

REPORT OF DIRECTOR OF PLANNING

SUBJECT:
WALES AUDIT OFFICE: DELIVERING WITH LESS: PLANNING SERVICES

Purpose of Report:

To advise members of the final report provided by the Wales Audit office on the audit of PCNPA planning services. The author Mr Rob Hathaway from the Audit office has been invited to attend this meeting and speak to the item.

Background

The Wales Audit office audited the three Wales National Parks with regard to the provision of their planning services including comparisons with the other two national parks. Detailed interviews took place with staff, planning agents and others involved in the planning process. Each Park received its own report and these have been shared.

The Auditor made several proposals for improvements. For PCNPA there were a total of four (the first two were as noted for the other two national parks).

Audit recommendations

1. Work in partnership with other national park authorities and other planning authorities in Wales to develop:
 - Consistent, robust comparative cost and volume data and use this to demonstrate whether or not it is providing value for money; and
 - Relevant outcomes to help measure the contribution towards meeting the goal of sustainable development, especially in relation to longer term change.

This work should be undertaken in co-operation with the Planning Officers Society for Wales (POSW), Welsh Local Government Association and the Welsh Government, building on the experience of cost measurement and comparison via Heads of Planning Scotland and the Planning Advisory Service England.

2. Increase levels of strategic collaboration and partnership working, especially with other national parks and planning authorities in Wales, including exploring opportunities for reducing planning service costs and the options for closer workforce planning.
3. Strengthen improvement planning through agreeing clear planning service priorities, setting more challenging targets and supporting improved document management.

4. Review the Authority's position on charging for the provision of some planning service to ensure opportunities for income generation are not lost.

Financial considerations

The recommendations clearly have financial implications which will need careful consideration at the time of implementation.

Risk considerations

The Authority would be well advised to consider the approach and direction of travel recommended by the Audit Office. Implementation of the recommendations together with a closer working relationship with the other 2 National Park Authorities will have a bearing on the limitation to reputational and financial risks.

Equality considerations

Equality issues will be matters to consider with regard to the implementation of the recommendations.

Recommendation

Members welcome the report and note the recommendations within it.

Background Documents and attached

Delivering with Less: Planning Services – PCNPA Audit year 2014-15 – full report
The three separate Park Reports – (summaries only)

(For further information, please contact Jane Gibson)

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Delivering with Less: Planning Services

Pembrokeshire Coast National Park Authority

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Status of report

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Robert Hathaway prepared this report on behalf of the Auditor General for Wales under the direction of John Roberts and Alan Morris.

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Summary report

1. National park authorities have a duty to protect the landscape for which they have responsibility, while, at the same time, ensuring that people can enjoy that landscape. An important part of that duty is the national park authorities' statutory planning function¹. Planning services represent a significant proportion of the time and resources that a national park authority spends in delivering its overall responsibilities.
2. The Welsh Government has recently significantly cut funding to all three national park authorities. These cuts came into effect during 2014-15, with further cuts required in 2015-16 and possibly beyond. All national park authorities in Wales are now taking difficult decisions on how they deal with reductions in funding. Given the proportionately high spend on the delivery of planning services in national park authorities in Wales when compared with councils, reductions in overall funding pose particular risks. This study examines and reports on how national park authorities are managing this risk. In May 2009 we produced an inspection report² on the performance of the Planning Service of Pembrokeshire Coast National Park Authority (the Authority). That report found that, while the planning service was maintaining a good level of performance, it needed to address weak leadership, performance management and pockets of poor performance in order to deliver sustained improvement.
3. We have carried out work at all three national park authorities in Wales to assess the extent to which they were delivering efficient planning services with less money. Our fieldwork in the Authority consisted of document and data reviews, as well as a series of interviews and focus groups with selected officers, members, community councillors and planning agents. Our analysis and fieldwork and information provided by the national park authorities in Wales have allowed us to make comparisons in performance and costs.
4. In this report, we seek to answer the question: Is the Authority providing efficient Planning Services aimed at high performance, even in the face of increasing budget constraints?
5. We concluded that improving leadership and community focus are supporting better planning performance, although the Authority's approach to collaborating with other national park and planning authorities in Wales and achieving value for money is not sufficiently robust.
6. We reached that conclusion because:
 - improvements in leadership and an increased focus on community priorities are strengthening the Authority's ability to deliver a better planning service, although service priorities lack a clear focus;

¹ This includes deciding on planning and heritage applications, developing local land use and heritage plans and investigating and enforcing against breaches of planning control.

² [Wales Audit Office: Pembrokeshire Coast National Park Authority - Planning Services, May 2009](#)

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- overall costs, performance and customer satisfaction are generally good but collaboration, while improving, is not sufficiently strategic, housing land supply and affordable housing provision are low and income generation is slow to develop; and
 - performance management is supporting improvement in planning services but the Authority is not sufficiently focused on costs, value for money or the outcomes of its planning service.

7. To assist the Authority in addressing the areas of improvement identified in this report we make the following proposals for improvement. The Authority should:

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| P1 | Work in partnership with other national park authorities and other planning authorities in Wales to develop: <ul style="list-style-type: none">• consistent, robust comparative cost and volume data and use this to demonstrate whether or not it is providing value for money; and• relevant outcomes to help measure the contribution towards meeting the goal of sustainable development, especially in relation to longer-term change. This work should be undertaken in co-operation with the Planning Officers Society for Wales, Welsh Local Government Association and the Welsh Government, building on the experience of cost measurement and comparison via Heads of Planning Scotland and the Planning Advisory Service England. |
| P2 | Increase levels of strategic collaboration and partnership working, especially with other national park and planning authorities in Wales, including exploring opportunities for reducing planning service costs and the options for closer workforce planning. |
| P3 | Strengthen improvement planning through agreeing clear planning service priorities, setting more challenging targets and supporting improved document management. |
| P4 | Review the Authority's position on charging for the provision of some planning services to ensure opportunities for income generation are not lost. |

Detailed report

Improvements in leadership and an increased focus on community priorities are strengthening the Authority's ability to deliver a better planning service, although service priorities lack a clear focus

Improved leadership of the planning service and stronger governance arrangements are supporting more effective scrutiny and clearer decision making

