following a bad experience of the service was encouraged by the positive comments she had heard during the session. This response serves to further highlight the benefits of the scrutiny process in raising external awareness of our work and in engaging with our customers in a positive and productive manner. The use of focus groups has been similarly productive in other Scrutiny Reviews.

However, the panel also noted comments from one agent that in his view it was wholly wrong to charge an agent simply because they were an agent, and that it was verging on a breach of human rights to do so. Another cited a case where a significant issue which

he felt should have been picked up by the officer had been omitted from the application causing a costly delay to the applicant, for which there was no recourse for compensation. His view was that the paid service changes the relationship between the applicant and the Authority and distorts roles.

A comment was made that there should be no distinction between the paid and free advice provided by the Authority and an example was given about a delay in giving advice following a surgery, which was only resolved through an agent's intervention which elicited the advice.

One agent felt strongly that for each development there are a number of areas to consider i.e. architectural design, conservation etc and the right level of expertise must come to bear – the level of expertise in architecture within the Authority is not sufficient.

There were also some comments about the responsiveness of the service and the time taken to turn around advice, which becomes a source of frustration for some customers, but the panel could not make any firm conclusions from this and would need a further analysis of response times against the stated level of service in the guidance note. The Authority has a 21 day limit for a response to an enquiry:

If the fee has been paid and all the relevant information submitted, then the Development Control Manager or a Principal Planning Officer will allocate your enquiry to the most appropriate officer (the 'Case Officer').

An acknowledgement will be sent within 3 working days of a valid enquiry being received in the Section and the acknowledgement will act as a receipt for any fee paid, confirm the details of the Case Officer handling it and the date you may expect to receive a written reply to a minor enquiry (within 20 working days from receipt).

Brecon Beacons National Park Authority Charging Advice Note ([Annex 7](#))

Developers

Telephone interviews were held with three developers and housing associations to ascertain the level of service and value for money for larger schemes. A summary of their feedback is given at [Annex 11](#).

There was consensus about

- The ease of access to the paid service
- The helpfulness of the officer (and the value of consistency in dealing with just one officer)
- The intention to use the service again if needed
- Value for money (with caveats about delays)
- Having used the service, they would recommend the service to others

However, there were comments about:

- The length of time that some negotiations took, with delays between correspondence or in setting up site visits

- A view that there was as much work needed for the pre-application stage as for the full application.
- Issues sometimes not being picked up which could cause delays and frustration.

Comments on how the service could be improved included:

- Tighten up timescales to drive projects on
- Officers need to ensure that they provide as much information on the day as possible and they also need to be very mindful of advice that is given at pre application when they are then considering application further down the line.
- Address problems with S106 and other matters, highways, housing.
- Address delays in BBNPA legal process, often in connection with Section 106 Agreements.

However, the overall rating for the service was either 'very good' or 'excellent'.

Other Users

Planning officers have sought feedback from users over the last few years. A summary of this is given at [Table 1 Annex 8](#). Respondents were asked to score the following aspects of the service:

- Quality
- Sufficiency
- Timeliness
- Professionalism
- Value

While the response level is limited, the majority of scores are 'good' or 'very good'.

A survey of all users of the planning system was carried out in 2013 where respondents were asked to score each aspect of the planning service. The results were reported to the Authority on 12 July 2013 ([Annex 14](#) & [Annex 15](#)).

- *Comments were made in relation to the availability of Officers and the fact that Officers do not have direct telephone lines, although they are considered to be quick to respond to emails.*
- *Pre application advice must be consistent and sensible; however the chargeable pre application system comes at a further cost to businesses and applicants.*
- *The pre app advice service was criticised by one respondent for charging business/professional clients and was not considered to be as effective as the free service provided by Powys County Council.*
- *Another respondent stated that they were happy to pay for pre-application advice however the advice must be sensible and consistent.*
- *Ease of access to the internet to specific information is very complicated and when recovered is not always accurate or readable.*
- *BBNPA will struggle with the perception its planning service has.*

In terms of prioritising functions the paid pre-application advice service came out as a very low priority but this may have been partly due to the fact that the respondents were mainly community councils and consultees who are less likely to need to access this service.

