



Delivering with Less: Planning Services

Brecon Beacons National Park Authority

Audit year: 2014-15

Issued: October 2015

Document reference: 307A2015

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.

Contents

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.

Summary report	5
Detailed report	
Vision and leadership: The Authority has a clear vision, better scrutiny processes and has improved the way that senior officials work together	7
The Authority has a clear vision that was developed after significant public consultation	7
More effective joint working between senior officers and members has produced better leadership	7
The Authority has strengthened its scrutiny processes by learning from models in other organisations and by engaging the public	8
The Authority aspires to deliver an excellent planning service but lacks a sustained focus on achieving this vision	9
Delivery and cost: 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	9
Customer satisfaction with planning application decision making is lower than in other national park authorities but the Authority has greater credibility with external interest groups and planning agents	9
Planning service delivery is good with quicker and more robust decision making and improved housing land supply but performance was mixed in relation to enforcement	10
The Authority has placed a stronger focus on income generation and has made savings through reductions in planning service staffing but this was not guided by detailed comparative analysis or a workforce strategy	13
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	14

The Authority's development management costs appear higher than other authorities, although overall costs compare well, but there is disagreement over comparability of information	16
Monitoring and review: 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	23
Performance management has improved although there is no clear focus on cost	23
The Authority is missing opportunities to provide assurance on, and to improve, the value for money and outcomes of its planning services	24

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.

-
- 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.

Detailed report

The Authority has a clear vision, better scrutiny processes and has improved the way that senior officials work together

The Authority has a clear vision that was developed after significant public consultation

7. The Authority's planning services, working alongside its land management functions, are a vital element of managing the use of land to secure an appropriate long-term future for communities, visitors and for the natural and built environment. In this way, the planning service supports the two statutory purposes of the Authority which is to conserve and enhance natural beauty, wildlife and cultural heritage and to promote public opportunities for understanding and enjoyment of the park. The Authority also has a duty to seek to foster the economic and social well-being of local communities in its area. The Authority, along with other national park authorities in Wales, has a key role in testing new approaches to the Welsh Government's overriding aim of sustainable development³.
8. The vision and aims of the Authority are based on significant consultation with residents, businesses and stakeholders. The Authority has a clear vision for the national park expressed in its Management Plan. The Management Plan sets the scene for all of the Authority's strategic documents.
9. In 2013, the Authority linked its corporate goals and objectives, including the Business Improvement Plan, with the six Management Plan themes. The Management Plan has a clear aim of ensuring that people understand the importance of the planning function in meeting its aims. The Authority's Business Improvement Plan priorities emphasise the enabling role of planning services, which lie at the heart of supporting the Authority in delivering its statutory purposes and objectives.

More effective joint working between senior officers and members has produced better leadership

10. Governance and leadership have improved since our May 2009 inspection report on the performance of the Authority's planning service. That report found that the Authority needed to ensure that members played a larger role in service improvement, including scrutiny and performance management.

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

-
11. Member and senior officer leadership is now stronger with significantly improved scrutiny and performance management. Members and some staff told us that prior to 2012, some local government members had not engaged effectively in the work of the Authority, especially in relation to its planning role. Members told us that since the appointment of new Welsh Government and council members in 2012, there has been stronger joint working at member level. The expertise and experience of the eight Welsh Government appointees bring added capacity to the Authority's membership. There is also now more effective joint working between the Chairman, Vice Chairman, and the chairs of various committees⁴. This has increased the overall capacity and focus of the Authority and its committees.
 12. Senior management has good support from members in relation to its decisions. Good joint working exists between the Chief Executive and Director of Planning and this has led to a sharpened focus on culture change and developing a more outward-looking organisation. Since taking up his post, the Director of Planning has played a significant leadership and managerial role in tackling previous poor-quality delivery. Performance now shows some significant improvement from its previously low base. Supported by many new senior officers, managerial leadership at the Authority has recognised previous failings and has a more open approach to performance and learning. Staff have responded to this approach and the organisation has improved ownership of performance and improvement issues.