8. Members and senior officers demonstrate significantly improved leadership and management of the Authority's planning service. Unlike the findings of our 2009 Planning Service report, which found weak leadership and performance management and pockets of poor performance, the planning service is now driven effectively at senior manager and member level. We found that the Authority now demonstrates improved governance, scrutiny and performance management. In particular, members now recognise that a high-quality planning service is vital to delivery of the Authority's long-term vision and have a clear sense of ownership of its success.
9. The expertise and experience of the six Welsh Government appointees bring added capacity to the Authority's membership. Members we spoke to value the chief executive's and director of planning's collaborative style of working that makes use of members' capacity and skills. Members also express confidence in senior managers and planning officers, whom they regard as bringing new leadership and appropriate external experience to bear in the work of the service. This greater confidence has influenced higher levels of delegation to officers, which improves efficiency in decision making on planning applications. Members told us that the centralisation of officers at the Pembroke Dock office had supported a more focussed improvement culture.
10. Governance at the Authority has improved since our earlier 2009 planning services inspection. The Authority's scrutiny processes have benefited from a joint review with Brecon Beacons National Park Authority. Backed by a Welsh Government grant, the two authorities researched best practices, tested processes and developed scrutiny models that best suited both areas. In order to increase capacity and improve its focus, the Authority has reviewed its Policy Review Committee and split it into two committees with nine members on each. One committee focuses on scrutiny while the other focuses on implementation.
11. The Authority uses its scrutiny function to tackle issues of local importance. For example, due to the degree of local dissatisfaction with the provision of affordable housing, members led a scrutiny review into this aspect. Members told us that their call for local evidence has given them far better understanding and ownership of the problem. The affordable housing scrutiny recommendations have

already led to new supplementary planning guidance. The recommendations will also result in a partial review of the Authority's local development plan in an attempt to better reflect local market conditions and increase delivery of affordable housing for local residents. Members considered that the success of the affordable housing scrutiny review was partly attributable to learning from an earlier Public Rights of Way scrutiny review. This demonstrates a good transfer of learning within the Authority.

12. Members of the Authority's development management committee operate under a clear code of conduct that supports the high principles of transparency and fairness in planning decision making. The Authority's separate code of conduct for planning committee members was cited as good practice by the Independent Advisory Group in June 2012 in its report **Towards a Welsh Planning Act: Ensuring the Planning System Delivers**. The code of conduct informed the Independent Advisory Group's recommendation for a national code of conduct for planning committee members.

The Authority is increasing its focus on improving economic prosperity for its communities

13. As part of its role in promoting sustainable development, the Authority is increasing its focus on improving the economic and social well-being of communities in the National Park. This shift in focus is partly informed by public consultation that suggested that the Authority prioritise its investment and focus on improving the contribution that the Authority can make in increasing economic prosperity.
14. The two statutory purposes of the three Welsh national park authorities are to conserve and enhance natural beauty, wildlife and cultural heritage and to promote public opportunities for understanding and enjoyment of the Park. When national park authorities carry out these purposes they also have a duty to seek to foster the economic and social well-being of local communities in their area. The Authority, along with other national park authorities in Wales, lies at the forefront of testing new approaches to the Welsh Government's overriding aim of sustainable development.³
15. The Authority and Snowdonia National Park Authority are jointly reviewing the success of their policies and actions in supporting job creation in micro businesses. The joint review aims to gather evidence as to whether existing policies support sustainable communities and micro businesses in the National Park. Members were also instrumental in ensuring a stronger Improvement Plan objective relating to economic prosperity. This led to the 2013-14 Improvement Plan stating at objective 3 that the Authority aimed to ensure that:
 - 'The work of the National Park Authority has a positive, sustainable impact on the local economy and the well-being of residents and visitors to the National Park.'

³ Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

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16. Officers and members work well with agents and developers with a view to ensuring that new, appropriate economic development can occur in the National Park. Examples include the Royal Gatehouse in Tenby which is a tourism scheme that the Authority initially refused but then worked on with the applicants to negotiate improvements in order to make the scheme suitable for approval. Similarly, planning consent to redevelop part of Saundersfoot Harbour involved members playing an important role, while at Slebech Park, planners and ecologists agreed a phased programme of work to support a tourism scheme.

Team plans link to corporate objectives but customers, staff and members are often unclear on planning service priorities

17. Development Management and Park Direction team plans guide the actions of staff. These two team plans link well with the Authority's Corporate and Improvement Plans. For example, the Development Management team plan links improved pre-application responses to the corporate objective of providing value for money while the team plan also focuses on seeking to improve the public perception of the planning service. However, members, staff and users share different service-wide priorities. These differences result in a lack of clarity and focus. For example, members regard speed, customer satisfaction and pre-application advice as the main objectives or features of a quality planning service. Managers regard speed, report writing and quality decisions as priorities, while the focus of front line staff is on allowing development, quality of design, customer satisfaction and engagement. Users want consistency and certainty in decision making and are generally less concerned with speed of decision in eight weeks.
18. Without clear agreed local priorities, the actions of staff and managers will often default to the Welsh Government's mandated targets on speed of decision making. While speed is an indicator of overall quality, this needs to be balanced against those priorities that members have agreed locally, such as well-being and economic prosperity. Clear priorities also assist strong and effective performance management. Without clear priorities the service cannot fully align its capacity and resources behind its team plans and its improvement objectives.

Overall costs, performance and customer satisfaction are generally good but collaboration, while improving, is not sufficiently strategic, housing land supply and affordable housing provision are low and income generation is slow to develop

Planning agents express high levels of satisfaction but, despite involving stakeholders, citizens' rating of planning services is lower than for other Authority service areas

19. In 2014-15, 75 per cent of planning applicants who responded to the Authority's survey considered that they were satisfied or very satisfied with the way the Authority dealt with their planning application. Comparable customer satisfaction at Snowdonia National Park Authority was 87 per cent and 42 per cent at Brecon Beacons National Park Authority. The majority of planning agents we interviewed spoke very highly of the work of the Authority's planning service. Agents indicated a stronger preference for submitting planning applications to the Authority, rather than to surrounding local planning authorities. They considered that the Authority's members and officers displayed a very clear sense of ownership, passion and care in relation to delivery of the planning system. The agents felt that it was relatively easy to speak to officers and they valued the free pre-application advice service that they considered worked well. Agents particularly valued the planners' willingness to support appropriate, innovative and sensitive design and their desire not to try and keep the National Park as a merely 'chocolate box' landscape. However, planning agents considered the Authority's affordable housing policy to be inflexible and ineffective given the high requirement for low-cost housing when making applications for residential development.
20. In March 2013, an Authority-wide citizens' panel survey indicated that planning was rated lower than other service areas. This, plus press articles and complaints, has on occasions led to a negative perception of the Authority's planning service. Since this survey the Authority has placed more focus on explaining the role and function of the planning service in meeting its wider corporate and land management aim. Alongside this however, there appear to be opportunities for the Authority to publicise and highlight the improvement in the performance of its planning services.
21. The Authority combines effectively with Pembrokeshire County Council to hold quarterly planning agents' meetings that cover issues such as emerging policy and guidance, overall performance and important planning decisions. The majority of agents considered that the Authority provided sufficient opportunities for engagement with planning officers, although at least one agent considered that the Authority does not maximise the potential of joint working with the private sector.