5.8 Observations about the Planning Surgeries

Panel Member David Sharman spent a morning observing a planning surgery in Brecon, with the prior agreement of the clients. His conclusions (See [Annex I6](#)) were that:

“..... all the enquiries presented were straightforward and where the Officer was unsure of an answer they went to consult colleagues and returned with an answer. None of the appointments exceeded the 30 minute allotted time slot and all applicants appeared satisfied with the surgery session format and advice received.”

5.9 Conclusions on Costs / Value for Money

- From the data available the panel analysed the cost-effectiveness of the service to the National Park Authority and concluded that it does not currently represent good value for money for the Authority in that the service is costing considerably more per application than the income received;
- Officers feel that the charges are too low, particularly in comparison with English authorities. The Panel looked at examples of ‘good practice’ authorities Winchester and Reading and did not note major differences in the scale of charges, although more research should be done before any recommendations are made to increase BBNPA charges;
- Anecdotal evidence suggests that value for money for the customer is perceived as being relatively good;
- There is insufficient data to thoroughly analyse the responsiveness of the service but customer feedback, particularly from the agents, suggests that this may be an issue.
- There is limited awareness of the paid service amongst the farming community and that while advice is given by Farming Connect comprising an hour of free one to one advice with a planning consultant, these consultants may not be up to date with BBNPA services such as the paid pre-application advice. The service is also not well used. There is scope for the Authority to liaise with Farming Connect to arrange a briefing session.
- Staff try to ensure consistency of service by maintaining same personnel on each application although this is not always possible
- The public awareness of the service and its value is relatively limited, usually people only become aware of the service when they actually need to use it.

RECOMMENDATIONS: COSTS/VALUE FOR MONEY

RECOMMENDATION 1: The Authority needs to promote the service more to highlight the benefits of the service to potential applicants and this should form part of any future communications strategy as a matter of urgency making use of all forms of media.

RECOMMENDATION 2: That officers undertake a more detailed analysis of input costs, i.e. the time it takes them to deal with pre-application advice multiplied by an hourly rate, and compare this against the incoming fees to reach conclusions on the cost-effectiveness of the service to the National Park Authority, and that this should be used to make recommendations about the future scale of charges. Included within this should be a weighting of benefit to reducing the time spent on the assessment of application that have received pre-application advice thus representing a potential cost saving to the Authority.

RECOMMENDATION 3: That officers undertake an analysis of response times and compare against the stated level of service in the guidance note to assess performance of service and link to customer satisfaction levels which are relatively low in terms of responsiveness – should be part of future monitoring.

RECOMMENDATION 4: Measures should be put in place to track the usage of the service and review this on an annual basis to ensure that costs are covered by the fees.

RECOMMENDATION 5: That officers review the comments made by a National Park Authority member on the guidance note and make any relevant amendments.

RECOMMENDATION 6: That officers liaise with Farming Connect to ensure that their planning consultants are fully briefed on BBNPA planning process including the paid pre-application service. This to be done as an evening meeting in line with suggestions from Panel Member Colin Passmore.

RECOMMENDATION 7: That officers review response times to ensure that targets are met, for example, minor proposals 14 days, 1-2 dwellings 21 days, major proposals – 28 days.

