



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.
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 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:

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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. <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. |

Detailed report

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

The Authority has a clear vision, developed through extensive community 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. The planning service supports the two statutory purposes of the Authority, which are 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 their 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. Eryri (Snowdonia) is a landscape of international importance, rich in its cultural heritage and wildlife. Key community challenges include the low-wage economy, high cost of housing and the future of the Welsh language. The Authority's vision is clearly set out in its long-term Management Plan and Local Development Plan. These plans set out the type of environmental, economic and social context the Authority is seeking to achieve. It has chosen to develop these key corporate plans in parallel with one another. In doing so, these two plans reinforce one another, with more integrated policies and actions. This also demonstrates the central role that planning services provide by assisting Authority members in managing land-use development.
9. Extensive consultation took place in order to prepare and approve both the Management Plan and Local Development Plan. The Management Plan was prepared after a period of consultation with key partners and the wider community. This consultation influenced the Authority's choice of six groupings to direct and manage change in the National Park including carbon management, enhancing landscapes and supporting sustainable communities.
10. The ambitions set out in these high-level plans are supported by the annual Business Improvement Plan and more detailed Corporate Work Programme, which explains how the Authority intends to achieve its objectives. Together these form a clear 'golden thread' that provides potential for effective translation of ambitions and capacity into actions in 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.

The Authority has improved its capacity and joint working at senior management and member level

11. Members exhibit a strong sense of engagement with the work of the Authority, especially in relation to the goals of maintaining cultural identity and sustaining strong community life. Members report that their joint working in the Authority is cohesive and they contrast this with the less consensual working in their constituent authorities. Members consider that sufficient opportunity for scrutiny exists at the Authority's meetings.
12. Since 2012 the expertise and experience of the six Welsh Government appointees have brought added capacity to the Authority's membership, with members and officers reporting strengthened joint member and officer leadership in recent years. This has supported continued improvement in many areas following our 2009 inspection report of the Authority's planning services including increased capacity, reducing backlogs and improving customer satisfaction.
13. The Authority uses bi-monthly member and officer workshops to consider issues in an open discursive way. This allows early discussion on areas such as the financial and budget strategies, corporate work programme and business improvement plan to enable an early member steer. Senior managers report greater member ownership and growing capacity to lead and manage workshop discussions. The relatively new corporate management team exhibit a shared and distributive style of leadership. Authority managers also set out clear expectations of staff through team plans and individual appraisals. This provides an important platform to secure continued improvement.

Although members, officers and customers support the aspiration for sustainable development, the Authority has not clearly set out local priorities to complement national targets

14. Authority members see the main aims of the planning service as delivering sustainable development in the National Park. They see this as covering areas such as protecting natural and built heritage but also as promoting economic diversification and growth, encouraging high quality design and energy conservation and supporting the maintenance of the Welsh language and culture of the area. When we interviewed officers and planning agents, they shared similar aspirations for the area and did not have just a narrow focus on elements such as speed or process.
15. Given low wage levels in the area and the importance of small and medium-sized enterprises, the Authority is increasing its focus on supporting this sector. As part of the Authority's role of delivering sustainable development, the Authority and Pembrokeshire Coast 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.

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16. No overall service plan exists to guide the work of the planning service although the Authority has reviewed elements of the planning application processes and the work of the enforcement team. The service's priorities and targets are set out in the Business and Improvement Plan, Corporate Work Programme and through the Statutory Performance Indicators. The Annual Monitoring Report of the Local Development Plan collects data on the performance of the plan in relation to aspects of the development management process. This is reported annually to members of the Authority and to the Welsh Government and provides a strategic overview of the performance of development management decisions in meeting the aspirations and objectives of the Local Development Plan.
 17. However, while the service has inputs into wider community objectives, the Authority's performance management arrangements do not fully provide for reporting and scrutiny of local member priorities. The Authority has no core or local measures that help it assure itself and the public that it is delivering on broader outward facing issues that link into the Authority's own ambitions. For example, local planning indicators focus on only two main outward facing issues – quality of planning submissions and an increased level of understanding of planning policies. Interviews with members, staff and some planning customers made it clear that the Welsh Government requirements on speed of decision-making were a clear and possibly overriding priority.
 18. The Authority does not make use of a balanced scorecard approach that would allow speed to be set alongside other elements of local importance such as job creation and increasing commercial/industrial floor space. In the absence of appropriate local priorities, the Authority's focus will inevitably be concentrated on nationally mandated targets. This weakens its focus on ensuring that officer capacity is maximised in delivering on the key priorities and objectives set by members. A stronger focus on collecting and scrutinising performance information against local needs would also help tackle the perception, noted in the report **Delivery of Planning Services in Statutory Designated Landscapes in Wales**⁴ that planning stands in the way of commercial (business) development.

