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A viable systems analysis of development control services in English Local Planning Authorities

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REFERENCE

A Viable Systems Analysis of Development Control Services in English Local Planning Authorities

Catherine Wynn

**A thesis submitted in partial fulfilment of the requirements of
Sheffield Hallam University for the degree of Doctor of
Philosophy**

December 2012

ABSTRACT

Development Control in England is an important element of the Town and Country Planning process and the economic structure of the country: it is the process which approves or prevents development. Despite this, there is comparatively little research into the processes involved in, and the management of, the decision making process, and there are difficulties effectively researching the process.

The Development Control process lies within a changing environment, both with regards to its political and economic influences, but it is vital that it remains effective and efficient throughout changes in its situation. Historically, it has struggled to adapt to these changes, such as the increased demand on its services throughout the 2000's when it was subject to criticism in particular in relation to housing supply.

This study presents a unique examination of Development Control services in England. It examines the barriers which present themselves in the research of its processes, developing a methodology based on the Viable Systems Model of Stafford Beer to overcome these barriers and, most significantly, it successfully applies this methodology, providing a structured examination of the ability of the system to adapt to changes in its environment.

This examination is highly original in both its subject matter and its methodology and is, as such, a significant contribution to both the fields of Development Control and the Viable Systems Model. It contributes to the limited research within Development Control, extends the fields to which the Viable Systems Model has been applied and demonstrates the presence of features of the Viable Systems Model in an existing high performing authority.

The analysis identified important areas of both good and bad practice and led to recommendations which can assist Development Control services strengthen their ability to recognise and adapt to change. Furthermore, the methodology and recommendations have potential to be applied throughout local authority services, and in other Government provision, to enable services to be effective throughout future changes in their political and economic environments.

ACKNOWLEDGEMENTS

My first thanks must go to the many local authorities who completed my survey and the further three who were willing and helpful case study participants. Without them my ideas would never have found a practical context and the research could not have taken place.

I am very grateful to my supervisory team: Professor Alan Griffith, Dr Ernie Jowsey, Dr Barry Haynes and latterly Professor Paul Stephenson, in addition to the support staff in the Graduate School. In particular, thanks must go to Ann Wilson and to Samm Wharam for her constant prompting and support.

I must also thank my fellow students for their companionship and for my other friends, in particular those who gave their time to read all, or part of, the work, for their patience and understanding throughout the process. Thanks also need to be given to my colleagues in employment, both past and present, who have encouraged me in this endeavour with continuing patience.

A special mention must be given to the SYTOC¹ unit at Derby University. Their encouragement came at a time of doubt and gave me confidence in my work. Similar thanks go to the members of SCIO² who were generous in both their welcome and their feedback on my work and provided the inspiration and enthusiasm to complete this work and to look for further applications of the ideas within it.

This work would not have been possible without the support, encouragement and practical advice from my family who have been there in times of need and doubt and have gently nudged the work along the way.

Finally, I would like to acknowledge those family and friends who have passed away during this long process and would like to think that they can somehow see that it has finally come to fruition.

¹ Systems Thinking and Organisational Change Research Group at the University of Derby (see <http://www.derby.ac.uk/dbs/research/sytoc>)

² Systems and Cybernetics in Organisations (see <http://www.scio.org.uk>)

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LIST OF ABBREVIATIONS

BVPI	Best Value Performance Indicator
CAA	Comprehensive Area Appraisal
CABE	Commission for Architecture and the Built Environment
CPA	Comprehensive Performance Assessment
CCT	Compulsory Competitive Tendering
DC	Development Control
DM	Development Management
GDPO	General Permitted Development Order
HSM	Hard Systems Methodology
LPA	Local Planning Authority
NAO	National Audit Office
NI	National Indicator
ODPM	Office of the Deputy Prime Minister
OR	Operational Research
PDG	Planning Delivery Grant
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RTPI	Royal Town Planning Institute
SCIO	Systems and Cybernetics in Organisations
SYTOC	Systems Thinking and Organisational Change Research Group
SOS	Secretary of State
SPD	Supplementary Planning Document
SSM	Soft Systems Methodology
SWOT	Strengths, Weaknesses, Opportunities, Threats
VSM	Viable Systems Model

CHAPTER 1 INTRODUCTION

1.1 Aim of the Chapter

The aim of this chapter is to introduce the subject of this thesis. It includes an overview of the control and management of development within English local planning authorities: outlining the history and structure of planning in England and the importance of its role within the economy of the country. This discussion will be further developed within the literature review in Chapter Two. This introductory chapter will then continue by introducing the issues that are present within the management of the service and the methodology used to study these structures by this work. These discussions will be consolidated into the aims and objectives of the research and the significance of the study. Finally it will present an overview of the methodology employed within the work and a brief guide to the chapters contained within the thesis.

1.2 Background to the Study

Town and Country Planning has a significant impact on the everyday life of the populace of developed countries. The process is responsible for determining diverse issues from housing design through to the location of industrial and business premises. Developed from the fire regulations in Ancient Rome, planning has developed in different forms around the globe. The planning systems of the United Kingdom and of England owe their twentieth century development to the social philanthropic movement and public health acts of the 19th Century which have been an integral, and expanding, part of the social, political and economic fabric of the country since this time. It has, like much of the British legal and democratic structure, formed the basis of many systems of planning around the world.

The systems in the constituent countries of the United Kingdom have much in common but they are controlled by different legislation. Devolution in 1998 and 1999 transferred many planning powers from Westminster to both the Welsh and Scottish Assemblies respectively, and the responsibility for land use and development in Northern Ireland lies with the Northern Ireland Planning Service. This work will focus on the processes which take place within the English planning system.

Almost since the post war establishment of the current English planning system, the procedures relating to the town planning process in England have been subject to criticism on a number of levels, predominantly relating to the delays created and barriers to be negotiated. Delays created by the planning system were, in 2008, estimated to cost the UK economy £70 million per year (Killian Pretty, 2008). In 2008 the UK was ranked 61st in the world in relation to the ease for businesses to obtain building and construction permits (World Bank, 2009). In comparison, it was ranked 6th in relation to the overall ease of conducting business (World Bank, 2009).

These criticisms have led to many reforms being introduced to amend and enhance the system. These have related to both policy and decision making. The planning process cannot cease to operate while these reforms are being discussed, formulated and implemented. Those responsible for the implementation of new proposals must be able to react quickly and incorporate the reforms into their regimes while preventing undue disruption to ongoing planning processes.

The work of policy formulation and decision making must also react to, and operate in, an environment of shifting economic and political structures. While some changes in this context can be foreseen, many are unpredictable but can, nevertheless, have a substantial impact on the work of planning authorities.

The above summary illustrates how planning authorities need to be able to react to changes, including those to their structure and remit and those in their external environment, in order to continue to provide an efficient and effective service. The importance of the planning process has been briefly discussed in relation to economic, social and environmental issues such as delays to the delivery of housing through to its role in delivery economic growth.

1.3 Research Focus

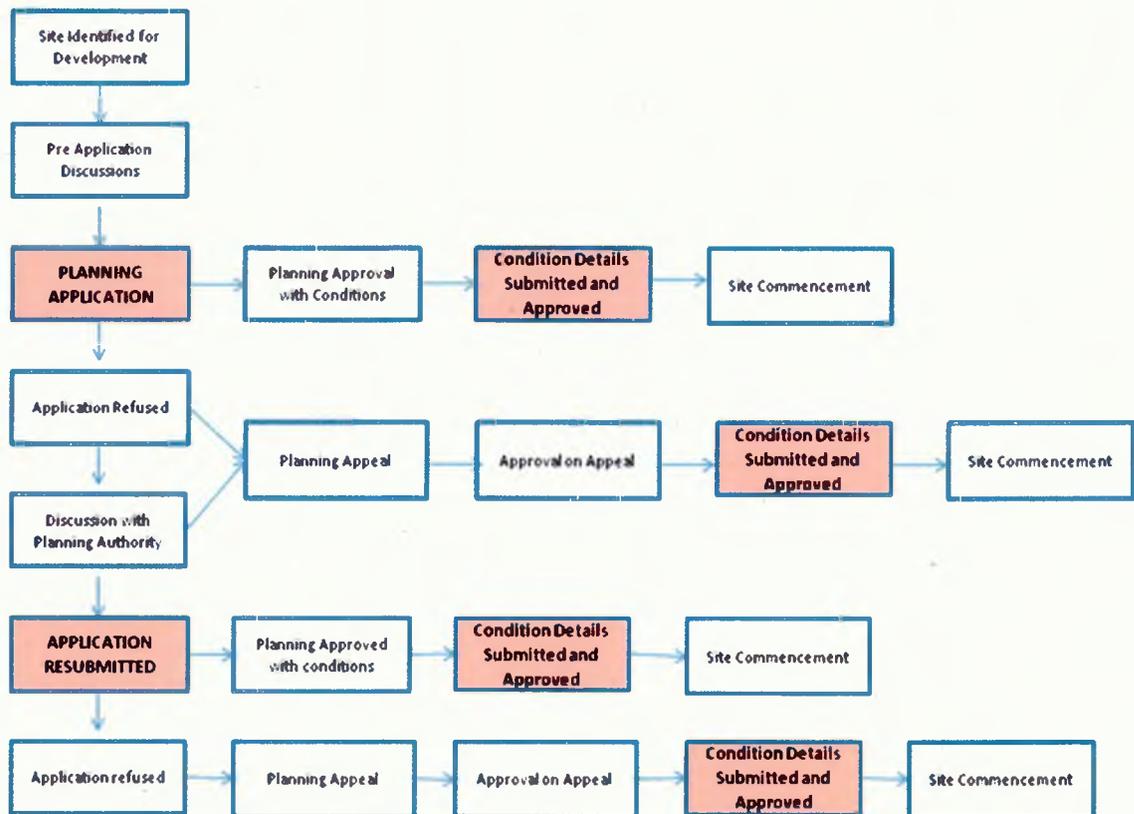
The planning structure within England can be viewed in two distinct areas: the creation of policy and plans and the delivery of the ideas in these plans through the decision making process. Broadly, these can be regarded as the Policy and Development Control functions. The Policy function takes place on a number of levels, from central government guidance through to local area plans. The final

documents which deliver these ideas are currently Local Development Frameworks which are produced by local planning authorities.

The main method of implementation of these ideas is through the determination of Planning Applications in accordance with the plans and policies. These decisions are predominantly undertaken by the local planning authorities' Development Control services. In recent years, a change in culture in these services has resulted in the delivery of this service shifting from a prescriptive authoritarian approach to one of greater cooperation and discussion with applicants. Many services have reflected this emphatic shift through a name change, often utilising Development Management. For the sake of clarity within this work, the term Development Control (DC) will be used to cover the service with this responsibility.

For many years the primary means for investigating and monitoring the performance of DC relied on the collection and analysis of performance figures, based on a narrow range of data which predominantly related to the speed at which planning applications were determined. Substantial funds available to local authorities were, between 2002 and 2009, allocated on the basis of these figures. However, as can be seen in Figure 1.1 below, the planning application is, in itself, only a limited part of the completed decision making process. The timed and targeted planning application stages are illustrated in red, although the discharge of conditions only became a formal application process, and therefore subject to timing and targets, on 7 April 2008.

Figure 1.1 A Simplified Illustration of the Planning Process leading to the approval of an application



In 2008, a Government commissioned review, the Killian Pretty Report (Killian Pretty, 2008), was conducted and published. This specifically focused on the delays in the entire determination process including the processes outside the timed application stage. A number of recommendations were produced by this report and local planning authority (LPA) DC services were responsible for implementation of many of these. Concurrently, a smaller scale report was published by the National Audit Office (National Audit Office, 2008) which made recommendations relating specifically to the facilitation of housing delivery.

These reports provided a basis to bring together the two main issues identified in this research: the investigation of Development Control services and their ability to implement and adapt to change. The recommendations contained within the reports were used to investigate and establish the abilities of Development Control services to implement these changes. The research will investigate the processes which enable the authorities to adapt to their constantly changing environmental circumstances including the economic downturn, and more recently, the political change in respect to the coalition

government. This investigation will produce recommendations to enable authorities to adapt efficiently.

1.4 Research and Systemic Methodologies

It is necessary to use a strong analytical framework for these investigations in order that the resulting recommendations remain relevant throughout future environmental changes. Previous research into Development Control has relied heavily on traditional quantitative analytical techniques which have been subject to criticism for a number of years. The research is intended to examine the ability of authorities to adapt to, and implement, changes in their operating framework and their environment.

The methodology then turns to Systems Thinking and Cybernetics. Systems Thinking varies from more traditional forms of management study by taking environment as a consideration of key importance. Briefly, the purpose of systems thinking can be described as:

"analysis... to help public and private decision and policymakers to ameliorate the problems and manage the policy issues that they face. It does this by improving the basis for their judgement by generating information and marshalling evidence bearing on their problems... focuses on a problem arising from interactions among elements of society, enterprises, and the environment; considers various responses to this problem; and supplies evidence about the consequences - good, bad and indifferent - of these responses." (Miser & Quade, 1985, p2)

Within systems thinking there are a number of methodologies which range from those which endeavour to predict, manage and control the environment (Hard Systems Methodology and traditional Operational Research) through to those which seek to understand and adapt to their situation (Soft Systems Methodology and the Viable Systems Model).

The Viable Systems Model (VSM) seeks to review and set up structures within organisations which enable them to adapt to changes within their environment and to remain viable both throughout and following the changes that occur. It has been applied to a diverse range of situations, from its early application to

the Chilean Economy by Stafford Beer through to a Cooperative Eco Village scheme (Espinosa et al, 2011). It seeks to identify and to enable the establishment of processes (or subsystems) which enable this survival to take place. The appropriateness of the methodology in relation to Development Control services will be established and this will, in turn, provide a clear tool for the analysis of the current practices. This will provide a clear framework in undertaking case study analysis for this research.

1.5 Research Aim

The aim of this research is to investigate the processes of DC in English local planning authorities and, consequently, the ability of the DC services to cope with changes. These changes include those which occur in the environment in which they are situated and with those which alter the framework in which they operate. The study will analyse the processes which take place within local authorities in order to develop a framework of recommendations to enable local planning authorities to manage the decision making process efficiently within these environmental changes.

1.6 Research Objectives

In line with the Research Aim of this work, there follow a number of subsidiary objectives which must be fulfilled in order to successfully obtain the research aim. These are:

- 1 To establish the current practices of planning authorities in the management of their decision making processes;
- 2 To evaluate the current ability of authorities to recognise, and adapt to, changes in their environment;
- 3 To establish an appropriate methodological framework to undertake case study analysis of the management of decision making processes;
- 4 To apply Systems Thinking methodology to identify strengths and weaknesses in current practice within DC services in LPA's;
- 5 To develop and validate a framework of recommendations of good practice to enable local planning authorities to adapt to, and retain efficient operations throughout, changes in their environment.

1.7 Overview of Research Methodology

Given these research aims, it was considered appropriate to adopt a mixed methods approach to this research, utilising both primary and secondary statistical data before moving on to undertake case study analysis. This data was used to establish, through statistical analysis, the relationships which are present between the characteristics of authorities and their reactions in relation to environmental and structural change. This data was obtained through government publications such as census data and authority performance figures and through a nationwide survey of DC services.

The survey for obtaining this data was developed following the literature review. It used feedback from a presentation at the UK and Ireland Planning Research conference, and primarily incorporating the themes identified in both the Killian Pretty Report (Killian Pretty, 2008) and Planning for Homes (National Audit Office, 2008). The surveys were piloted by planning professionals at a Planning Aid event and by a Head of Development Services in a local planning authority. They were delivered by electronic means and elicited a 32% rate of return.

Following analysis of the survey responses, case studies were conducted in three local authorities in different areas of England. These case studies involved in-depth interviews with a variety of participants in each authority from different levels in the hierarchy and with different roles in the process.

The contents of these interviews were then analysed using the ideas of the Viable Systems model at two levels of recursion to establish a set of recommendations of practice which would enable services to establish mechanisms to sense, and adapt to, changes in their environment. These recommendations were validated through a process of feedback to the participating authorities, discussion with other authorities and comparison with the qualitative elements of the nationwide survey.

The primary aim and subsidiary objectives of the research were achieved through this process of literature analysis, survey work and VSM diagnostic analysis.

1.8 Significance of the Research Study

The significance of delays within Development Control cannot be underestimated. In times of economic prosperity the inefficiencies were held responsible for the lack of delivery of housing (National Audit Office, 2008) and in the present economic climate it is equally as important to remove as many factors as possible which may inhibit the economic recovery. The British Chamber of Commerce have described the planning system as having:

"too much uncertainty, risk and delay... which has a negative impact on development and the broader economy". (British Chamber of Commerce, 2009).

The planning process needs to ensure that it provides as much support as it can reasonably achieve to enhance economic development. It is important to understand the barriers to good practice in the implementation of the current recommendations and to enhance the planning process to aid recovery.

It is equally important for the planning process to remain viable in the long term. Prior to the economic downturn, the planning system was struggling to process the large volume of applications. This has been partly attributed to a lack of qualified and experienced staff to undertake the work (House of Commons, 2008) potentially as a legacy of the last recession, when the number of planners was drastically reduced (Durning, 2007). This example illustrates the potential longer term impacts of short term measures.

Research into planning processes has focused heavily on plan creation and the development planning process rather than Development Control. This research gap has begun to be acknowledged (Carmona & Sieh, 2005) but the body of work still remains limited. Meanwhile, the decision making process remains the primary means of policy implementation and should not be neglected in the research process. There are acknowledged difficulties in researching this area and discussions on appropriate effective means of analysis have been taking place since the early 1980's (McNamara and Healey, 1984). A study of statistics and planning outputs can not fully assist in the investigation of the management of the decision making process. It is important in this research to develop an understanding of the management mechanisms which are present

within the provision of Development Control in order to establish the means of delivery of recommendations for improvements and to enable positive interaction with the external environment. The management processes within DC, and the issues surrounding their research are summarised by Enticott who stated:

"management and its relationship to planning performance occupies a somewhat ambivalent position within planning literature... problems associated with objectively determining planning activity (Wood, 2000; Brotherton, 1982 & 1984, McNamara and Healey, 1984) have shied researchers away from these issues" (Enticott, 2006, 148).

The Viable Systems Model can not fully objectively determine the structure of activity in the management of Development Control but it does provide a clear structure to guide and develop the research into the management issues of a Development Control service by examining both its internal and external relationships.

Therefore this research holds its significance in four substantial areas:

- A contribution to the limited academic output on the decision making element of the planning process
- A study of the management of Development Control processes through the use of a defined methodology which has not previously been applied to this area.
- The application of a methodology which looks at both short and long term viability which is of particular relevance in relation to the current period of political and economic volatility.
- the application of Viable Systems thinking in the new area of Development Control in local authorities.

1.9 A Guide to the Thesis

A brief summary of the thesis contents is presented below.

1.9.1 Chapter One - Introduction

Chapter One has presented an introduction to the thesis, introducing the key

themes of the study, its aim and objectives, the context in which the study lies and the significance of the work. Finally it will provide a brief overview of the thesis structure.

1.9.2 Chapter Two – A Review of Town Planning in England

Chapter Two begins by presenting, in greater detail, the development of the town planning process within England and the United Kingdom, discussing the need for the planning system and its development. This includes a consideration of the theories of both planning and planning research. It then considers the importance of speed and efficiencies within the process. The structure of the delivery mechanisms for planning is discussed and a review of interventions within the process is presented. This chapter then continues to study the previous research into Development Control and the issues that emerge in this area.

1.9.3 Chapter Three – Methodology: Theoretical Underpinnings and Systems Practice

This chapter primarily examines the methodological framework for the project. It begins with a discussion of the importance, and the subsequent development of, a research question. It then considers the theoretical underpinnings of the work and the necessary considerations in the development of an appropriate and successful means of enquiry. It also addresses the practical issues inherent in the research process and the importance of establishing that the work be valid, reliable and hold generalisability.

It continues by discussing the development of systemic practice, introducing several of the key concepts in this area. It includes an overview of the costs and benefits of the application of different methodologies and the concepts which can be examined through these processes:

1.9.4 Chapter Four – Methodology: Research Design

The focus of the work now moves to a discussion of the practical application of these research theories, addressing the manner in which the research aims can be met. It establishes the benefits of conducting the research through an

internet based survey and a case study application of Viable Systems Methodology.

1.9.5 Chapter Five – Authority Analysis

This chapter presents the initial analysis of local planning authorities in England. This includes analysis of secondary data, such as population, deprivation figures and the type of authority together with primary data obtained through a nationwide survey of planning authorities. It continues with discussion of the process of selection for case study authorities following this analysis.

1.9.6 Chapter Six – Viable System Analysis - Exploration of Identity and Purpose

This chapter presents the initial analysis of the case study authorities, examining the system of Development Control within its local authority context. The chapter opens with a brief overview of the characteristics of the participating authorities. Following this, it moves to present the identity and purpose of Development Control in the case studies before continuing to look at the identities of the operational subsystems.

1.9.7 Chapter Seven – System Regulation and Management

This chapter continues the Viable Systems analysis by exploring the management and regulation of the systems explored in Chapter Six. It undertakes a discussion of the strengths and weaknesses identified in the case studies and an exploration of the discretion and communication of the systems. The chapter then moves to present systemic diagrams of the systems' management and communication flows. Finally the chapter identifies the actions which could be incorporated into Good Practice proposals.

1.9.8 Chapter Eight – Good Practice Recommendations and Validation

This chapter takes the findings of this data analysis to produce recommendations of good practice drawing, in particular, on the complexity models of Chapter Six and Chapter Seven. It then validates these recommendations through feedback to a case study authority, presentation to an authority established in 2010 and through integration with qualitative

answers to the original survey research.

1.9.9 Chapter Nine – Conclusions

This final thesis chapter presents a summary of the thesis, providing an overview of the research process, literature review findings, quantitative and qualitative research findings and recommendations and the significance of the study. It also considers the applicability of the research and its limitations. Finally it will move to explore potential ongoing research which emerges as a result of the study and its recommendations.

1.10 Chapter Summary

This chapter has provided an overview of the subject of this research, briefly exploring the history of the Planning System and the role it plays in the economic structure of the country. It has also provided an overview of the factors which affect the operation of the decision making process to which it is necessary for Development Control services to react. It put forward a means of researching this area, with an overview of the methodological framework, which takes account of these influences before continuing to examine the significance of the work. Finally a brief synopsis of the make up of the work was presented.

CHAPTER 2 LITERATURE REVIEW

2.1 Chapter Aims

This chapter introduces the key concepts and issues which will be explored in this research, discussing more fully the development of the present day town planning process, before continuing to address the concerns which surround it. It then moves to introduce the area of systemic analysis, exploring its purpose and some of the methodologies which exist for its implementation. This provides an overview of the issues behind this study, illustrates the context in which the work lies and identifies the key issues which must be incorporated into the framework of the study.

2.2 Town Planning in England

2.2.1 The Foundations of Planning

The origins of the English town and country planning system can be traced back to the public health legislation of the industrial revolution. The living conditions of the working classes began to cause concern and legislation was passed in order to regulate the accommodation provided. The legislation developed from controlling the new housing through to the provision of municipal housing and for the control of the location of housing and industry.

In order for these developments to take place, the prevailing economic attitude of the Victorian era also had to undergo a cultural shift moving from the dominance of 'laissez faire'. The process commenced through the Public Health Acts of 1875 and continues to develop in the present day. The previous opinion had held that "competitive markets should be relied on as they would allocate societies resources in an efficient manner" (Klosterman 1985). It had previously been considered that it was most appropriate to let the market regulate the conditions of the working classes, but the attitude slowly began to shift to appreciate that the market economy alone would not take care of the living conditions of the urban population, and that government intervention was necessary to maintain acceptable conditions.

This social justification for planning continued throughout the twentieth century.

The interwar and post Second World War period saw the rise of the profession following public concern over the quality of housing for war veterans, at the same time, concern was beginning to arise regarding the encroachment of new developments into the green areas around cities, for example, ribbon development along arterial roads. In 1947 the beginnings of the modern town and county planning system were established in the Town and Country Planning Act 1947. This Act introduced the preparation of development plans and brought "almost all development under control by making it subject to planning permission" (Cullingworth & Nadin, 2006, p23).

The planning system has expanded since its original origins and now covers concerns "ranging from kerb design to the Greenhouse Effect" (Wadley & Smith, 1998, p1006). Indeed, in 2008 a report into the operation of the decision making process stated that the system has:

"had to cope with increasing complexity from an ever widening range of policy objectives that the Government expects it to deliver". (Killian Pretty, 2008, p3)

The remit of the planning system has already incorporated these added objectives and we can consider what it now encompasses. Until March 2012 Planning Policy Statement 1 stated:

"Good planning is a positive and proactive process, operating in the public interest through a system of plan preparation and control over the development and use of land. The core principles of the planning system are underpinned by the principles of sustainable development. [and] planning should:

- make suitable land available for development in line with economic, social and environmental objectives to improve peoples' quality of life*
- contribute to sustainable economic development*
- protect and enhance the natural and historic environment, the quality and character of the countryside, and existing communities*
- ensure high quality development through good and inclusive design, and efficient use of resources*

- ensure that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services to all members of the community." (Office of the Deputy Prime Minister, 2005, p2)

This clearly demonstrates the large number of roles which the planning process in England is now expected to perform. It is, however, necessary to discuss the development of the process, and how it can be justified, in order to fully understand its ability to delivery these high demands efficiently. The debate following the introduction of the Coalition's planning reforms in summer 2011 has highlighted the continuing dichotomies between local decision making, public involvement and environmental protection against the demands of economic growth. This chapter will discuss the role and development of the planning and development control processes, and the theories which have developed surrounding them.

2.2.2 Planning Theory

"The extent of the vilification to which development control has been subject in Britain over the past 25 years suggests that it may be a rather more important process than its detractors allow. The importance of the process has, at one level, to do with matters of substance. Questions of land-use and urban form affect profoundly the welfare and enjoyment of life of those who live in urbanized societies like ours. Decisions taken in the course of development control have a long term impact. At another level, however, the development control process serves as a focus for a whole range of questions about how we govern ourselves and on whom we confer powers to take decisions on our behalf" (Booth, 1996, p1).

In understanding the role of planning, and the methods through which it can be studied, it is important to consider the theory which relates to planning itself: "a sound body of theory is an essential component of the planning profession – both fundamental to an understanding of what planning is and helpful to those who practice it" (Brooks, 2002, p21).

The development of planning theory is related to the development of planning itself. "Planning does not occur in a vacuum, but in a social, political and

economic climate" (Brooks, 2002, p40). The theories which are applied to and have developed around it must consider these elements of the process. Planning is subject to, and involves, a large number of different influences in often conflicting situations. This development of the theory of planning will be briefly explored below.

Mazza, at the outset of his discussion on the development of planning theory states:

"Planning has two origins, both related to politics, but related in rather different ways, concerned respectively with 'ethics' on the one hand, and with what may be called 'engineering' on the other". (Maudelbaum et al, 1996, p4)

He continues to observe that most theories of planning relate to the "mingling of power balances" which are being acted out between these two main approaches.

The initial plans produced under the original 1947 Planning Act were considered too detailed and too inflexible, being based upon scientific approaches to town design while dealing "inadequately with transport and the inter-relationship of traffic and land use" (Ministry of Housing and Local Government, 1965). The technical, positivist, engineering element of the planning theory was prominent in the practice, whereas those directing the policy, the authors of the reports, were moving towards the incorporation of the more normative approach which would take into account further reaching concerns. This situation was summarised by Taylor who stated:

"town planning should not be just confined to matters of physical form and design but should be concerned with 'economic and social' policy more generally, having a wider remit than envisaged by town planners wedded to a physicalist and design based conception of planning". (Taylor, 1998, p53)

It is these changes in direction which the planning practitioner, and planning practice, must react and adjust to. While empirical understanding and appreciation is an important aspect in the aims to improve society, an

understanding of the social issues is of equal importance. Planning continually needs to adapt and change, and in order to do this it needs a balance of both empirical and normative understanding. Contemporary theory and debate, and the associated theories of planning, can predominantly be related back to this balancing act: "the two origins become two planning approaches which mingle variously with theoretical contributions" (Mandelbaum et al, 1996, p4).

In seeking a context for itself, planning theory has drawn upon the wide area of social and political theory, as has been previously discussed, and it can not be isolated from this context in which it has developed. These theories, and their specific applicability in the planning context, have been explored in greater detail by the American planning theorist, John Friedmann.

In his examination of the development of planning theories, Friedmann continued to explore his identification of four main traditions in which the efforts of planning can be applied (Friedmann, 1987). He included in these traditions the idea of planning as a vehicle for social change (Social Reform), the identification of optimal courses of action (Policy Analysis), the use of social learning and the use of planning to allow social mobilisation which would not take place within a traditional capitalist structure. A brief exploration of these categories follows.

2.2.2.1 Social Reform

This tradition of planning thought is, according to Friedmann, related to endeavours to improve the efficiency of processes, regarding planning as a scientific process through the defining of clear, often economic, objectives. Members of this tradition see planning as an area of professional expertise which should not necessarily involve public participation. The public would not have the training and understanding to make the technical decisions required. In relation to the initial discussion in 2.2.2, this tradition falls at the positivistic end of the balancing scale, seeking to control the economic and political environment rather than incorporating tools to engage with it.

2.2.2.2 Policy Analysis

This tradition of planning theory considers the behaviour of organisations, and

examines the impacts, incorporating the consequences of their actions on their environment into their decision making structure through the creation of models and the utilisation of feedback mechanisms. While this tradition utilises scientific techniques, it acknowledges that these may often be used to produce the best solutions as opposed to the only solution. It retains the approach that the application of scientific techniques will produce a better decision than "through a process of unmediated politics that is subject to personal whim, fickle passion, and special interest" (Maundelbaum et al, 1996).

2.2.2.3 Social Learning

This tradition stems from the belief that "knowledge is derived from experience and validated in practice, and is therefore integrally a part of actions" (Maundelbaum et al, 1996). Importantly, in terms of planning theory, it expounds the use of social experimentation and the learning which can be generated from the admission of failure.

2.2.2.4 Social Mobilisation

The final tradition identified by Friedmann relates to the theories which treat the act of planning as an act of politics which, in itself, initiates organisations and empowering bodies to take action for themselves. To set this within the current political climate, the proposal of the coalition government to give communities the power to propose and approve schemes for themselves would fall within the justification of this tradition of thought. However, this theory relates more to the creation of policy as opposed to the decision making process to which this thesis relates.

These four traditions reflect the balance of scientific and socio economic and political ideals which constitute the planning system. Many planning interventions can be related back to this balancing act. For example, the continuing need for public participation cannot be reconciled with the traditions of Social Reform and Policy Analysis while it would, in society today, seem difficult to justify the mobilisation of communities without some backing of quasi scientific data.

All these definitions have taken account of planning as part of the political and

social processes of the country, and given a broad overview of the considerations behind the understanding and development of planning processes and the distribution of power. The discussion has demonstrated the complexities in both the issues that planning is faced with, and the theory behind the means with which these issues can be dealt with. This thesis will now continue to establish the need for the planning process, and its constituent elements.

2.2.3 The need for a Planning Process

It would not be appropriate to analyse the operational aspects of the current town and country planning system without first examining the necessity for such a system. There are a number of economists and think tanks (see, for example, Balen 2006, Corkindale 2004, Evans 1988, Pennington 2002) who argue that in the modern, capitalist society, the town planning system which has developed from this historical basis is no longer suitable for this society: it stifles the free market through its regulation and long delays. These arguments, according to Klosterman find their historical roots in the work of Adam Smith, John Stuart Mill and others of the neo liberal tradition (Klosterman, 1985).

They argue that the free market itself will produce results similar to that of the planning system without having such an impact on the economic well being of the country. It is suggested that those issues which are covered by the planning system, such as amenity, could be covered by other legislation such as nuisance laws while natural market conditions and practical considerations would themselves control areas of concern such as excess development in the countryside. For example, it is unlikely that a large number of residential developments would take place in the countryside as they would not be accompanied by jobs and facilities: people would remain living in towns alongside their employment and social networks. The arguments continue to suggest that the planning system is now itself an obstacle to the economic growth of the country (Balen 2006, Evans 1988). Balen states that:

"We are too frightened of what an unplanned, market-order would produce. But in the absence of planning laws, supermarkets would still locate near busy roads with a large car parking space, not in rural

hamlets, just as newsagents would spring up on street corners. Chemical plants would not appear in a back garden but near natural resources and transport links necessary for their economic survival... there is a strong case for the planning process to be abolished, and the useful functions it performs replaced by an increased reliance on Covenants and Nuisance Law." (Balen, 2006, p13)

In contrast, over recent years the planning system has found itself facing an increase in its responsibilities as opposed to a decrease, covering more areas of concern. This can be illustrated by the example of the rising importance of flood risk, and its concurrent rise in the public interest, which is now a primary consideration of the process. In previous decades, the question of development in flood plains was considered to be one of more concern to the private sector, such as insurance companies and house builders, with decision makers content to allow the market to regulate this development. One would also conclude that these arguments, in themselves, fail to take account of this social political context, looking only towards regulatory procedures.

This social context can be emphasised by the movement, in recent years for the planning system to become more involved in such areas as the provision of licensed premises and involvement in competition issues in areas such as retail.

It can be seen that while there are strong economic principles to support the abolition of the planning system and potential theoretical processes and regulations which may fulfil some of the controls that currently operate, the planning system does not currently lie in a political or social environment in which such reforms will be readily put in place. The strength of feeling against reducing the protection contained within the planning system can be illustrated through the reaction to the Coalition Government's proposed planning reforms of summer 2011 (National Trust, 2011). In the current climate of political and economic change, and with the new Coalition Government's stated intentions to remove red tape and simplify the system, such pressure groups may come to the fore and this could, in time, be considered a serious option. This statement must be tempered with the consideration that while the previous Conservative Government, under the leadership of Margaret Thatcher, was making many reforms to reduce the influence of the planning process, it never went so far as

to consider its wholesale abolition.

Klosterman, conversely, lays down economic reasons for the need for a planning system: - some goods are provided for the general public but affected by individual actions. These, such as a healthy environment, cannot be provided for by perfectly competitive markets; - markets are not able to deal with the social costs and benefits of resolving distributional questions in a socially acceptable manner. These will be briefly outlined below, as his arguments counter the economic and social justifications put forward for the potential abolition of the planning system as it exists today.

2.2.3.1 Public Goods

While a house or a business premise is by its nature, owned and managed for the individual, family or business, there are other outputs of a planning system which exist for the public good, such as the open space created between developments, the transport infrastructure, and overall, the production of a "healthy and pleasant environment simultaneously enjoyed by more than one individual" (Klosterman, 1985, p6). While those for planning abolition argue that this could be controlled through a series of agreements and obligations by developers, this is currently controlled and balanced through the planning process itself, and various attempts to quantify it, such as the Community Infrastructure Levy (a tariff based fixed charge for developers) have illustrated the complications that can arise.