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22. Senior planning managers meet with town and community councils to promote effective engagement and support for the Authority's policies and objectives. We met the clerk of one town council who was very supportive of the operation of the Park's planning service. The Town Council allows easy access for residents and visitors to view copies of planning applications at its offices and this allows for greater public engagement in the planning process.

Performance is generally good with efficient decision making but housing land supply falls well below the five-year requirement and affordable housing provision is poor

23. The Authority's performance, when measured against the 2014-15 Welsh Government's Performance Framework⁴, is generally good, although the Welsh Government identifies the need for improvement in allocating a sufficient supply of housing land.
24. Although the Authority was the first in Wales to adopt its Local Development Plan, it does not possess a five-year housing land supply. In 2014-15, its supply of 2.7 years was below the level required by National Planning Policy Guidance and this leaves the Authority more vulnerable to losing appeals against housing-application refusals.
25. In 2014-15 the Authority decided on 86 per cent of all applications within the required time scales, an increase from 77 per cent the previous financial year. The Authority's performance on this measure was the third best among Wales' local planning authorities. Brecon Beacons National Park Authority decided on 88 per cent of all applications within the required timescales while Snowdonia decided on 75 per cent. In 2014-15 the Authority improved its speed in deciding 'major'⁵ applications, deciding 22 per cent (two out of nine) in the required timescale. Rates of delegation increased to match the high performance of Brecon Beacons National Park Authority. In 2014-15 the Authority increased the percentage of applications it delegates to officers from 84 per cent in the previous financial year to 93 per cent, in line with that achieved by Brecon Beacons National Park Authority. In 2014-15 the Authority approved 95 per cent of all planning applications it received compared with 90 per cent at both Brecon Beacons and Snowdonia National Park Authorities.
26. Quality of decision making has improved. The Authority performs well against other national park authorities in Wales in relation to the number and percentage of decisions taken against officer advice. In 2014-15 only one such decision was taken out of 17 applications. At 22 per cent this contrasts with Snowdonia National Park Authority at 48 per cent (10 out of 21) and Brecon Beacons National Park Authority (3 out of 17). The Authority successfully defended 77 per cent of planning appeals made against its decisions, an increase from just under 50 per cent the previous

⁴ **Welsh Government Performance Framework Table.** The Welsh Government plans to update the Performance Framework Table on a quarterly basis.

⁵ Major applications include applications for residential development of 10 dwellings or more or above 0.5 hectare or for office, general industry or retail development of over 1,000 m² or one hectare.

financial year. The Planning Inspectorate awarded no costs at section 78 planning appeals against the Authority. The Public Services Ombudsman did not record any cases of maladministration against the planning decisions of the Authority. Judged by the above measures, the quality of planning decision making is sound.

- 27.** In 2014-15, the Authority investigated 66 per cent of enforcement cases in 12 weeks. In 2014-15, it took enforcement action or received a retrospective planning application in 74 per cent of cases within 180 days. The comparable figure for Brecon Beacons National Park Authority was 48 per cent. The average time taken to take enforcement action compares well with the majority of local planning authorities in Wales at 88 days. However, the number of enforcement cases outstanding – longer than 12 weeks – has increased from 58 at the end of the 2012-13 financial year to 83 at the end of the 2014-15 financial year. Conversely Brecon Beacons National Park Authority has reduced the figure from 124 to 55 over the same period. Comparable enforcement data is not available to judge the similar performance for Snowdonia National Park Authority on the majority of enforcement measures.
- 28.** In 2014-15, the Authority significantly increased the number of affordable housing units granted planning permission over the previous financial year. This rose from nine housing units (17 per cent of all housing units approved) to 30 housing units (60 per cent of all housing units approved). However, the number of affordable houses built has dropped from three in 2013-14 to none in 2014-15. While affordable housing figures are not directly comparable due to differing housing policies and guidance and to sometimes widely differing land values, comparable figures over the same two-year period for affordable houses built in Brecon Beacons National Park were 58 and 37 in Snowdonia National Park. The lack of available affordable houses weakens the planning service's contribution to meeting the Authority's objectives of sustaining and building strong local communities. The Authority has already addressed its affordable housing policy through reviewing its guidance and is preparing for a partial local plan review that will centre on amending its long-term affordable housing policies.

The Authority has made prudent savings, including reductions in planning service staff, but has been slow to develop income generation and improve document management

- 29.** Members feel adequately engaged with budgetary planning and consider they work well with officers to ensure that their views are reflected in budget discussions. They particularly valued the informal budget workshops that were supported, where necessary, by officers. Members consider they are sufficiently informed of budget pressures and opportunities to deliver services in different ways. The Authority's funding for 2014-15 and 2015-16 reduced by over £772,000, or nearly 13 per cent. The Authority delayed the larger budget cuts until 2015-16. This delay was to allow for more planning and preparation time so as to limit the impact on service delivery. This avoided reducing funding on projects too quickly and spared the need for compulsory redundancies.