⁴ Welsh Government research to evaluate the delivery of planning services in National Parks (NPs) and Areas of Outstanding Natural Beauty (AONBs).
Welsh Government, [Delivery of Planning Services in Statutory Designated Landscapes in Wales](#)

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

Customer satisfaction is good and planning agents, architects and town and community councils express improved confidence in the planning service

19. In 2012 and 2013, the Authority received a Customer Service Excellence Standard certificate from the Cabinet Office. This award reflects an exceptional standard in providing customer service, with particular commendation for listening and understanding the needs of users before investing to improve its service provision.
20. In 2014-15, 87 per cent of planning applicants who replied to an Authority survey expressed overall satisfaction with the way their application was handled. This satisfaction level was higher than that of Pembrokeshire Coast National Park Authority, at 75 per cent, and Brecon Beacons National Park Authority, that recorded 42 per cent. Nearly one in two applicants told the Authority that they were 'very satisfied' with the way the Authority dealt with their application.
21. The planning service meets its planning agents at least annually and uses comments and feedback to improve its efficiency. For example, planning agents provided helpful advice on the new planning website, which led to changes that made it much more user-friendly and intuitive. Planning agents and architects express high confidence in the planning service and they told us that the Authority's policies and staff support high quality, sensitive and appropriate design. These factors support the Authority's overall vision for the National Park. A mark of the quality of development produced is reflected in the design and setting of Ysgol Craig Y Deryn, Llanegryn. In 2014, the Royal Town Planning Institute Wales gave this scheme its highest award. Members also told us that they were previously conservative in their design outlook but now recognise the vital importance of buildings for the 21st century. This suggests high member confidence in officer recommendations for newer and more innovative design solutions.
22. Effective engagement with community councils helps deliver local ownership and confidence in the service. Community councillors consider that the two area-based meetings made it easier for them to attend. They also expressed satisfaction with the way the Authority deals with their comments even though there were often differences of opinion between the Authority and town and community councils as to how an application should be decided on. The meetings also helped them better understand technical issues such as section 106 funding⁵ and new Welsh Government policy advice. In 2013-14 all community councils which responded to the Authority's

⁵ A legal agreement to provide infrastructure, services or finance on or off the development site.

questionnaire said they had a good understanding of what the Authority does and the special qualities of the National Park.

- 23.** In 2014-15 the Authority invested in improving its planning service website and in that financial year, 77 per cent of users who commented on the quality of the website were satisfied. This was a rise of 12 per cent on the previous financial year. The website does have an online register of planning applications. This allows members of the public to track the progress of planning applications and view their content. However, customers still cannot make electronic payments online.

The Authority performs well in respect of preparation of land use plans, and delivery of affordable housing, although the quality and speed of decision making are not as good as many authorities