The Authority has strengthened its scrutiny processes by learning from models in other organisations and by engaging the public

13. Since 2012, the Authority's scrutiny processes have benefited from the findings of a joint review carried out with Pembrokeshire Coast 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. For example, at the Authority, scrutiny is linked to the Authority's improvement objectives. This contrasts with most other models of scrutiny where challenge relates primarily to decisions or policy. Effective public engagement in local scrutiny produces greater local involvement and increases prospects for successful change in policy or delivery through local knowledge and expertise.
14. We concluded that the Authority's scrutiny processes involve effective public engagement. The Authority carries out two scrutiny reviews each year. The first review focuses on an improvement priority from the previous financial year and the second looks at progress on one of the improvement priorities chosen for the current financial year. The public has opportunities to vote on areas for scrutiny examination and be involved with providing evidence on any review areas that the Authority selects.

⁴ Planning and Rights of Way and Audit and Scrutiny committees.

The Authority aspires to deliver an excellent planning service but lacks a sustained focus on achieving this vision

15. In 2012-13, the Authority introduced stronger measures to help it assess the extent to which it was providing an excellent planning service. These measures focused on qualitative areas such as value added, outputs and customer satisfaction, relying less on narrower measures such as speed. This approach goes further than other national park authorities and many councils in Wales have aspired to. It expresses a good understanding and ambition to deliver a rounded and balanced service that meets the needs of environmental quality, customer satisfaction and speed.
16. The Authority set some targets for 2013-14 designed to measure the eight domains of excellence in areas such as providing timely and professional pre-application advice and validation guidance. The Authority no longer has 'delivering an excellent planning service' as a standalone objective but considers that it has mainstreamed this vision for 'excellence' into its normal work. However, our interviews with staff and members suggested that this was not a key area of focus or ambition for the Authority and the service no longer reports or tracks performance against the eight domains. Given our recommendation for the Authority to work with other authorities on developing clearer outcome measures, we consider that this requires further re-examination.

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

Customer satisfaction with planning application decision making is lower than in other national park authorities but the Authority has greater credibility with external interest groups and planning agents

17. In 2014-15, only 42 per cent of planning applicants who replied to an Authority survey expressed overall satisfaction with the way their application was handled. This contrasts with 87 per cent on a comparable survey at Snowdonia National Park Authority and 75 per cent at Pembrokeshire National Park Authority. Well over one in three applicants (39 per cent) were dissatisfied with the way the Authority handled their application. The Authority's 2014-15 customer satisfaction rating is based on a low response rate of 36 replies, which was only 13.1 per cent of applicants/planning agents surveyed. This satisfaction level contrasts sharply with previous Authority surveys which, between 2010-11 and 2012-13, showed increasing customer satisfaction levels with the planning service. Given the importance that the Authority's planning service attaches to good communication, together with the additional capacity

it has built in this area, there are opportunities to address customer perceptions of poor performance.

18. Despite the 2014-15 customer user findings, the Authority has improved its relationships at a more strategic level with town and community councils and national user groups such as the Country Landowners Association and Farming Unions. This has led to greater credibility with external interest groups. This includes better user knowledge of the links between the delivery of planning services and National Park Authority purposes. The key to this improvement has been effective engagement. For example, the Authority meets previously highly critical and vociferous national and local interest groups to explain and discuss joint issues of importance, especially the operation and delivery of the planning service.
19. The Chief Executive and Director of Planning have met with over 80 per cent of town and community councils to discuss issues of importance and concern. The Authority also effectively engaged town and community councils in the development of its recently adopted local development plan through the use of community-focused Planning Aid Wales. In terms of openness, the Authority was the first in Wales to webcast all of its committee meetings as part of its commitment to transparency.
20. Planning agents we spoke to expressed greater confidence than in the past in the planning service. The planning service contains a dedicated customer service team which addresses phone and web enquiries. In 2013-14 this team answered 75 per cent of queries at the first point of contact. Planning and Enforcement charters help manage stakeholder expectations and provide online advice.