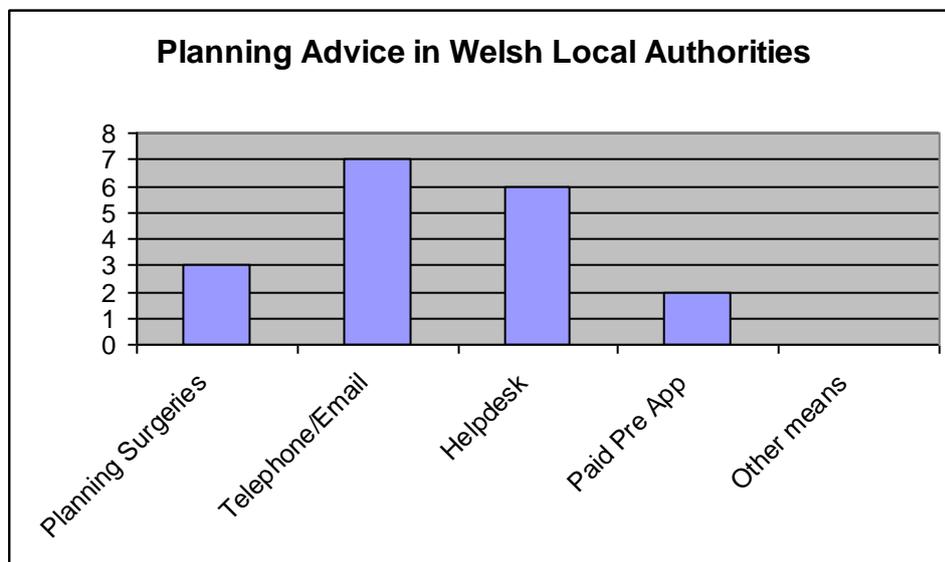
6. COMPARISONS WITH OTHER LOCAL PLANNING AUTHORITIES

Evidence Base

1. Customer feedback surveys
 - a. From LPAs ([Annex 17](#))
 - b. From NPAs ([Annex 18](#))
 - c. Planning Services Customer Survey - Report to NPA July 2013 ([Annex 14](#) & [Annex 15](#))
2. Review of paid pre-application service 2010/11 ([Annex](#))
3. Agents Focus Group ([Annex 10](#))

6.1 Comparisons with Local Authority pre application advice

A questionnaire ([Annex 19](#)) was sent to all 22 local planning authorities in Wales seeking information on the pre-application advice they provided and asking for details on costs as well as further details about the service. Nine responses were received (see [Annex 17](#) for details of these). In summary, of these:



NB. In addition one authority intends to implement a charging system and has political support to do so, and one is considering a report to Cabinet.

'Other Means' includes informal free advice by letter, office and site meetings.

Three authorities gave more detail about the planning advice they provide:

- We charge £75 for a site visit which agents tend to use for pre-application advice purposes. We also charge £25 for advice on the need for planning permission.
- We provide a full written pre-application service for the whole Council area. Additionally we're trialling a service with initial site meetings for part of the Council's area. For major proposals, once initial contact has been established and general principles agreed, informal contact occurs as schemes are developed.
- Pre-application advice can be sought through links on our website, via email direct to an officer or by letter in the post. All enquiries are booked in and registered on our mapping system. Responses can be given in writing, by email or in person at a meeting or site visit.

All authorities responding provide most of their advice via email and telephone, with the exception of one authority which provides 70% of advice via a planning front desk.

Of those authorities currently charging, most also offer a free advice service for small householder application.

6.2 Planning Surgeries/Advice Centres

Three authorities provide these, with the following details:

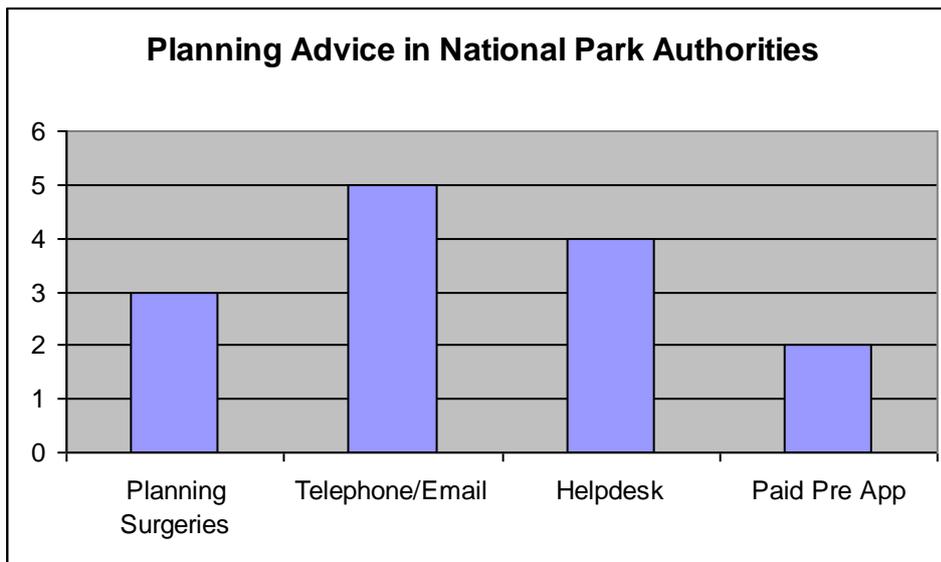
- Fortnightly via 30 minute appointments at One Stop Shops in the major towns (3 hour total). Mainly for householder and minor developments.
- Planning Surgery at HQ by appointment every other Monday between 10.00am – 3.30pm at half hourly intervals.
- Householder advice surgery held weekly, now by appointment as so popular. Slots are 15 minutes but overruns occur.