- 24.** The Authority's performance when measured against the 2013-14 Welsh Government's Performance Framework⁶ is mixed. Preparation of land use plans is a key strength of the Authority's work. The Authority has an adopted Local Development Plan. In 2014-15, its 8.3 year housing land supply was the highest of the three national park authorities in Wales. The Authority has consistently granted a comparably high percentage of all approved dwellings as affordable houses. In 2014-15 the Authority approved 13 affordable housing units, representing 59 per cent of all housing units approved. Between 2012-13 and 2014-15 the Authority granted well over half of all new dwellings as affordable units. Over this same period the Authority has also seen a high proportion of all new dwellings completed being affordable housing units. In 2014-15, 27 dwellings were built, which compares with 10 in 2013-14 and 37 in 2012-13. This success is very important for ensuring that local people can afford to live in the National Park and makes a valuable contribution to sustaining the cultural and linguistic heritage of the area.
- 25.** Quality of decision making compares unfavourably with other national park authorities. In relation to members overturning officer advice on planning applications, members overturned nearly a half (10) of all 21 officer recommendations. At an overturn rate of nearly 48 per cent the Authority had the highest rate among all local planning authorities in Wales. The comparable figures for Brecon Beacons National Park Authority were 12 per cent (2 out of 17) and Pembrokeshire Coast National Park Authority six per cent (one out of 17).
- 26.** In relation to the percentage of appeals successfully defended by the Authority, its comparable performance declined to only 'fair' in relation to other local planning authorities in Wales. With an appeal success rate of 63 per cent its performance fell below that of Brecon Beacons National Park Authority at 80 per cent and Pembrokeshire Coast National Park Authority at 77 per cent. In 2014-15 the Public Service Ombudsman did not find any cases of maladministration nor did the Planning Inspectorate award any appeal costs against the Authority.

⁶ [Welsh Government Performance Framework Table](#). The Welsh Government plans to update the Performance Framework Table on a quarterly basis.

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- 27.** In 2014-15 the Welsh Government assessed the Authority's 'efficiency' as only fair. This measure assesses performance in terms of the speed of decision making. Based on the time taken to decide all applications within eight weeks, the Authority continues to underperform against the two other national park authorities in Wales. Between 2011-12 and 2013-14 the Authority's performance on this measure showed no significant improvement, although in 2014-15 performance improved to 75 per cent. In 2014-15, Brecon Beacons National Park Authority decided 88 per cent of all applications in eight weeks, while Pembrokeshire Coast National Park Authority decided 86 per cent. In 2014-15 the percentage of applications approved rose from 89 per cent to 90 per cent, which matched the approval rate at Brecon Beacons National Park Authority, although falling below the approval rate of Pembrokeshire Coast National Park Authority at 95 per cent.
- 28.** Between the 2011-12 and 2013-14 financial years the Authority failed to approve any of its nine major applications⁷ within 13 weeks, although the Authority did approve one of its two major applications in the required timescale in 2014-15. In comparison, in 2014-15 Pembrokeshire National Park Authority approved 33 per cent (three out of nine) and Brecon Beacons National Park Authority 20 per cent (one out of five) of its major applications. Opportunities exist to improve the overall efficiency in improving the speed of decision making, especially on 'major' and 'other'⁸ applications.
- 29.** In 2014-15 the rate of delegation has, however, improved with the Authority delegating 90 per cent of its decisions to officers – a rise of four per cent from the previous financial year. This rise supports more efficient decision making. In the same year, Brecon Beacons and Pembrokeshire National Park Authorities both achieved delegation rates of 93 per cent of their planning decisions. In 2013-14 the Authority's Business and Improvement Plan focused on improving areas of the Authority's enforcement service. In both 2013-14 and 2014-15 the Authority met its target of resolving over 60 per cent of enforcement cases within 12 weeks. In 2014-15 the Authority increased its performance from 61 per cent in the previous financial year to 63 per cent. We are unable to comment on other aspects of the Authority's enforcement performance such as average time taken to investigate and take enforcement action and the number of outstanding cases, as the data is not available.
- 30.** The service encouraged customers to discuss their plans before submitting an application to ensure a higher quality of application and a quicker and more certain outcome. In 2014-15 the Authority was successful in halting a previous decline in the percentage of invalid applications received. In 2014-15 the percentage of valid applications received as a total of all applications received improved from 63.5 per cent to 79 per cent. However, this falls below the levels of Brecon Beacons National

⁷ '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.

⁸ 'Other' applications include applications for householder development, certain changes of use, adverts and listed buildings.

Park Authority at 97 per cent and Pembrokeshire Coast National Park Authority at 89 per cent. Reducing the percentage of invalid applications reduces inefficiency and waste and supports better customer service in the planning service.