2.2.3.2 Externalities

While economic abolitionists argue that economic considerations will prevent, chemical plants appearing in back gardens, the 'spill over' effects of development are an important consideration which currently lies within the remit of planning. While this extreme example could indeed be limited within a free market to development, it may be more difficult to prevent spillover effects in relation to transport infrastructure as a strictly economic and market approach may not face the consequences of these actions, and indeed take a deliberative look at them in the first instance.

2.2.3.3 Distributional Questions

This argument is inherently related to the benefit of 'public goods' laid down by the Planning Process. Klosterman argues in order to counter the theory that perfectly competitive markets will allocate resources without causing harm. While the location of industry may be controlled through a permit system and licences which consider safety and environmental issue, the planning system today also controls the distribution of industry into areas which may benefit further from its location, therefore conducting a role which "gives societal consensus on the proper allocation of resources" (Klosterman, 1985, p6).

2.2.3.4 The Prisoner's Dilemma Conditions

If a purely free market is in operation Klosterman (ibid) identifies areas where, "individuals pursuit of their own self-interest does not lead to an optimal outcome for society or for the individual involved". Klosterman cites the examples of landlords deserting an area as opposed to being the first to invest and improve it.

2.2.3.5 Summary of the Need for Planning

This brief analysis of Klosterman's paper illustrates that there are arguments to defend the planning process against the calls for its abolition. However, as Klosterman acknowledges, these principles lay down a justification for what the United Kingdom's planning system originally set out to achieve rather than a justification for the planning system which exists in the United Kingdom today (Klosterman, 1985).

Additional issues have also come to prominence since Klosterman was writing. The importance of long term sustainability has come to feature prominently in both public and private decision making. It is equally important within the planning process and can be seen to influence many, both short and long term, material planning considerations. These considerations, for example, range from minimum standards for homes through to the more controversial area of the location of housing developments on both a local and a national scale. While it would be possible to cover the sustainable features of individual houses under Building Standards requirements, the location of housing development

needs to take into consideration a full range of sustainability considerations, such as environmental protection, community impacts, transport and infrastructure which could be neglected through a process of licences.

It is difficult to fully assess whether a suitable, private alternative to the planning system as it exists today could be fully achieved without adverse societal impacts. It is, however, considered on balance that the processes in place achieve, and are accepted as, a positive outcome for society as a whole. It is also important to note the socio political purposes and outcomes of the system. When considering the previous discussion regarding planning theory politically judged concepts, such as the interpretation of sustainability are an undeniable part of the process and the planning process cannot be examined in isolation from these.

Similarly, it is undeniable that the current process is now completely entwined with the economic structure of the country. The protagonists for the abolition of the planning systems themselves acknowledge that the planning system cannot simply be abolished. In discussing the housing market, a major component of the British economy, Evans states, "the immediate abolition of town planning would result in falls in property values which would have a catastrophic economic impact" (Evans, 1988, p51). It is therefore important that the system that delivers this service remains viable throughout political, economic and social changes.

2.2.4 Planning and Democracy

*"The context within which our planning system has developed its 'democratic base' has not always existed, indeed it has been hard won, and there is no guarantee that it will be appropriate in the future."
(Cullingworth & Nadin, 2006, p431)*

The English planning process has, since taking its current form in the 1947 Planning Acts, become an inherently political process. Development Plans, or Local Development Frameworks, are formed following extensive public involvement and examination and Development Control decisions are taken after mandatory forms of public consultation. This was not always so. In 1964, in the 1st edition of his textbook of Town and Country Planning, Cullingworth

stated:

*"Planning Proposals are generally presented to the public as a fait accompli, and only rarely are they given thorough public discussion."
(Cullingworth, 1964, p273)*

This statement clearly reflects a time when the English planning system was considered to be the preserve of experts, fulfilling the public good in a logical and scientific role. This reflects the Social Reform era of planning theory which has been previously discussed. Shortly after this was written, the role that the public could play in the planning process began to be considered. This is partly attributable to the changing societal culture but also influenced by ideas and practices from the United States of America. In particular Davidoff's 1965 article is cited as an example of the need for advocacy planning in representing disadvantaged groups in the process (Davidoff, 1965).

As a result of these changing demands, in 1969, the Ministry for Housing and Local Government commissioned the Skeffington Report to investigate the need to include public participation within the planning processes (Ministry for Housing and Local Government, 1969). It introduced the concept of utilising participation as a mechanism to legitimise planning decisions and to add additional knowledge to decision making processes.

The difficulties that motivated this review, and which its reforms sought to address, were those of power and acceptance. Concern was rising as to the interests which the planning system had come to represent. Despite being established as a skilled, value free professional act, the planning process had begun to be viewed, in a Neo-Marxist view of power, to be reinforcing the political ideals of the state, and, therefore, those with political influence as opposed to establishing policies of the general public.

The Skeffington Report is the first example in the English planning system of the dichotomy of the planner as a politically neutral professional practice (Social Mobility) and planning as the means of promoting minority interests (Social Mobilisation). It was the development of these ideas, and an academic questioning of the values being produced by the planning system. This debate remains topical and an important consideration even to today. It is useful to

discuss its theoretical origins and the application that they still hold for today's planning processes.

However, with this increased participation the dichotomy between speed and involvement became further apparent in the strong economic climate, and the related property boom, of the 1970s. In 1975, George Dobry was commissioned to undertake a comprehensive review of the planning system, and he was immediately faced with this dilemma. However, in considering the situation he stated:

"Not all delay is unacceptable, it is the price we must pay for the democratic planning of the environment." (Dobry, 1969 in Cullingworth, 2006, p184)

It can be seen that democratic involvement in the process was becoming an accepted, and desirable, element of the planning process. Dobry continued to put forward justifications as to the benefits which could be gained through public involvement. These included an education: to increase understanding as to why particular decisions have been made and to make use of local knowledge and environments and the promotion of high quality development.

This discussion has illustrated that public participation was becoming an established principle of the planning process, and an expected part of the decision making process. By the 1990s it was accepted that the promotion of public participation is one of three broad ideologies of British planning. The other two ideologies were the protection of private property and the advancement of the public interest (Simmie, 1994).

Innes and Booher further expanded the theoretical justification for public participation in the planning process, putting forward five areas of concern (Innes & Booher, 2004). Briefly these are:

- To allow decision makers to find out the public's preferences to incorporate them into their decisions;
- To improve decision making by incorporating local public knowledge;
- To advance fairness and justice;
- To gain legitimacy for decisions;

- To comply with legislation;

Public participation has become an established, and expected, principle of the planning process, which any study of the processes must appreciate. Students of planning learn that:

*"The right of the public to have a direct say in planning decision and the inherently political nature of planning are now taken for granted."
(Cullingworth & Nadin, 2006, p462)*

Meanwhile, the role and importance of the democratic voice within decision making has also been criticised by both those participating in the process, and by those responsible for implementing the process. While the initial movement of the 1960s was aimed at gaining a wider input into the process, in order to represent a wider sector of society, the current methods of gaining public input, are also said to involve only certain sectors of society as a whole.

"Because of the focus on speed and streamlining the planning system, those members of a community unfamiliar with the planning process are placed directly at a disadvantage, as they often lack the knowledge and confidence in bureaucratic processes. Those who are involved in consultation can commonly be representative of the more powerful interests in society which only serves to reinforce existing power structures." (Tewdwr Jones & Thomas, 1998, p129)

In addition to demonstrating the ongoing discussion of the interests represented by the planning system, this quotation also demonstrates a further issue of the process, which has also been discussed over many years: the need for speed within the planning process.

2.2.5 The continuing need for speed

It has been established that the planning system is an integral part of the economic and democratic structure of the country. As such, it follows that it is necessary that the system should be operating as efficiently as possible in order that it may fulfil its role to ensure the delivery of a sustainable society. There now follows a discussion as to why it is important for the planning decision making process to operate in this way.

The need for speed was emphasised in the economic boom of the 1970's. It was here that the first government sponsored attempts to increase the speed of determination of planning applications. While most of the recommendations of the Dobry Report (Dobry, 1969) were not implemented due to a shift in the economic climate and political change, it was in this report that the time limits for planning applications were first put forward. These were designed to accommodate the balance between public participation and the need for clear predictable procedures.

The previous UK Labour Government and their planning advisors were keen to emphasise the importance of speed within the planning process. This keenness can be easily illustrated through the examples of parliamentary debates and Government planning guidance.

In the debate introducing a UK Planning Bill in December 2007, Hazel Blears, the then Secretary of State responsible for Planning stated, "No one benefits from ... delays: not business, local people, the economy or wider society" (Hansard, HC Dec 2007). However, while this White Paper introduced measures to speed up the introduction of Major Infrastructure Projects, it introduced only minor measures to increase the speed of the Development Control process in general. Further evidence of the central government rhetoric can be found within national planning guidance. Planning Policy Statement One (Office of the Deputy Prime Minister 2005) states that:

"the country needs a transparent, flexible, predictable, efficient and effective planning system. Planning Authorities must ensure that, planning applications are dealt with expeditiously, while addressing the relevant issues." (Office of the Deputy Prime Minister, 2005, p3)

The Coalition Government, since gaining power in May 2010 have continued to focus on the importance of the planning system, and the importance of minimising delay. The new Draft National Planning Framework states:

"Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations... Development that is sustainable should go ahead without delay." (Department for Communities and Local Government, 2011, p. x)

It is recognised that in processes as complex as town planning, it is difficult to relate a financial figure to the delays in Development Control decisions. For example, the delay in building an industrial estate may simply delay income for the construction industry which is a comparatively short term impact, or could additionally have a longer term effect on the community of the proposed location, perhaps causing blight to the area from the possible confusion and frustration. Alternatively, and to an extreme, a delay in the consideration of a proposal for a large housing scheme could exacerbate housing affordability issues and result in the outward migration of labour and prevent investment in jobs.

Others theorise that it is the uncertainty caused by the system which is more likely to have an economic cost. Evans (1988) states that:

"Whether or not a development takes place a few months earlier or a few months later is usually not of much importance. A more significant cost is the uncertainty which the system creates: will the development go ahead at all? In this respect speeding up the system is somewhat beneficial because the uncertainty is resolved into certainty rather sooner (Evans, 1988, p42)."

The potential damage of delays can also be seen through changing economic circumstances as illustrated in the recent economic climate. During the height of the economic boom, the planning system was heavily criticised as a major barrier to housing delivery. In 2006, the Barker Review of Housing (Barker, 2006) cited DC processes, alongside other planning procedures as a major barrier to housing delivery and therefore to economic growth. This report was followed by her review of Land Use Planning (Barker, 2008) and latterly by the Killian Pretty Review of Planning (Killian Pretty, 2008) and the National Audit Office Report, Planning for Homes (National Audit Office, 2008).

In the current economic climate there are now further factors which hold greater influences over the delivery of housing but Development Control remains an important factor in the economic health of the country, and the road to recovery. Reports both from the central UK government and the Scottish and Welsh assemblies and from representatives of business interests have emphasised

the importance of preventing delays to development which could encourage economic growth. The British Chamber of Commerce stated that the system is still subject to:

"Too much uncertainty, risk and delay... which has a negative impact on development and the broader economy." (British Chamber of Commerce, 2009)

These discussions illustrate the need for Development Control to operate in an efficient manner, while still maintaining its key principles, in order to have a minimal negative impact on the economy of the population which it serves. It is on this basis that much governmental intervention has been based.

A discussion of these key principles of the system, and previous approaches, interventions and reforms which have taken place will now follow in order to create an understanding of the diverse issues which impact on this area of society.

2.2.6 A History of the process issues

"We are told that 500 000 houses are required at once, immediately upon the declaration of peace. How can they be built? Are we to have the same kind of house, a hundred all alike in a row, the same dreary monotony, the same lack of open space, the same miserable backyards? No, we must have something better than this for the men who have been willing to give all for their country. If Town Planning is not simplified and speeded up, how is this to be prevented? These men have been willing to obey any order given to them, or face any danger on sea and land, in the air and under the seas. Are they to be denied a comfortable house when they return because of the so called rights of the owners of property that before we can say he shall not overcrowd his land we must issue eight different advertisements, and serve him notice 4 times over?"
ER Abbott, October 1917. RTPI Presidential Address. (Cherry, 1974, 75)

As can be seen from this quotation, the speed of the planning process has long been an issue within planning in Britain with much literature and several reforms based on accelerating the complex processes. Concurrently this quotation is an

illustration of the constantly changing pressures and aims of the planning process. In 1917, the system was charged to decrease the density of housing whereas nearly 100 years later, the pressure on the availability of housing land has caused a shift in its aims to allow, and indeed, enforce, increased density of housing development as the issue of the protection of the natural environment has increased in prominence. Most recently the UK Coalition Government has placed sustainable economic development at the forefront of the planning system.

Many reforms of the planning process have focused on the speed of plan and policy making, for example the Skeffington Report (Skeffington, 1969) discussed the balance between public participation in the process and the speed that it was taking to produce Development Plans, rather than the development decisions themselves.

Between 1997 and 2007, attention shifted to the decision making element of the process with local authorities being rewarded for meeting performance targets relating to their speed. However, problems have now been acknowledged in relation to the setting of, and the measuring of achievement by, these targets. The current Coalition Government have continued this emphasis on speed although the rewards for meeting targets have been withdrawn. The 2011 proposals for simplifying the planning process are based on enhancing the speed of the entire planning process in order to increase economic prosperity.

2.2.7 The Decision Making Process in England

2.2.7.1 Local Planning Authority Structure

An important consideration in a discussion of Development Control in England is a discussion of the structure of local authorities, and consequently, Local Planning Authorities (LPA's). This structure has been subject to many adjustments in the last 30 years, and these have led to a seemingly confused and complicated picture of different structures. This section will briefly describe the structure of local planning authorities within England before moving to discuss the debates, both historic and contemporary, surrounding the benefits of these as delivery mechanisms.

The most thorough overhaul of local government structure within England took place in 1974 following the Local Government Act 1972, while those authorities in London are determined by the Local Government Act 1985. Most recently, nine new Unitary Authorities were formed under the Local Government and Public Involvement in Health Act 2007, with the abolition of 37 single tier boroughs and seven single tier counties on 1st April 2009.

Consequently there are two main structures relating to local government in England: the single tier authorities, such as London Boroughs, Unitary Authorities and Metropolitan Districts, and the authorities which act as separate tiers in a two tier structure: the County Councils and the Borough Councils. Within this two tier structure, the two bodies, while working in partnership, are responsible for the provision of different services. The single tier authorities are responsible for the provision of both sets of services. In addition, National Parks, the first of which was the Peak District National Park established in 1951, are also responsible for some services within them as opposed to the relevant Local Authority. A brief discussion of these different authority types follows below.

The majority of England's local government services are provided by a two tier system of County Councils and District (or Borough or City) Councils. These were established in 1974 under the Local Government Act 1972.

County Councils are the first tier of the two tier system, having responsibility for services such as Highways, Social Services and Education. In regard to planning, they have responsibility for the areas of minerals and waste together with being responsible for the determination of applications which relate to their own functions, such as schools and libraries.

District Councils are the most common form of local authority within England, currently 201 in number. These form the basis of the second tier of the two tier system under County Councils. Their duties include, among others, responsibility for housing, leisure, benefits, the collection of council tax and waste collections. In terms of planning, they are responsible for the majority of local planning functions, excluding those for which the County Council is responsible. In addition, it is likely that a District Council would need to consult

their county with regards to the highway safety and educational impacts of an application.

London Boroughs, which consist of thirty three in number, operate as single tier authorities with responsible for the majority of services, such as highways, schools and social services. However, some services, such as, for example, transport and policing, are run by the Greater London Authority and the Mayor of London. The Mayor of London also has the ability to become involved in planning matters by 'calling in' applications.

Unitary Authorities, like London Boroughs, act on a single tier basis in the provision of services. There are currently, with the nine new Authorities, fifty six Unitary Authorities in England. They were predominantly created in the 1990's and were introduced as being a more efficient means of running Local Government. While they predominantly consist of large towns and cities, they also include the smallest authority in the country, the Isles of Scilly.

Metropolitan Districts are, in effect, a Unitary Authority covering a metropolitan area. They were created following the abolition of Metropolitan Counties in 1986. As a result they carry out the majority of functions as conducted by a Unitary Authority although some function, such as public transport, may be carried out by organisations such as transport executives. In terms of planning, they have the same responsibilities of the Unitary Authorities. There are currently thirty six Metropolitan Districts in England.

There are eight National Parks within England who hold responsibility for planning in the areas within the National Park. While they consult the relevant local authority on the applications, they have the planning powers at both the county and district levels within their boundaries. National Parks are considered to be areas in which additional protection should be placed on the protection of both the natural and built environment and therefore the statutory duty to determine planning application is relevant to sit separate from the other councils, in whom the parks are situated, providing a coordinated response across administrative boundaries.

This disparate structure of local government within England is the product of much debate, and consequent reform, on the best means of delivery of local

authority services. This debate primarily concerns the balance between locality and the advantages of maintaining a single body for the delivery of services.

The primary advantage of Unitary Authorities is argued to be the increased efficiency in the use of resources and the greater ability to provide comprehensive in-house services (Clarke & Stewart, 1994). However, this improvement is difficult to fully analyse and appreciate as empirical means of investigation, such as improvements in cost and perceived efficiencies have not, and can not, take account of factors such as customer satisfaction and other socio economic influences (Boyne, 2002).

While unitary authorities have been in existence since the early 1990's the debate over their relative advantages and disadvantages is still both current and topical, with the recent Coalition Government announcement that they are ending the process to create two additional new Unitary Authorities in Norfolk and Devon.

The reactions to the ending of this process succinctly reflect the arguments for and against the authority. Norwich City Council, the protagonists for the Norfolk scheme state:

"The bid to create a new council for Norwich was never simply about a unitary council for its own sake. Norwich is the largest city in the country where residents are denied the right to decide on important local matters like day centres and street lights. A new council would have repaid the costs of set up in two and a half years and by 2021 would have saved around £30m for council tax payers in Norwich." (Morphew, 2010)

Meanwhile, one of the District Councils set to be encompassed by the bid objected on a number of grounds including affordability, customer acceptance and the lack of ability of a larger unitary authority to provide localised services. While they appreciate that some advantages may occur for the process of planning delivery, it is believed that these can be delivered efficiently through the existing two tier system in partnership with their other, dual tier neighbours (Broadland District Council, 2007).

It should be noted that both these authorities held vested interests in their

situation. Norwich City Council was proposing itself as the basis of the new unitary authority while Broadland District would have been subsumed in the process. However, in halting the process, the Coalition Government stated that the process of changing these authorities would be expensive and not represent good value for money. As such, the debate of potential savings, and, in relation to planning, the benefits of an overview of a wider area are yet to be empirically, or otherwise, demonstrated, and the debate will continue.

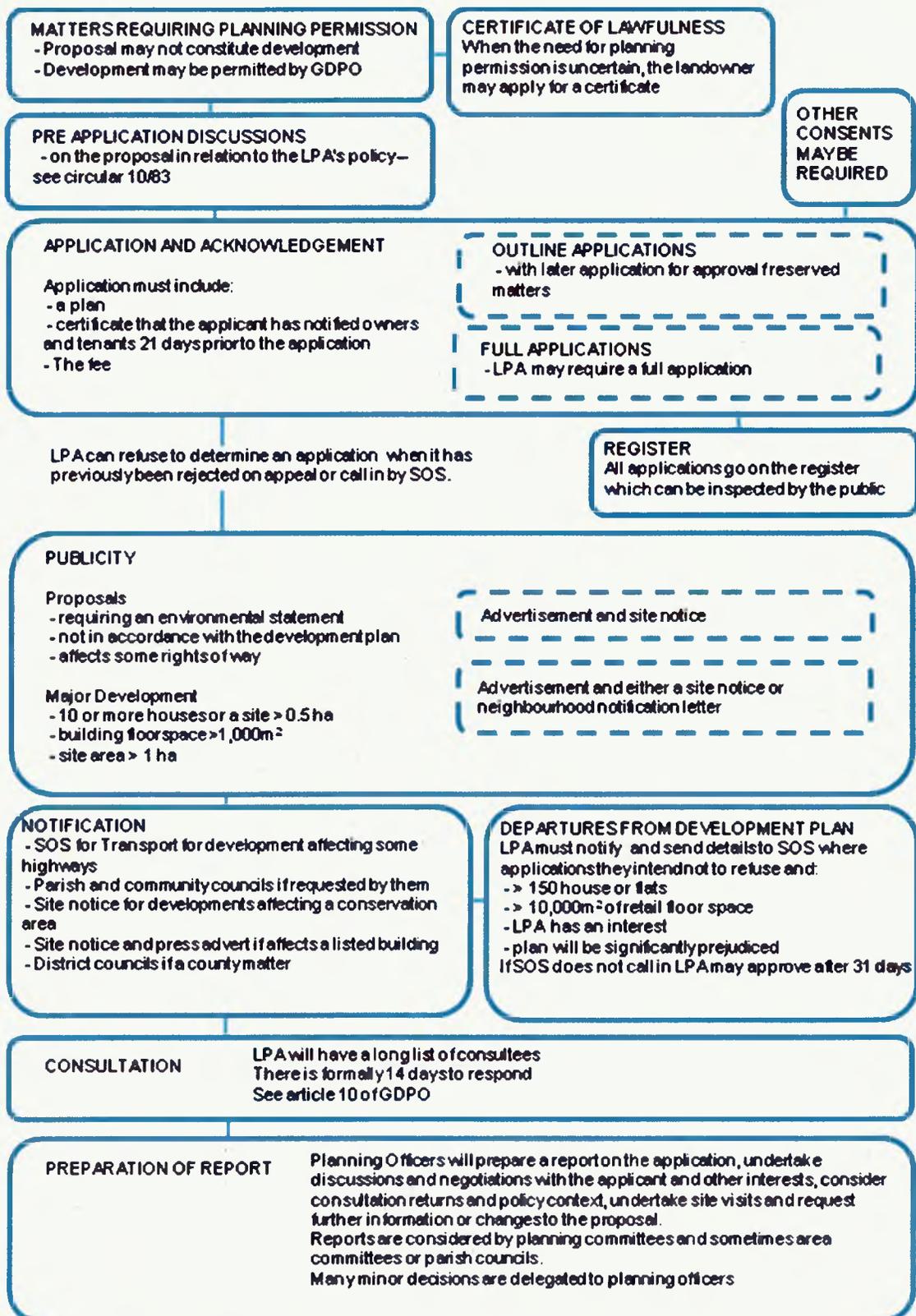
Until their abolition by the Coalition Government in 2010, planning authorities operated under the auspices of eight Regional Government Offices. These offices were predominantly involved in the spatial plan making element of the planning system but were also the body who initially processed planning performance indicators. These offices were responsible for the coordination of a wide range of government functions.

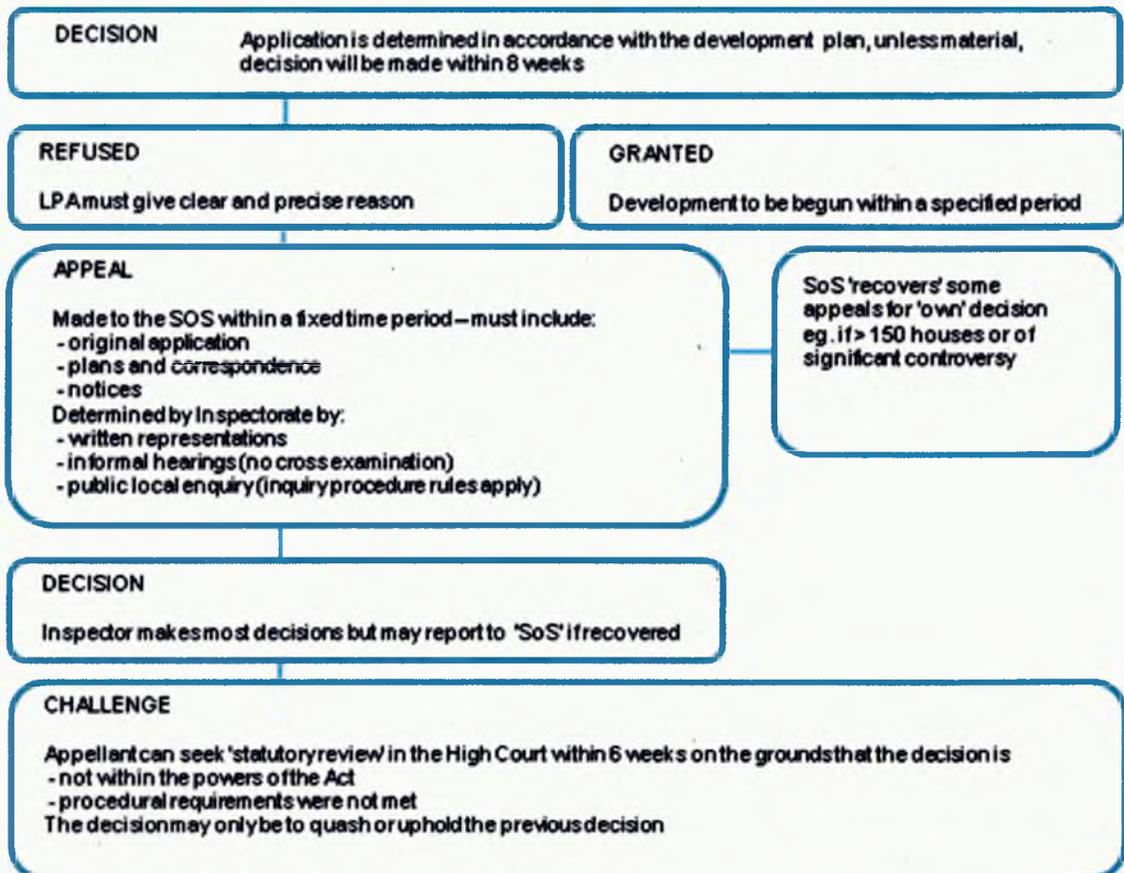
2.2.7.2 Decision Making Procedures

Planning applications in England are determined by the local planning authority in accordance with national guidance, regional guidance and local policies. The 2004 Planning and Compensation Act 2004 introduced amendments to the process of the creation of local planning policy, introducing a new form of spatial planning. Development Control decisions consider, primarily, the policies laid down in these local policy documents, and where they are not yet available, in saved policies from the previous system of Local Plans. These Local Plans reflect the policies of the regional plans and these, in turn, reflect those of National Planning Guidance.

The framework of determination for these applications is illustrated in the diagram, taken from Cullingworth and Nadin, 2002, below.

Figure 2.1 The Development Control process in English Local Planning authorities (source Cullingworth and Nadin, 2002, p122-123, with amendments)





This diagram shows that the processes by which decisions are made is a simple linear process. The planning application is at the core of the process but there are a number of other procedures which contribute towards the complete approval for commencement of development. These include the policy context in which the decision is made, the controls over development and, as previously established, the social, political and economic environment in which the entire process is situated at the time, These issues, and the impact that they have, will be broadly discussed below.

2.2.7.3 Policy Context

Section 54(a) of the Town and Country Planning Act 1990, stated that Development Control decisions are to be:

"determined in accordance with the development plan, unless material considerations indicate otherwise."

It is appropriate to briefly examine these two key aspects: the development plan and material considerations.

Since the Planning and Compensation Act 2004, this has become, broadly speaking, a changing set of documents which as a whole reflect the authority's policies. These can be changed and updated provided that the necessary procedures are undertaken. Changes in local policies can be, relatively speaking, quickly incorporated in to the planning policy of the area. It is the policies contained within this Development Framework with which the planning application should primarily be determined. This evolving process of Development Plans is designed to allow the planning system, and its decision making process, to be flexible and to be able to adapt to change, both in its economic and its political environment.

These plans do not exist in isolation and must take account of policies which feed into the local area. Until recently, this included Regional Plan policies which themselves incorporated policies and objectives from national guidance. Local Development Frameworks, in themselves, must also be in accordance with this guidance.

The Development Plan is the primary consideration in the determination of planning applications, but the area of material considerations must also be considered. This includes national policy Guidance notes (PPS's), which Development Plans should already have incorporated, but can also encompass a wide range of issues, which have been tested through the courts. Indeed, very few considerations have been held by the courts to be immaterial (Moore, 2000). They can include the consideration of broad concepts such as sustainable development or smaller scale environmental impacts. Primarily they include governmental guidance which has been issued, but not incorporated into, the development plan, or appeal decisions. It provides a means for the planning system to adapt to changing social and political pressures while allowing local issues to be fully considered. Development Control decisions, while made at a local level, are in accordance with national government policies and the means by which changes in these policies are incorporated into the system.

Changes in policies at a national level, which often take place as a result of economic or political change, can also be reflected in further stages of the process, through the influence of appeal decisions and through the rarer, 'call

in' of applications for consideration by the Secretary of State. At this stage, the material considerations which the current government, and government policies, consider to be of importance will be reflected in the decision and Local Planning Authorities will, in turn, either adapt their Development Planning Frameworks, or, as previously discussed, take these decisions into account as material considerations.

The Coalition Government is currently introducing its proposals for reform to the planning process, primarily through:

*"replacing over a thousand pages of national policy with around fifty."
(Department for Communities and Local Government, 2011, p1)*

These reforms, which are the subject of much public debate (National Trust, 2011) have a stated aim of both increasing speed and local engagement with the process. Where a Development Plan has not been adopted for an area, this guidance is now the significant consideration in the DC process.

This brief discussion has provided an outline of the context in which decisions are made and how political changes can be incorporated into the system. It has also demonstrated how the most recent process changes are being introduced. These processes will be expanded below in section 2.2.8.

2.2.8 Government Interventions in Development Control Processes

Section 2.2 introduced the Dobry Report (Dobry, 1969) as an early discussion regarding the increase of the speed of the process. His recommendation relating to the speed at which planning applications are determined was taken forward, and has now become an important tool in monitoring performance, but the majority of his recommendations were not implemented due a change in the economic and political environments. Meanwhile, Development Control remained a focus of criticism in terms of impinging upon economic development.

2.2.8.1 The Conservative Era

In 1979, a Conservative Government was returned to power. While, by this time, Dobry's report and recommendations had been predominantly discarded,

the Conservative Government, "quickly picked up the theme of planning delay and lost no time in preparing a revised development control circular" (Cullingworth & Nadin, 2006, p184). This circular faced aggressive opposition from the planning profession and a new circular, 22/80, was produced. The emphasis remained the same, focusing on the need to increase the speed within the system. This circular and the subsequent white paper, *Lifting the Burden* (HM Government, 1985), were part of a series of measures which sought to restrict the role of the decision making process, with the justification that the delays caused were stifling necessary economic development. The role of planning was also called into debate within this era. A succinct summary of the situation, from the perspective of the planning profession, was provided in the first issue of the journal, *Planning Theory and Practice*:

"In keeping with this anti planning ideology, a steady stream of measures and announcements have, according to this view, led to a significant weakening of planning powers and a corresponding increase in the power and assertiveness of development interests. This, it is held, has meant a deterioration in the urban environment, as planning and coordination have given way to private profit. It has also meant a deep and widespread demoralisation among town planners as the beliefs that had previously sustained them (in particular the notion of planning as a political neutral activity, serving the public interest) has been progressively undermined by the new emphasis on the market and entrepreneurship." (Griffiths, 1986, p3)

These measures included the Planning and Land Act 1980 which introduced Enterprise Zones, Urban Development Corporations and the Housing and Planning Act 1986 which introduced Simplified Planning Zones and expanded the Use Classes Order. These interventions involved the reduction of the development proposals which were included as part of the statutory planning process and allowed developments in certain areas to bypass the process altogether. Theorists such as Allmendinger view these interventions as attempts to re-orientate UK Planning along neo-liberal lines (Allmendinger, 2009) with the needs of private enterprise and economic growth taking primacy over public involvement in the process.

It was during this era that the timescales first proposed by Dobry (Dobry, 1969) became a formally established target for the determination of planning decisions.

At the beginning of the 1990's, this strategy of bypassing the formal decision making process, and the focus on speed, began to lose momentum as issues relating to the quality of the output began to be raised. A 1992 Audit Commission report, *Building in Quality* (Audit Commission, 1992), suggested that planning services should focus on five key areas, including both the assessment of 'added value' and the reduction of delay.

2.2.8.2 The 'New Labour' Years - Local Government Independence and Central Government Intervention

Following the election of a Labour Government in 1997, the regime of Best Value (BV) was introduced in the Local Government Act 1999, following a period of pilot studies. It replaced the previous Conservative policy of Compulsory Competitive Tendering (CCT) for local services provision. The regime placed a requirement on local authorities to "make provisions to secure continuous improvement in the way (their) functions are exercised, having regard to a combination of economy, efficiency and effectiveness" (Great Britain, 1999, Section 3(1)). While Development Control had not been significantly influenced by CCT as a result of its management function, the all encompassing Best Value regime quickly developed national targets for the speed of decision making.

The Best Value scheme was initially envisaged as a means of increasing the individual autonomy of authorities in the uptake of good practice, but became increasingly target oriented as it was introduced (Geddes and Martin, 2000; Boyne et al, 2002; Maile and Hoggett, 2001). Geddes observes that this can be due to government and audit pressure, stating that central government are "determined to drive down costs and drive up quality of services and see league tables and national performance standards as the surest way of doing this" (Geddes and Martin, 2000, p381). These targets applied to all area of local government and were eventually used to rank the performance of local authorities as part of the Comprehensive Performance Assessment (CPA).

The planning service was integrated as a part of this assessment system, and in relation to Development Control the primary indicator was Best Value Performance Indicator 109 (BVPI 109, later National Indicator 157). This was formed by 3 sub indicators:

a – 60% Major Applications (for example, 10 or more dwellings) to be determined within 13 weeks;

b – 65% Minor Applications (for example, 1 – 9 dwellings) to be determined in 8 weeks;

c – 80% of Other Applications (for example, listed building consents, Advertisement Consents) to be determined within 8 weeks.

These timescales were designed, drawing from the Dobry Report, to enable sufficient consultation and negotiation to take place as necessary but to encourage the LPAs to minimise the unnecessary delays which were perceived to be taking place within the system.

However, within areas of targeted local government, concerns began to be raised as to the emphasis on these targets and the impacts that were occurring on the working practices of the authorities. When speaking about Health Action Areas, Alcock states that "the effect of targets and indicators in the steering, monitoring and evaluation of programme activity moves towards inputs and outputs, rather than outcomes" (Alcock, 2004, p220). In this case, he observed that the targets related to the act of bringing people into contact with centres as opposed to monitoring any impact that this contact may then have had. As a result, policies began to focus on how to attract people as opposed to ensuring the quality of any intervention once that initial contact had been established.

In 2009, the Labour Government abolished the scheme of Comprehensive Performance Assessments, replacing it with the Comprehensive Area Appraisal. These changes were aimed at restoring the local independence in decision making, restoring the initial aim of the CPA system to allow process decisions to be made on a local basis. Early evidence (Local Government Association, 2010) is that the focus is remaining on the target outputs as opposed to the process outcomes. In terms of Development Control, BVPI 109

was replaced by National Indicator (NI) 157, with the same targets being reported. Therefore, the pressure for development control performance from councils, and their senior management, remains.