6.3 Ad hoc enquiries

These are dealt with through duty officers and dedicated telephone line bouncing calls between officers, although instant responses are not always given.

6.4 Comparisons with National Park Authorities

A similar questionnaire (See [Annex 20](#)) was sent to all 15 National Park Authorities, and eight responses were received (see [Annex 18](#) for summary). To sum up:



As with the local authorities, most of the National Park Authorities provide the majority of their planning advice informally by telephone and email, although one authority carries out 90% of its work via a formal pre-application protocol which is not charged for (Pembrokeshire Coast National Park – Pre Application Enquiry Form at [Annex 21](#)). Householders complete and submit a form with details of their proposed development and a planning officer will then by return confirm whether or not they need to submit a planning application or if they need to contact the planning officers to discuss the proposal in more detail.

6.5 Planning Surgeries

Of the three authorities who run planning surgeries, one holds two per week (one in the north of the Park on alternate weeks and one in the south) with 30 minute appointments, one holds a surgery once a month for two hours at three different locations with no appointment necessary, and one provides a range of weekly and monthly drop in surgeries at major towns.

6.6 Paid Pre-application service - Comparisons with other Authorities

Of the nine Local Authorities who responded to our questionnaire three charge for a pre application advice service, one charges £36 to cover 30 minutes work, and has been doing this for 3 years, and the other charges £70 for a site visit which is then occasionally used as an advice session – this service has been in operation for approximately seven years and another has a fee scale depending upon the size of the scheme – see [Annex 22](#) (*Ynys Mon*).

One National Park Authority (*Lake District*) does not charge for pre application advice on small householder schemes but does operate Planning Performance Agreements for

large scale developments. This is a collaborative approach between NPA and developer and fees start at £1000.

Of the eight National Park Authorities who responded to our survey only one provides a paid pre application advice service – a list of their charges is at [Annex 23](#) (*South Downs*).

Desktop research into the websites of the remaining National Park Authorities who did not respond to the questionnaire would suggest that most do not provide a paid pre application advice service.

6.7 Conclusions

- Telephone/e-mail/helpdesk remain the most popular forms of engagement
- Planning surgeries are used by a smaller number of Authorities but with mixed success rates
- BBNPA remains in a minority of planning authorities who have adopted a paid pre-application service but others are actively exploring this option

RECOMMENDATIONS: COMPARISONS WITH OTHER AUTHORITIES

RECOMMENDATION 8: Currently the fees levied are on a one-off basis and any follow up enquiries are covered by that initial fee. Officers should look at determining what is a reasonable / realistic period to allocate for follow up enquires and consider a supplementary fee when that period has been exceeded. This should then be reflected in the pricing system outlined in any guidance notes.

7. CUSTOMER SATISFACTION / PUBLIC PERCEPTION

What is the level of customer satisfaction evidenced through data, interviews and surveys? (Research question)

Evidence base

1. Customer feedback surveys
 - a. From LPAs
 - b. From NPAs
 - c. Planning Services Customer Survey – see report to NPA 12 July 2013 [Annex 24](#)
2. Review of paid pre-application service 2010/11
3. Agents feedback surveys and focus group
4. Telephone interviews with developers and housing associations
5. Interviews with Principal Planning Officers

7.1 Customer feedback from local authorities

None of the three authorities who provide a pre-application paid service had carried out any consultation to seek customer feedback but officer responses were provided:

“Not received much feedback to date – apart from the fact that the responses varied from officer to officer, which is why we are now working on a standard pro forma.”

“It is valued if they get a quick response. However, some officers take longer than others and there has been some slippage in providing the advice which has led to some complaints.”

“There hasn’t been much take up of the service but those who do use it appreciate the advice they receive. We tend to have one or two agents who use it regularly.”

There was anecdotal evidence of the value of the pre-application advice from officers, to whatever extent it was provided:

“...it helps us sustain a strong record of approvals.”

“It is difficult to place a percentage or figure on it but I would hope that the number of badly thought out applications being submitted has reduced.”