The Authority is becoming more commercially orientated and, while it has made savings through reductions in planning service staffing, these reductions were not guided by detailed comparative analysis or a workforce strategy

31. The Authority has acted quickly to address the budget cuts and has developed clear budgetary strategies and actions. Early discussions at informal workshops between the corporate management team and members were pivotal in agreeing a financial and budget strategy. The Authority prioritised the work of the planning service due to its statutory nature, and budget cuts have largely fallen on non-planning services.
32. The financial strategy is clearly articulated at a high level. The Authority seeks to increase collaboration and partnership working. It seeks to make savings wherever possible through efficiencies and increasing income rather than direct service reduction. For example, it is seeking to work more closely with its constituent authorities and other local planning authorities in North Wales. In March 2014, in order to support its Financial Strategy, the Authority agreed to change staff working conditions to save money across all of its departments and did not fill some posts in its planning service. This resulted in full-time equivalents within the planning service reducing from 20.9 in 2013-14 to 18.5 in 2014-15 (see [Exhibit 1](#)). However, the Authority's staffing levels are not guided by a workforce strategy or comparative analysis or detailed benchmarking with other similar authorities. 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

	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. Since the last round of budgetary cuts, the Authority continues to attempt to become more 'commercially oriented'. The relatively new corporate management team have helped lead this process and are seeking to learn from good practice elsewhere. However, interviewees did not highlight income generation and controlling costs as a fundamental part of their role, which suggests that there is continued room for improvement in relation to a focus on cost.
34. The planning service has recently introduced, on a trial basis, pre-application charges but at a lower rate than Brecon Beacons National Park Authority and many other local planning authorities. It recognises that, with low wage levels and limited house building, it needs to develop sensitive local pricing so as not to frustrate appropriate local development. In 2014-15 the Authority collected £1,250 in pre application fees. It has also recently introduced charges for the production of section 106 Legal Agreements. Brecon Beacons National Park Authority has benefitted from both pre-application and the production of section 106 Legal Agreement charges for a much longer period and in 2014-15 it received £27,580 in pre-application fees. Pembrokeshire National Park Authority has yet to introduce fees for pre-application advice.
35. The service uses the capacity and expertise of its team to good effect. For example, the service completely revamped its website through the use of its in-house GIS and IT technician. This involved good internal working between staff in all the planning disciplines, together with support staff. This resulted in reduced costs as there was no need to employ external consultants or face recharges from an internal IT provider.

The Authority is building on its collaborative arrangements for delivering planning services but its plans and targets are not sufficiently strategic to deliver significant cost savings in the face of continuing public sector austerity

36. The planning service improves its efficiency through its joint working arrangements with other North Wales planning authorities and other national park authorities in Wales. The Authority jointly funds rural housing enablers with Gwynedd Council and Conwy County Borough Council. It also works closely with these two constituent authorities regarding housing viability studies. It forms part of a consortium of North Wales planning authorities that has set up a joint minerals planning unit within Flintshire County Council to deliver minerals planning on their behalf. The planning

service has worked closely with Gwynedd and Conwy local planning authorities on Welsh-language issues, the Community Infrastructure Levy (CIL)⁹ and has jointly commissioned a study on Landscape Sensitivity with Gwynedd Council.

37. The planning service is seeking to become more efficient and is actively engaged in extending its partnership opportunities through the North Wales Planning Group. This has the potential to lead to reduced costs, increase capacity in a specialist area and increase overall resilience. The North Wales consortium of councils has engaged a private contractor to support additional capacity and an action plan to gather more information exists. Opportunities for improved efficiencies include the appointment of a landscape architect through pooled funds for the consortium. However, one of the key recommendations in relation to better understanding of costs has already slipped from its project timescale date of August 2014.
38. 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.
39. Since April 2014 the three national park authority planning managers have produced a formal programme on 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 report¹⁰ 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.
40. 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 national park 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.

⁹ CIL is a levy that planning authorities can choose to charge on new developments in their area.

¹⁰ [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).