This focus on outputs also affected Development Control. Initially pressure was exerted as a result of the contribution of the Development Control targets to the individual council's CPA score, but, in 2003, the UK Government introduced the Planning Delivery Grant which allocated additional funds to councils. A substantial proportion of this was based upon their performance of BVPI 109. These two factors are considered to have greatly contributed to the attention of councils being heavily focused upon these targets fulfilling the roles of both carrot and stick.

It cannot be denied that performance, in terms of the indicators, has improved. A brief analysis by the author, of the performance of local authorities, using data published by the Audit Commission in 2003 and 2007, shows the average value for the number of major applications determined within 13 weeks rising by 27 percentage points, from 44% in 2002/2003 to 71% in 2006/2007. Similarly the number of minor applications determined within the BVPI 109 target rose by 22 percentage points and other applications by 15. The change is dramatically illustrated by looking closer at major applications. In 2002/2003 83% were determined outside the 13 week target but in 2006/2007 86% were determined within it. However, as has been previously discussed, the decision making process is not necessarily a simple case of submitting a planning application and waiting for it to be determined. There are many other procedures which can be engaged in, and which can add to the time taken to get complete consent for a development proposal such as the use of the appeal process or through negotiating and resubmitting applications.

Potential adverse impacts of these practice changes have been recognised by the Audit Commission: the body responsible for monitoring the performance of councils. In its report, *The Planning System, Matching Expectations and Capacity*, the Audit Commission (2006) acknowledged a variety of methods by which councils were potentially adversely changing practices in order to meet targets. The potential practice changes included:

"showing a reluctance to register planning applications, refusing planning consents due to a lack of time to negotiate, making requests to applicants to withdraw planning applications, showing a lack of focus on those applications which have gone beyond the target dates, showing a lack of focus for pre application discussions, increasing the use of conditions covering areas previously negotiated as part of the formal application process." (Audit Commission, 2006, p23)

These actions, which were all appropriate in terms of the legal framework for planning, would result in more targets being achieved, but the use of these strategies would not improve the 'economy, efficiency or effectiveness' of the operation of the Planning Authorities as was defined as proposed outputs in the original Best Value legislation. Indeed, they are more likely to act in the opposite manner. These practices have the potential, for example, to increase the number of appeals which will create a need for further resources from the planning authority, the developer and the Planning Inspectorate; leaving authorities undertaking further planning applications without the receipt of fees and to in fact prolong the process and increase the uncertainty produced. The responsible Government Department, the Office of the Deputy Prime Minister (ODPM), took action to investigate these claims. However, it found "no generalised evidence to suggest that the Planning Delivery Grant (PDG) has resulted in any unintended consequences" (Office of the Deputy Prime Minister, 2005a, 7).

This preceding discussion has addressed the issues of the targets which were introduced across many areas of local government, and the impact that they had generally, and particularly on the planning process. However, alongside these targets, the Labour Government introduced other measures to increase the speed of the planning process. These are laid out below.

2.2.8.3 The Infrastructure Planning Commission and expansion of permitted Development Rights

Following the Barker Review of Housing (Barker, 2006) and the Barker Review of Land Use Planning (Barker, 2006a), the Labour Government produced a white paper and the subsequent Planning Act 2008. This sought, once again, to remove certain applications from the local planning system, at both ends of

the range of planning applications.

Firstly, it sought to remove smaller applications from the decision making process, extending the range of those applications which fall under 'permitted development': applications which are deemed not to require a planning application.

Secondly, it established the Infrastructure Planning Commission, whose remit was to deal with those applications, including road schemes, airports and power supply, which were deemed to be of significant national importance, and should be dealt with by a specific independent process. The commission has now, under the Coalition Government, been re-established within the Planning Inspectorate, with its future yet to be fully confirmed.

2.2.8.4 The Killian Pretty Report and Planning for Homes

In March 2008, the Labour Government commissioned Killian and Pretty to investigate the planning process looking at ways to cut the red tape within the system. They reported in December 2008. The National Audit Office produced a concurrent report investigating the measures taken by Government to increase the speed of decision making within the planning process. In November and December 2008, the UK Government published the results of these two research projects: 'The Killian Pretty Review, Planning Applications, A faster and more responsive system' and the National Audit Office's 'Planning for Homes' (National Audit Office, 2008).

The Killian Pretty review undertook a large scale consultation exercise. This included 169 formal responses to its 'Call for Solutions', nine stakeholder events three commissioned studies: review of information requirements for planning applications, sixty four detailed case studies and availability of use and guidance on planning applications. These involved the participation of many stakeholders in the process ranging from local authorities, developers, academics and other advisors. The National Audit Office's report was conducted on a smaller scale but undertook detailed case study analysis as part of its investigation.

The Killian Pretty Report produced a total of seventeen recommendations

based around five key areas of concern: proportionality, process, engagement, culture and complexity.

These reports, while covering other issues, do appear to mark a threshold in the official rhetoric in relation to the impacts of targets in DC, and, with a range of case based evidence, they acknowledge that the unintended consequences of the target culture have impacted on the delivery of a quality service, even in relation to the overall speed of development projects. Following this acknowledgement, the reports make recommendations to overcome the cultures of target meeting and to provide an overall increase in speed in the system. These reports provided further evidence of the difficulties created by the focus on the measure of speed and propose some steps towards an overall system approach, working with the targets as opposed to for the targets.

Like previous reports (Dobry, 1969; Audit Commission, 1992; Barker, 2006), the recommendations produced by the reports covered a wide range of the areas of the Development Control process, including an expansion of permitted development, an increased emphasis on pre application advice, public engagement and the use of IT. These recommendations are based on the evidence gained from the six months of research and feedback. Many of the ideas have been previously recommended and past experience indicates that there are difficulties in the implementation of these proposals, both at a local and national level. It would seem appropriate to examine these barriers to implementation, and the systems which can be put in place to incorporate theoretical recommendations into practice.

Since 2007, the economic structure of England has been undergoing a period of considerable stress and change. The demands on the planning system have substantially changed. For example, the high demand for services and the processing of applications has now become an environment of public sector cutbacks, a reduction in nationwide development and a drop in income from planning fees. This further demonstrates the issues that can occur in proposing and implementing changes to the planning process.

2.2.8.5 Coalition Government proposals

In July 2011, the Coalition Government put forward their proposals for the

simplification of the framework in which Development Control operates. This represented a system which would "promote sustainable development without delay" and "allow people and communities back into planning" (Department for Communities and Local Government, 2011). This dichotomy is a recurring theme of planning reforms and the future implementation of the reforms will no doubt continue to prompt examination of the aims of the planning process.

This document puts forwards the national policy relating to the entire planning process, and within its fifty pages, dedicates three to the area of Development Control/ Management. These pages continue some themes proposed in the Killian Pretty and National Audit Office reports of 2008 (Killian Pretty, 2008) (National Audit Office, 2008). There are eighteen clauses contained within the proposals of which six clauses cover the areas of pre application engagement and four relate to planning conditions and obligations. This new framework was published in March 2012 and Local Authorities are now at the forefront of its implementation.

2.2.9 Development Control Research

The Killian Pretty (Killian Pretty, 2008) and National Audit Office (National Audit Office, 2008) reports represent major studies into the area of Development Control, but there has previously been a relatively limited body of academic writing with regards to the Development Control processes: much academic and practice based research is based on the Development Plan process.

This, in particular applies to the area of planning performance. Carmona (Carmona and Sieh, 2005, p306) state:

"Where researchers have attempted to examine questions of planning performance, they have tended to concentrate on evaluating the performance of development plans, rather than the development control decision making processes that flow from them."

Enticott (2006) also observed, on the more specific area of planning management, that, "management and its relationship to planning performance occupies a somewhat ambivalent position within planning literature".

When examining the possible explanation for the scarcity of research, it would appear to be primarily due to the difficulty in accurately recording and interpreting data. Local authorities record only a limited amount of information, such as that necessary for the BVPI's, but a researcher in this area will often require more information than that which is available, or draw conclusions from the limited data available.

The concerns over using the data recorded directly by planning authorities, have been ongoing for a substantial period of time. As a result of this debate in Town Planning Review McNamara and Healey offered the following warning in using the recorded statistics and aggregate data (in this instance from the County Councils Gazette):

"development control data must be ... used with great caution. Wherever possible it should be accompanied by detailed research into the informal aspects of the land use planning process and the discretion used by development controllers... the use of such data for monitoring the 'efficiency' of local planning authorities is also very hazardous. This comment has issued a warning about the potential absurdities which are possible if too much faith is placed in development control data."
(McNamara and Healey, 1984, p96)

This is further emphasised by Enticott who, 25 years later, referenced this debate, stating:

"problems associated with objectively determining planning activity and performance (Wood, 2000; Brotherton, 1982 & 1984; McNamara & Healey, 1982) have shied researchers away from these issues."
(Enticott, 2006, p148)

Similarly Carmona and Sieh warn against the reliance on speed data, stating that research needs to:

"avoid a reductionist approach to the measurement of speed, design or any other aspect of quality in planning, that measurement needs to occur within a 'holistic' framework that encompasses all quality dimensions."
(Carmona & Sieh, 2005, p328)

The academic research community have identified, and acknowledged the issues involved in research into Development Control. There remains, however, a limited body of researchers and knowledge within this subject area, much of which is focused on the production of Government sponsored reports with defined research objectives.

An example of academic study of speed in DC was conducted at the University of Reading. A large scale study of the speed of housing development proposals was conducted in the south of England. This work clearly identified that the delays are definitively greater than is shown within official planning statistics (Ball, Allmendinger, & Hughes, 2009). This research was limited to timescales, albeit including the detailed analysis of the full process as opposed to the targeted specific area of the planning application stage.

The authors of this work also move to question the methodology of, and the ability to implement, the recommendations of the government reviews, and their potential benefits.

The issues created by the reliance on speed targets, and the subsequent practice alteration, are now emerging as an area of research in the consultant community. The system in Scotland has been investigated by Vanguard Scotland (2011), who continued to propose ways to manage these applications. This report puts forward proposals based on Lean Management. This research is produced by an organisation within a specialist field of consultancy and it is important to take on board the advice contained but to remain open to other considerations.

It has been illustrated that there is an opportunity to research an area which has, to date, attracted limited academic attention, despite being an integral part of the political and economic structure of the country. Previous research has indicated issues which need to be considered and provided a base on which this research can be situated.

2.3 Key Findings of the Literature Review

The literature review represented the first stage of this research process and provided the following key findings:

- The planning process within England is expected to perform a wide range of roles, all of which need to be considered when applications are considered for decision.
- Planning theory now considers political, economic and social factors to be key influences on the planning process which must be considered in both the decision making process and the study of the planning process.
- Within the current context, it would not be feasible to abolish the planning process and to replace it with a model based on free markets. The system must therefore remain viable throughout social, political and economic change.
- There is a long established dichotomy between public involvement in the planning process and the speed at which decisions are made. Speed targets were initially introduced to account for this and the consultation involved. The profile of public involvement has become increasingly prominent in examinations of the planning process.
- The structures and demographics of planning authorities are not consistent within England. There is no clear consensus as to the manner in which demographics or structure impacts on council performance.
- The context in which planning decisions are made is constantly changing due to political, economic and social circumstances.
- Delays in the planning process are a continuing area of concern, both in times of economic prosperity and during periods of recession.
- Targets relating to the speed at which applications are processed have increased the speed at which applications are determined. However, there are many elements of Development Control processes which fall outside the measured elements. The overall impact of this on the speed of the overall process is undetermined and a matter of debate.
- A major research study in 2008 put forward proposals to increase the overall speed of the planning service. While these proposals could not all be implemented by Development Control departments, there was

limited practical consideration of how the recommendations could be brought into practice,

- There is limited research into Development Control and, in particular, to Development Control performance primarily due to access issues. These difficulties lead on to barriers relating to accurately recording and interpreting data. This includes difficulties which surround the interpretation of data recorded for other purposes.

2.4 Chapter Summary

This review of existing processes, literature and debate has illustrated the complex environment in which the town planning decision making process lies within the UK and the issues that must be considered when investigating and instigating change in the process. It has related this environment to the theories relating to the planning process and local government and illustrated the progression of planning theory within changing political environments. It has also reviewed those recommendations which have previously been made with regard to the process, the extent to which these have been implemented and the impacts that they have had.

Primarily, it has shown that the demands placed on the system, and the important dichotomy between speed and public involvement, is a constantly evolving issue which can vary with changes in the economic environment and consequent political ideologies. The process, however, needs to be able to maintain a viable existence throughout these changes and react to the changes and pressures placed upon it.

Secondly, it has illustrated the difficulties in investigating the development control process within an academic structure and the subsequent limited literature in the area. It has highlighted the need to identify a means to investigate structures and processes within Development Control which does not reduce it to a study of limited data and which incorporates the complex influences on the sector.

2.5 Research Outlook

This review has provided an examination which frames the issues which will be

incorporated into the aims of this study. The literature has identified issues which keep arising and the changing methods to tackle them. It has shown that many recommendations put forward to tackle the identified issues have not been implemented, both as a change of political thinking or through issues at a local level of implementation.

The study will investigate the area of Development Control and its ability to adapt to changes and recommendations, while taking account of the diverse environment in which the system lies. This relates to the implementation at a local level.

The review has also identified important considerations for the research and its methodologies. It will need to incorporate the different structures and agencies and avoid reducing the process to the limited output of statistical figures based on performance with regards to the speed of decision making. These considerations will now be discussed in greater detail in Chapter Three.

CHAPTER 3 METHODOLOGY: THEORETICAL UNDERPINNINGS

3.1 Introduction

This chapter introduces and describes the research methodology, its theoretical underpinning and the research methods to be used for this study. Following a statement of the research questions, it will continue by evaluating the appropriate research paradigm in which the researcher in conducting this study, lies. It will discuss the approach that the research will take, including an examination of the use of systems analysis within the work.

3.2 Research Questions

According to Lincoln and Guba the motivation for research is to “resolve the problem through the acquisition and accumulation of sufficient knowledge that leads to understanding” and that there is “a state of affairs that requests for additional understanding” (Lincoln and Guba, 1985, p226). It is important to identify a precise research question in order to focus the direction which the research will take. Collis and Hussey (2003, p115) state that research questions are “questions which identify the nature of the research problem” and they are an essential tool in defining the nature and direction of a study. Their importance can be stated succinctly as a crucial part of any meaningful research project as they will clarify, guide and shape the research process.

The primary aim of this research, as stated its introduction and further determined through the literature review of the subject in Chapter Two, is to investigate the Development Control processes in English local planning authorities and, consequently, the ability of the Development Control services to cope with changes. These changes include those which occur in the environment in which they are situated together with those which impact on the framework in which they operate.

3.2.1 Primary Research Question

This translates to a Primary Research Question of,

Can the processes of Development Control services in English Local Planning Authorities be improved to make them more able to adapt to changes in their

environment?

3.2.2 Secondary Research Questions

This leads to a number of subsidiary questions which relate to the intention to examine this over reaching aim. The dominant questions which emerge within this primary objective are:

- What are the current management practices of the Development Control processes in Local Authorities?
- What is a suitable method for examining the ability of English Local Authorities to react to change?
- What are the issues which limit the ability to react to change?
- Are there practice changes which can be introduced to address these issues?

3.3 Theoretical Underpinnings

3.3.1 Research Paradigms

When considering ways to address the research questions and possible techniques to be used within this study, it is also necessary to explore the philosophical standpoints and theoretical perspectives which will impact on the work. These perspectives can be considered to contribute towards the paradigm, the set of concepts and assumptions and beliefs that guide the particular scientific community (Espejo & Harnden, 1989) in which the researcher is placed and are paramount in the selection of both the data and its collection techniques, which will be used for this work.

Through his work, *The Structure of Scientific Revolution* (Kuhn, 1962), Kuhn prompted an ongoing debate on the nature and definition of a Research Paradigm. Kuhn's definition viewed paradigms as, "universally recognised scientific achievements that for a time provide model problems and solutions to a community of practitioners" (Kuhn, 1962, p.viii). A key element of Kuhn's paradigmatic theory related to a generation accepting a new dominant paradigm, and working within the structure that this would create.

The importance of establishing the paradigmatic standpoint of the researcher, in

terms of its consequences of the tools used and the conclusions made are further emphasised by Kuhn who, when discussing the competitions within different scientific paradigms states:

"the proponents of competing paradigms practice their trades in different worlds... the two groups of scientists see different things when they look at the same point in the same direction." (Kuhn, 1970, p150)

The extensive body of work which surrounds this concept has created a number of different descriptions and definitions of 'a paradigm'. Burrell and Morgan (1979) discuss the layers within the theoretical approach to research. They describe the research paradigm as including the ontology, epistemology and the research methods for a study (Burrell & Morgan, 1979). Denzin and Lincoln similarly describe it as:

"[a] net that contains the researcher's epistemological, ontological and methodological premises." (Denzin & Lincoln, 2005, p22)

3.3.2 Paradigmatic Positions

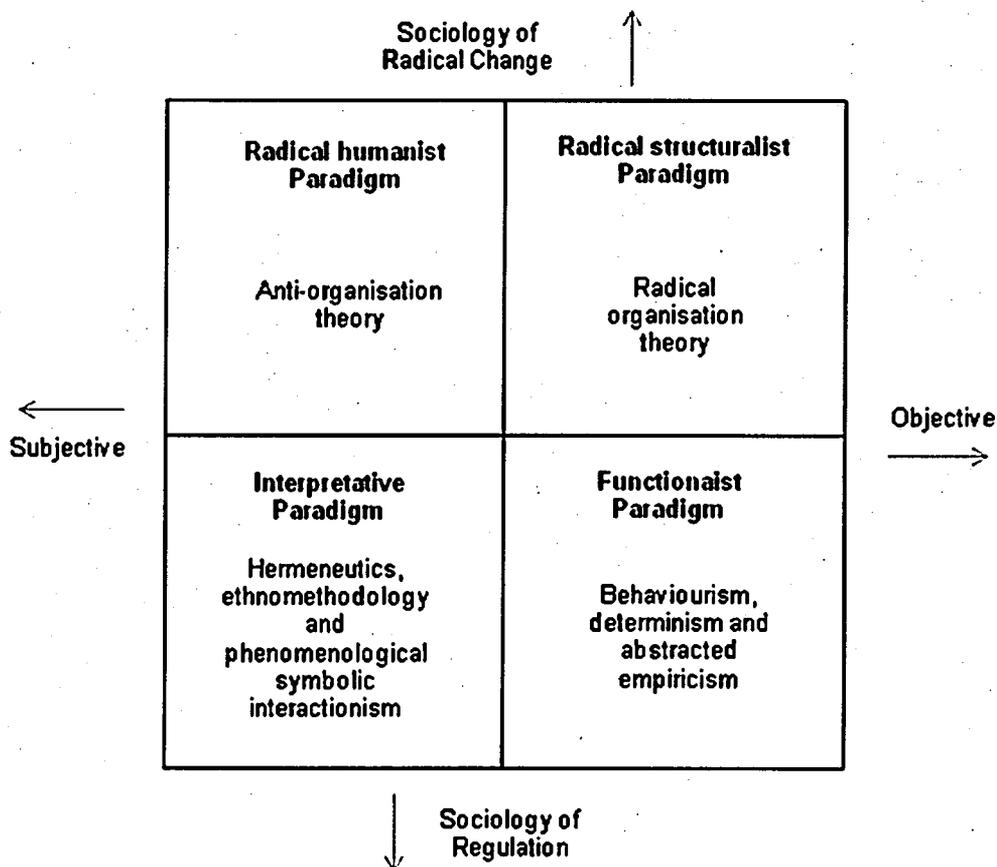
There is no clear consensus on the precise nature of a paradigm consequently the definitions of paradigmatic positions vary. Burrell and Morgan relate to four main Sociological Research Paradigms: Radical Humanist, Radical Structuralist, Interpretive and Functionalist (Burrell & Morgan, 1979) whereas Creswell expands his interpretation of paradigms from including two: Quantitative and Qualitative in 1994 (Creswell 1994) to three: Quantitative, Qualitative and a Mixed Methods Paradigm in 2003 (Creswell, 2003). Collis and Hussey, meanwhile, describe a spectrum of paradigmatic standpoints ranging from a qualitative, phenomenological paradigm through to a positivist quantitative paradigm (Collis & Hussey, 2003). Gilbert similarly describes "a 'positive' tradition begun at the very inception of sociology" and an "'interpretative' tradition" (Gilbert, 1993).

A researcher must be clear about their philosophical and theoretical position in order that, for example, the choice of methods is not incongruous with the questions asked and so that the interpretation of the data is clear for both the researcher and audience. In reaching a standpoint it is, nonetheless, important

for a researcher to have an appreciation and understanding of, and to have considered, the possible opposing positions. Burrell describes this in Morgan, 1983, as a means to improving the quality and context of the work produced. He states that, "by reflecting on one's favoured research strategy in relation to other strategies, the nature, strengths and limitations of one's favoured approach becomes much clearer" (Morgan, 1983, p381).

Figure 3.1 taken from Burrell and Morgan, 1979, illustrates the four paradigms defined in their work. To take a simplified view, the spectrum of Collis and Hussey would flow, from qualitative to quantitative, across the matrix from left to right. In the matrix, the four paradigmatic world views are distinguished by the views and assumptions of the nature of science and knowledge (epistemology) and the nature of society and the world under study (ontology) which will be discussed in greater detail below.

Figure 3.1 Four Paradigms of Organisational Theory (Source Burrell and Morgan, 1979, p22)



The functionalist paradigm is based on the assumption that society has a real

existence and a systematic character. It focuses on understanding the role of human beings in a real world of concrete relationships, and looks at the world in an objective manner.

The interpretative paradigm is based on the assumption that the social world is created through the experience of the individuals within it. Scientific knowledge is seen as no less problematic than practical knowledge or common sense.

The radical humanist paradigm also sees reality as socially constructed and believes that the process of reality creation may be influenced by psychic and social processes.

The radical structuralist paradigm assumes a materialist world independent of the individual. Society is seen as a dominating force. Reality is characterised by tensions and conflicts which lead to radical change in society.

The above discussion has illustrated the main constituents which contribute to the research paradigm, and hence, the location of the researcher and the direction in which the research will progress. It has set out the basis through which the theoretical development of this research will follow. A discussion of the constituent parts of the diagram, such as the ontology and epistemology, beneath the level of paradigm will follow.

Figure 3.2 Theoretical Construction of a Research Paradigm

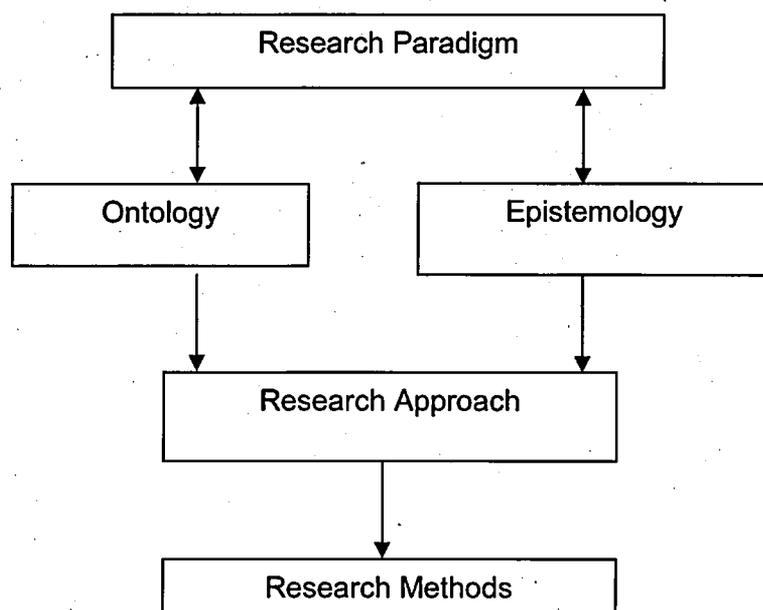


Figure 3.2 does not illustrate the full 'net' as described by Denzin and Lincoln (Denzin & Lincoln, 2003), but it does begin to represent the interconnected nature of the layers. For example, it demonstrates that the ontological and epistemological standpoints are influenced by, or can influence, the research paradigm. These positions, in turn, will influence the approach of the research and the research methods which will be utilised in the work. This chapter will continue by discussing the ontological and epistemological standpoints in which the research lies before moving to establish the research paradigm in which the study will lie. This will include a discussion of the traditions of planning theory as this is a primary concern of the research.

3.3.3 Research Ontology

The research ontology relates to the theory of being and how these things can be said to exist. Collis and Hussey define ontological assumptions as people's assumptions about the nature of reality (Collis & Hussey, 2003). Again, there are no clearly defined ontological positions. At the two extremes lie the ontological approaches of objectivism, which begins with the premise that things exist whether they are studied or not, and constructionism, which considers that things exist as a result of the meaning given to them by groups and individuals.

3.3.4 Research Epistemology

Collis and Hussey define epistemology as the study of knowledge and what we accept as valid knowledge (Collis & Hussey, 2003). The epistemological assumptions of a study relate to what is knowledge and how can it be acquired. Examples of epistemological standpoints include, along a spectrum, empiricism, realism and interpretivism.

An empiricist standpoint believes that knowledge can be constructed through perceptions and observations. These senses can be recorded to construct a record of reality. The empiricist standpoint often uses quantitative, positivist tools. The observer is independent and the science is value free. This is the traditional epistemological standpoint for scientific endeavour and was also applied at the outset of social scientific endeavour. As previously illustrated, other means of approaching situations have developed and have justification and value in their own right.

Realism, meanwhile, broadly considers that the world is made up of structures and objects that have cause-effect relations with one another. Therefore, observations of one object or structure may not be conclusive if they do not take into account the other objects or structures. As a concept it places a greater emphasis on the understanding and allowance of interactions with the environment as opposed to seeking to control these.

Finally, interpretivism falls at the far end of the spectrum to empiricism, drawing on the importance of human nature in interpreting the material world, so observations of physical phenomena should not be considered, and subsequently understood, without reference to human actions and culture.

It is appropriate to note that both ontological and epistemological standpoints lie once again in spectrums, which encompass a large range of notions of the nature and understanding of being. When locating this research in an appropriate field, it is important to find a position within these spectra. This process will involve consideration of a variety of factors, including the subject of the research and the background and beliefs of the researcher.

3.3.5 Planning Theory

This research primarily concerns the successful operation of the English town and country planning system. The research philosophy must take account of this context. Planning research does not represent an independent scientific discipline. The fields of knowledge that planners draw on, "include disciplines within natural science, social science as well as humanities" (Naess & Saglie, 2000, 734). The area of planning research does not, as a result, naturally ally itself to a specific research paradigm. However, in the process of this work it is important to ensure that the chosen epistemology and ontology relate to the process of Planning and its related theories.

As was demonstrated in Chapter 2, the planning system is now an integral part of the economy of the United Kingdom and is entwined within the structure of the governance and politics. The planning system has expanded its remit and now covers concerns, "ranging from kerb design to the greenhouse effect" (Wadley & Smith, 1998, p1006). Friedmann identified four main traditions in which the efforts of planning can be applied (Friedmann, 1987). These include

a vehicle for social change, the identification of optimal courses of action, the use of social learning and the use of planning to allow social mobilisation which would not take place within a traditional capitalist structure.

All these definitions take account of planning as part of the political and social processes of the country. This context is important throughout the research process. Ontological standpoints which disregard the roles of groups and individuals would not be appropriate for use in the study. The planning system is inherently integrated in the economy of the country and would not exist without the politics and society with which it is concerned.

The Development Control role is, in itself, at the heart of the socio-cultural life of humans and therefore the discourse of power. Study of planning must consider, and account for, planning's place in society and that there will therefore be a technical, a practical and an emancipatory interest in their functioning. Politics and other environmental factors cannot be disregarded in planning research.

Development Control is a key element of the structure of governance and control within the United Kingdom and is integrated within this structure. This research is involved with the 'regulation' element of Burrell and Morgan's grid, the 'objective' element of the ontological spectrum. Meanwhile, the subject cannot be considered without reference to the societal influences in which it lies being inextricably linked to the interpretations placed on it by society. As such, it cannot lie at the extreme of this scale and some constructivist influences are also an important element of the study. It would therefore appear that the research is located between these two extremes.

With regards to epistemology, this research originally stems from an apparent irrationality of measuring performance according to performance indicators alone. This appears to indicate that empiricism in its purist form, and its observations, would have its limitations in relation to the subject. Indeed, literature now points to the demise of the positivist empiricist principles and its applicability to planning (Allmendinger, 2002). Additionally, it is necessary to consider the interactions between different aspects of planning, and economic, systems and their interactions with the social and political circumstances in

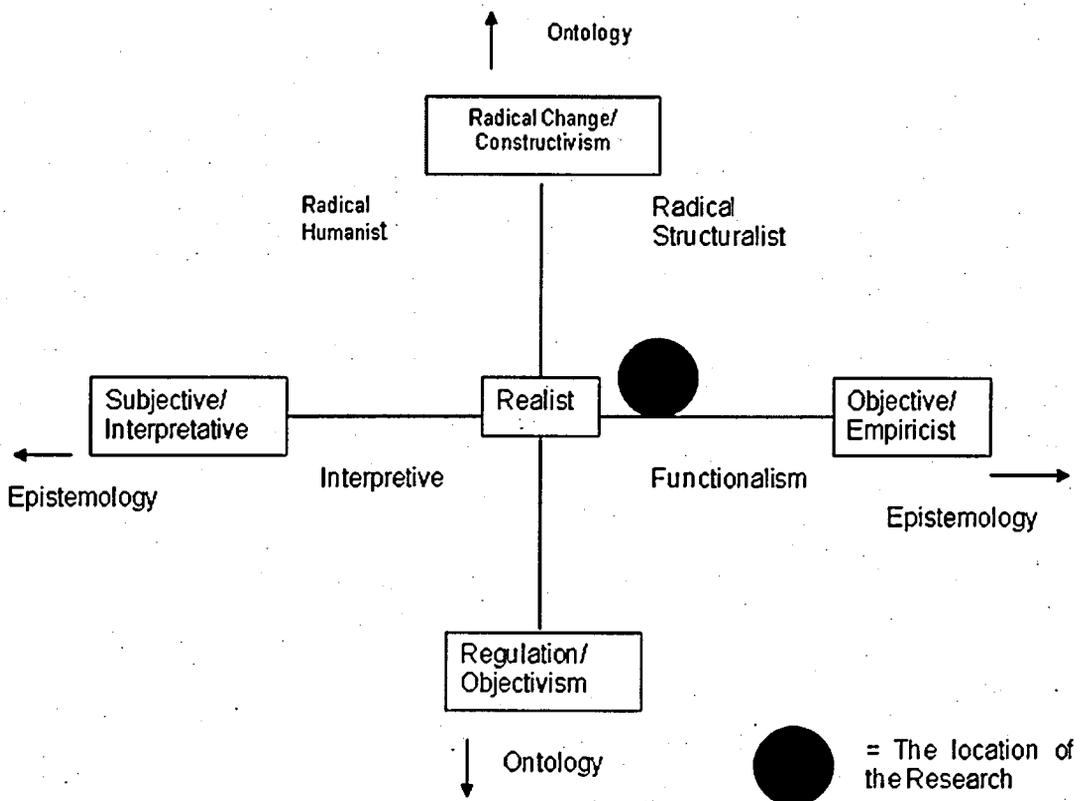
which they lie. However, it is not considered expedient to fully reject the use of numeric data, and the information it provides, wholeheartedly. Additional data and techniques are needed to explain and rationalise data provided in an empirical form. It would seem appropriate to locate this research between the epistemological standpoints of empiricism and realism.

A summary of this standpoint would be to say that there is the reality of the planning process, which needs to be studied, but that there are issues with the observation of this. It is necessary to relate any observations, such as numerical, objective data, to the people, and social realities and the power structures, of the context in which the subject is situated.

3.3.6 Research Paradigm Selection

Figure 3.3 represents the Burrell and Morgan Grid of paradigmatic positions, locating, following the preceding discussion of planning theory, the position that the researcher believes that the research falls. This location reflects that planning cannot be considered or examined through an empiricist scientific analysis. The motivation for this research stems from the reductionist approach of using a limited data set to analyse and control performance. In order to examine a process which is undertaken by different agencies and has changing influences, it is necessary to study a number of different structures but to investigate the patterns that emerge between them. The examination and the understanding of the issue that emerges must have a logical basis. Finally, both the epistemological and ontological influences on the work must take account of, and cannot control, the environment. The diagram illustrates that the research is located within a predominantly realist perspective but within the structuralist paradigm.

Figure 3.3 An illustration of the location of the research within the ontological and epistemological standpoints



3.3.7 Research Approach

The adoption of this paradigmatic approach influences the choice of research approach which will be used to in the study. It is necessary to first outline the dominant research approaches and the tools associated with it.

3.3.8 Quantitative Research

The quantitative research approach is closely related to the initial development of natural sciences and positivistic enquiry. It is located at the objectivist, empiricist end of the research spectrum. The data obtained through this approach is highly measurable and therefore numerically based. Features of a quantitative approach include large samples, hypothesis testing, highly specific and concise data and an artificial location (Collis and Hussey, 2003).

The use of quantitative methods can be associated with schools such as functionalism, structuralism and political economy (Gilbert, 1993), however, the use of this method does have its weaknesses. Predominantly, it involves the

reduction of often complex issues to single measures and also creates an artificial distinction between people and their societal structures. It necessitates rigid research designs which may prevent other relevant or interesting findings (Collis and Hussey, 2003, p54). Finally, it fails to take account of the objectivity, or otherwise, of the researcher themselves, and their influence on the issue being addressed or the research itself.

3.3.9 Qualitative Research

A qualitative approach takes a wider view of the problem situation, stressing "the subjective aspects of human activity by focusing on the meaning, rather than the measurement, of social phenomena" (Collis & Hussey, 2003, p53). It features smaller samples which lead to the generation of theories, and thick and detailed data which is located within its natural setting.

It does, conversely, have its weaknesses through a focus on small settings and the difficulties in transferring it to other settings. In addition, it could be considered more difficult to communicate its results and their value.

3.3.10 Validity, Reliability and Generalisability

These two research approaches have both their strengths and weaknesses. These can be discussed in terms of validity, reliability and generalisability. They are key elements which need to be considered as part of any research approach. Validity refers to a number of different elements relating to assessing if the measuring instrument is truly measuring the intended variable. Reliability concerns the consistency of the results: their stability and consistency. Generalisability applies to the "application of the research results to cases or situations beyond those examined in the study" (Collis and Hussey, 2003, p59).