“Since implementing a comprehensive pre application service we have found that the number of refusals has decreased together with the number of invalid application. If they are invalid now it tends to be for a minor reason which is usually quickly resolved.”

7.2 Customer Feedback from National Park Authorities

There is anecdotal evidence of the impact of pre-application advice:

“...assisted with clear progress for significant proposals with member and public interest.”

“...has an impact on the percentage of successful applications (96% at present).”

“...has resulted in increased opportunities to add value to a number of developments. Quicker decisions are possible as officers are aware of sites and issues prior to applications being submitted).”

In relation to the paid pre application service:

“Greatly welcomed by our customers and their agents. In particular, the agreed joint approach to timing, assembly of information, progress reports and communications.”

“Largely positive with recognition that the fee results in a professional and informed response. There has not been a recognisable drop in enquiries.”

7.3 Customer Satisfaction

The panel reviewed evidence from agents and developers, whose levels of satisfaction with the service were generally very high, with some caveats about the speed of the process which had caused some frustration. There was a very strong view that officers were helpful and the fact that one officer remained with the case throughout the process was welcomed. There was agreement that the service was structured, clear and easy to access.

The following points were suggested by agents for improvement, and the issue of speed was also raised during the interviews with developers:

- A named officer should be assigned to each case and should follow it through to its submission (It should be noted that this is now current practice)
- For each development there are a number of areas to consider i.e. architectural design, conservation etc and the right level of expertise must come to bear – the level of expertise in architecture within the Authority is not sufficient. **The officer response** to this was that the Senior Heritage Officer provides advice on listed buildings and conservation areas and officers have sufficient experience in dealing with design issues. Design is subjective but schemes are

vetted at new cases meetings to reach a general consensus and consistency of approach.

- Every case is different and should be treated on its own merits.
- There was a minority view within the focus group that advice should be free (the panel could not make judgements based on a small sample).
- Advice and responses need to be turned around more quickly.
- Letters to applicants should make it very clear what the advice is to avoid any misunderstanding – e.g. use of planning terms should be explained and the advice highlighted at the beginning of the letter.
- The service should be better promoted.

However, the panel also noted comments from one agent that in his view it was wholly wrong to charge an agent simply because they were an agent, and that it was verging on a breach of human rights to do so. Another cited a case where a significant issue which he felt should have been picked up by the officer had been omitted from the application causing a costly delay to the applicant, for which there was no recourse for compensation. His view was that the paid service changes the relationship between the applicant and the Authority and distorts roles. The officer response to this was that officers are covered by professional indemnity insurance, and that caveats are always included as part of the response.

7.4 Additional Feedback

Anecdotal feedback from an external member of the panel showed that the National Farmers Union felt that the Authority's planning system was a good one, and were pleased to support it.

What are the agent experiences of similar processes at other Authorities? (Research question)

There was very limited feedback from agents on this question, although a comment was made by one agent that his experience had been more positive in the Brecon Beacons as there were officers dedicated to the service. In other authorities he had witnessed delays through officers being redirected to other work.

7.5 General supporting evidence

While not specifically relating to the pre-application process, evidence emerging from the Brecon Beacons Residents' survey conducted earlier this year very clearly demonstrates how aware residents are of the importance the planning function to protect the special qualities of the National Park. In response to the question "Do you think planning decisions can help protect the special qualities of the National Park?" an overwhelming 90% of respondents believed this to be the case. In a follow up question, some 60% of respondents believe we are doing this to a satisfactory level. It could certainly be argued therefore that providing an excellent pre-application service can only serve to strengthen this important point.

RECOMMENDATION 9: The importance of clear advice cannot be underestimated. Officers should look at developing a ‘jargon buster’ set of planning terms which could then be included with any advice given.