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- 30.** The Authority's 2014-15 budget strategy was comprehensive in its examination of options but lacked a clear sense of prioritisation for work programmes in the longer term. The strategy proposed nine options including tightening budgets, improving efficiencies, stronger collaborative working and developing local income but it did not set any challenging targets for the planning service in order to drive and set greater financial efficiencies.
- 31.** The Authority prioritises its planning services budget but it is not ring fenced and the planning service has to contribute to the Authority's overall savings plan. The planning service drills down into budgets to look for opportunities to contribute to the budget cuts required. Examples include:
- freezing posts and/or employing staff on different contracts and pay grades if the job allows;
 - reducing time and spend on the plans accompanying decision notices; and
 - cutting back on non-essential travel and use of pool cars.
- 32.** Other areas where the planning service seeks to become more efficient include reducing the number of development management meetings per year, purchasing private legal advice through a public sector framework contract and more flexible working between planning officers. However, the Authority is missing opportunities to increase income through charging for pre-application advice. For example in 2014-15, Brecon Beacons National Park Authority received £27,580 in pre-application income and has benefited from pre-application income for many years.
- 33.** The Authority has not introduced a modern document management system that can support more efficient working of the planning service. Plans and supporting information in connection with planning applications cannot be viewed online. As a result the Authority only has a partial online facility for customers and planning users. This omission introduces frustrations and inefficiencies for the public, statutory consultees and customers.
- 34.** Prudent financial savings over recent years by the planning policy team have allowed the Authority to draw on earmarked reserves for its local development plan and planning policy work. By 2013-14 the Authority had saved £100,000 through good budgetary management and this allowed £30,000 to be drawn down for local development plan work at a time of budget restrictions. Such longer-term financial planning builds resilience to withstand budget constraints.
- 35.** In 2011 the Authority brought together its planning policy team with other planning specialisms and countryside managers to form its Park Direction team. This has increased co-ordination and improved the capacity and resilience of policy and implementation at the National Park. This supports the objective of linking the objectives of its National Park Management Plan and the local development plan to deliver sustainable development.
- 36.** Between the financial years of 2012-13 and 2014-15 the planning service reduced its full time equivalent staff from 19.6 to 15.7 (see [Exhibit 1](#)) – a reduction of nearly one in five staff. The Authority's planning service has the lowest number of full-time

equivalents among the national park authorities in Wales. As well as having a service level agreement with other national park authorities in Wales to increase its capacity, the planning service also has a service level agreement with a firm of private planning consultants that it uses for interim management and some caseload work. It uses this agreement to fill gaps in manager and case officer capacity but the use of this arrangement adds to the planning service's costs.

37. Changes in staffing levels are driven by opportunism, with managers examining alternative ways of working if officers leave, retire or want to work fewer days. Examples include the Authority lowering pay grades when it considers that a role can be filled at a lower level and employing interim planning officers. However, the Authority's staffing levels are not guided by comparative analysis with similar authorities or a workforce strategy. The lack of a strategic approach has the potential to fail to protect key priorities and undermine the Authority's ability to achieve its key objectives in the longer term.

Exhibit 1: Trend in number of planning service staff (FTE)

	2012-13	2013-14	2014-15
Snowdonia NPA			
Development Management	14	15	13
Planning Policy	5.9	5.9	5.5
Total	19.9	20.9	18.5
Pembrokeshire Coast NPA			
Development Management	15.85	14.65	12.85
Planning Policy	3.75	3.35	2.85
Total	19.6	18	15.70
Brecon Beacons NPA			
Development Management	19.9	18.7	17.5
Planning Policy	3.55	2.95	2.45
Total	23.45	21.65	19.95

Source: National park authorities in Wales.

The Authority is working more collaboratively to deliver planning services but its plans and targets are not sufficiently strategic to deliver significant cost savings in the face of continuing public sector austerity

38. The Authority collaborates with surrounding councils and with other national park authorities in Wales with a view to improving its capacity and resilience and reducing its costs. The Authority obtains mineral planning advice and rural enterprise advice from Carmarthenshire County Council. It shares an ecologist and joint affordable housing enabler with Pembrokeshire County Council and the two authorities work closely on highways and economic development. The Authority utilises officer capacity and expertise at Pembrokeshire County Council to monitor section 106⁶ agreements and to share legal advice.
39. Authority members and senior managers told us that they wanted to collaborate more successfully with Pembrokeshire County Council but did not support the formation of a single planning service model. Recent attempts at developing a pilot project examining closer joint working between the authorities have not developed. Authority members considered that in the context of planning issues, areas such as affordable housing, enforcement, shared Information Technology (IT) and document management required better collaboration.
40. The Authority has begun to work more closely with the other Welsh national park authorities and has produced a list of short, medium and long-term actions. The joint work has a clear focus on sharing good practice and building greater joint capacity. Since April 2014 the three national park authority planning managers have produced a formal programme of joint working initiatives, which includes a regular programme of meetings. This provides more potential for continuous improvements to be made across the three national park authorities and opportunities for efficiency savings. These joint meetings were highlighted as a 'quick win' in the 2012 Welsh Government appointed Land Use Consultants report⁷. However, the national park authorities lost some time in getting these joint meetings started due to a lack of capacity. Examples of outputs from the meetings include a joint service level agreement between the three authorities in relation to sharing of development management at times of critical need such as sickness or increased workload.
41. This service level agreement allows the work of one Authority to be transferred to one of the others. This has potential to allow for greater resilience to meet capacity demands in the operation of the development management service. As indicated earlier in this report, the Authority has turned to its service level agreement with a private planning firm to plug gaps in management capacity and has not used the service level agreement with the other national park authorities. The Authority took this decision in order to seek to maintain good performance. The three authorities

⁶ A legal agreement to provide infrastructure, services and finance on or off the development site.

⁷ [Delivery of Planning Services in Statutory Designated Landscapes in Wales](#), prepared by LUC for the Planning Division of the Welsh Government by LUC (August 2012).

are discussing a similar service level agreement approach for development planning. However, it is clear that the medium to longer-term aspiration of co-ordinating and amalgamating the local development plan reviews is very unlikely to occur due to differing local review needs and timescales. To date, the authorities have not utilised the service level agreements.

42. The three authorities have worked together to produce Sustainable Development guidance as Supplementary Planning Guidance and they ensure that only one Authority takes the lead in responding to the Welsh Government and other major statutory consultations. Examples of transfer of learning between the Authorities include a reduction in the number of committee meetings (first used at Brecon Beacons National Park Authority) and increased focus on encouraging the submission of electronic applications through the National Planning Portal.
43. While a clear ambition exists for more effective working between the Welsh national park authorities, this is not matched by clear targets and anticipated efficiency savings. The national park authorities have not built quickly and effectively on the opportunities for improved collaboration identified in the Land Use Consultants report to create a clearly prioritised, targeted and costed action plan. To date the examples of joint working are low value compared to overall budget expenditure and do not reflect a common longer-term commitment to work more closely, for example, through combined workforce strategies or shared medium-term plans.
44. However, whereas the Land Use Consultants report concluded that ‘the planning departments operate largely as independent’, our most recent findings suggest an improving culture of joint working. Given the significantly changed financial landscape since the Land Use Consultants and an earlier 2011 PricewaterhouseCoopers⁸ report, the need for strategic collaboration between public sector bodies is increased. Our views on the need for improved strategic collaboration between the national park authorities in order to improve value for money match recommendations made by the Commission on Public Service Governance and Delivery 2014.⁹ For example this recommends ‘...that NPAs must develop clear and consistent ways of collaborating with each other, and with local authorities, with Visit Wales and with Natural Resources Wales, on the ground, to avoid duplication and maximise the use of resources and scarce expertise’.
45. Given the potential benefits of joint working, collaboration and co-production of planning services it is important that the Authority also recognises that there may be options for working more closely with neighbouring council planning authorities.
46. With stronger member and officer leadership at all three national park authorities in Wales, opportunities exist to face public austerity measures on a more strategic and agreed financial basis. Examples of strategic collaboration that have led to significant