The large scale, highly refined methods used in quantitative research can be considered to be highly reliable: the techniques can be replicated in a number of situations, and the large (suitably selected) sample sizes are likely to reflect, and the results consequently applied to, the population as a whole. However, it carries more risk that the validity will be low, with the results reflecting something other than the researcher's initial aim.

Conversely, although the validity of research undertaken through the qualitative research process is likely to be high, due to the increased level of, and emphasis on, the detail of the situation, it is difficult to replicate qualitative studies and the results are unlikely to be able to be applied universally. Indeed, many qualitative researchers do not intend this to be the case.

3.3.11 Mixed Method Approaches

It can be seen that both the quantitative and qualitative research approaches have strengths and weaknesses relating to their application within a social context. McGrath (1982) (in Amaratunga et al (2002), p20) describes this as their being "no ideal solutions, just a series of compromises". Research studies taking a combination of methods are becoming more accepted and widespread.

In terms of the location of this research in paradigmatic terms, it can be appropriate to use a mixed method form of study: a purely quantitative approach would not take account of the realist elements which must be incorporated whereas qualitative analysis would not fully take account of the variance in structures and would lack reliability and generalisability value.

The increased value and understanding of the data produced through a mixed methods approach is being increasingly recognised. Saunders et al (2003), in discussing this state, since it was recognised that all methods have limitations, and that a mixed-methods approach could facilitate a greater understanding by working to counteract the limitations.

In relation to the field of planning, there has also been an increasing awareness of the value of supplementing positivist, quantitative research with qualitative analysis. Kelly and Gilg (2000, p341), observe that numerical analysis, "should be accompanied by an in depth study of the processes that have contributed". This rationale for mixing both kinds of methods and data within one study is grounded in the pragmatic fact that "neither quantitative or qualitative methods are sufficient, by themselves, to capture the trends and details of a situation" (Ivankova et al, 2006, p3).

It is proposed that this study will be conducted using a 'mixed methods' approach, combining the use of the two main research approaches. It is now

necessary to examine the research methods to be utilised in the study.

3.3.12 Research Methods

When operating within a structuralist approach, the aim of the research is to not simply discover the facts but to also discover the mechanisms which underlie the facts. Furthermore, the influence of realism on this research will enable these facts to be related to the environment in which they lie. The aim of the research is to provide models of the causal processes at work at a structural level which produce the relationships between surface elements (Espejo & Harnden, 1989). The research must continually locate itself within its context of the political, social and economic environment in which the Planning Authorities lie.

The study will therefore be divided into two main sections. Firstly, to study and discover facts in relation to the current performance and structure of authorities, and their willingness and ability react to change and secondly, to model the causal processes of the authorities and to identify areas of good practice in relation to change.

These two elements naturally lend themselves to the utilisation of both quantitative and qualitative methods: quantitative to assess, describe and analyse the situation, and qualitative to gain further information on the underlying processes which are occurring.

The first stage of this study involves a full scale survey of English Local Planning Authorities in order to establish the current position relating to their ability to implement recommendations and react to change. This survey aligns itself comfortably with the adopted paradigm, as it allies itself with the more traditional features of structuralism by using the more traditional quantitative methods. The details of this survey and its design are explained more fully later in the chapter.

The second important element of this study is the application of Systems Thinking to study the Development Control services. This will study their ability and willingness to adapt to continual changes in their environment. This clearly allies with realism location within the paradigm.

It is proposed to apply Systems Thinking to analyse the relationship of planning with its environment and an introduction and discussion of this means of thinking and analysis follows.

3.4 Systems Practice and Cybernetics

This work seeks to apply the thinking of Systems Practice, to the world of planning and the Development Control process. In particular, to apply this thinking to investigate the ability of Local Authorities to implement recommendations for practice change.

3.4.1 Introduction to Systems Thinking and Practice

"The central purpose of systems analysis is to help public and private decision and policymakers to ameliorate the problems and manage the policy issues that they face. It does this by improving the basis for their judgement by generating information and marshalling evidence bearing on their problems... [it] focuses on problems arising from interactions among elements of society, enterprises, and the environment; considers various responses to this problem; and supplies evidence about the consequences - good, bad and indifferent, of these responses." (Miser & Quade, 1985, p2)"

Within the domain of Systems Thinking there are a wide range of methods and techniques which explore these interactions, responses and consequences. These range from those which can be considered reductionist, such as Hard Systems practice through to those more reflective, holistic responses, such as the Soft Systems methodology. The techniques have their advocates and their critics and have been applied in both private and public contexts. The characteristics of three of the methodologies will be outlined below.

3.4.1.1 *Hard Systems Methodology*

Hard Systems methods (HSM) stem from the mathematical, scientific and engineering approach to problem solving and could be considered to be the type of analysis which lies within a positivist paradigm. It is sometimes considered to be the original form of Systems Thinking and it mainly developed within post World War II industry. It assumes that through a process of

investigation and analysis the system can be managed. Linear problem solving is predominant in the analysis: it looks to identify individual problems and find solutions for these problems. However, it is not a solely quantitative tool as it needs to be aware of the non quantifiable constraints which will set the political and value-laden boundaries on the final decision (Bell & Chapman, 2004). Key aspects of a Hard Systems approach to a problem include:

- Clear definition of the problems and their context;
- Generation of different ways to these objectives;
- Formulation of Performance Measures;
- Evaluation of the routes through modelling techniques;
- Choice of the routes.

In summary, a Hard Systems approach believes that differences between the existing and the desired can be achieved through technical analysis and implementation. Key requirements for this are a clear statement of aims and objectives and a means of measuring the outcome to see if the desired results have been achieved. This shares similar characteristics to the social reform era of planning theory.

3.4.1.2 Soft Systems Methodology

The Soft Systems methodology (SSM) emerged from criticisms of Hard Systems techniques and its reductionist approach. It is based on the principle that 'the methodology of systems engineering, based on defined goals or objectives, simply did not work when applied to messy, ill-structured, real-world problems' (Flood & Jackson, 1991a). It extends the boundaries of the 'problem situation' from a clearly defined problem or objective into an investigation into the context in which the problem may lie. The differences can be described as approaching a problem systematically (Hard Systems) or systemically (Soft Systems). The intentions of Soft Systems methods are to learn about the situations which it explores and to take action based on the knowledge. Once this action has been taken, the practitioner will continue to examine the situation. As such it is a type of Action Research.

The prominent protagonist of this field is Peter Checkland. He set out the stages and elements involved in this type of analysis. The researcher will

examine the situation by identifying various elements: Customers, Actors, the Transformation, the Worldview (Weltanschauung), the Owner and the Environmental Constraints. The methodology then moves to try and define the system under study using these. A conceptual model is then constructed and this is compared to the situation that exists. Any changes which could be made to reconcile the two are debated in terms of their systemic desirability and their cultural feasibility and those considered appropriate are implemented. It is expressed as a seven stage process (Checkland, 1999) during which the purpose of the system is defined:

- The problem situation unstructured;
- The problem situation expressed;
- The roof definition of the relevant system;
- A conceptual model;
- A comparison of the conceptual model with the problem situation;
- Analysis of feasible and desirable changes.

3.4.1.3 Viable Systems Methodology

The Viable System methodology was developed by Stafford Beer. He applied the use of 'management cybernetics' to a wide range of situations including the Chilean economy (see, for discussion, Espejo, 1980).

Viable Systems Modelling (VSM) is a systemic method of modelling and analysing an organisation's structure and entities, as well as the relationships and patterns that emerge during the operations of the organisation (Keating, 2000). It is primarily concerned with the ability of an organisation to survive, or remain viable, within a changing environment. It examines the processes present within organisations in a structured manner, at a number of different levels, or fractals. It has been described as providing a science to organisations:

'by setting down the principles that underpin all organizations, and create viability, which is the capacity to exist and thrive in sometimes unpredictable and turbulent environments' (Beer in Hoverstadt, 2009, p126)

The aim of the analysis is to identify, and ensure the existence of, systems and

processes which have been determined as essential to create a stable and 'viable' system. VSM achieves this aim through modelling the functional, management, communication and regulation aspects as well as the controls on variety and the inter-relationships between the organization and the environment. Modelling focuses on "functions and activities, not physical entities" (Keating, 2000, p186)

3.4.2 Planning Theory and Systemic Practice

Planning theorists have not, over the years, been unaware of systemic thinking and practice. Systems methodologies have been considered and discussed in textbooks on planning theories (Mandelbaum et al, 1996; McLoughlin, 1969). In the preface to his 1969 book, *Urban and Regional Planning: A Systems Approach*, McLoughlin states:

"Can we apply... tools of study, analysis, evaluation and control to the spatial elements of human life – to the patterns of living, working, recreation and movement? In the belief that not only are we able to do so but that for any reasons we must." (McLoughlin, 1969, p17)

In 1969, when question of the extent of engagement of the planning processes with their environment questions were emerging relating to the outcomes of the systems. An element of systems thinking began to be introduced into the area of planning, however it focused on applying systemic practices in planning, as opposed to its use in the study of planning.

3.4.3 The Application of Systems Thinking to the Planning Process

The Development Control process, the decisions made and subsequent developments are set in a wide context. The motivation for undertaking this research stems from a reductionist approach to the problem (the targets concerning the time taken to determine applications) and the unintended consequences which stemmed from this approach. It would not seem appropriate to undertake a wholly Hard methodological approach to the situation, indeed, this approach would seem incongruous with a functional standpoint.

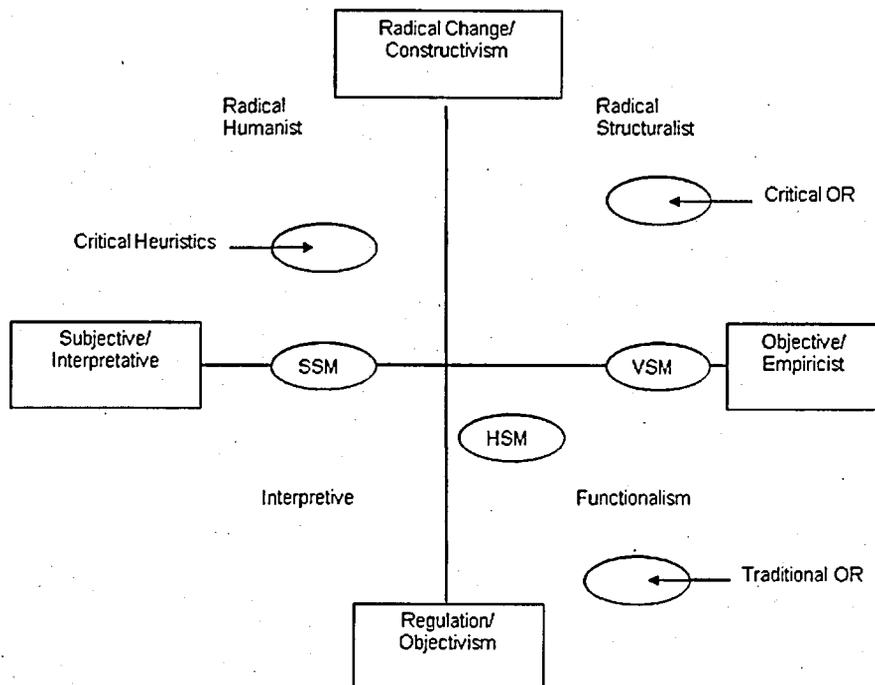
The soft systems approach is a type of action research and would involve wholesale participation of the parties involved as practice is amended and referred back to conceptual models. It is, however, considered inappropriate in this scenario: the time scales involved are long and a full immersed partnership with a Local Authority would be required. The approach would seem to lie towards the interpretative epistemological standpoint and would not therefore sit comfortably with research located within the paradigm, and research objectives, of this work.

The Viable Systems Model would seem to be the most appropriate for this study. It will look at the functioning of the organisations and the balance of power and autonomy within them while providing a framework on how these different elements could interact. It has been designed to consider within the system, the changes in the environment in which a system lies which sits easily with a town planning system which is embedded within the political and economic structure of the country. Golinelli et al (2010) state that a Viable Systems methodology can be considered a grounded theory. This is "because it suggests a new interpretation both of corporate behaviour and relative interaction with the context (Beer, 1972) and consolidated strategic-organizational managerial corporate models" (Golinelli et al, 2003, p3). In other words, it facilitates the analysis of the internal components (sub-systems) of a firm as well as the analysis of relationships between firms and the other influential systems entities of its context (supra-systems) (Golinelli, 2000; Barile 2008). However, the application of the ideas contained within the model presents both the use of Deductive and Inductive research methods and so is not Grounded Theory in its purist forms. Indeed, it has been described as a form of Abductive reasoning whereby it serves as a hypothesis to explain an explain observations. The practical application of the methods is discussed in greater detail in Chapter 4.

Figure 3.4, below, replicates the paradigmatic grid as previously represented in Figure 3.2. In this version (adapted from Holloway, 1990), some main schools of systems thinking have been positioned so as to relate them to the underlying social theories from which they were developed. This graphically illustrates that the Viable System Model (VSM) is appropriate for use within the paradigm of

the research and researcher. This is reinforced by Jackson & Keys (1987) who suggest that the work of Stafford Beer, the initial developer of VSM, demonstrates a 'structuralist' orientation. The application of the VSM in the Local Authority context combines this structuralist element with the social, economic and political processes which must be considered. This may shift the location of the model along the vertical axis towards the subjective and interpretative end, however, objective principles are still important in the format.

Figure 3.4 Systems and Operational Research ideas located in Burrell and Morgan's Paradigmatic Grid



The use of a methodology based on the Viable System Model which examines the decisions, actions and interactions and the real world functioning of systems, would seem to be appropriate to the complex area of Development Control which, as has been seen, cannot be examined without consideration of the context in which it lies.

In relation to planning it has been established that the Planning System does not, and can not, be considered to lie within a vacuum; it is an inherently political and economic process, primarily involved with the allocation of the limited resource of land. It is difficult to set clear system boundaries or to define influences on the system.

For example, any policies for increasing the speed at which homes are being constructed cannot be realistically considered without taking full account of the existing economic climate. However, the aim of the proposal cannot be immediately focused on the short term, and must remain valid following a change in economic circumstances.

Given its location within society, it is important that the planning system is able to cope with these changing environments. For example, the current economic climate creates conditions in which authorities will be experiencing change, both in changes to funding, through government funds and fee income, and through pressures on staffing levels. However, if the economy expands, it will be important to have a supply of skilled and experienced staff members to deal with an expected increase in workload.

In the context of this study, the ability of an authority to implement the recommendations will be closely related to the authority's ability to cope with change and it is important to identify what barriers, or even good practice, exist. In Viable Systems theory, this ability primarily depends on the existence of, and the trust, power and autonomy between, the 'internal systems' of the organisation.

The methodology also provides a structured approach to analysis which can be applied to different forms of organisation. In the context of this research, there are different institutions of planning, and it is appropriate to use a standardised form of analysis across these different authorities.

Stafford Beer, the originator of the VSM, promoted the method as a diagnostic means to identify organisational pathology. He claims that although many of the pathologies that VSM brings to light might coincide with those turned up by alternative methodologies, there are others that are likely to remain invisible when other methodologies are used (Espejo & Harnden, 1989). This diagnostic element of the methodology is a valuable tool in a structuralist research paradigm.

3.5 Chapter Summary

This chapter has analysed the theory and context of both research paradigms

and systems thinking, relating these to the field of town planning.

Firstly it explored the various means by which we can consider our understanding of how both objects and processes exist. By considering the issues which impact on the planning process, and our comprehension of it, the research was positioned within a structuralist paradigm, which leads the work to investigate and explore the structures which exist. However, the research must also take account of the interaction of these structures with the environment in which they are situated and therefore the research is also based on realist ideologies.

It was proposed that a combination of both quantitative and qualitative methods would contribute to the research study, which would provide an overall strategy and a balance of validity, reliability and generalisability which either methodology on its own would not be able to sufficiently achieve.

Finally, it was proposed to use systems thinking methodologies to critically examine the area of Development Control and planning processes. Given the embedded nature of these processes within the social, economic and political structure of the country and the constantly changing nature of these, it was illustrated that the Viable Systems Methodology will provide a coherent means of assessing the potential of local authorities to adapt to change.

CHAPTER 4 METHODOLOGY: RESEARCH DESIGN

4.1 Introduction

Chapter 3 established that this research should be undertaken using a mixed methods approach relating to the Structural Realist paradigm. This provides an optimum balance between the Validity and Reliability of the results and recommendations.

The study will be divided into two main sections. Firstly, it will examine the current performance and structure of authorities, and their willingness and ability to react to change. Secondly, it will model the causal processes of the authorities and identify areas of good practice in relation to an ability to react to, and survive, change.

These two sections of research are not wholly independent from each other: both are important elements of an overall mixed methods strategy. Primarily the initial more generic data showing how authorities are operating will establish the current situation and will additionally provide a means through which appropriate case study authorities can be identified. In addition to this, data obtained at this stage can also contribute towards the Viable Systems Analysis and its wider applicability. Details of these processes will be further discussed later.

This chapter now discusses the means by which these two phases of research will be achieved, and the practical implications which must be considered as part of this research process.

4.2 Local Authority Investigation

The first stage of the research was to establish the current position of English Planning Authorities with regard to their performance, structure and their ability to react to changes. This broad statement requires further analysis in itself to establish the process of research. An important consideration is to establish an appropriate means of measuring change.

It is proposed, in the context of the study, to incorporate the two government reports which have put forward recommendations for improvements to the

system. A number of recommendations in these reports rely on their acceptance and implementation by local planning authorities. Therefore they are a valuable tool to analyse the position of authorities and will be used in the process.

Additionally, it remains appropriate to use the performance indicators of the planning system as one means to establish the current situation. These are, undeniably, an established part of the demands placed on local authorities, and part of the environment in which they lie. However, they should not be considered in isolation.

It is also proposed that an initial analysis will take place using both the existing performance measures and additional information obtained from local authorities relating specifically to their appreciation of the recommendations of the Killian Pretty Report and the National Audit Office's, 'Planning for Homes'.

Performance figures are a publicly available form of secondary data. However, it is necessary to primarily obtain the data from local authorities on their knowledge of, and reactions to, the reports' recommendations.

4.2.1 Data Acquisition

A key decision to make within this research concerned the most effective method of discovering the current state of play with regard to the awareness, acceptance and integration of change.

Saunders et al (2003) put forward five forms of research strategy: Experiments, Surveys, Case studies, Grounded Theory and Action Research. Given that the selected philosophical position of the research does not lie within the interpretive sector of research philosophies, it would seem appropriate to reject the concept of the use of Grounded Theory and Action Research. These two strategies are closely involved with the inductive, subjective and interpretive ends of the philosophical assumptions, with close collaboration between the researchers and researched and, in the case of Grounded Theory, commencing the research without a theoretical framework and developing one as the research and data progresses.

An experimental approach to the research is also rejected as this, in addition to being impractical in the context of Local Authorities, would only provide very specific information on a limited topic of the subject. The validity of the approach in relation to the original research question would be restricted. It is also contrary to the philosophical viewpoint of the research as this technique employs strongly empirical techniques which seek to control, rather than engage with, the environmental factors. This would not be appropriate for studying a subject which is so entwined with changes in the environment.

The two strategies of surveys and case studies remain. During the initial research, the aim is to establish a broad overview of the implementation of recommendations. In doing this it is necessary to achieve reliable, valid and generalisable data. By taking into account these considerations it seems most appropriate to undertake a survey of the authorities, which enables the researcher to gain data from a wider selection of Local Authorities. This information, cannot, by the nature of enquiry, be as rich and detailed as it would through a case study approach, but it will later be supplemented by the Viable Systems analysis on a case study basis.

This balance provided by the two stage research process enables the survey data to be supplemented while, concurrently, allowing any information gained through the systems analysis to be set, and perhaps applied, within a wider context.

4.2.2 Mode of Survey

Having decided upon the surveys as a research strategy it is necessary to establish the recipients and the means of distribution for the work. There are, within England, 326 Local Planning Authorities, excluding County Councils who have restricted specialist planning powers. These comprise 201 Borough Councils, 56 Unitary Authorities (including nine new authorities created in 2009), 36 Metropolitan Boroughs, 33 London Boroughs and eight National Parks. Previous survey research of Local Planning Authorities has, for example, elicited a 27.6% response rate through the use of a postal survey (Wynn, 2005). It is accepted that the response rates for surveys can be particularly low, with response rates of 10% not considered uncommon (Collis &

Hussey, 2003)

Given this response rate, it was not considered appropriate to create a sample of authorities, as this would further reduce the range of possible data which could be received. It was decided to distribute the questionnaire to all authorities. This method means that an awareness must be maintained that the responses obtained will be self selecting as being from authorities who had the willingness, and resources available, to complete the questionnaire. There may be a problem of sample bias as:

"those who respond may have a particular interest in the topic and therefore are not representative of the population". (Collis & Hussey, 2003, p177)

It was also necessary to determine a suitable method of distribution of the questionnaire. The alternatives include the postal method, internet/ email distribution, telephone surveys or face to face delivery. Once again, each of these hold strengths and weaknesses. These were summarised by Nachmias and Nachmias (1996) who evaluated the process of surveys via face to face interviews, the postal method and telephone interviews. The choice of survey method is essentially a balancing act of a number of factors which includes cost, response rate, control of the interview, geographic dispersal, detail of the information and speed (Nachmias & Nachmias, 1996). For example, while face to face interviews are more likely to illicit a high rate of return once appointments have been arranged, they are highly resource intensive especially if they are to be conducted over a large geographical area. In addition it may be difficult to arrange initial access. However, along with telephone interviews, they allow the researcher to maintain more control over the process, including who completes the survey, and allowing any explanation of the questions which may be needed. However, telephone interviews are also relatively resource intensive and access can be restrictive.

Postal and internet surveys are likely to be much less resource intensive, once the initial contact details have been collated and the initial distribution has taken place. A key advantage is that the consultee can complete the survey at their own convenience. However, control is lost to the researcher, for example, of who completes the data and how or when the survey might be returned.

However, these disadvantages can be balanced against the strengths of a mailed questionnaire. Some additional advantages as identified by Burns (2000) include:

- A reduction in errors made in response recording;
- Removal of embarrassment or fear;
- Objectivity of the questions, without direction from an interviewer, and therefore an increase in the reliability of the results.

Given these considerations, and following consultation with other researchers, it was decided to utilise the newly developing means of internet distribution. This method shares many advantages and disadvantages with the more traditional postal method of delivery but also has some benefits, and potential disadvantages of its own. Schmidt (1997) outlines the benefits of this method, including costs, control and future analysis potential. The survey is hosted online and can be accessed through the use of a link sent in an email or posted on a website.

The main considerations in choosing this method were:

Geographical Distribution – The survey area is nationwide, and it would therefore be unfeasible to travel to conduct all the surveys face to face. This restricts the choice of method to telephone or post/ internet.

Cost – The survey only need to be available for a limited period of time, and therefore the subscription to the survey host is at a minimum in comparison to other methods of survey such as the postage (including the return postage) of around 300 surveys.

Response Rate – While a telephone survey is likely to elicit a higher response rate once contact is established, it is invariably difficult to make contact with the personnel of planning. Their work, by its nature, involves travel out of the office and it would be difficult to coordinate an interview schedule with a large number of participants.

Speed – Related to response rate is the time taken to conduct the survey. A web based system firstly allows more than one survey to be taking place simultaneously and secondly allows completion at the convenience of the

respondent. Finally, the web based system allows for quick transfer to other electronic equipment to aid analysis.

Having established this method of survey, it is necessary to address some key issues. (Schmidt,1997). These include:

- Incomplete responses
- Unacceptable responses
- Multiple submissions
- Lack of control

The survey hosting software assists in overcoming some of these difficulties. It is possible to require answers to specific questions, although this in turn could lead people to abandon the survey altogether. The web hosting service also has inbuilt 'safety measures' for example, the use of cookies in order that only one survey can be completed from an individual computer,

These advantages and the safeguards which can be put in place make web surveys an appropriate method of survey distribution. Leedy and Ormrod (2005) contend that the method will, by its nature, exclude and limit participants due to the nature of internet users. However, it is countered that the job roles of the participants require them to be IT literate and therefore this is not an immediate barrier to completion.

The invitations to take part in the survey were distributed through an email. These emails were sent to email addresses obtained through the examination of Local Planning Authority websites. Where the contact details were available for the Head of Planning (or equivalent) or the Head of Development Control, the emails were sent directly. In many cases such an address was not available and the email was sent to a generic 'planning' email address, with a request for it to be forwarded to the Head of Planning or their equivalent.

4.2.3 Survey Design

A few elements of the survey design were briefly discussed above, however, more survey characteristics will be discussed in detail below.

4.2.3.1 Question Type

A survey can be used for both quantitative and qualitative data acquisition. For the purpose of this research, this is particularly relevant as a mixed methods methodology has been adopted. While quantitative questions are more likely to elicit responses (Gilbert, 1993) it is also important to gain further information and input which cannot be achieved through these means. The survey was designed to include both these elements in order to minimise potential data loss.

4.2.3.2 Question Subjects

The primary purpose of the survey was to assess the ability, the perceived ability and the willingness of the LPAs to implement recommendations of change, using the 2008 reviews. The first stage of the design process was to analyse the recommendations put forward and to select those which are applicable to Local Planning Authorities. These were then grouped into general themes and categories. The themes and their associated recommendations were then taken and formulated into questions which related to the processes known to be taking place within Local Planning Authority offices and including information included in the report. Once these themes and ideas were established, questions were formulated.

While, a great deal of information could be obtained through the use of open questions, the potential value of this had to be balanced against the possible rates of reply to the survey. Consequently, the majority of the questions were created using the Likert approach, with an option available at the end of each section, to allow for any clarification or additional information that the respondent wished to include. A further section for additional observations was provided at the end of the survey.

4.2.3.3 Survey Awareness and Distribution

In order to raise awareness of the work the researcher previously informed the RTPI (Royal Town Planning Institute) and the Planning Officers Society.

The proposed survey was also piloted by a Head of Planning for a borough council and their opinions were sought on the format, the questions and the

length of time required to complete the survey. The feedback from this was used to formulate the covering emails which accompanied the link to the questionnaire.

The survey was also informally shown to, and discussed by, a variety of levels and types of planners at a training event for the Planning Aid service. The feedback was generally positive and as such the survey was distributed via an email link.

The initial emails were sent to the planning authorities with a request to complete the surveys within a three week period. Following the expiration of this period, a further email was sent, including the original text and also incorporating feedback from previous consultees in terms of the time needed to complete the survey.

Had the result still been poor following this second mail shot, the option remained to follow it up with a traditional postal survey. However, given the received response rate (32%) this was not considered a necessary course of action.

The data obtained from this survey was analysed both statistically through the SPSS statistical package. It was also used to identify authorities to select as case study authorities. This selection process is explored in greater detail in Chapter 5. Qualitative data obtained in these surveys was also used to validate the results of the case study analysis.

4.3 Case Study Design

As has been previously identified in section 3.4.3, the ideas of the Viable Systems Model will be used to conduct case study analysis within local authority development control services. This is essentially qualitative research with an area of scrutiny aimed at identifying the features of the VSM within the Local Planning Authorities.

Marshall and Rossman (1999) describe qualitative research as predominantly relying on four main approaches to gathering data. These are:

- Participation in the setting;

- Direct observation;
- In depth interviews;
- The analysis of documents and materials.

These core methods can be manipulated, merged or expanded in a variety of frameworks, for example a case study approach may use either one, or a variety, of the techniques. All the techniques, in their various forms, have strengths and weaknesses which must be considered in the formulation of a research plan.

In the case of this study it was necessary to dismiss the potential use of participation within the setting and the use of document and material analysis. This technique might have provided valuable information had the researcher already been embedded within a relevant organisation, and research into Development Control has been conducted by this means (Tait and Swain, 2007). However, the researcher is not involved with working within the local authorities concerned and it would be both time consuming and create ethical and access issues to participate in the setting in order to gain the information needed. Similarly, access to the documents which might contain the relevant information would be difficult and it would be difficult to initially identify which documents, if any, the information may be contained in.

The use of participant observation may prove useful in its ability to provide 'real' data as to the power relationships, and their operation within the authorities, in particular those which happen in the form of non-verbal communication. However, it may also be disproportionately time consuming and suffer from issues related to the influence of the observer on the data obtained and gaining access on this basis.

The use of in depth interviews was considered the preferred option for obtaining data. These interviews will be beneficial with regards to access as they enable the participants to set aside time and not intrude too much on their normal working patterns and schedules. They also allow questions to be asked by both sides and clarifications made at the time. The interview could take place in the form of a focus group. However, in this instance it is not considered that this is the most appropriate form as, although it may stimulate further discussion, it

would be more difficult, and would require more good will, to arrange the events. In addition, some stakeholders may, in fact, be less forthcoming.

The interviews needed to be conducted with a selection of stakeholders within the local authority ranging through elected members, management, planners, internal audit teams and administrative support. These people were identified with the assistance of the contacts within the authorities and then contact made individually to arrange suitable times. The interviews were recorded using an electronic MP3 device.

The interviews sought to identify the key elements of VSM and asked the participants to identify who, or what department, if any, is responsible for key functions. The processes associated with the Viable Systems Model are detailed below.

4.3.1 Viable Systems Model

The case study stage of the research involves the use of the Viable Systems Model as a diagnostic tool in relation to the ability of Local Planning Authorities to react to changes within their environment. These case studies are selected through the volunteers identified through the survey stage of the research and with the intention to try and select a cross section of Authorities. The justification for the use of this methodology is contained in Section 3.4.3. This chapter will now more fully explore the development and application of this methodology.

VSM stems from the work of Stafford Beer. He applied the use of 'management cybernetics' to a wide range of situations including the Chilean economy (Espejo, 1980) through to the restructuring of New Zealand rugby and cricket (Stowell et al (ed) 1997). The ability of any system to adapt to this change can be investigated through the examination of 3 ideas:

- Recursive Systems;
- Trust, Autonomy and Power;
- Variety.

4.3.1.1 Recursive Systems

The theory advocates the idea that each viable system is itself contained within a viable system and will itself contain viable systems and so forth. The Development Control system cannot be isolated as an individual unit, it is one element of, and entwined within, the planning service of the local authority and the unit of the local authority as a whole. Indeed, additionally, the authority itself lies within, for example, the wider system of local government, which lies within the overall system of the UK Government.

Within an authority there may be other factors which will influence the ability to implement the recommendations. These may include political unwillingness, financial restrictions or staff limitations. These factors stem from a variety of sectors of the system's environment. When considering this context, it would appear that a system of analysis which appreciates, and accounts for, the layers of systems and organisation, would be ideal for the analysis of Development Control management.

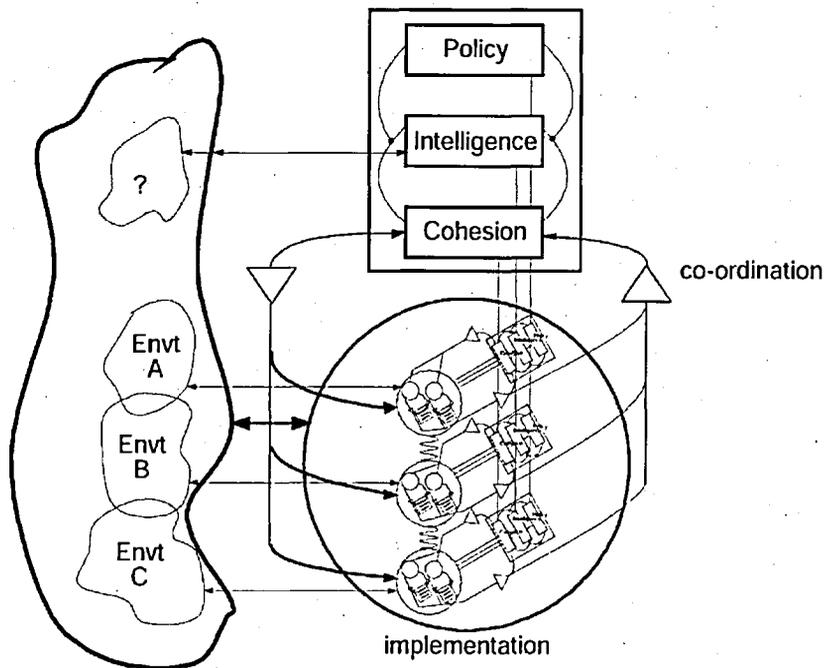
This recursive nature of any organisation is discussed within Viable Systems theory and, once a system of interest has been defined, a number of 'Internal systems' are identified and analysed. They can briefly be described as the Operations, Stability, Cohesion, Planning and Policy Units. However, although these titles are attributed to these for this work, it is important to constantly acknowledge that focus should be placed on the process of the function as opposed to the title given to these functions and processes. The names given to these can vary across the literature as it is difficult to find a succinct term to reflect the purposes implied. These different functioning systems must work coherently in order for the system to be viable. These systems can briefly be summarised as:

- 1 - Operations: producing the systems aims;
- 2 – Coordination/ Management of Stability: responsible for looking inside the organisation, resolving conflicts between the units;
- 3 – Delivery/ Management of Cohesion: responsible for looking inside the organisation maximising the cooperation between the units;
- 3* - Monitoring: responsible for analysing the performance of the sub systems;
- 4 – Development/ Management of Planning: responsible for looking outside the

organisation, making long term plans and identifying the future resources;
 5 - Management of Policy: identifying and developing the overall policy for the organisation as a whole.

These system and the recursive nature (three levels of recursion) of the model are illustrated in Figure 4.1 below. In this diagram, system 1 is described as implementation, system 3 and 3* are referenced as Cohesion and System 4 as intelligence thus demonstrating the difficulties of semantics in this model.

Figure 4.1 Viable Systems recursions (source Hoverstadt, 2007, p84)



4.3.1.2 Trust, Autonomy and Power

In order for a system to be viable, the above 'internal systems' must be able to work efficiently together. This needs to be achieved through the ability of each system to be able to work to meet the overall aim of the system, while leaving the others to produce their own outputs, without undue interference. In order for this trust and autonomy to be achieved, it is important that the overall system has a clear identity (or aim). This can be found through the construction of an identity statement. In searching for this identity, it may be possible to see where conflicts lie, and consequentially where weaknesses appear in the system.

When these factors are analysed within the different levels of a system, there needs to be agreement amongst the levels of recursion. If disagreements arise,

this would indicate that the viability of the system may be at risk and therefore attention should be given to this area. For example, in a Development Control context, if the Operations believed that the aim of the organisation was to produce good quality development and the Policy section believed that the aim was to determine applications within the target timescale, the system as a whole is, in all likelihood, relatively unstable.

The motivation for undertaking this research stems from the predominantly reductionist approach to the problem of speed within Development Control (the targets concerning the time taken to determine applications) and its unintended consequences and their lack of account of its other impacts.