8. CONCLUSIONS AND RECOMMENDATIONS

8.1 Anticipated Benefits

In [paragraph 2.2](#) above the panel noted the anticipated benefits of introducing a paid pre-application service which had been highlighted at the Authority meeting in October 2009. After examining the evidence and after further discussion with one of the Principal Planning Officers, members concluded the following benefits:

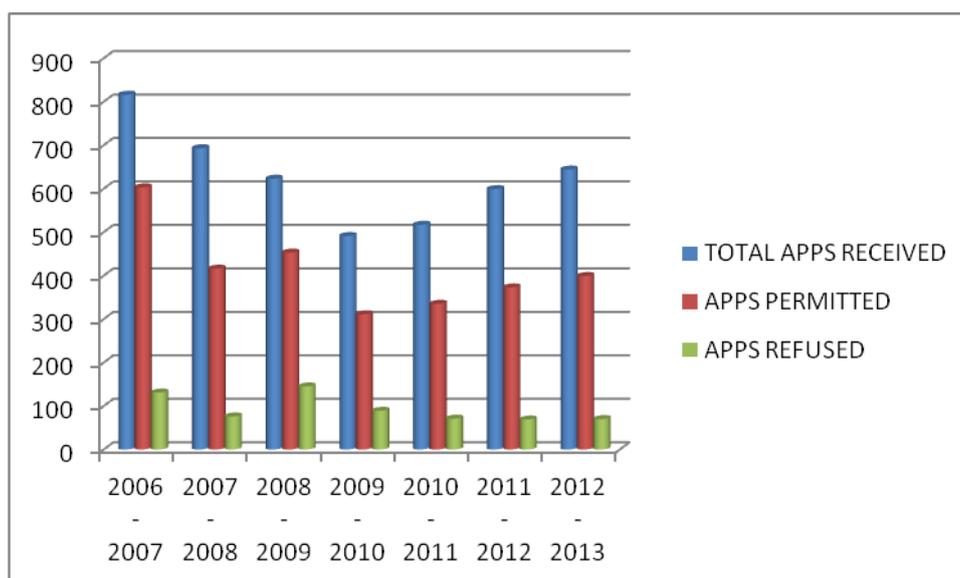
- **Avoiding incomplete applications that cannot be registered**

The paid service helps to limit the number of unviable application by advising on steps needed to improve it. Officers specify a five day period to turn an application from invalid to valid following the paid advice service.

It was the officer's view that the Welsh Government's introduction of standard validation process had been a retrograde step for the Authority, whose validation process had been more thorough and included, for example, the need to provide market assessments where appropriate 'up front' thus avoiding delay after validation. The panel noted that the Authority was able to extend the validation process only on developments of more than 10 units or 1000 hectares, and that a report on this would be considered by the Authority on 30 September 2013.

- **Reducing the number of unsuccessful planning application**

As a percentage of the total number of application received the number of unsuccessful application has reduced since the introduction of the paid service which is to be welcomed:



Applicants receive an early steer through the paid service which discourages them from making an application unlikely to succeed rather than relying on applying anyway and appealing if the application was refused. However, the panel noted that the number of successful appeals had reduced, although the advice from officers was that this was due to a number of anomalous decisions from the Planning Inspectorate

- **Saving time and money**

Based on the evidence received from agents, developers and officers the panel concluded that the paid service had saved time and money for applicants and also saved money for the taxpayer, as the applicant was paying for additional officer time. It also saved money for the applicant if the proposed development was very unlikely to be refused, in that an application might not be submitted, or submitted in a different way. What is not so clear is the amount of officer time saved at the actual application assessment stage.

What is very clear however, is the significant staff time and cost resource necessary to provide this service which is not currently being met by the income received.

- **Reducing confrontation in the planning system**

Based on the evidence of developers and officers, the panel felt that the paid service reduces confrontation later in the process by giving applicants an upfront indication of the viability of a scheme thus avoiding disappointment later in the process. It also enables officers and developers to develop more productive working relationships. This in turn leads to an improvement in overall relations between the developers and the Authority generally.

- **Raising the quality of developments**

Based on officer evidence the panel concluded that while there was useful scope to influence design at the pre-application stage, this scope is limited at later stages in the process

- **Gaining community acceptance and support**

The panel acknowledged that this is difficult to evaluate as it depends on whether the development is justified, but the paid service can recommend the use of public exhibitions and discussions with local people, as well as securing planning gain to communities through larger schemes.

- **Securing satisfaction with the planning process**

There is evidence from developers, users of the service and officers that the paid service has contributed to an overall improvement in user perception of the planning service which has had a positive effect on the wider reputation of the Authority compared with the negative perceptions pre-2009. However, judging from the feedback to the 2013 survey there are still some perceptions that the BBNPA planning process is slow and can be unhelpful. It is not clear how much this is due to historic views rather than recent direct experience.