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41. While 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 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.
42. However, whereas the Land Use Consultant's report concluded that 'the planning departments operate largely as independent', our most recent findings suggest an improving culture of joint working. The significantly changed financial landscape since the Land Use Consultant's and 2011 PricewaterhouseCoopers¹¹ reports has heightened the need to explore strategic collaboration between public sector bodies as a means of increasing efficiency.
43. 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 2014.¹² 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. 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.¹³
44. 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 authorities.

¹¹ PricewaterhouseCoopers, [Review of the Welsh National Park Authorities' Planning Services](#), January 2011, for the three National Parks in Wales.

¹² See para 2.60 of [Welsh Government Commission on Public Service Governance and Delivery 2014](#)

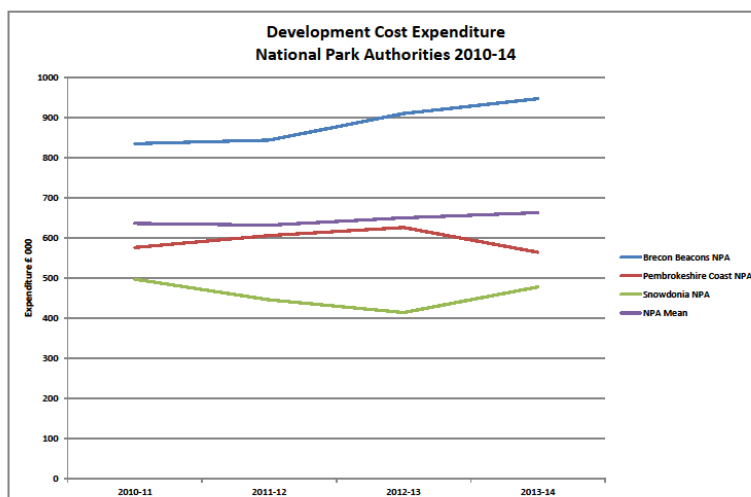
¹³ LGA and Drummond Macfarlane 2012, [Services shared: costs spared? An analysis of the financial and non-financial benefits of local authority shared service](#)

The Authority's development management service costs compare well against other national park authorities in Wales, although planning policy costs are higher, but there is disagreement over comparability of information

45. 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 5), we recommended that the Authority work 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.
46. Similarly, a 2011 PricewaterhouseCoopers report commissioned by the national park authorities in Wales, recommended that they should 'undertake further analysis on costs and resources to understand and agree a consistent basis for comparison'. Despite these recommendations, the 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.
47. In 2013-14, when measured by revenue outturn¹⁴ returns (see [Exhibit 2](#)), the Authority's development control costs were £478,000. This compares with Pembrokeshire Coast National Park Authority at £564,000 and Brecon Beacons National Park Authority at £947,000.

¹⁴ 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.

48. Due to concerns about data quality and comparability, the 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 Authority and other Welsh national park authorities to prepare alternative comparable costs for their development management services, some planning policy costs 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. The Authority's development management costs compare well to other national park authorities in Wales. For the last three financial years, the Authority has consistently been a low cost provider of development management services. In 2013-14, compared against three English national park authorities, only the Peak District National Park Authority's development management costs were lower than the Authority's.
49. In 2014-15, when measured by costs that exclude recharges¹⁵, the Authority's total costs were the lowest among national park authorities in Wales at £277,034 compared with Pembrokeshire Coast National Park Authority at £304,000 and Brecon Beacons National Park Authority at £399,686. In 2014-15, when measured by total costs including recharges, the Authority's costs were £490,684, which again were the lowest among the national park authorities in Wales. When measured by average costs per application, the Authority provided the cheapest service between 2011-12 and

¹⁵ 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.

2013-14. In 2014-15, based on average costs per application (excluding recharges), the Authority's costs were £527, with Pembrokeshire Coast National Park Authority at £488 and Brecon Beacons National Park Authority at £705.

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.

50. In 2015-16 the Authority is budgeting (see Exhibit 6) for small increases in its Development Management costs. The Authority is predicting to spend 2.17 per cent more in 2015-16 (including recharges) than it did in the previous financial year. This compares with a 7.05 per cent increase at Brecon Beacons National Park Authority and an 11.8 per cent increase at Pembrokeshire Coast National Park Authority.