Planning service delivery is good with quicker and more robust decision making and improved housing land supply but performance was mixed in relation to enforcement

21. The Authority's planning performance when measured against the 2014-15 Welsh Government Performance Framework⁵ is generally good. This framework identifies good performance in relation to planning services' engagement with customers and users of the planning system. The public can speak at the Authority's planning decision making committee and the Authority's website allows access to key documents and the ability to track progress with applications.
22. The Authority receives the vast majority of its applications via the planning portal which helps improve efficiency of handling. In 2014-15 the Authority handled the start of the planning application process quickly and increased its efficiency by ensuring that the vast majority of applications could be validated. Of all applications received, the Authority was able to validate 97 per cent, which was the highest figure among the national park authorities in Wales with Pembrokeshire National Park Authority

⁵ [Welsh Government: Performance Framework Table](#). The Welsh Government plans to update the Performance Framework Table on a quarterly basis.

recording 89 per cent and Snowdonia National Park Authority 79 per cent. In 2014-15 the Authority delegated 93 per cent of its planning application decisions to officers. This high delegation rate helps support efficient decision making.

- 23.** The Authority has continued to improve its speed of decision making and is ranked by the Welsh Government in the highest banding for 'efficiency'. In 2014-15 it increased the percentage of all applications within the required time periods from 72 per cent the previous year to 88 per cent. This was the second best performance among all local planning authorities in Wales and the best among national park authorities. It improved the percentage of major⁶ applications decided within the required time periods, from 29 per cent to 40 per cent (two out of five major applications), performing more highly than the two other Welsh national park authorities. Performance in defending appeal decisions at 50 per cent fell below the performance of the two other national park authorities in Wales.
- 24.** In 2014-15 the Authority improved its overall delivery of development management services while reducing its costs (including recharges) from £868,429 in the previous year to £695,027.
- 25.** The Authority adopted its Local Development Plan in December 2013, having previously operated with a relatively recently adopted Unitary Development Plan. This plan provides the public, planning customers, and developers with greater certainty in relation to the use of land in the national park. The plan has the delivery of sustainable development at its heart and its future annual monitoring will provide additional evidence of progress towards meeting its land use objectives. A good focus on developing community plans in villages such as Hay on Wye offers opportunities to tackle local issues from the bottom up. Communities are able to prioritise how resources are used locally as well as help create a sense of place by promoting locally distinctive events. This community focus again highlights the Authority's growing experience and strength in local engagement and capacity building.
- 26.** The Authority has substantially improved its housing land supply. Its 2014-15 housing land supply of 5.5 years meets the Welsh Government target of five years and lies in the top performing band of all Wales' local planning authorities. This is a significant improvement on the Authority's 2013-14 housing land supply of only 1.9 years.
- 27.** The Authority's strong focus on delivering affordable homes in the National Park is backed by new Local Development Plan policy targets. In 2014-15, it granted consent for 36 affordable houses, which amounts to 22 per cent of all approved houses in the Authority. This was the highest percentage over the last three financial years. While affordable houses actually built, dropped to six in 2014-15 from 31 the previous financial year, the overall trend over the last three years is largely in line with Local Development Plan targets. Since adopting the Local Development Plan the Authority has secured £290,000 in affordable housing contributions with a commitment to a

⁶ '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.

further £420,000. These sums will support the provision of affordable houses for local people through the Authority working with Registered Social Landlords.