This reductionist approach may have also led to the lack of trust and autonomy within Development Control services. For example, with the focus on achieving targets, it would appear that there have been conflicts between the aims of those within Development Control, and those within the management elements of the councils. The pressure on the speed of decision making has been acknowledged to impact on the quality of decisions, and therefore, subsequently, on the quality of developments. Consequently, it appears, that there was a conflict between the aims of the subsystems: the operations, Development Control, could be said to be operating to produce good quality development while the audit and policy systems were looking to produce good performance statistics, to boost the status of the organisation and the income stream.

4.3.1.3 Variety

The methodology draws on Ashby's Law of Requisite Variety (Ashby, 1956) which is stated by Beer as, "only variety can absorb variety" (Beer, 2002). The theory of the methodology believes that this variety can be achieved through a balance between the autonomy and the power of internal systems, as discussed above, within organisations.

4.3.2 Practical Application of the Viable System Model

There are a number of key activities which need to be conducted in the practical application of the VSM as a diagnostic tool. These include:

- the identification of an Identity Statement (at various levels of recursion);
- the identity of systems one to five (and any levels of recursion, in particular those contained with System one);
- the identification of any systems which may be missing or only partially present;
- The identification of any undue interference of a system within the activity of any other system;
- Conversely, the identification of any barriers to communication between the systems.

These activities can be converted into four stages of the research process..

These are:

4.3.2.1 Establishing the identity of the organisation

Stafford Beer, the creator of the Viable Systems Model, stated that, "the purpose of a system is what it does" (see, for example, Beer, 2002). This is not necessarily the stated intention of those involved in the system. For example, if a protest group is formed in response to an issue, but in fact its main achievement is a group of like minded individuals meeting for a drink, then the purpose of that organisation or system is to meet for a drink rather than as a protest group. In the case of local authority development control services, it would seem natural to state that their purpose is to control, or manage, development.

This is primarily completed through examining what those involved in different parts of the organisation consider the purpose of the organisation to be, including an examination of the customers and suppliers and the inputs and outcomes of the work which takes place. For example, in the case of the Development Management/ Control – this easily ranges from creating high quality development through to achieving National Indicator targets.

Espejo et al (1999) identify different factors which could be taken into account when constructing an Identity Statement:

- What is produced by the organisation?
- What needs are being satisfied by what is produced?
- What time factors influence the production?

- What is the size and location of the organisation?
- What is the relationship with the environment and the products of the organisation?
- What organisations are related?
- What are the economic variables?
- What are the financial variables?

The analysis of these provides an initial indication of the occurrence of tensions, or the smooth operating of the systems. Different staff within organisations consider that there are different purposes to their system, it may well result in a miscommunication between parts of the system and an imbalance in system outputs. In order for any organisation to remain viable, the subsystems, and those working within them, must hold shared values of the identity of the system.

4.3.2.2 Modelling the structure of the organisation

This stage examines the number of different ranges of operations that any system is responsible for. In this case, the analysis will be primarily based around those areas identified as important for Development Control/Management teams from the previous reports on the subject, including:

- Pre Application Advice and Discussions;
- Submission, Validation and Processing;
- Conditions and Obligations;
- Involvement.

The processes (both formal and informal) which are involved in these are determined in the interview process

4.3.2.3 The distribution of discretion

This examines the amount of autonomy provided to the people and functions of the systems to act under their own ideas and the amount of control placed upon them by other areas.

4.3.2.4 Unfolding and modelling complexity

This stage relates assessing the previous components and their importance or power within the overall process. All the information obtained in the previous

stages is now amalgamated into the overall structure of the organisation and analysed to identify potential areas of concern within the system.

4.3.3 Previous Application of the Viable System Model

Perez Rios et al, 2012, observe that the Viable Systems Model has been applied by a number of different authors, through varying methodologies and to many contexts since the work of Stafford Beer, citing):

"among others, Clemson (1984), Espejo and Harnden (1989), Flood and Jackson (1991), Yolles (1999), Jackson (2000), Schwaninger (2006) and Perez Rios (2008a (sic), 2010, 2011a (sic))." (Perez Rios et al, 2012, p292)

The work of Espejo and Perez Rios in particular works around the development of IT systems (Viplan and VSMOD® respectively) which will help to increase the use of the ideas contained with the Viable System Model.

Despite this acceptance, the application of the Viable System level has not had the uptake of other systemic approaches. Espejo & Gill (1997) attribute this to two main reasons:

"Firstly, the ideas behind the model are not intuitively easy to grasp; secondly, they run counter to the great legacy of thinking about organizations dating from the Industrial Revolution" (Espejo & Gill, 1997, p1)

The aim of this study is to successfully apply the ideas of the model, overcoming these barriers in a manner which is practical to apply within a busy local government context and which can subsequently be transferred to other areas.

4.3.4 Work in the Case Study Authorities

The work in the case study authorities was undertaken to identify these structures and to discuss and establish the organisational identity of the Development Control department concerned. The manner in which the case study work will contribute to these areas is outlined below. This will also enable a comparison of the practices within the case study authorities.

The interviews proposed had two main objectives: to obtain the ideas of the identity (and therefore of the perceived purpose) of the Development Control/ management function of the authority and to investigate the processes which are undertaken.

The interviews were held with representatives from:

- The Senior Management Team
- Elected members
- Planning management
- Planning officers
- Planning administrators.

The participation from these levels resulted in the collection of data representative of a cross section of the levels within the organisation which provided valuable information such as views and perceptions which may not traditionally be examined. It was considered vital that this broad spectrum of participants is involved within the study.

The basic structure of the interview remained standard across the participants, although the style and some content was amended in accordance with the participant at that time. For example, an elected member was likely to have a lower awareness of the individual processes which take place and therefore a greater emphasis was placed on importance of the processes and roles. The interviews were recorded and notes taken.

4.3.4.1 Organisational Identity

Initially the interviews acted to establish the organisational identity of Development Control/ Management within the authority. This took place through the discussion of who conducted activities and how. It included a brief discussion of the inputs and outputs of the system, the 'suppliers' and 'customers' in the process, who has overall ownership of the process and who can intervene in the system.

This data, obtained from participants at different levels of the system, was used to create an overall identity statement for the authority and as an initial indicator of where conflict may occur within different areas of the organisation.

4.3.4.2 Structural Modelling

In order to examine the structures and processes which take place, the study will discuss the presence of, and the means of operation of, the systems in place for the underlying processes as examined in section 4.3.2. Within the case studies these were examined through an open discussion between the interviewer and participant. An interview guide can be found in Appendix 2.

4.3.4.3 Examining Discretion

This was examined subsequent to the interviews with the information from the interviewees. This information will concern obtaining data relating to the responsibilities within the process and the extent of involvement of individuals.

4.3.4.4 Modelling the Organisational Structure

This is the part of the process which pulled together the previous stages. For example, if there is conflict in the idea of identity of the organisation or in the level of involvement or responsibilities in the processes, it is an indicator that the system may not be functioning as efficiently as it could. Therefore this analysis, contained in Chapters 6 and 7, will bring out those areas which may give rise to inefficiencies but which would not necessarily be identified when examination takes place using traditional hierarchical structures.

4.4 Chapter Summary

This chapter has explored various aspects relating to the practical elements of the research study, establishing the methods which will be employed in both stages. It has considered the alternative means of conducting the research and put forward the best case solutions. It has confirmed that the use of VSM is an appropriate form of analysis which has the potential to reveal a greater level of information than may be revealed in more traditional forms of analysis. It has also demonstrated a structure for its application which can be utilised within different structures of development control organisations.

CHAPTER 5 QUANTITATIVE DATA ANALYSIS

5.1 Chapter Aims

This chapter examines the data provided by the questionnaire survey through the use of statistical techniques. This analysis fulfils two objectives: to describe and examine the existing situation within local planning authorities and to identify possible relationships between authority characteristics and their performance in order to develop a rationale for qualitative case study selection. This relates to their ability to sense, accept and adapt to changes in their environment as presented in the research objectives. This analysis is designed both to present the current situation and to assist in the process of selecting representative authorities for case study analysis. After a brief examination of the survey respondents, it will analyse the data obtained through the survey in relation to itself and in conjunction with other secondary sources of information. It will also examine the potential validity and reliability of the data and put forward explanations for the results that have emerged. Finally it will put forward a scheme for the selection of case study authorities.

5.2 Quantitative Data Collection

The data was collected through an internet based survey distributed via email during the summer of 2009. The initial email was either sent directly to either Heads of Planning or the Development Control Manager. When direct contact information was not available, the email was sent to the generic planning email address with a request for it to be forwarded to the Head of Planning or their equivalent. This choice was to target those individuals with both the knowledge of, and the responsibility for implementation of, new recommendations for practice. A total of 334 planning authorities were sent the initial contact email. This included all Local Planning Authorities with the exclusion of the County Councils.

Despite the surveys being initially targeted at Heads of Planning, it was still considered appropriate, and not detrimental to the survey results, to accept and analyse those responses received from other members of the service.

5.3 Variables for Analysis

This work analyses the data in accordance with variables obtained through the research, and further variables, as considered appropriate and as touched upon in section 2.2.7 of the literature review. These variables are set out in Table 5.1 below and include the variables obtained from both primary and secondary sources.

Table 5.1 Variables for Analysis

Data	Variable Type	Source	Justification
Authority Type	Independent Nominal	Survey Respondent characteristic	Does the ability to change relate to the legal structure of the authority: either as individual types or in broader terms of the formal authority structure?
Authority Region	Independent Nominal	Survey Respondent characteristic	Is there a regional basis to the ability to change?
Authority Population	Independent Scale or Ordinal <i>Not Normally distributed</i>	2001 Census Data (merged for the New Unitary Authorities)	Does the size of the authority, in terms of the population, influence an Authority's ability to change?
Deprivation Index	Independent Scale or Ordinal <i>Not Normally Distributed</i>	UK Government Deprivation Index	To see if the relative 'wealth' of an area effects the ability to adapt to change
Major Performance Change	Dependent Scale or Ordinal <i>Normally Distributed</i>	BVPI Indicator (Change 07/09 minus Change 02/03) – UK Audit Commission	A measure of 'change'. The Planning Delivery Grant allocation depended largely on this indicator. Therefore an authority's achievement of this change is a measure of how that reacted to Government directions.
Overall CPA Score	Independent/ Dependent Ordinal	UK Audit Commission	This is the overall score for the entire council, based on BVPI indicators. It can be a measure of the council as a whole.
Cost of Planning per Head 03/04	Independent Scale or Ordinal <i>Not Normally Distributed</i>	UK Audit Commission	The last available year for this data.
Awareness of Killian Pretty and	Both Independent	Survey Data	Dependent variable - for example, do any previous independent variables have a relationship with how aware an authority might

Planning for Homes	and Dependent Scale <i>Not Normally Distributed</i>		be but also possibly an Independent Variable: eg. are those authorities with a high awareness more accepting of change
Acceptance of Reports' Recommendations	Independent/ Dependent Scale <i>Not Normally Distributed</i>	Survey Data	As an indication as to how (on a self rated scale) authorities indicate their support for the implementation of some elements of the reports.
Pre Application Advice	Independent/ Dependent Scale <i>Normally Distributed</i>	Survey Data	As an indication as to how (on a self rated scale) authorities indicate their performance on recommendations relating to best practice
Submission and Validation	Independent/ Dependent Scale <i>Not Normally Distributed</i>	Survey Data	As Above
Planning Conditions and Obligations	Independent/ Dependent Scale <i>Normally Distributed</i>	Survey Data	As Above
Involvement	Independent/ Dependent Scale <i>Not Normally Distributed</i>	Survey Data	As Above
Overall Current Practice	Both Dependent and Independent Scale or Ordinal <i>Not Normally Distributed</i>	Survey Data	Independent Variable – could the current practice of the authority determine an authority's responsiveness to change? Dependent Variable – is the current practice related to other independent variables?

5.4 Methods for Analysis

Following the receipt of the surveys, a dataset was created within the SPSS software package. The dataset also included the additional further variables, contained in Table 5.1 which were obtained from secondary sources. The data for the entire population was entered for these variables, with a filter variable used for participating authorities. Qualitative data, such as job titles and those responsible for validation were, at this point, coded into groups. Further coding,

and transformations, were used to create variables including the awareness of the recommendations and the acceptance of change. Appropriate recodes were also used to create sets of ordinal data for analysis from scale data. Random checks were then used to examine the accuracy of the data input.

5.5 Analysis of Respondents

A total of 106 survey responses were returned. However, not every survey was fully completed, and, in some cases, authorities duplicated the response. The rate and type of returns are indicated below.

Table 5.2 Questionnaire Responses

Online Survey Responses Generated	106
Fully Completed	80
Merged Surveys	2(4)
Single Question Uncompleted	9
Limited Questions missing	7
Large amounts missing	6

Those surveys where only a small amount of data was absent, such as the job title of the respondent, are not completely excluded from this analysis. The appropriateness of their inclusion was considered on a case by case basis. However, a major omission in the survey completion was the authority failing to identify themselves. This omission prevents the analysis of those factors which rely on authority data including, type, size, deprivation index, cost of planning, region and CPA score which heavily limits the value of inclusion of their data in the analysis. This omission was considered to inhibit their value to the study and they were removed from the overall analysis. Some responses could be identified through the exploration of IP addresses but some were unidentifiable and a total of 97 'completed' and identifiable surveys, 29% of the total, were used for this research analysis.

5.5.1 Generalisability (External Validity)

"The critical issue with surveys is the representativeness of those who

you survey. In many surveys, researchers feel content if 20 per cent of people respond to their survey. So what can we say about the remaining 80%?" (Adams et al, 2007, p128)

The survey response in this case represents nearly one third of the population of planning authorities. It is necessary to consider to what extent the analysis of these survey returns can be applied to those authorities not represented within the completed surveys. It is first necessary to acknowledge that, in the return of the survey itself, there may be a reason, and a pattern behind the non-response of the remaining two thirds of authorities to whom the authority was sent.

This impact can not be fully accounted for, but the following analysis briefly examines the survey analysis in relation to overall population. This will allow the results to be examined in the light of the knowledge of which groups are excluded through non-response. Failure to take account of these non-responses can result in the representative nature of the work being questionable (Adams et al, 2007) and therefore limits the potential for the research outcomes to be applied in a wider context. In this case the following examination is put forward that the returned surveys are reasonable representative of the population as a whole (Robson, 2002) and, as such, have research applicability to the entire population of planning authorities.

5.5.1.1 Authority Type, Region, Cost and CPA Score

Appendix 4a contains both pie charts and tables which represent a comparison of the survey respondents with the population as a whole. A summary of the conclusions which can be drawn from this brief univariate analysis is contained below.

Firstly, regarding the type of authority which responded to the survey, it can be shown that the percentages of the authorities who responded are broadly equal across the authority types. There is a slight increase in the proportion of National Parks and Unitary Authorities with a reduced proportion of London and Metropolitan Boroughs.

Secondly, the analysis contained within the Appendix shows that while there was at least a 17.57% (the South East) response rate from all of the regions.

This rate was more than doubled by the highest regional response rate of 42.24% from the West Midlands. The majority of the regions lie between a 20% and 30% rate of response.

The survey respondees also broadly reflect the population as a whole in relation to the money spent on planning services. The mean cost for the population, excluding the City of London, is £13.91, while the mean cost for those responding authorities is £14.80. The city of London was excluded from this analysis as it is a clear outlier, due to its low population but high rates of development.

Finally this initial overview shows that a greater proportion of both those authorities rated excellent and fair responded to the survey than are present in the population as a whole, with a lesser proportion of the 'Good' authorities choosing to participate. It is, once again, considered that the responses do broadly represent the sample as an entirety.

5.5.1.2 Population

The population of local authorities, as drawn from the 2001 census, range dramatically from 1,936 to 715,402. The majority of these authorities have a population of below 250,000. The statistical mean of the full population lies at 147,000 while the mean of the participant authorities lies at 138,000. Given that the maximum population of the respondents was 500,000, the respondents are, once again, considered to be broadly reflective of the overall population.

5.5.1.3 Deprivation Index and Major Performance Change

The analysis of Deprivation Index in relation to the population and the survey respondents show that while the survey respondents do represent a broad range of the index of deprivation, they are not distributed in the same manner. The survey respondents contain a greater proportion of authorities with deprivation indices of between 10% and 12%. However, this analysis used relatively small ranges (2%) and this makes these differences appear more visual and prominent. It is considered that the respondents sufficiently reflect the overall population of planning authorities and, as a result, it is considered appropriate to apply the findings of the survey analysis to the overall population.

In relation to Major Performance Change, both the population and the survey respondents follow a broadly normal distribution although the performance change of all the authorities follows a smoother curve. The questionnaire respondents have a greater than expected performance change of between 20% and 25%. However, the range of change is consistent across both data sets and it can consequently be considered that the survey respondents do generally reflect the population as a whole.

5.5.1.4 Summary of External Validity

This brief univariate analysis has demonstrated that the survey respondents do broadly reflect the overall population in the characteristics put forward in Table 5.1. They do, however, reveal potential selection bias as a greater proportion of authorities with an Excellent CPA rating completed the survey as exist in the overall population.

5.6 Analysis of Survey Responses

5.6.1 Reliability

This analysis now examines the survey responses. The measures were created through the amalgamation of a number of different Likert style self assessments of the performance of the authorities. Firstly, it was important to examine the relationships between the variables in order to establish that they are appropriately grouped and, as far as possible, to ensure that they are measuring a common purpose. This grouping process produced results, and measurable variables, relating to the processes of pre-application advice; submission, validation and processing; planning conditions and obligations; involvement and, finally, a measure of acceptance of change.

The Cronbach's Alpha statistical test was used to test for this reliability. It is a measure of how the individual elements correlate in relation to the total sum of the elements. In addition, by showing the impact of each individual element on the test result, discrepancies in the measurement may also be identified.

The constituent elements of the variables and the Cronbach's Alpha analysis are illustrated in Appendix 4b. The analysis produces a result with a maximum value of 1: the closer the statistic is to this value, the greater the

correspondence between the answers and therefore the predicted reliability of the data is considered more applicable.

In addition to the Cronbach's Alpha analysis, the means and modes of the elements were examined to highlight any clear variations. Observations made from this will also be explored in sections 5.6.1.1 to 5.6.1.5 below.

5.6.1.1 Pre Application Advice

The Cronbach's Alpha score for the variables selected as a measure for pre-application advice gave a score of 0.889. This increases the acceptance that there is consistency between the responses within this group and it can be considered that the subjects are reliably approaching the area of authority performance with regard to pre-application advice.

The mean and mode of the variables are located in close proximity to each other across the factors. A quick analysis of these figures shows that while many authorities feel that they provide good quality information, both online and electronically (mode = 5), and allocate suitable resources for pre-application advice (mode = 4), substantially fewer involve external agencies in these discussions (mode = 2).

As these external agencies will be consulted on, and inherently involved in, the application process, it seems appropriate, as the reviews recommend, that they should be engaged as early as possible within the process. These lower averages among the questionnaire respondents illustrate an area in which authorities may look to improve their practices and policies.

5.6.1.2 Submission, Validation and Processing

An initial Cronbach's Alpha score of the five proposed variables produced a negative score. This prompted the reconsideration of the appropriate variables for this process. Therefore only two, the timing of the validity check and the use of a validity checklist, were used for this measurement. The other factors, while providing interesting univariate observations, were, on more detailed consideration, measuring the outcomes of these processes and the resources available. A further Cronbach's Alpha analysis confirmed, with a value of 0.918, the reliability of combining early validity checks and the validity checklist.

The averages, both mean and modal, for the two factors relating to processes show that the authorities which responded to the questionnaire are already compliant with the recommendations of the reviews, and check the validity of applications through the use of a checklist early in the process. However, the variance between the means (5) and the modes (c. 4.5) shows that it is not the case in every authority.

5.6.1.3 Planning Conditions and Obligations

Six question responses were proposed as an overall measure of performance of planning conditions and obligations. The strong Cronbach's Alpha score, 0.837, indicates that confidence can be held in these factors as variable for measurement.

An examination of the modes and means of these variables illustrates that the modal value for each variable lies at 4, while the majority of means lie below this value. This indicates that a number of authorities score their practices lower on the scale. The comparison also shows that the lowest score of both mean and mode relates to the practice of monitoring planning conditions (3), highlighting this as a potential area of weakness.

5.6.1.4 Involvement

Thirteen variables were put forward as measures of Involvement in the system. The Cronbach's Alpha score of 0.898 indicates that the factors are reliable in relation to each other and can be considered appropriate variables for establishing the processes undertaken in relation to involvement in planning applications.

Once again, the modal answers to these questions lie predominantly around '4', with the authorities agreeing with the statements. The exception to this is the variable in relation to the involvement of elected members in the process, which lies at the centre point of the scale. The location of the mean beneath this value further indicates that members are not fully involved in this element of the process.

5.6.1.5 Acceptance and Awareness of change

Twelve questions in the survey were put forward as appropriate measures for

the authorities. The Cronbach's Alpha score of 0.766 for these variables indicates that there is a likelihood of reliability between these indicators, and that they are an acceptable combination of factors. They are put forward as the overall indicator for the acceptance of authorities, of changes placed before them.

An overview of the means and modes of this data indicates that the respondent authorities are accepting of change. Every modal response lies either at, or above the mid point value with only two indicators with a mean value of less than 3.

Similarly, the two elements which were combined in order to give the score for awareness of change (awareness of Killian Pretty and awareness of Planning for Homes) illustrate that there is a relatively high awareness of the recommendations put forward in the reviews and that therefore the authorities consider themselves aware of changes in their environment (in the case of these chosen proxy measures),

5.6.1.6 Summary

This brief analysis, and the establishment of indicators to analyse the questionnaire responses has demonstrated some key points:

- Local authorities have the potential to further involve external agencies in pre-application discussions. This factor was put forward as a recommendation within the Killian Pretty report but had the lowest averages of those factors chosen to represent pre-application advice practices.
- The use of a validity checklist is not universal across authorities. This was also a recommendation put forward in the Killian Pretty review and their use warrants further exploration.
- The analysis of conditions and obligations has revealed that the monitoring of both obligations and conditions is an area of weakness, and therefore concern, within the authorities.
- Elected members are not fully involved in the process within the majority of authorities who responded to the survey.

5.6.2 Validity

Section 4.4.2 explored the use of an internet survey, and its associated strengths and weaknesses. One considerable weakness is the lack of control over the completion of the questionnaire. In this case, the respondent was requested to provide their job title in order that any influence from this could be examined.

It is considered necessary to examine the data returned in order to assess whether the job role does significantly impact on the responses. If this was the case, there was the risk that the survey may be examining the knowledge of different job roles rather than the situations within the authorities.

The questionnaire survey was designed with the intention to analyse the possible relationships between the characteristics of the local planning authority and their ability to recognise, adapt to and implement change. The analysis of the results will be focused on establishing relationships between these factors. It is necessary to establish whether further factors inherent in the research process are also having a significant influence on the results produced. While the research method and the questionnaire design and piloting have considered and addresses many of these factors, it was not possible to design out all error.

Figure 5.1, below, illustrates the job roles of the completers of the surveys, and the associated data in relation to their awareness of the reforms put forward in the Killian Pretty Review and the National Audit Office's 'Planning for Homes' (Killian Pretty, 2008 & National Audit Office, 2008).

Figure 5.1 Staffing Level and Awareness

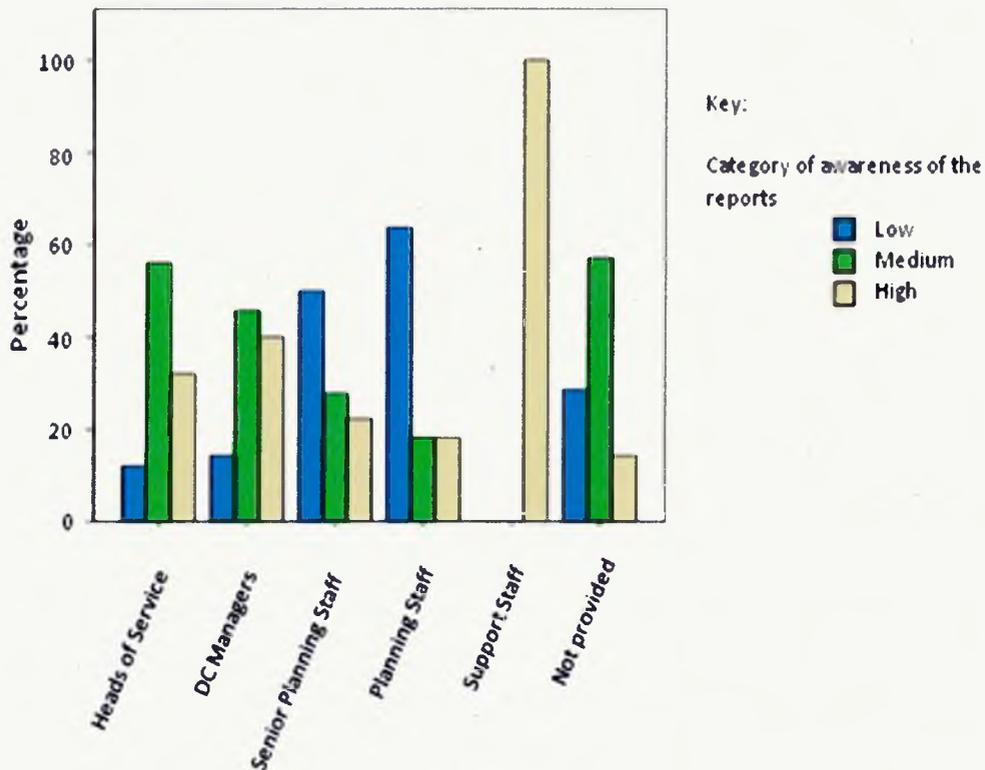


Figure 5.1, above, does appear to illustrate differences in the awareness of the recommendations between different types of staff. These differences include a heightened knowledge of the recommendations from the staff involved in support roles (although this is heavily tempered by the low population ($n = 3$) in this field) while there is a lower awareness from the professional planning staff. Meanwhile, both the Heads of Service and the Development Control Managers share a similar spread with the low awareness falling in the minority.

It is appropriate to test these factors to establish if there is a significance relationship in existence between these variables. The Chi squared test, a non-parametric test, can be used for this purpose as it analyses the likelihood of the results occurring by chance alone.

The hypotheses in this instance are as follows:

H0: There is no relationship between the role of the responder and their awareness of the recommendations.

H1: There is a relationship between the employment of the role of the responder

and their awareness of the recommendations.

Table 5.3, below, represents the cross tabulation undertaken to examine these hypotheses. Note here that to allow appropriate analysis of the data, the senior planning staff, planning staff and support staff have been combined into one category.

Table 5.3 Cross Tabulation of Staffing Level and Awareness of Change

			Grouped score of awareness of KP and NAO			Total
			Low	Medium	High	
Staffing Level	Head of Service	Count	3	14	8	25
		Expected Count	6.5	10.1	8.4	25.0
	DC Management	Count	5	16	14	35
		Expected Count	9.1	14.1	11.8	35.0
	Planning and Admin Staff	Count	16	7	9	32
		Expected Count	8.3	12.9	10.8	32.0
Total		Count	24	37	31	92
		Expected Count	24.0	37.0	31.0	92.0

Chi-Square Tests

	Value	df	Asymp. Sig. (2-sided)
Pearson Chi-Square	16.002 ^a	4	.003
Likelihood Ratio	15.705	4	.003
Linear-by-Linear Association	4.647	1	.031
N of Valid Cases	92		

In this cross tabulation (Table 5.3) no cells have an expected value of less than 5. The test for independence gives a significance level of 0.03. Taking a significance level of 0.05 (ie a 5% chance of rejecting a true null hypothesis) we can confidently reject the null hypothesis ($0.03 < 0.05$) and conclude that there is a statistically significant relationship between the level at which the respondent is employed and their awareness of the recommendations put forward in the review. This predominantly relates to those planning staff having less knowledge of the changes than those at a management level as can be observed in the 3rd row of Table 5.3.

Similarly it is appropriate to explore any possible relationship between the level of staff and the perceived acceptance of change within their authority. In this

case, $P > 0.05$ (0.165) and it is not therefore possible to reject a null hypothesis and so it should be accepted that there is not a statistically significant relationship between the job role of the respondent and the authority's acceptance of change.

5.7 Relationship Testing

Having established the factors which attribute to the reliability, generalisability and validity of the data, and provided an overview of the information obtained, this work now moves to analyse the data for relationships between the variables.

5.7.1 Modes of Analysis

There are some key elements of the data which influence the tests which are appropriate for analysis: predominantly, the types of the data and their distribution. In the case of this work, only one form of scale data, Major Performance Change, follows a normal distribution and therefore a number of parametric forms of statistical analysis are not appropriate to be used.

This work will, as a result, predominantly use the Chi Squared test, with Cramers V to establish relationship strength, and Spearman's Rank correlation coefficient to analyse for relationships between the variables. While the scale data is maintained in its original form as much as possible, it is necessary at times to recode and group it, in order to analyse it effectively. These groupings of scale data were predominantly based on the proportions of the population lying within the groups and were, due to the relatively small sample size, frequently involving three groups in order to facilitate the use of Chi Squared analysis.

The tests will be examined through a p value of 0.05: the likelihood of the relationships occurring through chance alone is 0.5%. The tests to be applied, and the relationships to be tested, are set out in Table 5.4 below. The pink squares represent where a Chi Squared test is appropriate and the blue where the Spearman's Rank correlation coefficient will be used. The light grey cells indicate where no test was conducted as the variables would need to be so condensed as to make the results insensible.

Table 5.4 Variables and appropriate tests

Key		Dependent Variables			
		Performance Change	Acceptance of Change	Current Practice	Awareness of Recommendations
P	Test of full population				
	Chi Squared Test				
	Spearman's Rank Test				
	No test conducted				
	Same variables				
Independent Variables	Authority Type	P			
	Authority Region	P			
	Authority Populations	P			
	Authority Average Deprivation Index	P			
	Authority CPA Score	P			
	Authority Cost of Planning per Head	P			
	Authority Performance Change				
	Current Practice				
	Acceptance of Change				
	Awareness of Recommendations				

5.7.1.1 Authority Type

Section 2.2.7.1 of the literature review revealed debate surrounding the impact that the structure of an authority, and the extent of its responsibilities, has on the end delivery of services. This work will now test to see if there is a relationship between the authority structure and its Development Control services.

The type of authority is to be tested against the performance change, the awareness of change, the current practice and the acceptance of change. Throughout this analysis, it was necessary to exclude National Parks as they represent a small percentage of authorities and created issues of the viability of

the test. In addition, to avoid the creation of cells with a value of less than 5, various types of authorities have been merged.

Table 5.5 Cross Tabulation of Authority Type and Major Performance Change

			3 groups performance change			Total
			<=30	30-60	>=60	
Authority Type	Borough	Count	92	83	26	201
		Expected Count	87.2	88.4	25.4	201.0
	Unitary	Count	23	26	6	55
		Expected Count	23.9	24.2	6.9	55.0
	London Borough	Count	8	16	9	33
		Expected Count	14.3	14.5	4.2	33.0
	Metropolitan Borough	Count	18	18	0	36
		Expected Count	15.6	15.8	4.5	36.0
Total		Count	141	143	41	325
		Expected Count	141.0	143.0	41.0	325.0

Chi-Square Tests

	Value	df	Asymp. Sig. (2-sided)
Pearson Chi-Square	14.664 ^a	6	.023
N of Valid Cases	325		

a. 2 cells (16.7%) have expected count less than 5. The minimum expected count is 4.16.

	Value
Cramer's V	.150
N of Valid Cases	325

This analysis of Table 5.5 indicates that while there is a statistically significant relationship ($0.023 < 0.5$) between the type of authority and their change in performance on major planning applications. The value of Cramer's V of 0.15 indicates that the strength of this relationship is not strong. The most distinct figure within the analysis is that London Boroughs have less representation in the lowest level of change and greater than expected in the higher levels of change.

Similar tests were then conducted to assess the further relationships which could exist between the type of authority and the other identified variables. Details of this analysis are found within Appendix 4c. The categories included in the analysis of Authority Type and the acceptance of change had to be

substantially reduced in order to produce results within the accepted assumptions of the test. The results of this analysis are summarised below.

A Cramer's V value of 0.213 illustrates a strong relationship between authority types and major performance change, while the Chi Squared value of 0.131 indicates that any result is not statistically significant and it is not possible to conclude that there is a statistically significant relationship between the two variables.

In testing for a relationship between the Authority Type and Current Practice, there is, once again, no statistically significant relationship revealed between the variables. The analysis produced a Cramer's V value of 0.153 and a chi squared significance level of 0.317.

However, further analysis between the Authority Type and the Awareness of Recommendations did reveal that there is a statistically significant, albeit weak, relationship between the authority type and the awareness of Killian Pretty, with those two tier boroughs showing a lower awareness than the single tier respondents of the changes.

In this case it is also necessary, as previously demonstrated, to consider the further variable of the staffing level of the respondent of the questionnaire. In this case, this is achieved through the addition of a further level to the Chi Squared analysis. However, the impact of this is that the number of cells with an expected value of less than 5 is greater than 20% and therefore the data must be treated with caution. The breakdown of this analysis follows in Table 5.6 below.

Table 5.6 Authority Type and Awareness of Recommendations (including staffing level)

Staffing Level				Authority Type		Total
				Borough	Single Tier	
Head of Service	KP and NAO Awareness	Low	Count	8	2	10
			Expected Count	7.6	2.4	10.0
	High	Count	11	4	15	
		Expected Count	11.4	3.6	15.0	
	Total	Count	19	6	25	
		Expected Count	19.0	6.0	25.0	
DC Management	KP and NAO Awareness	Low	Count	8	2	10
			Expected Count	5.9	4.1	10.0
	High	Count	12	12	24	
		Expected Count	14.1	9.9	24.0	
	Total	Count	20	14	34	
		Expected Count	20.0	14.0	34.0	
Planning and Admin Staff	KP and NAO Awareness	Low	Count	14	5	19
			Expected Count	11.1	7.9	19.0
	High	Count	3	7	10	
		Expected Count	5.9	4.1	10.0	
	Total	Count	17	12	29	

Cramer's V and Chi Squared Values

Staffing Level		Value	Approx. Sig.
Head of Service	Cramer's V	.076	.702
	Number of Valid Cases	25	
DC Management	Cramer's V	.278	.105
	Number of Valid Cases	34	
Planning and Admin Staff	Cramer's V	.422	.023
	Number of Valid Cases	29	

These results indicate that no relationships exist between the authority type and awareness of change at both levels of management included in the survey responses. However, in the responses obtained from planning and administrative staff, there appears to be a relatively strong relationship, Cramer's V = 0.422, which is significant, Chi Squared has a value of 0.023. between the authority type and the awareness of change. This holds the same relationship structure as established in the initial analysis of the entire sample and it could therefore be feasible that this initial weak relationship is occurring as a result of the staffing level of the questionnaire respondents.

This analysis illustrates that although there are some statistically significant relationships between the type of authority and other variables, these relationships are limited and are not consistent across the variables. This relates to the literature and debate which already existed regarding the benefits of different local government structures as briefly explored in section 2.2.7.1.