⁸ PricewaterhouseCoopers. [Review of the Welsh national park authorities’ Planning Service](#), January 2011 for the three national parks in Wales.

⁹ See para 2.60 of [Welsh Government Commission on Public Service Governance and Delivery 2014](#)

savings include some shared services in local government, between local government and health and between Fire Authorities.¹⁰

47. We found that the Authority's members and some senior managers clearly recognised that national park authorities in Wales were missing opportunities to plan for more strategic joint working. Examples cited included the back office functions of finance and accountancy, human resources, IT and communications. Although these are not directly related to the Authority's planning service, they contribute to the recharges¹¹ that are added to the Authority's planning service budget.

Costs of producing Wales' first local development plan were low and development management and planning policy costs generally compare well with other national park authorities in Wales, but there is disagreement over comparability of information

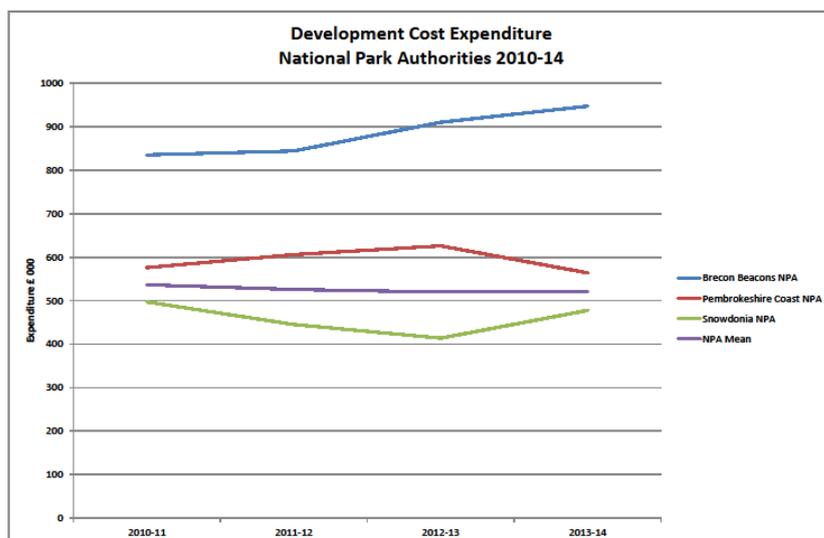
48. Our study revealed a continuing lack of progress amongst the Welsh national park authorities in agreeing how the costs of planning services should be assessed and compared. In 2009, following an inspection of the Authority's planning service, we recommended that the Authority worked with other local planning authorities to ensure that cost data is comparable and to use this information to demonstrate that it is providing value for money.
49. Similarly, the 2011 PricewaterhouseCoopers report (commissioned by the national park authorities in Wales), recommended that the three authorities should 'undertake further analysis on costs and resources to understand and agree a consistent basis for comparison'. Despite these recommendations, national park authorities in Wales have not made any progress on agreeing comparable data. This is discussed in more detail later in this report, but explains the use of different data sets in our judgements below.
50. Between 2010-11 and 2012-13 (see [Exhibit 2](#)) the Authority's development control costs, when measured by revenue outturn¹² returns, show a gradual increase before decreasing between 2012-13 and 2013-14. In 2013-14 the Authority's costs were £564,000 compared with £475,000 at Snowdonia National Park Authority and £947,000 at Brecon Beacons National Park Authority.

¹⁰ LGA and Drummond Macfarlane 2012, [Services shared: costs spared? An analysis of the financial and non-financial benefits of local authority shared services.](#)

¹¹ Recharges are costs charged by other areas of the National Park Authority or external organisations for work or services undertaken on behalf of the Authority's planning service.

¹² Revenue outturn represents the costs of running services such as staffing, buildings, together with the expenditure on goods and services used by the service.

Exhibit 2: Development Management Costs measured by national park authorities in Wales – Revenue Outturn Figures



Source: Welsh Government based on data supplied by national park authorities in Wales.

51. Due to concerns about data quality and comparability, national park authorities in Wales do not have confidence in using the revenue outturn figures as a basis for cost analysis. We recognise some of these concerns and so we asked the Welsh national park authorities to prepare alternative comparable costs for their development management services, some planning policy services and local plan production. They did this for 2012-13 to 2014-15 (see Exhibits 3 to 5) and also collected comparable costs for three English national park authorities for 2013-14. Between 2012-13 and 2014-15 the Authority's development management costs reduced. When measured by costs including recharges, the Authority's costs during this period fell from £667,033 to £507,000. When measured with costs excluding recharges, the costs fell from £458,928 to £304,000.
52. In 2014-15 (see Exhibit 5), total development management costs with and without recharges were significantly lower than the highest spending Brecon Beacons National Park Authority. When measured by average cost per application, the Authority delivered the lowest cost service at £813 per application (including recharges) and £488 (excluding recharges).

Exhibit 3: Development Management Costs 2012-13

	Snowdonia NPA	Pembs Coast NPA	Brecon Beacons NPA
Planning applications	508	400	556
Costs with recharges	£380,483	£667,033	£817,619
Average cost per application	£749	£1,668	£1,471
Costs without recharges	£194,503	£458,928	£402,831
Average cost per application	£383	£1,057	£723

Source: National park authorities in Wales.