A member of the panel, who had been very critical of the planning process in the past, concluded that the planning communication had improved 200% in recent years.

The Panel noted that the new permitted development regulations which will require people to apply for Certificates of Lawfulness in order to prove (for example in the event of them selling the property) that works carried out to properties did not require planning permission will be in place from 30 September 2013. This is likely to require officers to carry out more site visits to ascertain the principal elevation and will have a further impact on resources. The possible knock on effect of this on the provision of a customer led pre-application service needs to be considered when reviews of officer time and any changes to the pricing structure are considered.

Issue raised by a Panel Member

When addressing the draft report one of the National Park Authority Panel members posed the question of whether one of the reasons for timeliness, consistency and customer satisfaction issues was linked to the breadth of issues planning officers are expected to consider and comment on beyond their area of planning expertise eg flood risk, highway issues, renewable technologies, etc. Whilst technical specialist advice will always be required on these matters perhaps a training programme for planning officers to improve their understanding of these issues and how they interrelate would allow more confident, timely and consistent responses to be made at the pre-app and full-app stages. This question was put to one of the Principal Planning Officers and his response is given below.

Where possible, and depending on the scale and complexity of the proposed scheme and the issues raised, we source advice from specialists (Heritage Officers, Highways Officers, Ecologists, Natural Resources Wales, Dwr Cymru/Welsh Water etc.) but it isn't always possible to get this advice during the 21 day period for responses and (in the case of Ecological advice) we have offered specialist advice as well but for an additional fee at a rate of £30 per hour. If we cannot get the specialist advice we will offer a planning opinion/policy view but will also refer the applicant to the relevant people/organisations.

However, we do check the site constraints and cover as many issues as possible in the formal response and in case we miss something or are not aware of anything on the site (e.g. public sewers crossing the site) we include a caveat at the end of the letter as follows:

"Please note the constraints identified relative to the site as outlined on the plan provided relate to planning constraints on the date the constraints check was undertaken.

It is strongly advised that thorough site assessments are undertaken in relation to other constraints on and around the site which are not planning related but that you will need to consider and contact the responsible Authority or provider. These may include the location of utility infrastructure such as main sewers crossing the site, electricity lines, telephone lines, water pipelines (this list is not exhaustive).

Please note that this is the informal opinion of an Officer given on the basis of the information currently available to the Officer in relation to your proposals. The opinion is

given on a without prejudice basis under the Brecon Beacons National Park Authority formal pre-application process, titled 'Charging for Pre-Application Planning Advice'. The opinion given is not binding upon the Authority and all planning applications will be subject to formal determination based upon consideration of the merits of each application, current planning policy, legislation, relevant consultation responses and other material planning considerations."

Consistency can be an issue in terms of design as it is a subjective matter but we are trying to eradicate this by considering pre-app proposals at weekly new cases meetings for a consensus view.

In terms of specialisms within the team I have encouraged Officers to choose which particular areas they are most interested in (e.g. Listed Buildings/Conservation, Bats/Ecology, Renewable Energy, Design, TAN6 Rural Enterprise Dwellings etc.) to develop depth of expertise across the team so that I can allocate specific pre-app queries and applications to specific Officers which improves consistency and avoids the "Jack of all trades, master of none" scenario. We also tailor their specific training needs to the specialisms.

8.2 LEARNING POINTS

LEARNING POINT 1: We need to take into consideration any other consultations ongoing so as to avoid duplication or confusion for the public.

LEARNING POINT 2: The importance of planning the study more thoroughly from the outset – setting out clearly who and what would be involved in gathering the evidence.

What went well and what not so well

Well

- The contributions from external panel members – response times were helpful and there was interest in and commitment to the study
- The willingness of the Principal Planning Officers and DC Admin Manager to step up in a colleague's absence to contribute to the scrutiny review
- Telephone interviews were an effective use of member and client time in obtaining views about the pre-application service

Not so well

- The ability of National Park Authority members to commit time to the research stage, although they had input into focus groups and interviews with Principal Planning Officers

- The delay in obtaining data from planning – partly due to the long term sickness absence of the key officer
- The response rate of local planning authorities was disappointing but given the limited number of authorities providing a paid pre-application service this did not unduly hinder the study.
- The reliance on officers to progress the study at all stages

8.3 CONCLUSION

The importance of an excellent planning service for the National Park was highlighted in the Residents Survey carried out in 2013, where 90% of respondents thought that planning decisions can help protect the special qualities of the National Park. In a follow up question, 60% considered that we are doing this to a satisfactory level.