5.7.1.2 Authority Region

Having established, within section 5.7.1.1, limited statistically significant relationships between the Authority Type and other considered variables, this study now moves to look at a different characteristic of the authorities: their location in order to assess if this impacts on any of the dependent variables. As with Authority Type, this analysis commences with an examination of this variable in relation to Performance Change.

A cross tabulation of the Region against Performance Change appears to demonstrate some interesting relationships. The full tabulation can be found in Appendix 4c. Firstly, those authorities in Yorkshire and the North have a greater than expected level of respondents in the lowest of the categories of change. Conversely, the London authorities have a greater proportion than would be expected in the highest category of performance change. However, there are few obvious relationships across the rest of the data and this is statistically illustrated by the low value of Cramer's V at 0.158. These small relationships are significant with a Chi Squared value of 0.013.

The cause of this should be considered, it could be for example, as a result of a lower starting base in these regions, or though the different development pressures which exist in these areas. However, given the large diversity of regional characteristics, and the difficulties in quantitatively establish causes and patterns, this small significant relationship is one which could be investigated further.

A Chi Squared analysis of the regional variation in relation to Change Acceptance illustrates that there is no strong, statistically significant relationship between these factors, with a significance level of 0.212 and a Cramer's V value of 0.15. Similarly an analysis of region and current practice produced a chi squared value of 0.339 and Cramer's V of 0.152.

Tests relating to Region and the Awareness of Change also revealed no statistically significant relationship between these variables, however, as with the Authority Type, it is necessary to examine these results with reference to the level of staff giving the survey response. This analysis can be found in Table 5.7 below.

Table 5.7 Authority Region and Awareness of Change (with staffing level)

Staffing Level				KP and NAO 2 groups		Total
				Low	High	
Head of Service	Region North	Count	3	1	4	
		Expected Count	1.6	2.4	4.0	
	Midlands and South West	Count	3	9	12	
		Expected Count	4.8	7.2	12.0	
	London and the South East	Count	4	5	9	
		Expected Count	3.6	5.4	9.0	
	Total	Count	10	15	25	
		Expected Count	10.0	15.0	25.0	
DC Management	Region North	Count	2	9	11	
		Expected Count	3.2	7.8	11.0	
	Midlands and South West	Count	5	5	10	
		Expected Count	2.9	7.1	10.0	
	London and the South East	Count	3	10	13	
		Expected Count	3.8	9.2	13.0	
	Total	Count	10	24	34	
		Expected Count	10.0	24.0	34.0	
Planning and Admin Staff	Region North	Count	4	4	8	
		Expected Count	5.2	2.8	8.0	
	Midlands and South West	Count	8	4	12	
		Expected Count	7.9	4.1	12.0	
	London and the South East	Count	7	2	9	
		Expected Count	5.9	3.1	9.0	
	Total	Count	19	10	29	
		Expected Count	19.0	10.0	29.0	

While the expected values of a number of cells excludes full reliance on the results of the Chi Squared test, this table clearly shows that there is very little variance between the expected values and those obtained from the respondents. As such, it can be confirmed that the lack of relationship between the region and the awareness of change is not influenced by the level of staff providing the information, and it can be stated with reasonable certainty that no statistically significant relationship exists between these variables.

5.7.1.3 Population

This is a further physical characteristic of a planning authority with the potential to impact the dependent values. This analysis will reveal if the size of the authority will improve performance through economies of scale or hinders it, for example, through the restriction of communication.

As with the Authority Type and Region, the analysis begins through examining the potential relationships between the variable and performance change. These two variables are both scale variables although they do not both follow a normal distribution. Therefore an appropriate test is that of Spearman's Rank correlation coefficient. The following table illustrates this test.

Table 5.8 Spearman's Rank Correlation Coefficient of Population and Performance Change

		Population at 2001 Census	Performance_Change
Population at 2001 Census	Correlation Coefficient	1.000	.056
	Sig. (2-tailed)	.	.314
	N	326	325
Performance_Change	Correlation Coefficient	.056	1.000
	Sig. (2-tailed)	.314	.
	N	325	325

The output of 0.314 in Table 5.8 is not a statistically significant output for the purposes of this research and therefore it cannot be demonstrated that there is a statistically significant relationship between the size of the authority and the change in planning performance. This analysis continued to test for a relationship between the Population and Acceptance of Change.

This analysis indicates that there is very little variation between the expected values of the cells and those produced from the survey results. Those smaller authorities do appear to have a greater number in the lowest group of acceptance but not to a large extent. There does not appear to be a relationship between the population of authorities and their acceptance of change. While the chi squared result's viability is weakened by the presence of cells with an expected value of below 5, it is not considered appropriate to run a

further test with a reduction in the degrees of freedom as the relationship, if existing, is a weak one.

Similarly, a test between Population and Current Practice (see Appendix 4c) does not demonstrate a strong relationship between the variables (Cramer's V = 0.153) which is statistically significant (Chi Squared = 0.382).

An analysis of the authority size and the awareness of the Killian Pretty and 'Planning for Homes' recommendations illustrates (Appendix 4c) that there appears to be a slight relationship between these factors: those authorities with the lowest population appear to have less awareness than those staff in the larger authorities. However, this relationship is not shown to be strong by the Cramer's V analysis, with a value of 0.241 although the Chi Squared value means that it is significant to a degree: if, for example, adjusting the accepted level of significance of 0.1. A further analysis of the data in relation to staffing levels indicates that there is not apparent significant variation between the staff, and it is therefore accepted that this factor is not having an undue influence on this slight relationship.

5.7.1.4 Deprivation

The analysis now moves to the Deprivation Index to see if there is any further possible influence on the performance of planning authorities, testing for the same series of relationships.

A Chi Squared analysis (Appendix 4c) illustrates that, once again, there is no significant relationship between the two variables: the average deprivation score of an authority and the change in performance.

However, an analysis of deprivation in relation to the acceptance of change would appear to indicate that acceptance of change is greater at the extremities of the deprivation index with those authorities within the lowest category of Deprivation score achieving a relatively higher rate of acceptance of change as do those with the higher Deprivation score (increased levels of Deprivation).

The statistical figures illustrate that the relationship is significant, chi squared = 0.04, however, the Cramer's V suggests that there is not a strong relationship in

existence. This may be as the relationship appears to lie towards the extremities rather than across the whole sample, although statements of a relationship existing must be made with caution,

Meanwhile, a cross tabulation and the subsequent chi squared analysis of Deprivation and Current Practice (Appendix 4c) within authorities reveal no significant relationships between the variable: Chi Squared= 0.185 and Cramer's V = 0.251. The analysis therefore moves to examine possible relationships between Deprivation and Awareness and the cross tabulation for this is shown below in Table 5.9.

Table 5.9 Cross tabulation of Deprivation and Awareness

			KP and NAO 2 groups		Total
			Low	High	
Grouped Deprivation <=12	Count	14	15	29	
	Expected Count	13.4	15.6	29.0	
12.01 - 24	Count	23	17	40	
	Expected Count	18.5	21.5	40.0	
>24	Count	7	19	26	
	Expected Count	12.0	14.0	26.0	
Total	Count	44	51	95	
	Expected Count	44.0	51.0	95.0	

Chi Squared and Cramer's V

	Value	Approx. Sig.
Cramer's V	.251	.050
N of Valid Cases	95	

Upon examination of the cross tabulation of Table 5.9, it can be seen that those authorities that lie in the centre of the deprivation scale showed less knowledge of the proposals while those with a high level of deprivation have a high knowledge of the proposals.

A borderline statistically significant relationship between these two variables

(Chi Squared = 0.05) exists between these two variables. However, despite being apparent on examination of the table, the Cramer's V value indicates that this is not a strong relationship.

Once again, this dependent variable must be considered in the light of the knowledge that it is also influenced by the person responsible for completing the survey. This analysis reveals that there appears to be a relatively high number of Development Control Managers (around 40% of the total group) located within this middle section. Therefore, the previously identified relationship must be treated with caution.

5.7.1.5 Authority CPA Score

A cross tabulation and Chi Squared analysis of CPA Score and Performance Change (Appendix 4c) reveals that there is no statistically significant relationship between the CPA score of the authority and their record of major performance change. The analysis gave a Cramer's V value of 0.078 and an extremely high Chi Squared value of 0.708.

This result could be somewhat surprising as the performance on major planning applications contributed to the CPA score of the authority although it can be seen as an indicator that the performance of the planning service is not dependent on the performance of the authority as a whole.

Meanwhile the cross tabulation and Chi Squared analysis of the CPA score and Acceptance of Change also showed no strong statistically significant relationship between them with a Cramer's V value of 0.142 and a chi squared value of 0.505.

Similarly the chi squared analysis of with the dependent variable of current practice also showed no strong statistically significant relationship between them with a Cramer's V value of 0.161 and a chi squared value of 0.330.

Finally, a cross tabulation and Chi Squared analysis of Awareness of Change also showed no strong statistically significant relationship between them with a Cramer's V value of 0.199 and a Chi Squared value of 0.137. A visual analysis of the cross tabulation revealed no clear patterns in the data. Further analysis

in relation to the level of the survey completer also reveals no clear relationships.

5.7.1.6 Cost of Planning

Having examined these physical and social characteristics of the authorities and found limited strong statistically significant relationships. This work therefore moves to look to see if the amount spent on planning influences the dependent variables,

A test of Spearman's Rank correlation coefficient reveals that there is not a statistically significant relationship between the measures of cost of planning per head and the extent of performance change with a correlation coefficient of 0.105.

This may be an indicator that the last data available for cost dated from 2005, and it not therefore considered appropriate to use this indicator for further analysis, as it will be questionable as to what it is demonstrating.

5.7.1.7 Major Performance Change

This section analyses the possible relationships between performance change and the acceptance of change and current practice. These are considered appropriate variables to analyse as an improved performance resulted in additional funds being allocated to authorities. The use of this variable as an independent variable will provide a tool to see if this previous change has an influence on the practice in accordance with the recommendations and how open to change authorities are.

A cross tabulation and chi squared analysis Acceptance of Change and Major Performance Change showed no strong statistically significant relationship between them with a Cramer's V value of 0.180 and a Chi Squared value of 0.256.

A cross tabulation and Chi Squared analysis of Major Performance Change and Current Practice (see table 5.10) also showed no strong statistically significant relationship between them with a Cramer's V value of 0.159 and a Chi Squared value of 0.323.

5.7.1.8 Current Practice and Acceptance of Change

Table 5.10 Cross Tabulation of Performance Change and Current Practice

			Grouped Acceptance of Change			Total
			Lowest	Medium	Highest	
Practice Grouped	<=85	Count	11	5	7	23
		Expected Count	6.4	7.4	9.2	23.0
	86 - 95	Count	8	15	17	40
		Expected Count	11.1	12.9	16.0	40.0
	>95	Count	6	9	12	27
		Expected Count	7.5	8.7	10.8	27.0
Total		Count	25	29	36	90
		Expected Count	25.0	29.0	36.0	90.0

From analysis of this cross tabulation there appears to be one observation which is worthy of note. Those authorities who have shown themselves to be operating in the least accordance with the recommendations put forward are also the authorities who are shown to be less amenable other changes proposed in the reports. However, it may be difficult to defend which is the independent variable in this case.

The Cramer's V Value and the Chi Squared for this cast doubt upon the strength and the significance of this result with values of 0.188 and 0.174 respectively.

5.7.1.9 Acceptance of Change

As with the previous variable, a cross tabulation and Chi Squared analysis of Acceptance of Change and the level of Performance Change showed no strong statistically significant relationship between them with a Cramer's V value of 0.092 and a value of 0.702.

Meanwhile, a cross tabulation of the Acceptance of Change and the Awareness of Recommendations is illustrated in Table 5.11 below.

Table 5.11 Cross Tabulation of recommendation awareness and acceptance of

change

			KP and NAO 2 groups		Total
			Low	High	
Grouped Acceptance of Change	Lowest	Count	14	10	24
		Expected Count	10.9	13.1	24.0
	Medium	Count	14	14	28
		Expected Count	12.7	15.3	28.0
	Highest	Count	12	24	36
		Expected Count	16.4	19.6	36.0
Total	Count	40	48	88	
	Expected Count	40.0	48.0	88.0	

This cross tabulation appears to indicate a relationship between the two variables: those authorities with the lowest acceptance of change also appear to have a low awareness of the recommendations investigated in the survey. Conversely those with a higher acceptance have a greater awareness. However, statistical analysis indicates that this relationship is not strong (Cramer's V = 0.212) and cannot be considered statistically significant (Chi Squared = 0.127).

5.7.1.10 *Awareness of Recommendations and Current Practices*

Finally, a cross tabulation illustrates that there does appear to be a slight relationship between the awareness of the recommendations and the current practice in relation to other recommendations. Those who are unaware of the current recommendations do not have the examples of good practice incorporated into their existing practices and the converse also applies. However, the strength of this relationship is not borne out by the Cramer's V analysis (0.24) and the relationship is not statistically significant (Chi Squared = 0.065, although this would be statistically significant if a confidence interval of 0.1 were to be utilised).

5.7.2 Discussion

Table 5.12, below, replicates Table 5.4, providing an overview of the

relationships identified and statistically examined between the variables.

Table 5.12 Identified relationships

Key		Dependent Variables			
		Performance Change	Acceptance of Change	Current Practice	Awareness of Recommendations
XX	No strong or statistically significant relationship				
	Not tested/ repeated element				
Independent Variables	Authority Type	Not strong relationship but statistically significant	Strong relationship but not statistically significant	xx	Weak, statistically significant relationship (with potential influence from staffing level)
	Authority Region	Not strong relationship but statistically significant	xx	xx	xx
	Authority Populations	xx	xx	xx	Visible relationship but neither statistically strong or significant
	Authority Average Deprivation Index	xx	Visible, statistically significant relationship but not statistically strong	xx	Visible, statistically significant relationship but not statistically strong (caution due to staffing level influence)
	Authority CPA Score	xx	xx	xx	xx
	Authority Cost of Planning per Head	xx			
	Authority Performance Change		xx	xx	
	Current Practice		Visible relationship but not statistically strong or significant		
	Acceptance of Change	xx			
	Awareness of Recommendations		xx	Visible relationship but not statistically strong or significant	

It can be seen that there is, within the data obtained in this research, few statistically significant relationships between the identifying independent

variables of the authorities and their independent variables. While in some cases this may seem surprising, such as the lack of relationship between the performance of the full authority and that of the planning service, it also serves to illustrate the separate issues which occur with the planning process. It has, however, been possible to identify patterns in the data which are worthy of mention. In addition, the lack of relationships is an important observation in itself.

5.7.2.1 Authority Type

There were, as with other variables, limited relationships between the Authority Type and the dependent variables. This includes the limited relationships which exist between single and two tier authorities and the other variables under consideration. As examined in the literature review, the relative strengths and weaknesses of the different structures of local government remain topical, and this analysis shows that, in this instance, no type is shown to be more effective than another.

A relationship, albeit not a statistically significant one, was identified between London Boroughs and the level of performance change. London Boroughs have the greatest level of performance change in relation to other types of authority. However, this could be due to a number of factors and it remains difficult to establish which one, or ones, are the fundamental reason for the differences. This includes the base, starting figure of performance; the development pressure on authorities and increased political pressure to meet the targets to name just a few. As such, it would be difficult to prove causality and would be inappropriate to undertake the case study selection on this basis.

5.7.2.2 Authority Region

The cross tabulations and statistical tests in relation to the region in which an authority lies showed very few relationships. The headline figure for this area of analysis is the observation that those authorities in London and the South East (London, the South East and the East) appeared to achieve a greater level of performance change than would neutrally be expected while those in the North (North East, North West and Yorkshire and Humber) had achieved a lesser level. Again, the reasons for this discrepancy are not clear within the data as

the practices, awareness and acceptance of change of the authorities hold no relationships with the regions in which they are situated.

5.7.2.3 Authority Population

When conducting this analysis, a small pattern which could be noted was that the smaller authorities appeared to be less aware of, and less accepting of, the recommendations put forward. However, in neither case was this relationship statistically significant. The relationship relating to the awareness of the recommendations would not appear to be impacted on by the level of the member of staff completing the survey.

5.7.2.4 Index of Deprivation

As discussed in the literature, it has been put forward that the deprivation of an authority can impact on its performance in the CPA ratings. As such this work set out to establish if relationships existed between the deprivation of the area and the dependent variables.

While, once more, no statistically significant relationships were found to exist, an interesting pattern emerged in relation to the Acceptance of Change, with those authorities with the lowest and highest deprivation both appearing to have an increased acceptance of change than would normally be anticipated. This may be for a variety of reasons, and these could feasibly occur for different reasons between the groups. For example, the deprived authorities may be looking for advice and support in the delivery of key services whereas those authorities in less affluent areas may be better equipped to observe, and therefore be more accepting of, changes in their environment.

Concurrently, the awareness of change appears, within the survey respondents, to be higher in the less deprived areas and lower in the more deprived areas. This relationship, like others in the study, is not statistically significant.

5.7.2.5 Authority CPA Score

Despite the performance in Development Control contributing to the overall CPA score of the authority, there were no significant relations identified in relation to the overall score of the authority and the variables under discussion within this work.

5.7.2.6 Major Performance Change

The analysis of the variables in relation to performance change as an independent variable yielded no relationships of significance. The use of this as an independent variable was considered necessary as the performance of authorities determined the amount of extra funding that they received in the form of the planning delivery grant. However, as can be seen, this factor does not appear to impact on the practice of the authorities and the awareness of the recommendations for change.

5.7.2.7 Current Practice, Acceptance of Change and Awareness of Recommendations

While not significant, there appears within the cross tabulation to be a relationship between the current practice of the authorities and their acceptance of the recommendations put forward. This may together be an indication that the authorities are forward thinking, although it had already been established that this does not necessarily lead to an improvement in performance.

Similarly there is a relationship between the practice of the authority of their awareness of the recommendations of the reviews, and their acceptance of the changes put forward. It would, as before, be difficult to prove the causal relationship, and the analysis shows this relationship to be weak and statistically insignificant.

5.8 Case Study Selection

The preceding analysis revealed few significant relationships between quantifiable variables and the performance of authorities. Such relationships which did emerge were of such a reduced level, such as the 11 regions reduced to 2, as to make the use of these indicators of questionable value.

It has been shown that there is no strong, substantial relationship between the characteristics of Local Authorities and their previous performance change, their awareness of recommendations for change and their acceptance of change, the characteristics which, as previously discussed, have been chosen as indicators. Therefore, it seems appropriate to base the selection of further case studies on the Dependent Variables themselves.

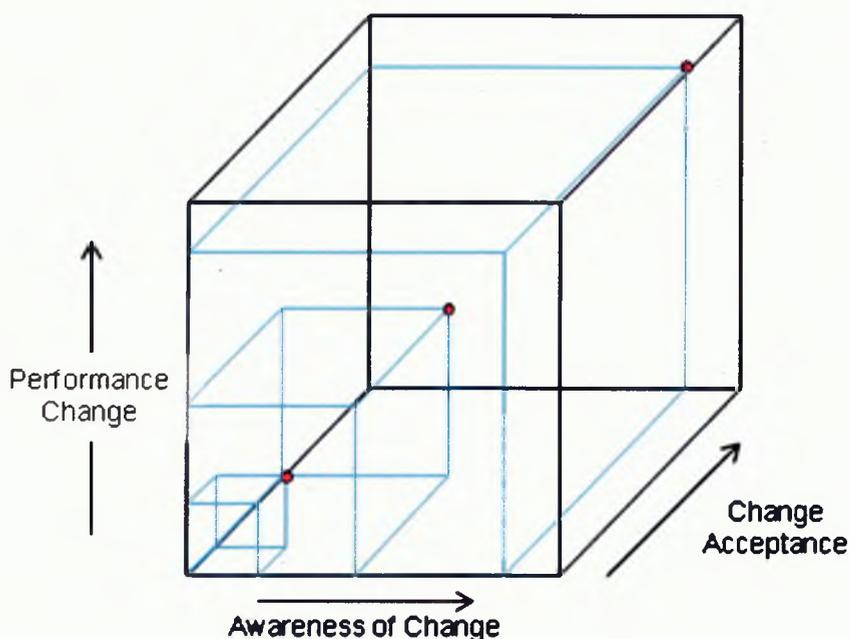
If the data were divided into binomial data with high and low performing authorities on these three axes, there would be eight possible permutations of achievement and knowledge, as seen in Table 5.13, below.

Table 5.13 Variable Permutations

Previous Performance Change	Awareness of Change	Acceptance of Change
Low	Low	Low
Low	High	Low
Low	Low	High
Low	High	High
High	Low	Low
High	High	Low
High	Low	High
High	High	High

It would not be feasible to investigate case studies from each of these within this research study and, as such it would seem appropriate to make case study selections based on the highest and lowest performing authorities on all 3 variables. Figure 5.2 indicates this proposed selection criteria which it would allow the high, low and intermediate performing authorities identified.

Figure 5.2 Case Study Selection Grid



In addition, an authority will be studied from the central area of the cube. This selection criteria is also reliant on the accessibility of the authorities concerned. In the case of this work, it proved easier to make contact, and arrange access with those 'higher performing' authorities than those lying lower down the scale.

5.9 Chapter Summary

This analysis has fulfilled four main purposes:

- To assess the generalisability, reliability and validity of the data and of any conclusions drawn from the data and its analysis;
- To use the data to provide an overview of the extent to which the local authorities who replied to the survey operated practices which already took account of the recommendations put forward in the reviews and their acceptance, or otherwise, of the recommendations which were not, at that time, integrated into their existing procedures;

- To analyse the data provided in order to identify any relationships which exist between the variables obtained through the questionnaire and any other identifying variables of the Local Authorities obtained through secondary data sources;
- To use these relationships to assist in the selection of case studies for the next phase of the research.

It has also identified key characteristics and patterns which may contribute to, or support, the case study analysis conducted in Chapters 6 and 7. This includes the highlighted weaknesses in the engagement of elected members throughout the process, the use of validation checklists and the involvement of external consultees in the pre-application process.

5.9.1 Reliability and Generalisability

The analysis has shown that the survey respondents broadly reflect the population as a whole in a number of characteristics. Therefore, the applicability of the findings to the wider population is enhanced. However, even with these shared features it is not possible to assume that the respondents will automatically reflect the overall population. The analysis has also tested for, and accommodated, reliability within the survey responses, establishing a basis to provide confidence in the results.

5.9.2 Local Authority Overview

The analysis of the indicators has provided an overview of the position that was present in the local authorities at the time that the survey was undertaken, clearly illustrating few relationships between the awareness, acceptance and implementation of change and the identifiable characteristics of authorities. Primarily, the overview of the authorities identified that many of the recommendations were already being complied with in a large number of the authorities which participated in the survey. However, weaknesses (in relation to compliance with the recommendations) were more prevalent amongst the involvement of elected members in the process: both before and during the

application and in the engagement of the community in the process. As such, these proposals need to be fully considered in the case study analysis.

5.9.3 Relationship Testing

The main conclusion to be drawn from the analysis of relationships was the absence of statistically significant relationships between variables. As such, the selection of case studies will not be clearly led through this analysis. These case studies will analyse authorities in a manner which is independent of structures such as their size or format, and will therefore maintain wider applicability even though relationships were not established.

5.9.4 Summary

This chapter has illustrated the results, and their applicability, of the survey research. Alongside the establishment, as far as reasonably possible, of the validity, reliability and generalisability of the data, the chapter provided an overview of the results before conducting analysis to explore and establish relationships between the data. Most notably, the chapter revealed that no statistically significant relationships existed in the areas of analysis undertaken.

Therefore, it is proposed that there are other reasons than the identifiable characteristics of the Local Authority area which contribute to their ability to sense, accept and react to changes in the external environment which may be identified through the case study process. This chapter has proposed an alternative rationale for the selection of case study authorities.

The study will continue to use the Viable Systems Model to examine the practice within the authorities in relation to key characteristics which Stafford Beer proposed were essential for the long term viability of organisations. This analysis will diagnose the practices of the case study authorities in order to establish recommendations to assist local authority Development Control services to remain effective in the future.

CHAPTER 6 CASE STUDY VIABLE SYSTEMS ANALYSIS: OPERATIONAL IDENTITY

6.1 Chapter Aims: Introduction

This chapter sets out a detailed case study analysis of Development Control practice in three local authorities. These authorities were selected from those who were willing to participate so as to provide as wide a cross section of authority characteristics as possible. These characteristics include the three parameters relating to change awareness, acceptance and implementation in addition to containing a range of physical characteristics. Following a summary of the characteristics of the case study authorities the chapter then moves to an analysis of the identity and purpose of Development Control as the System in Focus before continuing to examine the identity of the operational subsystems: Pre Application, Validation, Consultation and Conditions and Obligations. Chapter Seven will then explore the management and regulation of these systems.

6.2 Case Study Authorities

Table 6.1, below, presents a summary of the characteristics of the authorities in which the case study interviews were undertaken. It demonstrates that the authorities were selected with the required characteristics as determined in Chapter 5 (Figure 5.2).

Table 6.1 Case Study Characteristics

	CASE STUDY 1	CASE STUDY 2	CASE STUDY 3
AWARENESS	High	Medium	Low
ACCEPTANCE	High	Low/ Medium	Low
IMPLEMENTATION	High	Medium	Low/ Medium
AUTHORITY TYPE	District Council	District Council	Unitary
AUTHORITY REGION	East	East Midlands	Yorkshire and Humber
POPULATION	80,000	90,000	160,000
DEPRIVATION INDEX	Low	Medium	High
CPA SCORE	Good	Excellent	Good
OTHER CHARACTERISTICS	Urban on outskirts of London	Small urban settlements on border of National Park	Industrial towns and surrounding villages (in area of industrial decline)

Table 6.2 illustrates the participants from the authorities who were interviewed in the process.

Table 6.2 – Case Study Interviewees

	Planning Support Staff	Planning Officer/ Senior Planner	Principal Planner/ Team Leader/ DC Manager	Elected Member (Planning Committee Chair)
Case Study 1	✓	✓	✓	✓
Case Study 2	✓	✓	✓	
Case Study 3	✓	✓	✓	

6.3 Qualitative Analysis Structure

This chapter presents an analysis of the delivery of Development Control services in Local Authorities. It will achieve this through a number of key stages. Firstly, it will present an Identity Statement of each case study authority through an examination of its products, the needs it meets, time factors, environmental relationships, related organisations and economic and financial variables. It will then continue to examine the identity of the Operational sub systems as put forward in Chapter 4 following the analysis of both the Killian Pretty and National Audit Office reports: Pre Application Advice, Submission and Validation, Conditions and Obligations and Involvement,

6.4 The Identity of the Development Control process

The literature review illustrated that the issues and the processes involved in managing development are not completely clear cut. Therefore, an initial stage in this analysis is to establish the Identity Statements, and the purposes of the organisations involved, exploring, for example, the constraints on the control of development. In addition the analysis will address conflicts which appear between the authorities in the development of these statements.

6.4.1 Product of the System

This section addresses the outputs of Development Control processes in the authorities. As has been examined in the literature review, there has,

particularly in recent years, been an apparent imbalance between the need to process applications quickly and an ability to control development. Therefore, the participants in the research were asked what, in their view, was the purpose of DC and its outputs within their authority.

6.4.1.1 Case Study One

Within Case Study One, the system products which were identified by the participants fell broadly within three main categories:

- Producing good quality development;
- Determining applications in accordance with Governmental speed delivery targets;
- Educating the public and customers in the decision making process,

There was a strong consensus amongst the council interviewees as to the purpose of Development Control in the authority. The planning officer, manager and elected member all strongly stated at the outset that the production of good quality development was the key outcome of the system. While the planning officer saw this as a simple statement, it was further qualified by the elected member, who extended the boundaries of the influence of the borough, the manager summarised it as follows:

"it's still preventing things from happening which are undesirable or are considered to be undesirable, but at the same time it's about helping to make things happen which are what we want to see..."

This statement appreciates that Development Control operates in both a positive and negative manner: encouraging proposals which are considered to be of benefit to the areas but additionally seeking to refuse, or amend, those applications which are seen to cause harm to the area, and its residents.

In contrast to the three planning professional interviewees, the planning support officer held an alternative view as to the purpose of the overall Development Control system stating succinctly:

"The only thing really is targets"

The role of targets did not go unmentioned by the other participants from the

authority. The manager was at pains to express that their working practices were not wholly based around these targets, but that they were instead used as an important tool in monitoring the performance and the progress of applications. In addition, both the elected member and the manager saw the targets as helping to contribute to the production of good quality development by virtue of the income that they were able to produce. The planning officer was located between these opinions, regarding the speed at which applications needed to be determined as part of the system which must have regard taken to it, but which need not continually be the determining factor in the processing of applications.

The elected member was, during the course of his interview, keen to express the importance of education in the process, in terms of applicants, other members of the authority and members of the public, and managing the expectations and desires of those who come into contact with the system. He stated:

"it's trying to talk to people that don't want something and saying, look this is the reason why, its not that we disagree with you, but it has [to happen] for the better good... that's part of it... getting through to people why things are happening."

These interviews have produced 3 main purposes which are perceived to exist in Development Control in this case study authority. In interpreting these purposes, it is proposed that they do not stand in isolation to each other. As the Development Control manager stated:

"Now I wouldn't want you to go away with the impression that I am just driving targets because I don't think that is right actually, they are useful and they are a useful measure of how you are performing, but at the end of the day it is important that we get the right decision, what actually takes place out there on the ground is key."

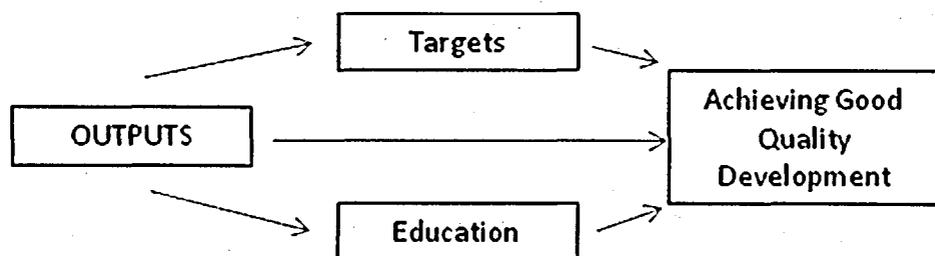
It can be considered that the targets are not necessarily simply an outcome of the system but can also be an important system input, both in terms of providing a means of monitoring how applications are progressing and in relation to the

income related to meeting the targets.

Similarly, the educational element of the purpose, as primarily identified by the elected member, could be considered as both an output and an input to the system. It may, for example, illustrate to applicants, the quality of development required to gain a quick approval, or allow objectors to understand the rationale of proposals and therefore reduce the delays caused through public reaction.

It is proposed that the key output of the system, in the eyes of the interviewees, is the production of 'Good Quality' development. Meeting targets and the education of those involved, while constituting key parts of the process, are themselves inputs to this primary aim. The output of an efficient and timely processing of one part in the process, such as the work undertaken by the planning support staff, contributes to the primary aim of the system. This results in the reconciliation of two potentially conflicting positions of the system's purpose. This proposal is illustrated in Figure 6.1 below.

Figure 6.1 The Outputs of Development Control in Case Study One



6.4.1.2 Case Study Two

Within the second case study the participants all stated a clear purpose for the Development Control: 'producing Good Quality Development'. The principal planning officer expanded this description citing the purpose as, 'to manage development' and who stated that the Development Control staff:

"manage the development that goes on, and by doing that you are protecting the environment, you are protecting the quality of your town you're protecting the good things. You are enabling work to happen but anything which is a material consideration has been looked at and the decision is made on that basis."

The planning support team leader spoke of the processes involved in this management of development. They stated:

"Development Control is a service that is there to protect the environment, ensuring that there are certain controls which are adhered to... implementing policies to ensure that certain areas are not over developed, and monitoring what is going on".

This purpose is recognised by the interviews as being achieved through the determination of planning applications and appeals. The principal planning officer stated:

"The main output is the decisions that we make, not only planning, it can be appeal decisions, we've not lost one for a good while, we're doing well."

Meanwhile the planning support officer stated the main service output to be:

"the quality of the decisions that we make."

In their discussion of system outputs, the Development Control manager identifies further aspects of good quality development, including:

- Delivery of corporate objectives;
- Sustainability;
- Development in accordance with climate change principles.

Throughout this discussion it is clear that, in this case study, secondary roles, do not play such a prominent role. None of the interviewees identified educating those engaged with the service directly as part of the system purpose or outputs, or as a process involved in achieving its role. Potential issues which can arise as a result of a lack of understanding in the process were identified, as were the benefits of practice relating to service customer education. For example, a process of work shadowing by elected members was identified by the principal planning officer as a commendable work practice as it can be used to establish:

"a good working relationship with councillors because at the end of the

day a lot of decisions will be made by them."

They continued to discuss the difficulties which can arise through a lack of understanding between other contributors to the service and the general public, citing an example of how the bulk submission of objections can cause problems with the processing of applications while the salient points have already been made:

"people think that they are getting involved but if I've heard the argument once, I don't need hundreds of letters saying the same thing... it just gets in the way... it'd be better if I could hear the objection and be left to make a decision of recommendation."

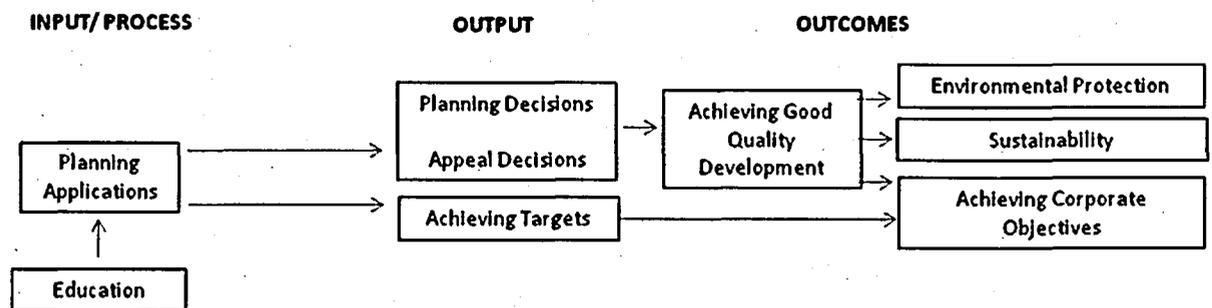
It can be seen that, while the education and engagement of service contributors and users of the service was not stated directly by the interviewees, it does clearly perform a function in the service's delivery, albeit not a direct 'aim' of the interviewees.

Limited mention was made by the participants as to the importance of meeting performance targets. The importance of targets was not raised by either the principal planning officer or the planning support officer. The Development Control Manager raised the subject when discussing the strategic aims of the service. He stated:

"There is pressure from senior management to deal quickly with planning applications, not just to produce the quality of development. We currently achieve about 85% on minor applications and around 70% on majors,"

The meeting of performance targets cannot be disregarded as a service output as it is an output, albeit one which is not identified directly by those primarily involved in the system. Figure 6.2, below, illustrates these processes, and the outputs of the system.