- 28.** In 2014-15, measures used to judge the quality of the Authority's planning decision making improved over the previous financial year's performance. The Authority now lies in the top Welsh Government band in relation to the percentage of appeals dismissed and the lack of the award of costs against its planning decisions when tested at an appeal. The percentage of appeals dismissed improved from 50 per cent in 2013-14 to 80 per cent in 2014-15. This was the best performance among national park authorities in Wales. The Planning Inspectorate did not award any costs against the Authority when it tested its decisions at appeal. In 2014-15 the Public Services Ombudsman did not uphold any complaints against the Authority over its handling of planning applications. This is significantly improved performance given that the Ombudsman upheld two complaints in the previous financial year. The number and percentage of decisions that went against officer recommendations increased between 2013-14 and 2014-15 although at 12 per cent (2 out of 17) the Authority's performance was in line with a large number of local planning authorities. Comparable figures for Snowdonia National Park Authority were 48 per cent (10 out of 21) and Pembrokeshire National Park Authority six per cent (one out of 17).
- 29.** The Authority continues to improve its enforcement function in dealing with actual and possible breaches of planning control. It substantially increased the percentage of enforcement cases resolved in 84 days (12 weeks) from 22 per cent in 2013-14 to 54 per cent in 2014-15. Comparably the Authority does not perform as well as Pembrokeshire National Park Authority on the majority of enforcement performance measures while Snowdonia National Park Authority is unable to provide comparable data. For example in 2014-15, Pembrokeshire National Park Authority took enforcement action or received a retrospective planning application in 180 days in 76 per cent of cases compared with the Authority's 48 per cent. Also in the same year, Pembrokeshire Coast National Park Authority took an average of 88 days to take enforcement action compared with the Authority's 197 days. However, the Authority continues to focus on reducing its backlog of enforcement cases. The Authority reduced the backlog of cases from 124 at the end of the 2012-13 financial year to 55 at the end of the 2014-15 financial year. This was the lowest number of outstanding cases among the national park authorities in Wales, with Pembrokeshire National Park Authority totalling 83 outstanding cases and Snowdonia National Park Authority unable to provide the data.
- 30.** In 2013-14 the Authority failed to meet the majority of its built heritage targets in areas such as grant funding for buildings at risk and conservation area guidance. This was due to a lack of staff capacity in the conservation section. Management took the decision to focus reduced staff resources on deciding applications and enforcement action. Our 2009 report found similar weakness in relation to capacity in the Authority's built heritage work. In 2014-15, the Authority increased capacity through employing part-time conservation staff.

The Authority has placed a stronger focus on income generation and has made savings through reductions in planning service staffing but this was not guided by detailed comparative analysis or a workforce strategy

31. The Authority tackled budget cuts early and decisively. The Authority has not ring-fenced its planning service from budget cuts as all of the Authority’s services are having to find savings where necessary. The Authority’s senior managers advised that decisions on staffing levels have been guided by a desire to sustain a level of improved performance and a commitment to excellence. The Authority has found savings by reducing staffing levels through natural wastage and by taking opportunities to reshape its workforce. Examples include making the Head of Development Control post redundant, merging the enforcement and Development Control functions and modifying roles and responsibilities for three Principal Planners. Job descriptions are now flexible with, for example, a good exchange of expertise between planning policy and development management.
32. Between March 2012 and March 2015, the planning service reduced its number of full-time-equivalent employees from 23.45 to 19.95 (see Exhibit 1) – a reduction of 15 per cent. However, the Authority’s staffing levels are not guided by a workforce strategy or comparative analysis or detailed benchmarking with local planning authorities with similar applications or workflows or with high performing authorities. Such an approach could have the potential to even further support the Authority’s drive to improve efficiency.

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

	2012-13	2013-14	2014-15
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

33. The Authority has become more income focused and was the first national park authority in Wales and one of the first planning authorities in Wales to charge for pre-application advice. In 2014-15, the Authority increased its pre-application advice income from £26,380 in the previous year to £27,580. In 2013-14, the other national park authorities in Wales had no set pre-application charges although Snowdonia introduced a trial in 2014-15 and received £1,250 in income. The Authority has reviewed its charging mechanism for pre-application advice a number of times, which also demonstrates its ability to review and take account of demand and local economic forces. The Authority also charges applicants for the production of section 106 agreements⁷.

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

34. The Authority increases its capacity, improves its resilience and reduces its cost base by working in partnership with councils. A clear aim of the Authority is to deliver efficiencies through collaboration and partnership working and the planning service has both existing and planned joint arrangements to support this aim. The Authority has a service level agreement with Carmarthenshire County Council for the provision of planning services covering minerals applications and legal services. It undertakes some of Powys County Council's planning function on their behalf outside of the national park authority boundary. It has worked with Monmouthshire County Council and Merthyr Tydfil County Borough Council in relation to buildings conservation advice. The Authority also benefits from the South Wales Legal Framework Agreement, allowing it to use the services of a specialised private law firm on planning matters.
35. 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.

