

Date	Org	Email	Comments on Priorities	NPA Officers response on Priorities	Comments on Service Levels	NPA Officers response on Service Levels	Additional Comments	NPA Officers response on Additional Comments
/02/20 13			<p>On consultation letters and online applications it is not clear who the case officer dealing with the application actually is and there are no direct contact details. It is essential for consultees to be able to discuss issues with the case officer directly.</p>	<p>Planning Officers at the BBNPA do not have direct dial lines- there are physical/technical difficulties in providing this but primarily the BBNPA employs customer service advisors to assist callers as the first point of contact. These customer service advisors will be able to connect a consultee straight away with the relevant case officer if available, or if not, may be able to deal with the enquiry thus avoiding delay of waiting for a return call from that officer. Whilst every Officer has an individual email address and will often be engaged in two way correspondence with a consultee over a specific issue on an application, the Generic email address is the one published and encouraged in use for the submission of enquiries, questions or any documentation. The use of the generic email address is in place to</p>				

				<p>enable the planning administration staff to keep a log of incoming electronic mail and direct it to where it is appropriate or upload to the public access system if necessary. It also avoids such issues as correspondence going unanswered for many weeks if someone is away and also ensures that the likes of consultation responses to an application as part of the statutory process are uploaded to the website and made publically available at the earliest opportunity as part of providing a good service to the public.</p>				
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27/02/
2013

Understand that there are social and economic reasons that are just as important as environmental ones. You never explain what direct effect a particular application has on the environment and provide no direct evidence. You just hide behind the usual non- descript statements.

As a result of this the service is considered to be non-responsive to the needs of the community.

Your pre application service which is charged for (and seen as a cash cow for the authority) is a further cost to business applicants and is not as good as that provided by Powys CC which is free and involves its regeneration and highways departments in pre app.

Your S106 charging is another money spinner for the authority and it holds up applications which is detrimental to businesses. Many are not required by other authorities.

The refusal of your S106 solicitor to meet to discuss S106 agreements is totally unacceptable

Looking at the performance over the last years of the BBNPA 8 week performance it is regularly wallowing at the bottom of the Welsh Gov table of the Welsh authorities. It is not the length of consultation time but the time it takes to process and also the time it takes for post application conditions and S106's to be signed off by the officers.

I doubt that these and the above comments will be included in this review but I do have evidence to back up my comments.

<p>06/03/ 2013</p>		<p>We feel that the comments made by the community council who have been elected to represent and reflect local people's feelings need to be listened to taken into account more when planning decisions directly affecting their local area are being made.</p>	<p>Community Councils are a Statutory Consultee now within the process so provided the CC makes a proper and soundly reasoned (in planning terms) objection which cannot be overcome through obtaining amendment or imposition of condition, then such an application and objection would be reported to the PAROW Committee. Our Officer reports (whether delegated or for PAROW) are detailed and will always carry a summary of each and every consultee comment which has been received up until that reports production. However, Planning law indicates that a LPA must determine its applications in accordance with its Development Plan Policy and the balance of other material considerations. The Comments of Community Councils often form an important other consideration but this must be balanced against all other</p>		<p>Our community council meets on a monthly basis on the first Monday of every month. Where applications are received between meetings it is not always possible to meet the 21 day deadline and we appreciate an extension in some circumstances. Recently we have had to call extra meeting which we are required to give 7 days notice of to the Public specifically to deal with planning applications. It may be appropriate to give Community Councils longer to respond to take into account the monthly meeting cycle.</p>	<p>The Welsh Government expects all LPA's to determine their planning applications within 8 weeks(except in the case of EIA development which is 16 weeks).In addition, a planning applicant can appeal for non-determination after the 8 week date has elapsed meaning the decision on the application passes out of the LPA hands and is given to the Planning Inspectorate. In such circumstances the LPA is open to costs against it. The BBNPA already gives community councils a week longer than required in the Regulations (National Planning Law) to return formal responses but with a mind other things that have to happen within the process, we cannot routinely extend consultation time scales further. However, there are occasions when we can accept a response a few days after the</p>
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considerations and the policy position. The result of this balance will sometimes be that a planning decision is taken at odds with the CC views. Reading the planning officers report for any application should explain why the decision was made in the way it was. CC's are also reminded that any application which goes to a PAROW meeting will also fall within the PAROW public speaking system and so there exists another avenue for CC's to get their point of view across.

deadline. If CC's find they are unable to return comments on a particular application they should contact the case officer who will be able to advise.