Figure 6.2: The Outputs of Development Control in Case Study Two



6.4.1.3 Case Study Three

Within Case Study Three, a large number of different purposes are identified by those working within Development Control. These include:

- Producing high quality development;
- Protection of the environment;
- Ensuring set standards (preventing inappropriate development);
- Getting the 'right development in the right places';
- Getting 'good development from applications rather than nothing at all';
- Dealing with planning applications, pre application advice and determination and appeals;
- Educating and advising all customers.

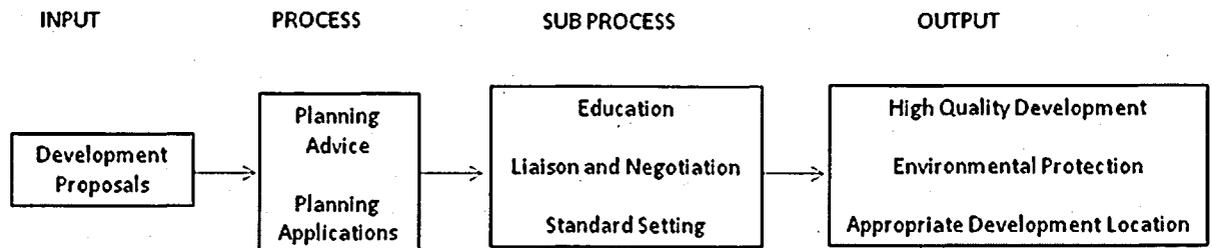
These bullet points can be reduced into two of the three themes, education and the production of good quality development, present within Case Study One. It could be considered from these that the aim of the system is to:

"produce high quality development while protecting the environment by getting the right development in the right place."

This is achieved, in this case, through dealing with, and educating, the developers and other service users, in order to improve the quality of applications and to achieve set standards. In addition to these themes, the interviewees also indicated that environmental protection was a key purpose of their work. The purposes put forward by the case study participants are summarised in Figure 6.3 below.

Figure 6.3 The Products of Development Control as Identified by Case Study

Three participants



Within this case study the participants did not initially identify the meeting of targets as an output of the system although in later discussions, the principal planning officer states:

"meeting the targets is the thing, they are quantifiable... we are target driven here still."

They continued:

"our flexibility depends on the type of scheme, if it is a scheme which is going to create jobs and wealth, then there is more flexibility. If it's meeting a council priority, the job creation, then you have the leaning power".

It would appear that, following the principle that 'the purpose of a system is what it does', those interviewed from this authority are not truly representing the purpose of Development Control in this case. The purpose within the authority is to determine applications with regard to the statutory time limits and considering the economic needs of the community. This does include the education, and improvement of applications, and the use of standards, but adds an additional key element which must be considered as part of the systemic examination: targets.

6.4.1.4 A Comparison and Discussion of System Products among the Case Studies.

This analysis has shown clear differences between the identified purposes of Development Control. Firstly, there are discrepancies between the intended purposes of the authorities and the outcomes of the processes undertaken and,

secondly, there are clearly different levels of emphasis on the outcomes expected within the authority.

The examination reveals that all three of the case study authorities clearly consider a primary purpose to be the achievement of 'Good Quality' development. Only one participant, a planning support officer in Case Study One, identified the primary purpose to be meeting the Development Control targets although, upon deeper examination, these targets play a key role in the delivery of the service in all three case studies. When the interviewees specified outputs to the system they also referred to education, clear guidance and achieving targets.

This divergence between the intention of the services and their staff, and the reality of the outputs that they must produce is an important consideration of the subsequent analysis of the systems, as the purpose of the system in all the studies is ultimately defined as to meet the performance targets and achieve good quality development.

The manner in which this is considered achievable varies between the authorities. In the first and second case studies, the role that education and liaison with participants can play in the process is viewed as a key interim output in order to reach the overall purpose. In the third case study it has been identified as a possible output of the service but is not emphasised by the staff interviewed as a key function.

The acceptance of the achievement of performance targets is advanced to its greatest extent within the first case study. Here, it is accepted, and has been modelled in Figure 6.1 that the achievement of targets contributes to the production of good quality development, through an increase in the certainty of the process amongst developers and through the external funding which target meeting could provide. Within this authority a wide range of staff pinpointed targets as a key consideration within their work.

In the second case study, there remains a discrepancy between the stated objectives of the system: to deliver good quality development, contributing towards environmental protection, sustainability and climate change mitigation,

and meeting corporate objectives, in the form of the performance targets. The DC manager viewed these targets as being set by management, and they were not stated explicitly as either a purpose or an output of the system.

In the final case study the role of these targets, while important, was considered subsidiary to the promotion of the economic strength of the area. Where a proposal concerned substantial housing or employment opportunities, priority was given to the successful approval of an application as opposed to a determination within the statutory time limit. However, time limited performance targets of economic prosperity were addressed in the original purposes of Development Control expressed by the participants.

It can be seen that the purpose of each authority remains to produce high quality development through the determination of planning applications within the statutory time limit. The emphasis on the importance of meeting the time limits varies dramatically between the authorities as do opinions on the importance of the targets. Similarly, the importance of education, through pre-application advice or other forms of communication, as an output or process varies in prominence between the authorities. Finally, it has been established that the definition of 'Good Quality' development has the potential to vary. In the second case study the creation of houses and employment was a key quality indicator whereas in the first case study design became more prominent.

It is possible to propose that within the first case study, with its record of high achievement in the targets, there is a more focused attitude on the products of the system and the majority of the team are aware of their outputs, and the contributions that they make to their key aim. However, within the second and third case studies, the outputs and outcomes do not hold such clear boundaries and their purposes are not so clearly defined by all levels of staff. This may be due to increased pressures in these authorities, such as the cited examples of economic growth and environmental protection although it may also be a result of the management and working practices of the routes.

6.4.2 Needs that the System meets

6.4.2.1 *Case Study One*

All four interviewees within the first case study considered their role to include a responsibility to protect, control and manage the limited authority area for the good of the entire population of the area. This was expressed in the words of the manager as:

"we are looking to determine applications for the greater good of the borough."

The elected member emphasised the need to consider the local issues alongside the area, regional and national issues, stating:

"the vast majority of things are a local thing, and it's trying to make them fit into the right sort of box within the national picture."

The centralisation of policies by the Government of the day was also raised, illustrating that these benefits are not intended wholly for the residents of the authority itself but it also considers those residents of neighbouring authorities, the region and the country as a whole, for example, to approve proposals for housing developments in line with regional and national guidance. However, in the primary instance the work of the authority relates to the residents within its area.

There is a need within the case study to serve the economic well being of the area. Applications are, for example, able to extend beyond the statutory time period if they are for the economic benefit of the area.

The participants also identify a need to meet the public interest in the determination of applications. They consider that this interest can be achieved through:

"taking account of council objectives, with guidance of central government".

This illustrates further levels within which the Development Control section of the authority operates.

6.4.2.2 Case Study Two

Within the second case study the needs that are met were primarily identified by the Development Control manager as meeting the criteria of Central Government while integrating the important local issues. They state:

"you need to know what to do with employment, housing, environment, what needs to be protected. You know what is important, and what are the local aspirations. I mean, here the aspirations are to protect its environment, create affordable homes and to create employment."

The Development Control manager identified needs at a more global level: those of sustainability and global warming. They identify the difficulty that these different levels of demand can cause in the decision making process: for example, balancing the need to provide affordable local housing with that of building environmentally friendly houses and that of building a local bypass. They state:

"what we are all failing on is sustainability, how do we balance large scale global strategic issues with local need on the ground?"

The planning officer interviewed also identified the applicants and the neighbours of applications as customers of the service, stating:

"we need to come to a good decision, for both the applicant and the neighbours to the development. If we see problems, we need to identify them as quickly as possible."

6.4.2.3 Case Study Three

The interviewees identified a range of customers of the service including consultees, elected members and parish councillors. These exist in addition to the applicants and developers who put forward development proposals. These customers are representatives of the public interest, on both a local and global level, in a technical and representative capacity.

6.4.2.4 A Comparison and Discussion of System Needs amongst the Case Studies.

Within this part of the analysis, the three case studies identify key needs which

are consistent throughout, operating at the global, national and local level. Certain elements, such as meeting the needs of neighbouring areas, were not identified by participants from all authorities, but they are likely to occur in each case. Importantly, the authorities all identify the importance of both national objectives and local issues. The emphasis placed on these issues varies between the authorities, most conspicuously relating to the economic prosperity and need of the areas. The need to create affordable housing and employment has greater emphasis in the second and third case studies although environmental protection still remains a key consideration in these boroughs. This difference is most keenly demonstrated by considering the different elements of the first and third case study authorities. In the first case study the pressure is from developers to gain consent for their proposals, whereas, in the third case study there is a pressure for the authority to quickly approve those proposals, such as business or residential works, which could improve the economic prosperity of the area.

6.4.3 Timescales

In this discussion, a dominant timescale emerges, that of the National Indicator targets. It is clear that the production of good quality development is not solely related to the speed at which applications are determined. Therefore, it is difficult to pinpoint a precise timescale in which the system operates. It is appreciated by the interviewees that it is not necessary, or possible, to define time boundaries to development: the Development Control process is a continually evolving and developing area, and the process is continually adjusting and learning from its past experiences. The system of Development Control is, in itself a long term policy for maintaining a balance of development for sustainable growth.

The emphasis on the timescales involved in determining planning applications varies between the case study authorities. In Case Study One, all members of staff interviewed identified the statutory time limits as being an important factor in their working practices. The delivery of planning decisions within these timescales has been identified as part of the process of achieving development of high quality.

In the third case study, while the interviewees did not identify time pressures within a discussion of the purpose of their Development Control service, they were discussed in relation to the monitoring of the service. The principal planning officer and the planning officer both stated that it is good to meet the targets but that the outcome of the development proposal is more important.

The case study participants in this authority also identified that it is important to deal with pre-application advice in a timely manner, even though it is not monitored in the same manner. This was to help ensure that applicants did not put forward development schemes with resolvable issues in the form of a planning application. The principal planning officer stated:

"Pre application advice is important and we need to deal with it quickly. It can resolve issues before applications, but if we don't respond quickly people may submit a poor quality application anyway."

Statutory performance targets were considered least important within the second case study. The main emphasis on the targeted timescales came from the Development Control manager, rather than the planning staff. He stated:

"this whole council is performance obsessed, so the time taken over applications by us is key. The directors need to justify payment, and one way can be through reaching achievement in the higher quartiles".

Meanwhile, the principal planning officer, demonstrated the views of the planning staff when they say:

"timeliness is important but not as important as the quality of the decision".

It can be seen that within this authority, the planning staff, and the planning manager appreciate that the timescale targets do need to be accounted for when carrying out their work, although they consider that other factors are more important.

6.4.3.1 Comparison and Discussion of Timescales

It has been shown that the main time constraint identified by the case study

authorities was the speed at which planning applications were determined. The three case study authorities place different emphasis on these targets. The first case study, with its record of high achievement in this area, had a very high emphasis on these targets, whereas the two lower performing authorities do not focus on these to the same extent.

6.4.4 Relationship with external organisations.

Case studies one and two both represent a single tier of a two tier system, and are clearly reliant on services provided by the county level of Government, including advice on highways and education. However, the Development Control service is also reliant on advice from within its council, such as Environmental Health and Legal services. In the first case study these relationships were felt to be strong with a number of departments. The Development Control manager considered that:

"as far as individuals are concerned they appreciate the different angle and different way of doing things and what they contribute."

Meanwhile, in the second case study these relationships did not appear to be so strong, with the principal planning officer observing:

"I think that we could do with better support from other departments, like legal, I think it would help if we had better internal relationships."

In Case Study One, the interviews revealed a clear, proactive relationship with other external agencies, such as the Planning Inspectorate, in promoting local ideas and policies and seeking to gain external support. This is demonstrated through the reaction of the authority to adverse appeal decisions. The Development Control manager stated:

"we've actually written a complaint to the inspectorate and are in the process of setting up a meeting with the assistant director to come down and talk things over."

While the internal relationships within the second case study would appear to have difficulties, it would seem that external relationships, such as with the Highway Authority are more firmly established. The principal planner

acknowledged the changing relationships with several external agencies as technical demands of applications become greater:

"We work closely with external ones [agencies] and the issues change, applications are accompanied by surveys and we value the technical input in the process".

Case Study Three is a Unitary Authority and is less reliant on external council services in matters such as the highways, education and other specialist teams. These teams share a large, open plan office with the planning team, and therefore consultations can take place on both a formal and informal level although formal consultations are undertaken electronically.

The case study participants also identified the relationship of elected members on the process, and their ability to influence the processing of applications. An example of this was by requiring applications to be determined by the planning committee, rather than by officers under delegated powers.

Significantly in the planning process, there are also two key groups of external organisations involved in the process: the applicants and other members of the public who become involved in the planning application process. These people cannot be ignored when discussing the identity of the organisation as they are a key part of a system which firstly relies on applications to deliver development and which is a fundamentally democratic process.

As has been previously discussed, the education element of the system is, within the authority, considered important. This educational element can be further identified through the information provided to developers. When discussing the provision of pre-application advice, it was made clear by the authority representatives that the advice was clearly offered to developers and that they were therefore expected to take up the offer prior to the submission of planning applications.

6.4.4.1 Discussion

It can be seen that, in both two tier and unitary authorities, there are two categories of external relationships existing in the system. This includes those

who are involved in a technical manner, providing important technical advice and support, and those who become involved in the process through other means: including politicians, applicants and those concerned with development proposals. The strength of the relationship with technical advisors does not, in this limited sample, appear to be dependent on whether the relationship is internal or external, but rather it depends more fully on respect and knowledge about the working practices between the agencies.

6.4.5 Economic and Political Influences

As previous discussions have illustrated, the planning process is inherently entwined with the political and economic state of the country. These interviews were conducted prior to the general election but reference was clearly made to both political and economic influences on the system and its environment.

For example, in terms of economic influences, within the financial year 2009/2010, the Development Control service in Case Study One had identified a drop in income of around £100,000 which it was necessary to find the means to cover. In this case, it was decided by the Development Control manager, appropriate to leave vacated posts open, but this needs to be considered in the context of increased workloads which will be present following an upturn in the economy.

Case Study Two had identified an income drop of £120,000 during the same financial year due to a 25% decrease in planning applications. In this case the Development Control manager did not have control of the budgetary adjustments which would be undertaken to counter this income drop. Decisions had been made to keep the staffing level for the current financial year but would be reviewed by a higher level team at the authority in the next financial year. The Development Control manager stated:

"we are here to deliver a service, and the current costs are there to keep it, I can only hope that those making the decisions can have a view to the future."

Case Study Two is also subject to the economic influences of the former Planning Delivery Grant, having received £350,000 in its last instalment.

However, this is not delivered to the Development Control service and £250,000 is not ring fenced in Planning Service funds.

Primarily, within Case Study Three there are, as previously discussed, economic influences concerning the need to support the economic growth of the authority area. It is important for the Development Control service to contribute to overall council objectives. The political influences on the system have been illustrated to work on a number of levels: the service is subject to local politics, in terms of controlling the applications, but is also susceptible to changes in the national political climate, and policy guidance.

Political influences, on both a local and national scale, were also identified during the interviews. The manager and the elected member of Case Study One identified examples of these, from the use of the planning process for 'electioneering' during local elections, through to the centralisation of policies which was becoming increasingly apparent under the then Labour Government.

6.4.5.1 Discussion

The three case studies demonstrate that are both local and national influences on the Development Control system. These impact on the priorities of the service and a clear difference can be shown in relation to the economic prosperity of areas. The case study authorities range from a borough with a high demand for land and one where there is a limited amount of economic development. A clear distinction in approach to applications can be identified.

6.4.6 Final Identity Statements

All these factors need to be considered in producing an Identity Statement (as described in section 4.3.2) for the services at the authorities. It is in relation to this statement that the analysis will continue to examine the processes in place within the authority. While these statements are broadly similar, they also reflect the different perspectives and outlooks of the case study authorities. In particular they reflect the variation in the emphasis on the performance targets and the process of education within the Development Control service but the overall objective remains consistent.

6.4.6.1 Case Study One

To produce good quality development decisions in a timely manner with consideration of the needs of local residents and in line with regional and national policy frameworks through proactive engagement and education with developers, the public and other formal institutions in the process throughout changes in the economic and political structure of the authority.

6.4.6.2 Case Study Two

To produce development control decisions, and to provide development control advice and education, which contribute to the economic growth and development of housing within the authority area and are in line with local and national policy guidance, and pay regard to performance indicators, within the funds available to the service.

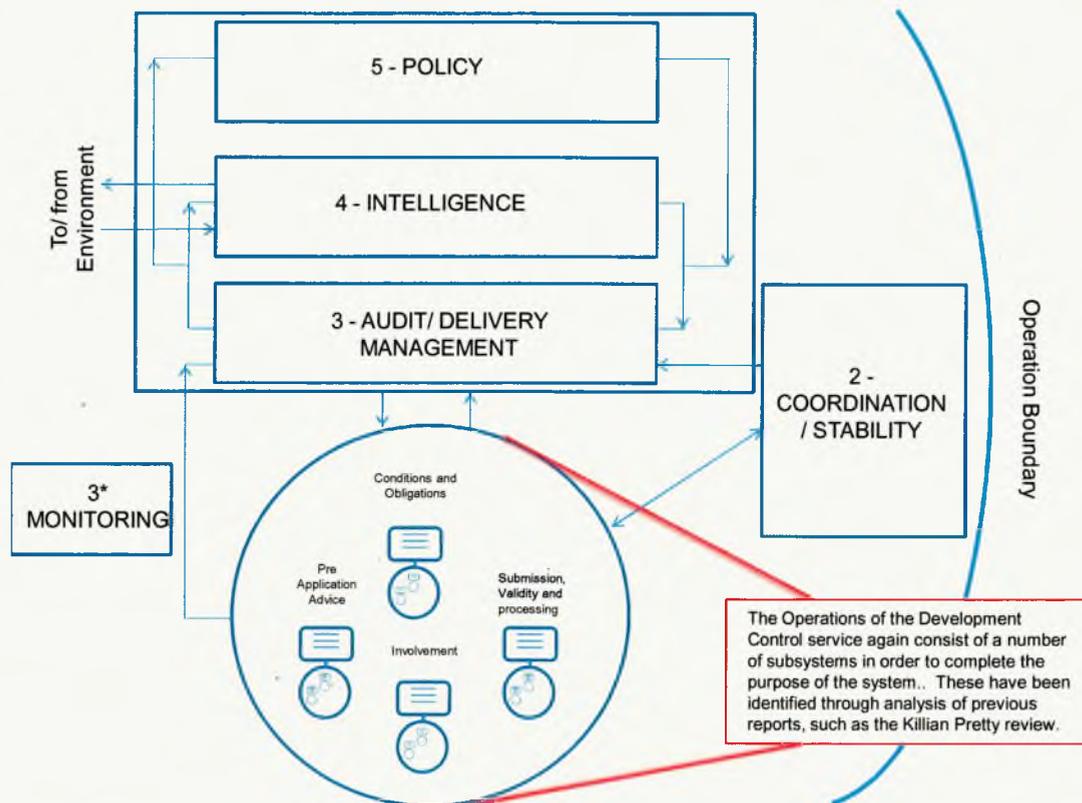
6.4.6.3 Case Study Three

To produce development control decisions which reflect the local needs of the borough while complying with National and Regional policy advice and consider issues of sustainability, and through advice from other services, address and balance technical issues, while, as far as possible, complying with performance targets, within laid down financial constraints.

6.5 The Identity of the Operational Subsystems

This chapter will now continue to explore the identity of the Operational subsystems. These were established in 4.3.2.2 and were predominantly based upon the key areas of Development Control practices as identified in previous reports into the process. The location of these systems is illustrated in Figure 6.4 below.

Figure 6.4 Illustration of the Location of the Operations Subsystems within the Viable Systems Model



The identity of these subsystems will be explored in the same manner as that the Development Control process above (section 6.4) with elements identified from the case studies as a unit.

6.5.1 Pre-Application Advice

The following discussion forms the basis of an identity statement for pre-application advice within the case studies, establishing the value of pre-application advice within the planning application process and the factors which influence its provision within the authorities.

6.5.1.1 *Purpose*

Study participants appear to hold one strong value in relation to the outputs of pre-application advice: to assist in the process of any future application. This output manifests itself in two main forms: to enable the negotiation of issues prior to the submission of an application and to encourage developers to take

part in the process.

Case Study One has produced detailed guidance on their pre-application advice service which lays out the proposed purposes of pre-application discussions and advice. These prescribed benefits include:

- An understanding of the application of planning policies to the proposed development;
- Identification of the need for specialist input;
- Explanations of validation requirements;
- Guidance on planning contributions;
- Reduction in the time needed by the applicant with professional consultants;
- Advice on procedures and timescales;
- Indication of unacceptable schemes.

The emphasis placed on the seeking of pre application advice, and the intent of the authority use it are clearly illustrated by the Development Control manager when he states:

"if there is a case when we think that pre application advice should have been sought and wasn't, we will have no hesitation in refusing an application which doesn't measure up... when the time is running we will not negotiate. The opportunity was there, was offered, and was well publicised. We make our position quite plain on that."

The planning officer emphasised this view point, stating:

"If you don't ask for pre-application advice and there is an issue which can't be resolved in the course of the application, we won't negotiate on our time."

The third case study authority also emphasised the purpose of pre-application advice in terms of providing a filter and adjuster in relation to the quality of applications, particularly focusing on the need to maintain a free service. This was due to the importance that they placed on pre-application advice as a tool to promote development through early negotiation of potential obstacles. A participant stated:

"issues can be sorted at during the pre application stage... I think free advice is important because you will find that developers, particularly those with smaller schemes, will take that advice and the information that you are giving them and will be able to use it as part of their application."

A second purpose of the system was identified by the planning officer who stated:

"If something at the time [of pre application advice] is unacceptable we will say so and if we think that it is not going to be supported we will say so, because they are asking for an opinion, and that's what we give, we're not going to ask for an application when we know that it is not going to be accepted."

Finally, this case study also emphasised the importance of pre-application advice in preventing applications resulting in the appeals process, through the early identification of potential issues. The principal planning officer stated:

"If they bypass the process and put in an application straight away which maybe is not acceptable and then you may have to go through the appeal process."

The second case study authority has recently started to charge for its advice and produces guidance on its procedures. This guidance has more restricted content than in Case Study One, and does not set out such detailed objectives for the process. The guidance provided on the pre application advice service is contained in a document, entitled, 'Charges for Pre-Application discussions: A guide for Developers and Agents'. In discussing the purpose of the pre-application advice service it states the purpose of the advice is to:

"improve the quality of the eventual application and its chances of success with quicker determination times... the primary emphasis is the promotion of higher quality development schemes".

This guidance also identifies that external consultees will be invited to participate at the pre-application stage stating:

"Planning Officers will carefully assess whether Officers from different

disciplines will need to be present... particularly recommended for more complex developments which may require input from other specialist staff."

This stated purpose is identified in practice by the principal planning officer who described the pre-application process as:

"everyone will be involved who would be in the planning application: the officer, the Environment Agency, the highways officer and the conservation officer".

The final case study authority participants stated alternative aims of the pre-application advice process, taking account of the new charging procedures.

The planning support officer identified the advice as contributing towards the submission of applications which were more compliant with the validation criteria stating:

"before we deal with an applications, all that is needed with the application is dealt with at the pre-applications stage so it makes my job a little easier with validation and registration."

whereas the principal planning officer stated:

"I don't think that it improves the quality of the applications, I think that what it is doing is getting rid of the non starters."

The principal planning officer also identified the consideration of planning obligations forming part of pre-application discussions and the subsequent presentation of heads of terms at the outset of an application. This speeds up the application process as it was then not necessary to conduct these discussions during the timed course of the planning application. However, in the case discussed, the heads of terms were not forthcoming at an application stage:

"We had a site where as part of the Pre-Application advice we've said that it needs to be part of a legal agreement and we need it up front, so the application should have come in with a draft agreement, or at least

the heads of terms, but it came in with neither."

6.5.1.2 Product Summary

It can be seen that there is, across the case study authorities, a key purpose stated for the pre-application advice process: to improve the quality of development. It is unclear whether, in all cases, this does occur, and if it does not occur then it can not, within VSM be defined as a purpose of the system. It is necessary to turn to the processes which pre-application advice fulfils in authorities. These have been predominantly identified within the guidance produced by the first case study authority and many of the practices were discussed by the participants from the other case study authorities.

The main purposes of pre application advice identified within these case studies are therefore:

- Early identification of schemes which are unlikely to gain planning approval;
- Resolution of issues which would prevent planning approval being granted;
- Identification of the need for specialist input;
- Guidance on Validation requirements;
- Guidance on Planning Contributions.

These products can be summarised into two main categories:

- removing potential applications which are unlikely to gain consent;
- allowing for a more efficient passage at the planning application stage.

6.5.1.3 Needs

Section 6.5.1.2 began to demonstrate that pre-application advice appears to fulfil the needs of the authority and the applicants through the identification and explanation of the issues involved and through the resolution of these issues before the formal planning application process commences. This aids authorities in meeting the statutory planning application time limits, and developers who have a reduced chance of a refusal resulting from an issue which could be resolved if time allowed it.

Pre-Application advice also benefits both authorities and developers by removing applications from the system which may have little chance of gaining

consent. This can reduce time consuming work during the appeals process. It also meets the needs of developers who will have an early opportunity to withdraw from schemes which are unlikely to receive consent or who will have early notice of issues which need to be resolved.

The Development Control manager in the second case study also identified a benefit to the authority of advanced notice of potential planning applications stating:

"if the majority of developers are using the pre-application service we can see what is coming in, and give a more structured approach in allocating applications".

The elected member in Case Study One illustrates the authority's view on the role on pre-application advice, in terms of the mutual benefit for the applicant and the authority:

"it's a case of knowing what we are looking for, because what you don't want to do is to waste a lot of people's time... sometime they [developers] won't do that, they just put it [an application] in and say, 'right just say yes or no', and we do, and say, 'that's a load of rubbish and here are 25 reasons why.'"

He continues to discuss the purpose of pre-application advice stating:

"it's just getting people to understand that we need to talk through it and get it half decent somehow."

It is possible to identify further needs which can be met through this process. These are those of the local community and those of the external agencies who are integral to the planning process. The local community were identified as a stakeholder by the elected member. He identified that the early knowledge of a development proposal allows those involved within the authority to keep the public, who may be impacted by the work, better informed, stating:

"sometimes you think with some applications, I wish I'd known that before, that way you are in a better position to answer queries and help those in your ward."

6.5.1.4 Timescales

The timescales involved in pre-application advice are not as clearly defined as those for planning applications: they do not have statutory targets associated with them.

The first case study authority provided guidance on their pre-application advice in which they state that such advice will be provided within 20 working days of the receipt of appropriate information, or any delays will be communicated to the applicant. The third case study authority does not specify a time scale within their guidance.

In the longer term, the relevancy of the advice will diminish, as policies and circumstances within the application site, the borough, and indeed, nationally, vary.

6.5.1.5 External Relationships

The dominant relationship in the pre-application advice system is between the local authority and the developer. The local authorities primarily control this through the publicity surrounding pre-applications and their treatment of application which have been subject to, or not subject to, the pre-application process. The developer also has control of the situation as they do not have a legal obligation to seek this advice and do have, in some cases, to pay for it. The first and second case studies have formal written and published guidance in relation to pre-application advice and work towards providing advice in accordance with the standards laid down in the authorities' guidance. This guidance also lays down the status of the advice in relation to the later planning application, stating:

"the pre application advice will be taken into account by the Council as a material planning consideration, subject to the proviso that circumstances and information that may subsequently come to light could alter the position."

Additionally, a relationship exists between other consultees such as the Environment Agency and relevant highway authority and the authority and potential developer; the advice can involve key input from these bodies. It is

necessary to note that the advice from these bodies is not paid for but the local authority will rely on this in formulating their response.

6.5.1.6 *Economic and Political Circumstances*

There are two main areas where these are relevant to this process: that relating to the passing of time as has been previously discussed within the timescales element, in that the advice given will hold less relevance as time passes and both political and social circumstances change. It is important to consider the influence of fees on the provision of the pre-application advice service. Two of the case study authorities charged for the service while one felt that it was important not to create the barrier to the service;

"some people were quite happy to pay whereas some small developers were not."

The main barrier to implementing a charging scheme related to the economic prosperity of the area. The principal planner noted:

"I think also, it has something to do with the way authorities look at development; we are perceived as a growth area, both economically and in terms of housing supply so the whole sort of process is quite growth oriented."

The Development Control manager of the second case study authority also indicated the potential pressures on the authority to deliver a decision in relation to the pre-application advice received. He stated:

"With the payment of a fee it becomes necessary to begin to manage expectations, developers feel that, having paid for advice, the decision should not be contrary to the advice received, but it is not always the case."

Political influences are exerted on the authority at both a national and a local level. As the Development Control manager of Case Study One observes, this authority manages to maintain a balance of the politicisation of Development Control decisions:

"we do get the odd bit of electioneering in DC but, by and large, it does tend to be an apolitical committee and not a lot of politics comes into play in making planning decisions."

The treatment of the advice as a material planning consideration will still involve it being considered in relation to other material planning considerations. While it is expected that the majority of these will have formed part of the initial advice, political motives may also influence the application at the application stage. The guidance provided by the council makes it clear that:

"no guarantees can or will be given about the decision that will be made."

6.5.1.7 Final Identity Statement

In pulling these factors together a final identity statement for pre-application advice can be produced stating,

"To facilitate the timely processing of planning applications through prior establishment, discussion and resolution of the potential issues, or by identifying those proposals unlikely to gain consent, to the benefit of the local authority, the developer and the local community, within the confines of the political and legal processes of the planning system and through the efficient involvement of external parties to the process."

6.5.2 Submission and Validation

The second subsystem to be examined relates to the submission, validation and processing of applications. This process predominantly concerns the administrative element of the application, ensuring that information is provided to the authority and that decisions are issued to the applicants.

6.5.2.1 Product

This subsystem involves the checking of an application to ensure that all the information which is needed for its processing is included, and its registration, including a clear description and the inputting of details, onto the IT system. It also includes the uploading of all the application data onto a website where it can be viewed by the public and creating a list which informs members, and other interested parties, of the presence of the application. It also includes the

administrative support required at the end of the process, in producing the decision notice. There are four identifiable subsystems operating within this system:

- Application validations;
- Application registrations;
- Application data display;
- Application decision dissemination.

6.5.2.2 Needs

The needs that this subsystem serves cover three main areas: the need of the application, including issuing the final decision, to be processed in as efficient way as possible, the need to ensure that all the information needed to process the application is provided and the need for the general public to obtain information.

6.5.2.3 Timescales

This subsystem is considered by the participants to be a key stage in the successful determination of applications within statutory time periods. The planning officer of the first case study stated:

"If the applications are delayed at the outset, it makes everyone's job more difficult as the application progresses."

The submission and validation stage of the application has, within the case studies, informal targets applied. These range from one week to ten days. This timescale is considered important by the participants as the quicker this stage is completed, the more time is available for the consideration of the application. The planning support assistant in the first authority demonstrates this importance saying:

"the longer it takes us to get stuff down to the guys to do, the less they can do their job properly."

At the end of the process there are also tight schedules to be met, with regard to the statutory targets. It is necessary for the administrative support team to issue a decision within the National Indicator target date.

6.5.2.4 External Relationships

This system involves the liaison of the planning support team with the applicants submitting the application. However, across the case study authorities it also involves the support of the planning staff in providing assistance and guidance on applications which are not straightforward. The planning support officer states:

"we generally ask the team leader for advice, they're very good."

It is at this stage in the process that the information on the application is presented online for members of the public and other external consultees. All three case studies enter the details, including mapping the data, themselves, although the first and second case studies send the accompanying documents, such as plans, to an external company to be scanned.

The data is received by the authorities in two main forms: paper and electronic, through an online submission portal. At the time of interviewing the authorities had not yet fully adapted to receiving the applications in this electronic state and printed the documentation which was then scanned. This was completed internally by the authority in the final case study while the first and second case studies an external contractor was used. The first case study authority had proposals in place to initiate a system of direct transfer.

6.5.2.5 Economic and Political Circumstances

The validation stage is less influenced by political and economic changes as it is predominantly a matter of procedure rather than the translation of opinions. It can be impacted on by economic circumstances, for example, by a change in the number of applications which need to be processed. The planning support assistant of the first case study authority states:

"As long as we have the staff in we are OK, I mean sometimes we can get 10/12 applications in a day but at the moment, with the recession... it averages around 8/10 a day."

6.5.2.6 Final Identity Statement

A final Identity Statement for this subsystem can be developed from these

factors. It is to provide timely administrative functions for the registration and validation of applications and for the production of decisions, in order that consultees can view the information and the planning officers can undertake necessary consideration of the issues and produce a decision in a timely manner.

6.5.3 Involvement

This subsystem concerns the consultation which is conducted once an application has been submitted and validated. It includes both the consultation with statutory and non statutory consultees and the neighbour notifications which take place as part of the application procedure.

6.5.3.1 *Product*

The output of this subsystem is effective consultation of those bodies and individuals to gain sufficient information to allow the beneficial determination of the application. This subsystem notifies those of whom involvement is beneficial and allows them the means to obtain the information on the planning application.

6.5.3.2 *Needs*

This subsystem fulfils two main needs: to gain expert input into the planning proposal and to give those people who the application may impact an opportunity to have their opinions considered in the planning process. The consultation can take place through a variety of means: letters, emails, memos, site notices and newspaper adverts.

6.5.3.3 *Timescales*

The expert consultation response is required to make the decision within the statutory time period of the application. The initial consultations need to be conducted as soon as reasonably possible on receipt of the application.

The neighbour and statutory consultations have a statutory minimum period of three weeks from the date that they are informed of an application, by either a letter, press advert or site notice. As a decision can not be issued until this time period has expired, it is also important that the means of consultation is

determined, and carried out as soon as practically possible.

6.5.3.4 External Relationships

External bodies are key to the consultation procedures; statutory and non statutory consultees, such as specialist interest groups, provide subject expertise to the planning process, most commonly in areas such as highways, education and flood risk. This relationship is controlled by service standards for the speed of response and through cooperation and standing advice.

The relationship between the planning authority and members of the public is also important as it ensures the democratic nature of the planning system. In addition, a clear process and guidelines should exist for the involvement of elected members in the process.

6.5.3.5 Economic and Political Circumstances

In the case studies, it appears that a major impact on consultation has been due to the advancing of technology and the increased means of communication. The majority of members of the public and consultees now access the plans and documents for applications online. The authority has been able to invest in the provision of this as a result of government grants for improved performance.

This system is clearly subject to economic influences as workloads will be impacted by economic changes while staffing levels cannot react with the same speed. In addition, there may be political pressure to consult additional different bodies and potential influence on the responses received or the speed at which the responses are received.