⁷ A legal agreement to provide infrastructure, services and finance on or off the development site.

-
36. 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 provides opportunities for efficiency savings. However, the need for regular joint officer meetings was highlighted as a 'quick win' in the 2012 Welsh Government appointed Land Use Consultants report⁸ and the national park authorities therefore 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. This agreement allows the work of one authority to be transferred to one of the others. This has potential to allow for greater resilience to be built in covering lack of capacity in the operation of the development management service.
37. The three authorities 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 agreement. 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 park authorities includes 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.
38. 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 Consultant's report to create a clearly prioritised, targeted and costed action plan. To date, the examples of joint working are low value in the light of 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.
39. 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 2011 PricewaterhouseCoopers⁹ reports, the need for strategic collaboration between public sector bodies has heightened the need to

⁸ [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).

⁹ PricewaterhouseCoopers, [Review of the Welsh National Park Authorities' Planning Services](#), January 2011, for the three national parks in Wales.

explore strategic collaboration between public sector bodies as a means of increasing efficiency.

40. 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 2014.¹⁰ For example, the Commission recommended ‘...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’. 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.
41. 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. Examples of strategic collaboration that have led to significant savings include some shared services in local government, between local government and health and between Fire Authorities.¹¹

The Authority’s development management costs appear higher than other authorities, although overall costs compare well, but there is disagreement over comparability of information

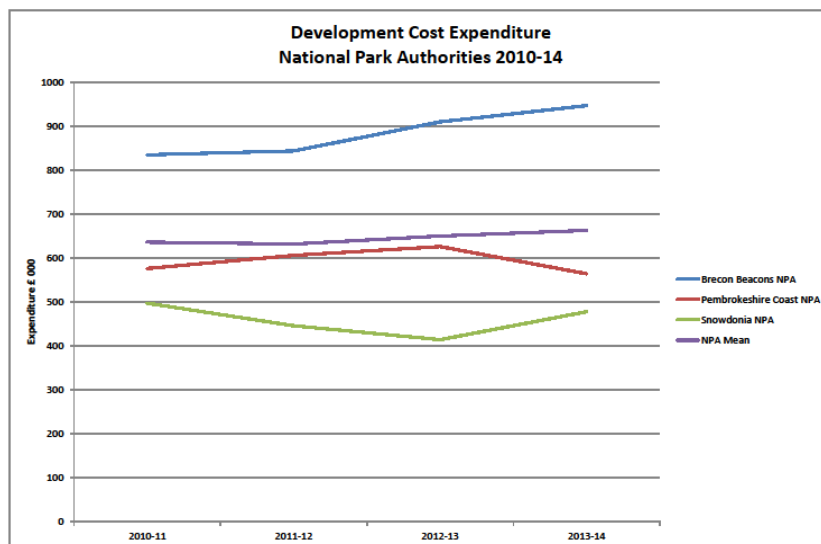
42. Our study revealed a continuing lack of progress amongst the Welsh national park authorities in agreeing how the costs of planning services should be assessed and compared. In 2009, following an inspection of the Authority’s planning service (see [paragraph 2](#)), we recommended that the Authority 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.
43. 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.

¹⁰ See para 2.60 of [Welsh Government Commission on Public Service Governance and Delivery 2014](#)

¹¹ LGA and Drummond Macfarlane 2012, [Services shared: costs spared? An analysis of the financial and non-financial benefits of local authority shared services.](#)

-
44. In 2013-14, when measured by revenue out-turn¹² returns (see Exhibit 2), the Authority's development control costs were £947,000. This compares with Pembrokeshire Coast National Park Authority at £564,000 and Snowdonia National Park Authority at £475,000. When assessed by revenue out-turn returns, the Authority's development management costs have been consistently higher than other Welsh national park authorities.