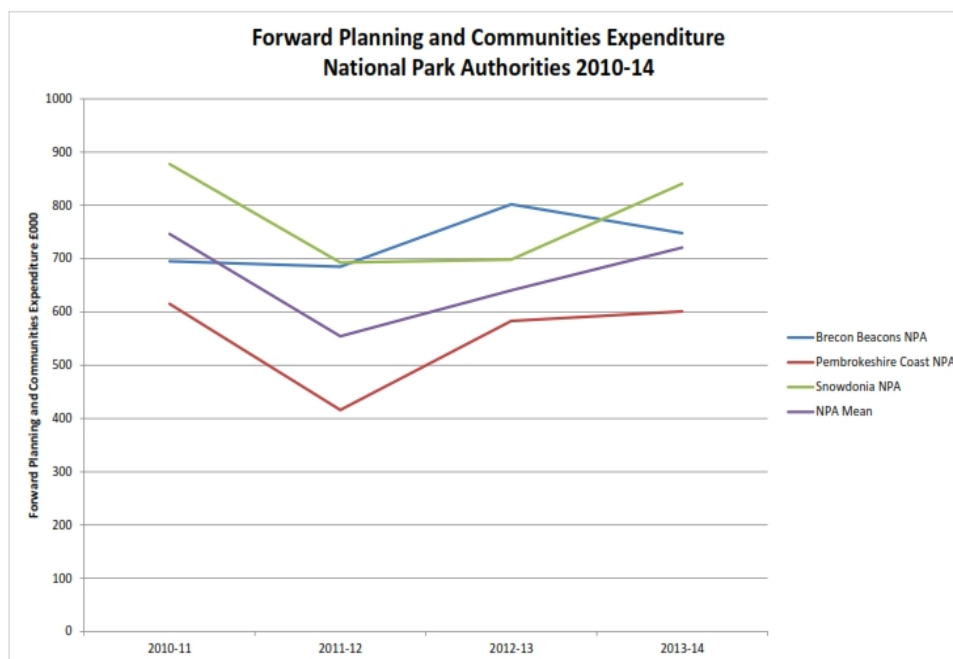
Exhibit 6: Budget for Development Management Costs 2015-16

	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.

51. Relative costs in forward planning and communities (see Exhibit 7) do not compare as well as development management against other national park authorities in Wales. In 2013-14, when measured by revenue outturn returns, the Authority's costs of £841,000 were higher than Brecon Beacons National Park Authority's costs of £748,000 and Pembrokeshire Coast National Park Authority's costs of £601,000.

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.

52. In 2014-15 the Authority's Planning Policy costs (see Exhibit 8) were also higher than those of the two other national park authorities in Wales. The Authority's costs (including recharges) were £380,242 compared with Brecon Beacons National Park Authority at £134,066 and Pembrokeshire Coast National Park Authority at £330,000.

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.

- 53.** In 2015-16 the Authority is budgeting (see **Exhibit 9**) for a higher increase in delivering its Planning Policy service when compared against its Development Management service. The Authority's budgeted costs (including recharges) of £410,790 amount to an increase of 7.4 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.

- 54.** Public subsidy of the Authority's planning service effectively rose between 2008-09 and 2013-14 as income from planning fees did not cover increasing costs. Income fell from £183,735 in 2008-09 to £130,529 in 2013-14. In 2014-15 the Authority estimated that income as a percentage of revenue was expected to drop to 10 per cent. While the Authority recognises the need within its Financial Strategy to increase its focus on raising income, the planning service considers that the scope for further income generation is marginal and would not be in the local community's interests. In 2014-15 the service had a fee target of £5,000 for pre application site visits and section 106 agreements. It raised £1,250 in pre application site visits.
- 55.** 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.

56. In July 2011, the Authority became the first planning authority (see Exhibit 11) in North Wales to adopt its local development plan and this is supplemented by a range of adopted supplementary planning guidance to support the implementation of appropriate development in the National Park. The Authority's costs in producing and adopting its Plan totalled £770,000 compared with Pembrokeshire Coast National Park Authority's costs of £450,000 and Brecon Beacons National Park Authority's costs of £979,351.