The paid pre-application advice service is only one aspect of planning excellence but this study has proved that it is a key element of a professional, high quality service. The context for this as part of continuing improvement is referred to at the beginning of this report. The paid service is not the only way we provide advice to applicants but it is a bespoke service for developers and for more complex planning applications, which is easily accessible and facilitates advice on specialist areas such as ecology and heritage. Crucially, it also avoids this service being funded by the taxpayer, although the study has clearly shown that there are views both externally and internally that while the advice is cost effective for applicants, it is not so for the Authority and this is one of the key recommendations below.

The evidence gathered suggests that the paid service has reduced the number of unviable applications, reduced the number of unsuccessful applications and has raised the quality of developments by influencing design at the outset of the planning process. Based on the evidence of developers and officers there are also indications that it reduces confrontation later in the planning process by giving applicants a clear indication of the viability of a scheme, thus avoiding disappointment later in the process.

The benefits of the paid service to the wider community are less clear but there are opportunities for officers to suggest the use of public meetings and exhibitions and to explore the potential for planning gain with larger developments.

From its study the panel concluded that the service has contributed to a more positive perception of the Authority's planning service over the last five years, although there are still some views, real or perceived, about the speed of resolution.

While not the main focus of the study, some useful observations on the clarity of advice notes, promotion of the service and ensuring that key groups such as the farming community have up to date and accessible guidance, have emerged from the scrutiny review, and these are reflected in the recommendations.

8.4 RECOMMENDATIONS

NB. The recommendations below have been edited from those which appear in the report, in order to remove duplication and to group themed recommendations.

RECOMMENDATION 1: The Authority needs to promote the service more to highlight the benefits of the service to potential applicants and this should form part of any future communications strategy as a matter of urgency making use of all forms of media.

RECOMMENDATION 2: That officers undertake a more detailed analysis of the following aspects of the service in order to review the scale of charges:

- a) input costs, i.e. the time it takes them to deal with pre-application advice multiplied by an hourly rate, and compare this against the incoming fees to reach conclusions on the cost-effectiveness of the service to the National Park Authority;
- b) a weighting of benefit to reducing the time spent on the assessment of applications that have received pre-application advice thus representing a potential cost saving to the Authority, and the need to consider a scale of further charges when additional information is required.
- c) What is a reasonable and realistic period to allocate for follow up enquiries and consider a supplementary fee when that period has been exceeded. This should then be reflected in the pricing system outlined in the guidance note.
- d) The usage of the service should be reviewed on an annual basis to ensure that costs are still covered.

RECOMMENDATION 3: That officers undertake an analysis of response times and compare against the stated level of service in the guidance note to ensure that targets are met, and link these to customer satisfaction levels which are relatively low in terms of responsiveness but should be part of future monitoring (for example, minor proposals 14 days, 1-2 dwellings 21 days, major proposals – 28 days).

RECOMMENDATION 4: That the importance of clarity and accessibility of advice be reviewed as follows:

- a) That officers review the comments made by a National Park Authority member on the guidance note and make any relevant amendments;
- b) Consider developing a ‘jargon buster’ set of planning terms which could be included with any advice issued;

- c) That verbal and written advice issued to applicants should be clear and easy to understand, with written advice given through a standard format with a summary in plain English, following the necessary detail, which outlines the key points of the advice and how the application should proceed.

RECOMMENDATION 5: Advice from planning officers should be consistent across the whole team and applicants should not receive differing/conflicting advice from Authority planning officers. Ideally, a planning officer will be assigned to each case from the pre application stage through to submission. Otherwise officers should set out the processes they have in place to ensure consistency eg standard forms, team leader, discussion at new case meetings.

RECOMMENDATION 6: That officers liaise with Farming Connect to ensure that their planning consultants are fully briefed on BBNPA planning process including the paid pre-application service. This to be done as an evening meeting in line with suggestions from Panel Member Colin Passmore.

RECOMMENDATION 7: That officers give consideration to how the Authority might influence the current level of planning fees in Wales which are below those in England, resulting in disparate income