Exhibit 2: Development management costs measured by national park authorities in Wales – revenue out-turn figures



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

45. Due to concerns about data quality and comparability, national park authorities in Wales do not have confidence in using the revenue out-turn 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, some planning policy services, and local plan production. They provided comparisons for 2011-12 to 2014-15 (see Exhibits 3 to 5) and also collected comparable costs for three English national park authorities for 2013-14.

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

46. Since 2013-14 the Authority's development management costs have consistently been higher than other national park authorities in Wales. Based on 2013-14 figures the Authority's costs were significantly higher than three comparable national park authorities in England (see [Exhibit 4](#)). In 2014-15 the Authority's development management costs (including recharges) were £695,027 compared with Pembrokeshire Coast National Park Authority at £507,000 and Snowdonia National Park Authority at £490,684 (see [Exhibit 5](#)). Average costs per application (including recharges) amounted to £1,226 compared with Snowdonia National Park Authority £933 and Pembrokeshire National Park Authority £813. In 2014-15 the Authority's comparative development management costs at £399,686 (excluding recharges) also remained significantly higher than those of the other national park authorities in Wales.

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.

-
47. In 2015-16 the Authority is budgeting (see [Exhibit 6](#)) for a 7.05 percentage increase in its development management costs (including recharges). While a lower percentage increase than that at Pembrokeshire Coast National Park Authority which increased its similar costs by 11.8 per cent, the Authority's budgeted costs at £747,735 are significantly higher than other national park authorities in Wales. The Authority's traditionally high costs (including recharges) are partly explained by large legal costs associated with a long-running contentious listed-building enforcement issue. A defendant recently pleaded guilty to five charges under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Authority awaits judgement on reclamation of its costs. However, the Authority's 2015-16 budgeted costs (excluding recharges) at £449,640 remain higher than the other national park authorities in Wales.

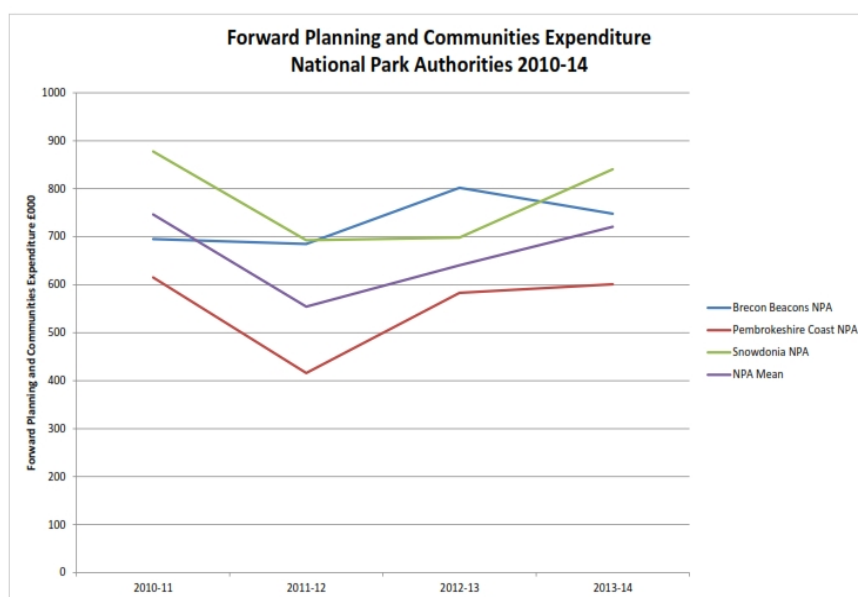
Exhibit 6: Budget for Development Management Costs 2015-16

	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.

48. In 2013-14, when measured by revenue out-turn returns (see [Exhibit 7](#)), the Authority's Forward Planning and Communities costs at £748,000 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 out-turn figures



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

49. In 2014-15 the Authority’s Planning Policy costs (including recharges) at £134,066 were significantly lower than that at Snowdonia National Park Authority at £380,242 and Pembrokeshire Coast National Park Authority at £330,000. Costs (excluding recharges) at £116,321 were significantly lower than similar costs at the other national park authorities in Wales (see Exhibit 8).