Exhibit 4: Development Management Costs 2013-14

	Snowdonia NPA	Pembs Coast NPA	Brecon Beacons NPA	Dartmoor NPA	Yorkshire Dales NPA	Peak District NPA
Planning applications	577	469	505	671	574	641
Costs with recharges	£465,935	£575,261	£868,429	£548,667	£519,000	£432,000
Average cost per application	£808	£1,227	£1,719	£818	£904	£674
Costs without recharges	£275,725	£337,352	£485,533	£368,406	£365,000	£183,000
Average cost per application	£478	£719	£961	£549	£636	£285

Source: National park authorities in Wales in association with three English national park authorities.

Exhibit 5: Development Management Costs 2014-15

	Snowdonia NPA	Pembs Coast NPA	Brecon Beacons NPA
Planning applications decided	526	623	567
Costs with recharges	£490,684	£507,000	£695,027
Average cost per application	£933	£813	£1,226
Costs without recharges	£277,034	£304,000	£399,686
Average cost per application	£527	£488	£705

Source: National park authorities in Wales.

53. In 2015-16 the Authority is budgeting (see Exhibit 6) for the largest increase in its development management costs among the national park authorities in Wales. The Authority is predicting to spend 11.8 per cent more in 2015-16 (including recharges) than it did in the previous financial year. This compares with a 2.17 per cent increase in Snowdonia National Park Authority and a 7.05 per cent increase at Brecon Beacons National Park Authority. Its budgeted costs, both including and excluding charges, lie higher than those predicted at Snowdonia National Park Authority but below those set at Brecon Beacons National Park Authority.

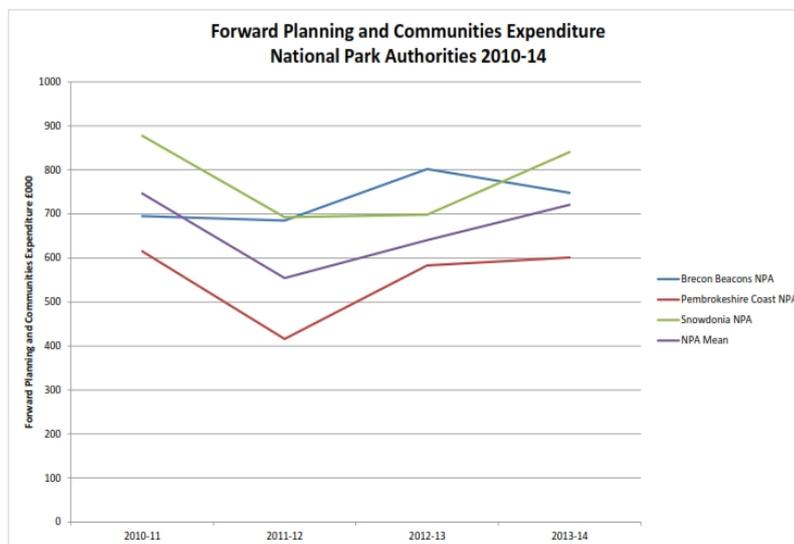
Exhibit 6: Budget for Development Management Costs 2015-16

	Snowdonia NPA	Pembs Coast NPA	Brecon Beacons NPA
Costs with recharges	£501,590	£574,888	£747,735
Costs without recharges	£283,450	£353,322	£449,640

Source: National park authorities in Wales.

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54. When measured by revenue outturn returns, the Authority's Forward Planning and Communities costs are consistently lower than the other national park authorities in Wales, (see Exhibit 7). In 2013-14, when measured by revenue outturn, the Authority's Forward Planning and Communities costs at £601,000 were lower than Snowdonia National Park Authority's costs of £841,000.

Exhibit 7: Forward Planning and Communities Costs measured by national park authorities in Wales – Revenue Outturn Figures



Source: Welsh Government based on data supplied by national park authorities in Wales

55. In 2014-15 the Authority's Planning Policy costs (see [Exhibit 8](#)) fell below those of the highest spending national park authority at Snowdonia but significantly above those at Brecon Beacons National Park Authority.

Exhibit 8: Planning Policy Costs 2014-15

	Snowdonia NPA	Pembs Coast NPA	Brecon Beacons NPA
Costs with recharges	£380,242	£330,000	£134,066
Costs without recharges	£263,042	£251,000	£116,321

Source: National park authorities in Wales.

56. In 2015-16 the Authority is budgeting (see [Exhibit 9](#)) for a reduction in delivering its Planning Policy service. The Authority's budgeted costs (including recharges) of £256,793 amount to a reduction of 22 per cent on the previous financial year.

Exhibit 9: Budget for Planning Policy Costs 2015-16

	Snowdonia NPA	Pembs Coast NPA	Brecon Beacons NPA
Costs with recharges	£410,790	£256,793	£204,830
Costs without recharges	£294,030	£186,873	£186,920

Source: National park authorities in Wales.

57. In 2014-15, the Authority's combined costs for development management and planning policy were broadly in line with the other national park authorities in Wales, both including and excluding charges (see [Exhibit 10](#)).

Exhibit 10: Combined Development Management and Planning Policy Costs 2014-15

	Snowdonia NPA	Pembs Coast NPA	Brecon Beacons NPA
Costs with recharges	£870,926	£837,000	£829,093
Costs without recharges	£540,076	£555,000	£516,007

Source: National park authorities in Wales

58. In 2010 the Authority became the first planning authority in Wales to produce a local development plan in line with the statutory requirements of the Welsh Government. Some planning authorities in Wales have still not achieved this. The Authority's costs of producing Wales' first local development plan were significantly lower than the other Welsh national park authorities, (see Exhibit 11). Its costs of £450,000 were significantly lower than those at Snowdonia National Park Authority and under half of those at Brecon Beacons National Park Authority. The Authority adopted a good project management approach and placed a strong emphasis on controlling costs.