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 reviewing priorities, value for money or outcomes for its planning service

Performance management has improved but opportunities exist to review the planning service's priorities and targets

57. Members demonstrate that they hold officers to account and reprioritise issues that are of concern to the Authority and to the public. Examples include enforcement where the service has reduced a long backlog and improved performance through stronger member and officer focus. This has included increasing financial and officer capacity.

The service has also prosecuted those who did not comply with planning requirements. This helps to increase the planning service's credibility among the public. During 2014-15, planning managers continued to meet with many of the town and community councils to reinforce the importance of their contribution to this work.

58. Newly established 'performance meetings' between the chief executive, directors and heads of department provide a more strategic oversight at a corporate level. Officer reports assist members in scrutinising performance and help drive improved effectiveness. Reports to the Policy and Resources Committee cover core and some local indicators along with progress against the Corporate Work Programme. Trends are shown and some level of benchmarking is available to members. Officer reports present information in a way that strengthens performance management, rather than focusing exclusively on performance measurement. In 2013-14, all members who responded to an internal survey considered the reports they receive on progress on improvement objectives to be timely and effective.
59. Our **Annual Improvement Report** issued in May 2014, included the following proposal for improvement:
- Having made progress on many of the improvement objectives¹⁶ that remained in place between April 2011 and March 2014, take the opportunity to fundamentally review these in the context of the financial challenges the Authority now faces.
60. The Authority did review its improvement objectives for 2014-15 and decided to include the following improvement objective:
- The Authority continues to deliver on its priorities providing a service for all within the reduced resources available.
61. However, the other improvement objectives remained the same as had been the case in earlier years. The Authority considered the limited change in its improvement objectives to be appropriate given its reduced funding. However, the Authority's improvement plan did state that: 'It is proposed that a more comprehensive exercise to arrive at our improvement objectives for 2015-16 can be undertaken, starting in the autumn.'
62. The Authority has progressed this proposal and, after extensive consultation, has adopted revised improvement objectives for 2015-16 that focus on:
- communication;
 - plans and policies;
 - health and well-being;
 - partnership and volunteer management; and
 - financial challenge and performance management.

¹⁶ The Local Government Measure requires all local authorities to adopt annual improvement objectives.

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63. However, none of these improvement objectives for 2015-16 specifically relates to issues which are core to the work of the Authority's planning service. However, the Authority recognises that there are opportunities to focus on areas for improvement for the Authority's planning service that lie outside the requirements of the Local Government Measure.

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

64. Earlier in this report we have recognised the Authority's good relative cost performance in some areas. However, despite the significantly changed financial landscape and the Authority's increased focus on finding savings, our interviews with Authority 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.
65. 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 report recommended that the three authorities should agree 'a consistent basis for defining the measures (to enable comparison) and in particular those around finance'.
66. The Authority partly recognises this criticism and considers that more detailed work may be required on certain activity costs, but states that its emphasis to date has been on streamlining processes which will reduce costs and improve efficiency.
67. 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.
68. 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](#)¹⁷.

¹⁷ 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?

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69. 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 value for money for local tax payers and paying planning customers. Without a better understanding of areas where efficiencies can be made, it is more difficult for the Authority to prioritise improvements. The new Welsh Government's 'Positive Planning' agenda has the opportunity to encourage and support the Welsh Local Government Association and local planning authorities in Wales in having a clearer focus on cost, value for money and improved benchmarking. Any work in this area in Wales should build on the experience and expertise gained through Heads of Planning Scotland¹⁸ and the Planning Advisory Service in England to review good practice.
70. 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 important local priorities such as cultural heritage, economic prosperity and well being, which members advised us were their key priorities. For example, a better understanding of the planning service's contribution to supporting economic activity in the form of jobs and investment in its work on applications including residential, commercial, farm diversification and energy production would be helpful to residents, businesses and planning customers. 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.

¹⁸ Heads of Planning Scotland: [Planning Performance Framework 2014-15 reports](#)

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