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.

50. In 2015-16 the Authority is budgeting (see [Exhibit 9](#)) for a significantly higher increase in delivering its Planning Policy service when compared against its Development Management service. The Authority's budgeted costs (including recharges) of £204,830 amount to an increase of over a third (34.5 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.

51. In 2014-15, the Authority's combined costs for development management and planning policy were lower than 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.

52. The Authority's estimated costs in producing its Local Development Plan (see [Exhibit 11](#)) were high compared with other national park authorities in Wales. This was, at least partly, because the public examination process took longer than for other national park authorities in Wales. Its costs were £979,351, compared with £777,000 at Snowdonia National Park Authority and £450,000 at Pembrokeshire Coast National Park Authority.

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.

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

Performance management has improved although there is no clear focus on cost

53. Since 2012-13, the Authority has introduced stronger performance management processes in enforcement and development management. Through the Audit and Scrutiny Committee, members have supported officers in tackling a backlog of enforcement cases and increasing the speed of decision making. The Authority has refocused existing capacity to improve performance to support delivery of these priorities. For example, it redirected senior legal officer leadership towards tackling the enforcement backlog in a prioritised and systematised way. As a result, the backlog in enforcement cases has dropped considerably from 300 to 55 between 2012-13 and 2014-15.
54. The Director of Planning and senior managers have managed performance to ensure that speed of processing improves in all categories of planning applications. For example, in 2014-15, the Authority decided 93 per cent of householder applications in eight weeks, up from 70.9 per cent in 2012-13. Management has taken realistic and sensible decisions to realign resources in support of key targets. This improvement has been achieved through cultural and operational change. For example, managers match types of applications with relevant officer skills and experience.
55. However, despite the need to focus on cost efficiency, we did not find a strong thread or focus on cost in terms of business improvement plans or in team plans. While members receive high-level budget reports, these do not appear to contain any comparable cost information and our interviews with both members and staff revealed limited focus and understanding of the costs of providing services. In 2014-15 the

Authority, unlike the two other national park authorities in Wales, did not introduce a new improvement objective to reflect the reduction in public grant funding.

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

56. Despite the significantly changed 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 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.
57. Our 2009 inspection report on the Authority's planning service said that the Authority should 'approve achievable and measurable outcomes for Development Control relating to...value 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 study recommended that the three authorities should agree 'a consistent basis for defining the measures (to enable comparison) and in particular those around finance'.
58. The Authority partly recognises this criticism and considers that 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 has improved efficiency. We recognise the steps the Authority has made over recent years to improve governance and performance but stronger efforts could be made to better understand and, where necessary, address high planning service costs. 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 out-turn annual figures.
59. 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 examine are set out 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?

60. Without agreeing appropriate measures and standards and assessing how these compare, then it is more difficult for the Authority to assess whether it is delivering good value for money for local taxpayers 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 improve performance and value for money.

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

-
- 61.** 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 sustainable development, economic prosperity and well-being. For example, some indicators of success at the Authority in relation to economic prosperity and sustainable transport are based on outputs such as leaflets delivered or number of people trained. Similarly, the Authority could build upon the excellence measures and new monitoring of the local development plan to develop measures of value added that would help to assess more difficult qualitative outcomes such as the planning system’s contribution to economic prosperity or community well-being.
- 62.** Opportunities 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 and working more closely with Heads of Planning Scotland and the Planning Advisory Service, and national park authorities in England to review good practice.

Wales Audit Office
24 Cathedral Road
Cardiff CF11 9LJ

Tel: 029 2032 0500

Fax: 029 2032 0600

Textphone: 029 2032 0660

E-mail: info@audit.wales

Website: www.audit.wales

Swyddfa Archwilio Cymru

24 Heol y Gadeirlan

Caerdydd CF11 9LJ

Ffôn: 029 2032 0500

Ffacs: 029 2032 0600

Ffôn Testun: 029 2032 0660

E-bost: post@archwilio.cymru

Gwefan: www.archwilio.cymru