Exhibit 11: Cost of preparing and adopting local development plan and date of adoption

	Cost	Date of adoption
Snowdonia NPA	£770,000	2011
Pembrokeshire Coast NPA	£450,000	2010
Brecon Beacons NPA	£979,351	2013

Source: National park authorities in Wales

Performance management is supporting improvement in planning services but the Authority is not sufficiently focused on costs, value for money or outcomes of its planning service

Performance management is improving although the Authority does not set sufficiently challenging improvement targets

- 59.** Performance management at the Authority supports improved performance. Some members and officers we spoke to considered that, since 2012, performance management is significantly more robust and effective. The planning service ensures continuity between the Authority's corporate plans, business and improvement plans and team plan links. Officers present high quality graphical information to members at the Audit and Corporate Services Review Committee with information showing key trends. This easily understandable information helped members challenge previous poor performance on areas such as speed of decision making. Members have used performance reporting arrangements at the Operations Review Committee to focus on improving speed of decision-making, robustness of the enforcement service and the Authority's approach to affordable housing. For example, performance on approving planning applications within eight weeks improved from 76 per cent in 2013-14 to 86 per cent in 2014-15. By the end of 2014-15 the service reduced the enforcement backlog over the last four years from 500 cases to approximately 83.
- 60.** However, the Authority does not consistently set challenging improvement targets. For example, in 2014-15 the Authority set a target of deciding 75 per cent of planning applications within eight weeks, when in 2013-14 it had achieved 76 per cent. For 2014-15 the Authority did not set a target to increase the percentage of applications it approves and link this to the importance of increased performance in pre-application and validation. This is a missed opportunity to demonstrate the Authority's desire to see more appropriate development within the National Park, aimed at promoting its economic and well being objectives. Not all of the Authority's service and improvement plans state clear explicit actions. For example, the 2013-14 development management, park direction team plans and 2014-15 improvement objectives lacked detailed targets and milestones.
- 61.** The Authority's 2014-15 improvement objectives introduced the following objective to reflect the reduction in public grant funding:
- 'The National Park Authority, in consultation with residents, visitors and other partners, adapts to the reduced funding over the period 2014/2016 while still maintaining good governance, quality services, and value for money.'
- 62.** This new objective reflects the need for the Authority to operate with a reduced cost base. Despite reduced funding, the Authority aims to deliver good governance, quality services, and value for money. The Authority seeks to measure the planning

service's contribution towards delivering quality and value for money through examining speed of deciding applications, responding to pre-applications and developing online access to planning application information. However, such measures do not address issues of economy and the service has no detailed measurement of elements of its cost base to compare with other national park authorities or local planning authorities in Wales.

The Authority is missing opportunities to provide assurance on, and to improve, the value for money and outcomes of its planning services

63. Despite the significantly changed public sector financial landscape and the Authority's increased focus on finding savings, our interviews with members and staff revealed that the Authority has made little improvement in its detailed understanding of value for money. The Authority, along with other national park authorities in Wales, has been slow to develop joint indicators and measures of success. The Authority has not acted on the findings of two significant reports that recommended that it should work with the two other Welsh national park authorities to agree a consistent framework for measuring and comparing value for money.
64. Our 2009 report on the Authority's planning service recommended, among other things, that the Authority'approve achievable and measurable outcomes for Development Control relating tovalue for money. Once these outcomes have been agreed, action plans should be updated so that it is clear what actions are required to deliver the desired outcomes.' Similarly, the 2011 PricewaterhouseCoopers report study recommended that the three authorities should agree 'a consistent basis for defining the measures (to enable comparison) and in particular those around finance'.
65. The Authority partly recognises this concern and considers that further, more detailed work may be required on certain activity costs. However, it considers that its focus to date has necessarily been on streamlining processes, which will reduce costs and improve efficiency.
66. As discussed earlier in this report, the Authority and the other Welsh national park authorities have not developed standard cost measures. The authorities argue that comparisons are not appropriate due to differences in data sets, especially the revenue outturn annual figures.
67. No clear rationale appears to exist as to why the national park authorities have not tried to agree appropriate standards or measures to deliver qualitative and quantitative benchmarking. This is especially the case since experience in England and Scotland indicates that a clear established methodology exists to measure and compare processes and associated time/costs. Authorities and their family groups have then had opportunities to examine relative performance and learn and improve if required. Some useful measures, standards and questions for the Authority's planning services to consider are set in [Exhibit 11](#).¹³

¹³ Examples of opportunities for comparison taken from the [Planning Advisory Service's Planning Quality Framework](#)

Exhibit 11: Opportunities for benchmarking to provide assurance or drive improvement in planning services at national park authorities.

Applications and workload:

- Are national park authorities and peers very different from each other and why?
- Does the applications/fees mix represent any risk?

Outcomes:

- Do national park authority approval rates differ significantly from each other and peers?
- What might be happening elsewhere that national park authorities can learn from?

Value and non value – withdrawn applications:

- What is the overall trend?
- What are national park authorities doing to avoid this and is it working?
- What is happening to the trend in free applications as fees do not cover costs?

Value and non value – follow-up applications:

- What are the trends in relation to conditions discharge and minor material amendments?
- How can costs be minimised?
- Who is doing this well?

Headcount estimate:

- How well matched are resources to the work?
- What are the caseloads both numerically and across what type of applications?
- Are there opportunities to re-focus resources?

Investment value:

- Do national park authorities know the investment value that development proposals represent?
- What do rising/falling trends mean for existing and future workforce strategies?

68. Without agreeing appropriate measures and standards and assessing how these compare, it is more difficult for the Authority to assess whether it is delivering value for money for local tax payers and planning customers who pay for the delivery of a service. Without a better understanding of areas where efficiencies can be made, it is more difficult for the Authority to prioritise improvements. The Welsh Government's new 'Positive Planning' agenda presents the opportunity to encourage and support the Welsh Local Government Association and local planning authorities in Wales to place a clearer focus on cost, value for money and improved benchmarking. Any work on benchmarking in Wales should build on the experience and expertise gained through Heads of Planning Scotland¹⁴ and the Planning Advisory Service in England in supporting planning authorities to improve performance and value for money.

¹⁴ Heads of Planning Scotland: [Planning Performance Framework, 2014-15 reports](#)

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- 69.** In relation to non-financial measures, the Authority has not acted on our 2009 recommendation to develop ‘achievable and measurable outcomes’ relating to themes including quality. Opportunities exist for the Authority to better demonstrate its contribution towards economic prosperity as members and staff have clearly added value and supported a range of employment generating projects.
- 70.** Opportunities also exist for the national park authorities in Wales to work together to develop more qualitative outcome measures. Examples include reviewing and progressing the 49 measures of success from the 2011 PricewaterhouseCoopers report.

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Delivering with Less: Planning Services

Brecon Beacons National Park Authority

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Status of report

This document has been prepared as part of work performed in accordance with statutory functions.

In the event of receiving a request for information to which this document may be relevant, attention is drawn to the Code of Practice issued under section 45 of the Freedom of Information Act 2000. The section 45 Code sets out the practice in the handling of requests that is expected of public authorities, including consultation with relevant third parties. In relation to this document, the Auditor General for Wales and the Wales Audit Office are relevant third parties. Any enquiries regarding disclosure or re-use of this document should be sent to the Wales Audit Office at info.officer@audit.wales.