15/03/2013			<p>[This community council] has easy access to Planning Officers. Community Councils are given direct telephone line numbers and direct e-mail addresses and responses are quick. At B.B.N.P. all is generic and responses are slow or inadequate. Any "Planning Training" that has been provided by B.B.N.P. seems to be focused on meeting the needs of B.B.N.P. to comply with statutory requirements / feedback and not genuinely looking at the needs of the Community Councils / communities. I would like to see notification of planning committee meeting dates, copies of the agenda and reports, notification of site visits etc. all this is currently done.</p>	<p>See above in relation to Contact with Officers. In terms of Planning training, certainly this is not representative of the feedback to Development Control training carried out by Officers with either Authority Members or with Community Council cluster groups. In terms of notification of planning committee dates, copies of agenda reports, minutes of meetings/site visits etc. all of this is on the Authority web site.</p>	<p>I would like to highlight the need for s.106 agreements to be transparent and involve the local Community Council.</p>		<p>Feedback on decisions could be through e-mail. When sending a response to a consultation it feels like sending it into a "black hole" as it is never seen or heard of again except when occasionally a determination letter is sent after a decision. Any attempt to engage with Officers does not seem to be encouraged.</p>	<p><i>Reports containing consideration of the application and consultee comments is available on line. The Head of DC or his Officers are more than happy to meet with representatives of community councils - just phone in and make an appointment.</i></p>
19/03/2013							<p>21 days is not always appropriate when community councils only meet on a monthly basis - so if the timing is wrong we either have to re-schedule a meeting, or not reply to the consultation. This arrogant approach is not helpful.</p>	
19/03/2013							<p>Insufficient planning applications since I have been clerk to answer many of these questions.</p>	

							Council Members had strong negative views.	
25/03/ 2013							We can still receive consultation letters by post and often second class. This gives us less time to consult internally within our organisation. As our inspectors regularly travel around Wales, this means that regrettably we do not always respond within the timescale given to us. We have a generic planning consultation inbox - which can be used to submit planning consultations which should help to speed up the process. Thank you	
26/03/ 2013							In relation to time scales, the legislation allows statutory consultees 28 days to respond - 21 days is therefore insufficient.	

<p>26/03/2013</p>		<p>You do not consult us on planning applications anymore. You have no direct dial access to officers. This is completely unacceptable in this day and age - it is no longer the 1970's.</p>	<p>We do consult on applications where considered appropriate to send individual letters, but this in practice in areas such as RCT, NPTCBC etc. is rare, as within a National Park (and within these relatively small areas of the park) there are few applications of such scale and significance to warrant consultation as provided for in the Regulations. We do advise all constituent Authorities of each and every application submitted to the BBNPA by sending out our weekly list of planning applications received - RCT are on that emailing list. We would maintain that our system, where you phone in and get to speak to a real person (who may be able to deal with your enquiry there and then) rather than an answerphone or automated system has clear customer advantages.</p>	<p>The biggest challenge BBNP are going to face is the perception of the planning service. Applicants and agents comment regularly on how difficult they find the planning process to be in the Park.</p>	<p>Within a National Park there is a clear expectation that a higher quality development standard should apply with regard to maintaining or enhancing the character and special qualities of the Park. It is difficult to comment further on the planning process difficulties experienced within the Park without detail or evidence. With the exception of any local information requirement to deal with local circumstances, the planning process should be no more difficult here within the National Park than in any other well run planning service seeking high quality development.</p>	<p>BBNP have ceased to consult [this authority] on applications for the last 3-5 years. There was no discussion when BBNP made that decision - only a letter to explain why a decision had been made.</p>	<p>There may be some confusion here between old processes of sending advisory letters out in connection with each and every application in a constituent authority area (no longer done as each Authority receives the weekly list of all applications received) , or the proper process of fringe development consultation as provided for in the regulations (rarely needed as development proposals in the park small in scale and unlikely to have effect upon the adjacent Authority - Such is opposite for the Unitary Authority)</p>
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27/03/2013					Timescales	Noted		
27/03/2013					It is impossible to evaluate the Level of Service subjectively as our experience is limited, hence 3 for everything.	Noted		
25/02/2013								
26/02/2013			It has been indicated that [an authority] are satisfied with your services and inclusion of comments in report. However, this Authority within Planning is not consulted on a regular basis and is difficult to provide a more accurate response.	Thank [this authority] for their response. We acknowledge as above that the occasions when we are required to formally consult planning under the Regulations are few. However, direct consultation with constituent Authority specialist services (eg; Highways, Environmental Health, Leisure Services etc) is taking place all the time	Whilst success at appeals (being dismissed) can provide some indication on quality of decisions made, sometimes the matters being appealed can be subjective (design, landscape impact etc). Therefore have some limitations.	We agree there are limitations to this indicator; not least the low numbers of appeals can make the percentages as a result of the data subject to significant swing year on year. However, as part of a suite of indicators of the Excellent Planning Service we consider it has value. The subjectivity of some appeals will speak to the quality	[This authority] has limited interaction with BBNPA except in rare circumstances where applications are close to or on adjoining boundaries with [this authority]. As such, in some case where satisfied has been selected, this indicates we have no identifiable issue with the service or communication from BBNPA, rather than an assessment of quality.	Noted; But again, there are Services connected with Development within [this authority] where there is more regular

					of the work Officers do in defending the Authority position.		contact.
01/03/ 2013				Speed of determination is a very poor indicator of service, getting the right decision should be the major indicator of service. Customer surveys are always likely to be negative as those who respond normally are unhappy with the service or more likely the decision that has been made.	Noted	Our published service standard is to respond to all planning applications inside 21 days of receipt. At the present time any reduction in this timescale could not be met without an increase in staff and consequently a raise the service charge	Noted - there are no plans to reduce the consultation timescales presently given.

05/03/2013			The ease of access to the internet to specific information is very complicated and when recovered is not always accurate or readable.	Noted - we could look to make improvements to our web linkages and the layout. In terms of the actual information available, this can fall into 2 categories; 1- Information and Guidance that has been produced by the BBNPA; AND 2- Information submitted by others as part of our processes eg application forms, plans, supporting documents etc. Whilst we can vouch for the accuracy of 1, we cannot do so for 2.	Training for Councillors on planning issues after each election should be put in place. Also training for other clerks on issues.	Training for BBNPA Members is in place and indeed, the Planning Officers Society Wales annual survey indicates our members receive significantly more training hours than many other Authorities. Officers could offer this level of training to Community Councils but there would be significant resource implications.		
15/03/2013			Officer contact	Noted				
19/03/2013					There are no concerns from this Community Council	Noted and thank you for your comments		
19/03/2013							As clerk I sometimes have problems down loading information etc., but I can usually have a hard copy forwarded. Everyone is helpful.	Noted and Thank you for the comment.