Robert Hathaway prepared this report on behalf of the Auditor General for Wales under the direction of John Roberts and Alan Morris.

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Summary report

1. National park authorities have a duty to protect the landscape for which they have responsibility, while, at the same time, ensuring that people can enjoy that landscape. An important part of that duty is the national park authorities' statutory planning function¹. Planning services represent a significant proportion of the time and resources that a national park authority spends in delivering its overall responsibilities.
2. The Welsh Government has recently significantly cut funding to all three national park authorities. These cuts came into effect during 2014-15, with further cuts required in 2015-16 and possibly beyond. All national park authorities in Wales are now taking difficult decisions on how they deal with reductions in funding. Given the proportionately high spend on the delivery of planning services in national parks in Wales when compared with councils, reductions in overall funding pose particular risks. This study examines and reports on how national park authorities are managing this risk. In May 2009, we produced an inspection report² on the performance of the planning service of Brecon Beacons National Park Authority (the Authority). That report found that weaknesses in the planning service had damaged the reputation of the Authority but that management arrangements were at that time offering potential for improvement.
3. We have carried out work at all three national park authorities in Wales to assess the extent to which they were delivering efficient planning services with less money. Our fieldwork in the Authority consisted of document and data reviews, as well as a series of interviews and focus groups with selected officers, members, community councillors and planning agents. Our analysis and fieldwork and information provided by the national parks in Wales have allowed us to make comparisons in performance and costs.
4. In this report, we seek to answer the question: Is the Authority providing efficient planning services aimed at high performance, even in the face of increasing budget constraints?
5. We concluded that good leadership and strong governance are improving planning services although the Authority's approach to collaborating with other national park and planning authorities in Wales and achieving value for money is not sufficiently robust. We reached that conclusion because:
 - the Authority has a clear vision, better scrutiny processes and has improved the way that senior officials work together;
 - the planning service's performance is good and, although customer satisfaction is low, its public reputation has improved but collaboration, while improving, is not sufficiently strategic and development management costs still appear comparatively high; and

¹ This includes deciding on planning and heritage applications, developing local land use and heritage plans, and investigating and enforcing against breaches of planning control.

² Wales Audit Office: **Brecon Beacons National Park Authority - Planning Services**, May 2009.

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- the Authority has improved its approach to performance management although it is not sufficiently focused on costs, value for money or outcomes for its planning service.

6. To assist the Authority in addressing the areas of improvement identified in this report, we make the following proposals for improvement. The Authority should:

P1 Work in partnership with other national park authorities and other planning authorities in Wales to develop:

- consistent, robust comparative cost and volume data and use this to demonstrate whether or not it is providing value for money; and
- relevant outcomes to help measure the contribution towards meeting the goal of sustainable development, especially in relation to longer-term change.

This work should be undertaken in co-operation with the Planning Officers Society for Wales, Welsh Local Government Association and Welsh Government, building on the experience of cost measurement and comparison via Heads of Planning Scotland and the Planning Advisory Service England.

P2 Increase levels of strategic collaboration and partnership working, especially with other national park and planning authorities in Wales, including exploring opportunities for reducing planning service costs and the options for closer workforce planning.



Delivering with Less: Planning Services

Snowdonia National Park Authority

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Summary report

1. National park authorities have a duty to protect the landscape for which they have responsibility, while, at the same time, ensuring that people can enjoy that landscape. An important part of that duty is the national park authorities' statutory planning function¹. Planning services represent a significant proportion of the time and resources that a national park authority spends in delivering its overall responsibilities.
2. The Welsh Government has recently significantly cut funding to all three national park authorities. These cuts came into effect during 2014-15, with further cuts required in 2015-16 and possibly beyond. All national park authorities in Wales are now taking difficult decisions on how they deal with reductions in funding. Given the proportionately high spend on the delivery of planning services within national park authorities in Wales when compared with councils, reductions in overall funding pose particular risks. This study examines and reports on how national park authorities are managing these risks. In May 2009 we produced an inspection report² on the performance of the planning service of Snowdonia National Park Authority (the Authority). That report found that, while some areas were performing well, improvements were required to ensure sufficient service capacity, reduce backlogs and improve customer satisfaction.
3. We have carried out work at all three national park authorities in Wales to assess the extent to which they were delivering efficient planning services with less money. Our fieldwork in the Authority consisted of document and data reviews, as well as a series of interviews and focus groups with selected officers, members, community councillors and planning agents. Our analysis and field work and information provided by the national park authorities in Wales have allowed us to make comparisons in performance and costs.
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5. We concluded that improved leadership of planning services is contributing to good customer satisfaction, the quality of plans and the delivery of affordable housing, although the Authority's approach to collaborating with other national park and planning authorities in Wales and achieving value for money is not sufficiently robust. We reached that conclusion because:
 - the Authority's clear, shared vision is supported by improved leadership, although the Authority has not clearly set out its local priorities for its planning service;
 - customer satisfaction is good, development management costs are generally low and some areas of delivery perform well but although collaboration is improving it is not sufficiently strategic; and

¹ This includes deciding on planning and heritage applications, developing local land use and heritage plans and investigating and enforcing against breaches of planning control.

² Wales Audit Office: **Snowdonia National Park Authority - Planning Services**, May 2009.

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- the Authority has improved its approach to performance management although it is not sufficiently focused on reviewing priorities, value for money or outcomes for its planning service.

6. To assist the Authority in addressing the areas of improvement identified in this report we make the following proposals for improvement. The Authority should:

- | | |
|----|---|
| P1 | Work in partnership with other national park authorities and other planning authorities in Wales to develop: <ul style="list-style-type: none">• consistent, robust comparative cost and volume data and use this to demonstrate whether or not it is providing value for money; and• relevant outcomes to help measure the contribution towards meeting the goal of sustainable development, especially in relation to longer-term change. <p>This work should be undertaken in co-operation with the Planning Officers Society for Wales, Welsh Local Government Association and the Welsh Government, building on the experience of cost measurement and comparison via Heads of Planning Scotland and the Planning Advisory Service England.</p> |
| P2 | Increase levels of strategic collaboration and partnership working, especially with other national park and planning authorities in Wales, including exploring opportunities for reducing planning service costs and the options for closer workforce planning. |
| P3 | Review priorities and targets for the Authority's planning services to ensure adequate focus on meeting local community needs. |