19/03/2013					Submit applications online is excellent, but I find it hard to believe you cannot pay online.	Noted and thank you for your comments. This issue can be explored again with Finance but we are of the understanding there would be cost to the Authority of taking such payments	The Community Council feels that the officers at BBNPA are not always aware of the needs of rural communities. We are finding it very difficult to find accommodation for the next generation of farmers due to the influx of wealthier persons pushing up house prices in the area. I would suggest that the BBNPA look at the large number of derelict properties and be more considerate with regard to giving permission to rebuild and bring them up to modern day standards.	We note the concerns but advise that Planning Law indicates we must make planning decisions in accord with Policy. The issue being raised is primarily a planning policy issue and one of Service or Process we can change as a result of this Survey.
25/03/2013					The value of a survey such as this one is to be found in application of its outcomes	Noted		
26/03/2013			I have not submitted any consultation comments so am unable to answer	Noted	In my opinion there is too great an emphasis on speed in determining planning applications. There has to be a balance between speed and quality and the balance has to move towards quality of decision within a National Park.	Noted		

17/04/
2013

As stated once I finally got through as they never bothered to reply to any messages, via email, they simply did not listen and ignored the valid reasons. On behalf of a constituent, he experienced delays, difficulty in speaking to officers and getting conflicting information, huge expense in meeting demands for reports and surveys leading to increased pressure on his business, the BBNP should be going out of its way to support businesses who bring income into the local economy and to employers who employ a large number of people. Having tried to contact a Planning Officer by telephone and never having the call returned I quickly realised I had a fast response by email. Is this because you can log emails?

Comments are noted
and will be considered

Happy to pay for pre-application advice, however the advice must be sensible and consistent to aid the planning process. The BBNP will use a S106 agreement wherever possible and charge inappropriately for their solicitor to draw them up. The BBNP do not listen to comments made by Community Councils and I am unsure the value of spending time and resources attempting to suggest to Community Councils and others of anything different.

Comments are
noted

Unsure why BBNP need to have a planning function in the first place, what is the difference in having Powys CC undertake this function with special safeguards for the 'protected' landscape? Additionally the BBNP need to address the very real issue of affordable housing which they single handedly seem unable to comprehend. The Planning Department seem to be at odds with the good work the Authority does in assisting tourism, rights of way and welcoming visitors to the area.

SUMMARY OF ADDITIONAL COMMENTS RECEIVED AS PART OF THE CONSULTATION

COMMENTS ON PRIORITIES

- Comments are made in relation to the availability of Officers and the fact that Officers do not have a direct telephone line, although are quick in responding to emails.
- Community Councils feel that their comments are not taken into consideration in the determination of applications and would feel the benefit of tailored training and additional notifications in relation to committees, site visits and agendas.
- Not enough explanation or evidence is given with regard to the impact of development on the environment, and responses from Officers are slow, inadequate and generic.
- Website can be complicated to use and information can be unreadable or incorrect when found.
- One comment states the satisfaction of the inclusion of their comments in Officer reports.
- Officers need to take into account that social and economic reasons are just as important as environmental ones.

COMMENTS ON SERVICE LEVELS

- Pre application advice must be consistent and sensible; however the chargeable pre application system comes at a further cost to businesses and applicants.
- Section 106 charges are too high and concerns raised in relation to the refusal of the S106 Solicitor to meet and discuss agreements. Community Councils would like S106 Agreements to be more transparent and have their involvement.
- BBNPA will struggle with the perception its planning services has.

- Several comments have been raised in relation to the importance in the quality of the decision being made and not on the speed of determination.
- Success at appeals provides an indication of the quality of decision made, however the matters appealed can be subjective (i.e. design).
- Community Councils feel that their comments are not taken on board and feel that training for newly elected Councillors and Community Council Clerks would be beneficial.

ADDITIONAL COMMENTS

- 8 weeks performance is poor and the timescale for processing, discharging conditions and signing S106's is slow.
- Community Councils feel they would benefit from an extended consultation period as they only meet on a monthly basis.
- Any reduction in the 21 days for consultees could not be met without staff and cost implications.
- Officers are not aware of the needs of a rural community and should be more considerate in allowing rebuilding of derelict properties.
- Attempts to engage with Officers are discouraged.
- Unsure as to why BBNPA need a planning function as it could be dealt with by Powys with safeguards for protected landscape.
- Need to address issues of affordable housing.
- Planning is at odds with tourism and rights of way who welcome visitors to the area.