6.5.3.6 Final Identity Statement

A final identity statement for involvement in the system is therefore:

To inform, meeting the statutory requirements, expert bodies, interest groups, and the local community of the existence of the planning application, provide access to the data and to achieve sufficient time for valid responses within the time period available for the consideration of the application.

6.5.4 Conditions and Obligations

This subsystem concerns the creation and the discharge of planning conditions, and obligations relating to planning applications. These are requirements placed on applications which make the overall scheme acceptable in planning terms: 'to make acceptable a development which would otherwise be unacceptable in planning terms (ODPM, 2005b, p9). Conditions are placed directly onto the planning decision whereby obligations, which are more commonly known as Section 106 agreements, are separate legal agreements between the authority, the applicant and other associated parties. Therefore their operation is a key element of the Development Control process as if they are not implemented efficiently the planning decisions to which they relate are, by definition, unacceptable. They are, in effect, the decision making element of the Development Control process as the planning permission, if and when granted, is subject to the criteria laid down in these two processes.

6.5.4.1 *Product*

The product of this system is the attachment to and the successful fulfilment of the requirements contained in the conditions and obligations associated with planning approvals. This can take a number of forms from ensuring that materials match those already in existence through to contributions to major highway improvement schemes.

6.5.4.2 *Needs*

The need that this system meets is, primarily, the need to create good quality development in a timely fashion. Conditions can be used to resolve issues which are clearly defined but which cannot be reasonably determined during the normal course of the application while obligations cover areas outside the direct remit of the planning process which make planning proposals acceptable.

6.5.4.3 *Timescales*

Conditions and obligations fall, by their nature, outside the remit of the timescales in relation to the planning application targets. The operation of the system following consent is therefore not significantly influenced by timescales.

However, planning obligations are formed by a legal agreement which must be

signed during the course of the application. This is made clear by the Development Control manager who described a case when an obligation was not completed in time:

"it is made plain to the applicant that if there isn't an undertaking in place then the application will be refused."

The discharge of conditions is now contained within a separate application process to enable certainty in the timescales involved.

6.5.4.4 External Relationships

The system of conditions and obligations involves continuing relationships with both the applicant and other external agencies. For example, the discharge of a highways obligation involves continued input from the Highway Authority. In addition, planning obligations often involve a monetary contribution for another body, such as the county council, as the elected member says:

"agreements are mainly county driven, a lot are to do with highways, that sort of thing."

6.5.4.5 Economic and Political Circumstances

The main economic influence identified by the case study authority concerned the payments required under obligations, with regard to the revised economic climate. The Development Control manager of the first case study states:

"we've had lots of pressure in the recession to renegotiate bigger agreements to defer contributions."

6.5.4.6 Final Identity Statement

This preceding discussion can be used to create an Identity statement for the sub system relating to Conditions and Obligations. The proposed statement of identity is, 'the agreement and appropriate establishment of requirements relating to planning applications, and the fulfilment of these agreements in order to ensure good quality developments'.

6.6 Operational Structures

Having established the Identity of the process of Development Control and its

operational subsystems, this work will now continue to explore the physical processes of operations as represented in the Case Studies undertaken. Following a brief exploration at the level of the Development Control process, the work presents a SWOT analysis of the processes present in the four subsystems discussed above.

6.6.1 The Development Control Process: Operations

The operational element of the Development Control service is the process responsible for determining the planning applications, providing advice (including pre application advice) and making the decisions, in order to produce good quality development.

This was primarily identified, within the first case study, as being conducted by the professional planning staff, although they themselves identified the role played by all parts of the service. The planning officer stated:

"all of us, from admin support through to the Development Control manager, even the elected members."

Within the second case study, the operational element of the Development Control service has been identified by the interview participants as that of determining, and negotiating, planning proposals placed before them, in order to achieve good quality development. Furthermore, they identified that this work was, as in Case Study One, primarily conducted by the planning professionals.

In identifying the processing of development proposals as the main role of the service, it was also acknowledged, in particular by the more senior planning professionals, that the planning support staff also played a key role within the service. Indeed, the principal planning officer stated:

"you would include the technical team as well.. they are vital."

The member of support staff interviewed, however, did not perceive themselves to be a part of this process, describing their administrative role to be a purely technical process, however, their involvement is further emphasised by the team leader who clearly states:

"everyone's involved, from the moment an application comes in to the moment that it is decided."

In the final case study, the lack of attachment to the final outcome by the technical support staff is again apparent. The planning support team leader stated in relation to those responsible for the output of Development Control:

"that's the planning officer, obviously, they're the main person... they make the decision."

In this authority, the professional development control staff also see themselves as the main produces of the output, stating:

"it is the actual officers, they make the decision."

This reflects the disparity between the stated aim of the system and the defined identity of the system. The planning officer and the support team leader are considering the output of good quality development, reflecting in this in the planning decision. However, this development relies on all the processes which take place in the determination of planning applications. While this authority does have less emphasis on targeted achievement, it does remain a part of their practice and contributes to the funds available to run the service.

6.6.1.1 Discussion

This review has demonstrated that, across the case studies, a large number of staff are involved in the operational element of the system. The main variation between the case studies relates to the extent of the appreciation of staff as to the value of their involvement. In the first, high performing, case study, this is clearly acknowledged, whereas in the second and third, this involvement is not universally acknowledged. However, this discussion demonstrates that there are a number of discrepancies between the subsystems identified (pre application advice, validation, consultation and conditions and obligations) and the perceived constituent elements of the Development Control process. It is therefore important that the role of the subsystems is clearly identified as part of the process to all those involved in the system. This work now moves to examine the working of these subsystems within the participating case study authorities.

6.6.2 System 1 'Operations': Pre-Application Advice

icipating case study authorities.

Table 6.3 represents a SWOT analysis of the processes present within the pre application advice services of the case study authorities, discussing the strengths, weaknesses, opportunities and threats which have been identified within the practices of the participating case study authorities.

Table 6.3 SWOT Analysis of the Pre-Application Advice 'Operations' Structures

<p style="text-align: center;">STRENGTHS</p> <ul style="list-style-type: none">- Clearly defined boundaries for the subsystems (formal and informal) <i>In Case Study 1, there was clear published guide lines relating to the need to seek formal pre-application advice: 'informal advice can be obtained from a duty planning officer but no opinion will be expressed'.</i>- Clearly defined classifications of types of development and the extent of advice <i>The guidance of Case Study One clearly lays down defined categories of development and their associated levels of advice (and charges).</i>- Clearly defined and understood means of delivery of pre-application advice (including set timescales) <i>The first case study authority has clear, published advice which defines the mode of delivery of the advice, including any meetings to be held, in addition to an ideal timescale (21 days).</i>- Clearly defined responsibility to include the relevant process stakeholders <i>In all three case studies the officers responsible for providing pre-application advice appreciate the need to involve key external stakeholder in the process.</i>
<p style="text-align: center;">WEAKNESSES</p> <ul style="list-style-type: none">- Ill defined boundaries between informal and formal advice and classifications of development <i>In the second case study, the pre-application policy states, 'queries which can be answered succinctly will remain free of charge'. The principal planning officer observed difficulties in setting the starting point for a formal pre-application process, stating, 'people do try to circumvent it, just asking a few questions, and a few questions lasting half an hour'. Case Study 3 provides free advice to all levels of development and does not distinguish between development types or the extent of advice to be given.</i>- Unclear, and misunderstood, means of pre-application advice delivery <i>Case Study 3 has no formal guidelines, either externally or internally, relating to the delivery of pre-application advice. Although the second case study does produce a guidance note on pre-application advice, this does not set down a process of delivery.</i>

OPPORTUNITIES

- Use of a duty planner to 'censor' advice

Both case studies 1 and 3 provide a duty planner service which can quickly assess and advise on the need for pre-application advice. This can also be used to reduce the workload, identifying inappropriate proposals, 'If we think that something at the time is unacceptable, we will say so'.

- Engagement of elected members in pre-application advice provision

In Case Study 1 the elected members become aware of pre-application discussions on an ad hoc basis. The elected member observed that it was useful to have this knowledge, even when they are not actively involved in the process. Elected members are the ultimate local decision makers in the planning process and their involvement at an earlier stage should be considered.

- Engagement of external organisations in the pre application advice service

The engagement of external parties in the pre application was identified in the first and second case studies as enhancing the process. The Development Control manager in the first case study observed how stakeholders, in their case the Environment Agency, are becoming increasingly willing to participate in this stage of the process.

THREATS

- Changes in policy between the pre-application stage and determination of the planning application

These changes, clearly identified by the Development Control manager in the first case study, can occur at a national or local level and can undermine developers' confidence in the pre-application advice system.

- Lack of connection of elected members and planning staff in the pre-application process

In Case Study 3, the team leader identified elected members as an element which could, like changes in policy, undermine the confidence of developers in the pre-application process, when committee decisions vary from the officer's recommendations and advice.

- Lack of engagement by external organisations/ consultees

In Case Study 2, the principal planning officer, described circumstances where, due to time and resource constraints, external consultees could not participate fully in pre-application meetings. As such, key information and discussion may be absent at this stage of the process. Case Study 1 identified a means to overcome this, with developers approaching third parties directly with the planning authorities circulated in the correspondence.

- Lack of Developer engagement in the process

It was believed in the final case study that introducing charging for pre-application advice would reduce developer take up of the service. This was not a risk that the authority was prepared to take. The first and second case studies offered conflicting views (within the authorities) of its impact. All authorities felt that developers should not face barriers in gaining the advice.

6.6.2.1 Case Study Overview of Pre Application Advice 'System One'

In looking at the strengths and weaknesses illustrated in this analysis, it is readily apparent that Case Study One, chosen as an authority which performed highly on all the selector indicators, dominates the Strength and Opportunity categories. This includes factors relating to clear system boundaries, elected member involvement and the involvement of third parties in discussions. Meanwhile, the existing practices of both the second and third case studies are largely present within the categories relating to Weaknesses and Threats most strikingly in relation to guidance and information about the services available and in relation to the involvement of elected members within the process.

6.6.3 System 1 'Operations': Submission and Validation

This work now continues to present a SWOT analysis of the elements of the Submission and Validation subsystem as identified within the Viable Systems Model, with reference to the three case studies undertaken. This exploration is presented in Table 6.4 below.

Table 6.4 SWOT Analysis of the Submission and Validation 'Operations' Structures

STRENGTHS
<p>- Flexibility of staff to work on a variety of jobs</p> <p><i>The operational element of the system is predominantly conducted through an administrative team of staff. These staff members can be trained in a number of teams and vary their working practices in accordance with the workloads received. This also ensures that they have variety in their working practices.</i></p>
<p>- Clear and readily available criteria laid out for of required information</p> <p><i>While a national checklist of the required data for planning applications exists, it is still necessary for local authorities to clearly indicate any additional information which may be required. The case study participants accepted that unique cases will always occur but that clear guidelines assist in the majority of cases. These information standards are perceived to be taken into account by regular service users and can be used when assisting those less familiar with the service.</i></p>
<p>- Clear prioritised approach to workloads</p> <p><i>The planning support staff from all the authorities are conscious of the need to meet time limits at the beginning and end of the application process. Within all the case studies they acknowledge that other work can be put to one side if unexpected demands on their time occur.</i></p>
<p>- Strong understanding of process role</p> <p><i>The planning support staff in the first two authorities understand the importance of quick and efficient delivery of their element of the service and acknowledge that this can allow planning staff greater time to undertake consideration of the planning issues with a wide range of inputs.</i></p>

- Ready availability of advice from planning staff

The planning support teams in the case study authorities acknowledge that they are aware that they can seek advice from their colleagues within the planning teams. All the case study authorities identify strong relationships between the administrative staff and the planning professionals.

WEAKNESSES

- Staff training and knowledge restricted to certain tasks

In all three case studies, the number of staff skilled in certain areas, in particular in producing decision notices, was limited. This has the potential to cause delay at the back end of the application process.

- Delays in seeking additional advice

The planning support teams within the authorities generally work to set procedures. In some cases, additional input is needed by planning staff. The planning staff, in particular from the second case study, observed that delays in gaining this input can cause significant delays to applications.

- Delays in initiating handling of electronic information

In all three case study authorities, the data received with planning applications was displayed online by an external company. This is achieved through sending paper copies in batches to an external company. Participants in both the first and second case acknowledged that delays can occur at this stage as they are sent away in batched groups

OPPORTUNITIES

- Availability of staff from other departments to cover workload increase

Within the first and third case studies the planning support team were sourced from a council wide administration team and, in times of stress, further staff members could be used from this team. This service could be reversed in times of decreased demand.

- Increased use of electronic information

The first case study was, at the time of the study, investing in technology to enable the display of electronic information on their website eliminating the double data handling.

THREATS

- Sudden workload increases/ staff shortage/ absence causes significant process backlogs

All the case study authorities identified occurrences when large backlogs have occurred due to an increase in applications or through reduced staffing levels. This forms a vicious circle where the increase in delays causes more enquiries and therefore increased workloads.

- Lack of customer confidence (communication)

In the second case study, applications are not allocated a case officer until they have completed the validation and registration process. The planning support officer and principal planning officer acknowledged that this can cause difficulties for customers seeking help and advice on an application, either as the applicant or someone otherwise concerned with the application.

- Double handling of electronic data

While the first case study has been able to invest in the technology to eliminate the double handling of electronic data, the other case studies mentioned no plans in this respect.

- Prioritisation of other tasks/ procedures.

In the final case study, the planning administration team member acknowledged if an application was received for a decision after a set time of day, it was unlikely to be produced on that day. If time is tight on that application, this can impact on the authority's performance on the timed targets.

6.6.3.1 Case Study Overview of Submission and Validation 'System One'

The practices within the case study authorities in relation to the sub system of Submission and Validation are less clearly distributed between the case studies and the positive and negative processes. Many of the processes, both strong and weak, are shared between all three of the case studies including those practices which can cause delays. However, the practices of the first case study were the most consistently present in the first case study although it was also represented in the negative practices.

6.6.4 System 1 'Operations': Involvement

This analysis again moves to conduct a SWOT analysis of the elements of the subsystem as identified in the case studies undertaken. This analysis is presented in Table 6.5 below.

Table 6.5 SWOT Analysis of the Involvement 'Operations' Structures

STRENGTHS
<ul style="list-style-type: none">- Clear consultation guidelines <i>The operational elements of the consultation system within the first and third case studies operate within clear consultation guidelines including a policy on neighbour consultations.</i>- Cross team approach to ensuring consultations undertaken. <i>In the final case study, both a planning officer and the technical team are involved in establishing the appropriate consultations on major planning applications.</i>
WEAKNESSES
<ul style="list-style-type: none">- Lack of overall policy in relation to specific consultations <i>In the second case study there are no clear standards relating to neighbour consultations and those consulted can vary greatly. The planning officer stated; 'we work on common sense, but it's not officially adopted. I would like an official policy, then we could refer people to it and back it up'</i>

OPPORTUNITIES

- Increased utilisation of electronic communication means

Within the case studies, the means of electronic communication has greatly increased over recent years. Therefore many consultations can be conducted through email notifications with the information held online. This has extended the availability of information outside the traditional 'Town Hall opening hours'.

THREATS

- Delays in publishing of data in relation to consultation

In the first and second case study authorities, the application data is scanned and published by an external company. Issues with this process have already been discussed in relation to the validation subsystem.

- Over reliance on electronic consultation means

The planning support assistant in the second case study emphasised the importance of continuing to provide consultation through non electronic means, with particular reference to neighbour consultations. Similarly, support is often needed in the interpretation of the large volumes of data which accompany planning applications.

6.6.4.1 Case Study Overview of the Involvement 'System One'

An overview of the above analysis establishes that the practices of the second case study dominate the negative elements of both Weaknesses and Threats. The final case study contributes two of the positive elements. However, the first case study is also represented in the strengths as a result of its clearly laid down criteria for consultation requirements.

6.6.5 System 1 'Operations': Conditions and Obligations

For the final analysis within this section, the work moves to explore the strengths and weaknesses in relation to the Conditions and Obligations sub system as has been previously introduced in section 6.5.4.

Table 6.6 SWOT Analysis of Conditions and Obligations 'Operations' Structures

<p>STRENGTHS</p> <p>- Clear conditions provided from consultees and planning negotiations within the application timescale</p> <p><i>The participants from all three case study authorities stated that they are generally able to receive responses and negotiate within the normal course of the application.</i></p>
<p>WEAKNESSES</p> <p>- Lack of condition clarity/ legality</p> <p><i>The Development Control manager of the second case study indicated that the authority can have difficulties with external consultees or elected members requesting conditions to be placed on applications which will be difficult to enforce. The Development Control team needs to amend these to meet the purpose while being practically possible to enforce.</i></p> <p>- Delays in obligation negotiations</p> <p><i>In the second and third case study authorities, the planning officers acknowledge that there can be delays in negotiating and concluding section 106 agreements.</i></p>
<p>OPPORTUNITIES</p> <p>- Increased use of unilateral undertakings</p> <p><i>The first case study authority relied heavily on the use of unilateral undertakings on the part of developers, the requirements of which were made clear to developers prior to the submission of the planning application. This has reduced the delays caused by protracted legal proceedings during the course of the application.</i></p>
<p>THREATS</p> <p>- Lengthy delays/ loss of ownership relating to legal proceedings</p> <p><i>The principal planning officer in the second case study authority identified large issues in relation to the legal process of planning obligations and the loss of a sense of control. They state. 'it's a funny situation: you've got your terms and you know what it is that people are talking about, and then it goes off to someone else to deal with the nitty gritty detail and I hear nothing and then one day I'll get told that an agreement's been signed and here's a copy'.</i></p> <p>- Delays in responses from external consultees</p> <p><i>In some cases it is not possible for the external consultees to provide their formal response in the time limit. At this point, it is necessary for the planning staff and management to determine whether a decision can be made without the formal input or whether, alternatively, to wait for the advice and to allow the application to go beyond the statutory time target.</i></p>

6.6.5.1 Case Study Overview of Conditions and Obligations 'System One'

In respect to Conditions and Obligations, it is again apparent that the first case study provides those examples of good practice whereas the second and third case studies are represented in the examples of bad practice, in particular in relation to the process of creating and ownership of Section 106 planning obligations. While the latter two case studies struggle with this the first case study has clear guidelines which enable commitments to be established at an early stage of the application under the leadership of the planning officer.

6.7 Chapter Summary

This chapter has introduced and explored the identity of the Development Control process as the system in focus and examined the four subsystems which occur within this process: Pre application; Validation; Involvement and Conditions and Obligations. It has discussed the structures and processes present within these elements as displayed in the three case studies examining the strengths, weaknesses, opportunities and threats which have presented themselves. This analysis has clearly demonstrated that the first case study is predominantly represented within the Strengths and Opportunities whereas the second and third case studies have a much higher level of representation within the Weaknesses and Threats.

CHAPTER 7 CASE STUDY VIABLE SYSTEMS ANALYSIS: MANAGEMENT AND REGULATION

7.1 Chapter Aims

Chapter Six has presented the Development Control process and the subsystems which are considered to be present within the operational unit of this system. This work will now continue to explore the management and regulation of these processes using the structures identified within the Viable System Model.

This structural analysis of the process will be conducted at the two levels of recursion as described in Chapter Six. It will explore the remaining systemic elements of:

- System 2 Coordination/ Stability
- System 3 Audit/ Delivery Management
- System 3* Monitoring
- System 4 Intelligence
- System 5 Policy

At this stage, it is again important to note that the names given to these systemic elements do, in themselves, appear to limit the scope of the systems. However, the processes which the numbers represent are the key consideration in these process and the allocated names while an important guide should not be restrictive in their application.

The analysis will then continue to identify the areas of communication between the systems, and the levels of autonomy within the systems, establishing examples of good practice which will be illustrated in the systems model.

These three elements are then combined, summarised and presented within Complexity Models of the five systems, with reference to the preceding discussions. These will additionally be examined in relation to the case studies themselves. Finally, a series of recommendations are presented, sourced from the analysis as a whole.

7.2 Development Control Process: Management Systems 2 - 5

The first stage of this chapter is to examine the management processes at the top level of recursion. This will be examined using the evidence provided by the three case study authorities.

7.2.1 System 2 – Coordination/ Stability

This system acts to ensure that the different units within the process can work together without conflict and that the application can move freely throughout the process.

In authority one, this process consisted of both formal and informal mechanisms. This included, formal 'standards' for the timescales involved in registering and validating applications, but also an informal method of communication between different members of staff. The manager described an incident he overheard within his team:

"I even at times hear the admin team saying to a case officer, 'you've got an application that's due tomorrow, where is it?'. So the team are on top of it."

There are formal and informal systems for coordinating the quality of design. There are standard design guides adopted for development but, in addition, the informal discussion between colleagues is attributed to maintaining consistency between the decisions as is the ability of the officers involved to learn from both decisions made by the elected members and the Planning Inspectorate. It allows officers to discuss and be aware of other cases which will assist in reducing inconsistent decisions between officers. The process of learning from member's decisions is further enhanced by a trust, and a good relationship, which exists between the parties involved, the elected member stated in his interview:

"there's a trust and respect for the fact that people understand that the planners are doing their job."

These formal and informal procedures can also be identified within the final case study.

Primarily, there is a long standing Development Control manual which is available in an electronic form to members of the team. This has:

"been developed over so many years and has procedures in there for all sorts of things which can be updated."

All four of the interview participants regularly use this manual and it allows the team to function efficiently as, for many processes, it clearly illustrates where responsibilities lie and how things should be approached. There is also a clear level of ownership in relation to this manual, as team members are able to take on responsibility for its amendment if they feel it necessary. These potential changes, and any issues which occur, are discussed at another means of coordination, team meetings. There is a meeting of the whole service once every month. In addition, some smaller teams hold weekly meetings to discuss their areas.

It has also been identified by the service that it is important to maintain consistency throughout the advice delivered to individuals and developers. The principal planning officer stated:

"there is a tendency at times for someone who isn't happy with a particular answer to go to another officer to try and get another answer, so you have a recording system in place to hopefully reduce that happening."

An IT based facility is used to record all informal advice distributed. In addition, attempts are made to ensure that the same case officer is allocated to applications with which they have already had involvement. This is tempered by an informal system to balance the workload of the teams.

Finally, cooperation operates at an informal level in the team, to ensure that application decisions are determined within the timeframes. The professional planning staff are aware that work also has to be conducted on applications by the technical support team before decisions are physically issued. In addition, the technical support team provide officers with information on applications which are approaching the time limit deadline. However, there does appear to be a weakness in terms of managing the workload at this point. As the

technical support officer states:

"if we get a last minute rush at 2, and the post goes at 3, well obviously there are some which go over time and day."

Finally, in Case Study Two, the coordination appears to operate on a more informal, and less strong, basis. The Development Control team and the planning support team are not located in the same office, and their parts in the process are seen as distinct from each other, beginning and ending in the planning support office. The planning support team leader acknowledges the lack of coordination between the two teams, stating:

"there is limited control over decisions and validation. The planners can leave things til the last minute and then need decisions quickly while we may be struggling with validation."

Similarly, the planning support staff are not necessarily aware of previous history on sites or which officer will be involved with applications, and there is often a delay in allocating case officers to applications. The planning support team field a number of calls without the ability to transfer them to an appropriate officer:

"we're not aware of the officer when we are validating... which is frustrating, as our planning support number goes on the bottom of the letter, so we can get lots of calls."

As in the previous case studies, an informal system of coordination exists between the professional planning staff. These staff are split into area teams and, as described by the principal planner:

"we have all got a very good working relationship in there so that we are discussing applications between ourselves but it is not formal. The less experienced staff do ask the senior staff in their area... we share information."

However, a weakness of more formal mechanisms is also acknowledged:

"I think that there should be more team meetings with the whole of DC, to

make sure we are singing from the same Hymn Sheet."

7.2.1.1 Discussion

It can be seen that both formal and informal processes contribute, within these case studies, to the coordination between the sections of the Development Control service. These vary greatly although the informal ones rely on the personnel involved. In both the second and third case studies, difficulties appear to arise in the coordination between the roles and validation and issuing the decision. It would therefore seem appropriate to establish more formal systems with regard to the flow applications through the system, perhaps with regard to communication of workloads between sections.

7.2.2 System 3 – Delivery Management

This system relates to the setting of targets and indicators to monitor the performance of the sections. While it may seem to overlap with the previous subsystems, it is concerned with the monitoring and management of the system as opposed to the coordination. So for example, the timescales adhered to in the coordination section of the work, relate to the ability of the authority to determine applications within the set timeframe, whereas, when considering them here, they are used as a measure of performance. These measures of performance need to be mutually agreed between the management and those responsible for the task.

Within the first case study, there have been identified two main areas of the monitoring of delivery: the timescales in which applications are determined and the standards of the approval of applications. The timescales are accepted by planning staff as there remains flexibility to negotiate with management in those cases where it is considered that a decision cannot be reasonably made within the target timeframe. However, any departure needs to be fully justified. This situation was described by the manager, and illustrates the flexibility which has been incorporated into the targets:

"Very occasionally someone will say, 'I've got an application which I think is going to go out of time because...' and if there are good reasons for it and we talk it through, I am not averse to that happening now and again,

because we are doing so well anyway that the odd one doesn't meet the target doesn't matter".

In terms of the quality of the application decision, the authority controls appear to operate on a more informal basis, with no formal guidelines on negotiation. Standard conditions for a number of situations do exist, but officers have the ability to judge when these are appropriate. All applications are ultimately 'signed off' by the Development Control manager and, if questions are raised, these will be discussed between the manager and officer.

Within the second case study authority, there is not such a great emphasis within the planning team on the achievement of statutory targets. The emphasis on these is provided by the corporate performance team and they do remain an important element of the delivery management system.

In addition, the performance of the service is also judged through the rate of appeal wins on both an informal basis, through the discussion of appeal losses within the team and on a formal basis of win rate.

The quality of planning decisions is, as in the previous authorities, monitored through being finally signed off by the Development Control manager.

The dominant formal level of progress monitoring with the third case study relies on the performance indicators relating to the speed at which decisions are made. The planning staff are aware of this, as the team leader states:

"it is on the Government Statistics, they are monitored and if we're not performing, it will get picked up on".

The principal planning officer reveals that these are not the most important factor in terms of the processing of applications: they can not be met if the application is of economic importance to the area. In addition, there is pressure on the service to meet further targets in relation to the supply of new housing.

There are no formal, and limited informal, processes in place in this authority relating to the monitoring of the quality of decisions and advice given. In addition, decisions, applications and advice are informally discussed within area teams and between colleagues. As the planning officer states:

"We are relaxed enough to talk to people when we have an issue. I think that the reason here is that you've got less experienced staff who are quite happy to talk to the more experienced staff about issues they may have with a particular application of policy."

7.2.2.1 Discussion

It has been shown that all the case study authorities do work to achieve the statutory time targets for processing applications but the importance placed upon these varies. In the first case study it is expected that they will be complied with unless an exceptional reason can be given whereas in the final case study enabling development takes priority.

The first case study has the clearest processes which relate to measuring the quality of the development produced with the involvement of both the planning staff and elected members. The second and third authorities rely more on informal communication between teams and ad hoc discussions and sittings of development.

7.2.3 System 3* – Monitoring

In relation to the process of delivery management and agreed targets and outcomes, it is also important that the standards set are monitored to ensure that they are adhered to. Without this process, their existence would retain a questionable value.

In the first case study the formal ability to monitor the speed of decision is conducted through IT based reports. These relate to individual officer case loads in addition to comparison reports of performance over three monthly and annual periods. The Development Control manager then also reports these results to committees. There is flexibility in the process: when a variance in the figures can be justified, it is accepted as a part of the process.

The monitoring of the quality of the output is more difficult to achieve and takes place on a more informal level when the Development Control manager signs off applications. Importantly, once an application has been approved, its quality is predominantly judged on the physical works. The members of the planning committee undertake a tour of the borough on a six monthly basis to comment

on developments. This is, however, a retrospective form of monitoring although lessons can be applied for future applications.

In terms of refusals, the decisions of the Planning Inspectorate are monitored to review, and react to, decisions made on those applications.

In the second case study, both the formal time figures and the performance on appeals are monitored on a reactive basis by the authority's performance team. The progress of the application is not monitored as it progresses through the system. The Development Control manager has the option to receive reports on the progress of applications through the IT package but does not regularly use this. This reflects the lack of emphasis on the performance targets of the Development Control team as was previously shown in the discussion of the system purpose. It would seem appropriate to introduce a system to monitor the quality of development.

There is little quality monitoring of the final decisions aside from the Development Control manager viewing and signing off each decision. This monitoring is carried out towards the end of the planning process, when it may be difficult to amend decisions. The process of quality monitoring is therefore heavily dependent on the informal discussion of applications between the members of the team.

Case Study Three takes a similar approach to Case Study One in relation to the indicators. They are monitored by the planning management team, who themselves are monitored by the Senior Management Team of the authority. However, this appears to be conducted on a reactionary basis, following determination of the application as opposed to a pro active basis as the applications progress through the system. At this level the monitoring appears to be primarily conducted through the planning support team and the planning staff themselves.

There is a system in place to record the advice given at a pre-application stage but there is not a system in place to monitor this advice in terms of either quality or speed of delivery. Emphasis is given to schemes which promote economic growth to the area from a Senior Management Team level.

Similarly, in terms of quality of the advice and decisions, monitoring predominantly takes place on an informal level, often following the issuance of decisions. The team leader states:

"I'd honestly say that there's not that many that i've driven past and thought 'how did that happen?'"

7.2.3.1 Discussion

There are few systems across the case studies in place to proactively monitor the system. Those which do exist are mainly associated with the speed, rather than the quality, of applications. Once again, the first case study shows the most extensive development of these systems with the second case study having the least established processes.

7.2.4 System 4 – Intelligence

This process is responsible for looking to the environment in which the system is operating to look for those factors which will impact on the system's operation.

The participants in the first case study identified one key player in this role: the Development Control manager. The planning officer clearly allocated the responsibility of this role to their manager, adding that it was readily shared at team meetings. The Development Control manager stated:

"that is one of the roles that I tend to perform. What I do there I to try and pick up things that are happening or likely to affect us and make sure that we bring them for discussion."

In the second case study authority, the professional staff believed that this external monitoring should be conducted by the Development Control manager but they acknowledge that it is not conducted effectively. The principal planning officer stated:

"this is where we have a problem I think. There is nothing formal. I think that it is a bit hit and miss as to whether we even know that things are changing."

Meanwhile, the Development Control manager believed it to be the responsibility of his superiors observing:

"probably more at Director level, looking outside and seeing what will influence what we are doing".

As a result, limited responsibility is taken for observing potential external changes, even when the information was circulated. The principal planning officer illustrated this when they stated:

"There was a recent change to the GDPO (General Permitted Development Order) and everyone just got that by email. It is difficult when you're busy and you get an email to actually read and assimilate it."

The final case study authority has a 'Service Improvement Officer' who, as part of their remit, is responsible for looking at the changes in the external environment which impact on its operation. These potential impacts are fed to the Senior Management Team but do not filter down to the planning staff. Some changes, are discussed with the planning management team, but ultimately the overall intelligence operates at this senior level. The planning officer observed:

"I suppose it's the management, the Development Control manager and manager that do that."

The participants in this authority identified that no one clear person or role take responsibility for monitoring for changes in the external environment, which may impact on the DC decisions. New legislation and policy guidance is identified by members of the team and then cascaded around through the use of the Development Control manual and more informal methods, such as emails and phone calls.

7.2.4.1 Discussion

This case study analysis shows that there may be different means of monitoring the external environment for changes, such as it being the sole responsibility of one person or contained within an overall group responsibility. However, when

no person or people take responsibility, issues can arise with the system's operation. In addition to the role being carried out, it is also important to have a means of communication of any information or intelligence which is forthcoming. This has been shown to operate successfully in two ways in these case studies: through structured team meetings and through a shared online journal. The analysis contained with Chapter 5 highlighted the absence of this monitoring and communication flow, as the planning staff were statistically significantly less aware of the recommendations of the reports which would influence their working practices.

7.2.5 System 5 – Policy

This system relates to the formulation of the future direction and aims of the organisation, and should be formed in relation to the factors in the environment of the organisation.

In the past, this responsibility in the first case study, was clearly held by the predecessor to the current manager who implemented wholesale changes to the service. The importance of the integration of this role with the environmental factors is clearly demonstrated by the deemed success of these measures. The elected member puts these down to the past experiences, and therefore the knowledge, associated with the role:

"It was quite interesting that the previous incumbent, came from the government side, he actually wrote some of the documents so he had an insight and a little bit of nouse of how things actually worked. He was good because he could just get on with it."

Meanwhile, it would seem that within this Authority this role is conducted through negotiation between the management team of the planning service.

In addition, the policy setting for financial matters is also conducted within this area. The DC manager has, in looking at the financial climate, reallocated staff to alternative roles in order to ensure their long term employment. This has been received positively by the member, who stated:

"Turning the situation to their own uses: why get rid of people if there's

something else they can do to help another department and move things forward?"

The strategy within the second case study is, according to the Development Control manager, is set by the Senior Management Team, through the senior managers and politicians. As the authority has demonstrated a limited capacity to observe the external environment, it would seem that the decisions on this front are limited. In addition, the decisions made are not effectively communicate to staff at different levels:

"I think it should be the Head of Service but I don't think that even he knows what is going on, there has been an incident recently and the DC Manager didn't know anything and the Head of Service even less."

Within the final study, the overall strategy of the service is conducted through the management: the Development Control manager and the Senior Management Team of the authority. They look for the changes and determine the structure and aims of the Development Control team. It is from this level that the role of economic development gains greater emphasis over that of target meeting.

It is necessary to note here that the authority, at the time of the case studies, was also considering a wholesale restructuring of its environmental services, as a reaction to the current economic crisis, sub contracting their provision to an external company. This clearly shows that, at this level, there is a clear responsibility for reacting to external changes.

7.2.5.1 Discussion

The level of strategy setting is again varied across the case study authorities although, in all the case studies, it is conducted by the authorities' Senior Management Teams. The importance of the input of the system 4, intelligence, system is clearly illustrated by the difficulties faced in the second case study in sensing relevant changes in its environment.

7.3 Pre Application Advice: Management Systems 2 - 5

This work now moves to examine these processes as they present themselves at the second level of recursion. The findings from the case studies are again presented via the form of a SWOT analysis of the Strengths, Weaknesses, Opportunities and Threats. Systems 2 to 5 of the Pre Application Advice process are displayed in Table 7.1 below.

Table 7.1 SWOT Analysis of the Pre Application Advice 'Management' Structures

SYSTEM 2 (Coordination)
<p style="text-align: center;">STRENGTHS</p> <ul style="list-style-type: none">- Clear allocation of pre-application requests by a team leader or manager <i>In case studies 1 and 3, written pre-application requests are distributed by the Development Control manager or an area team leader. Informal verbal advice is given through a duty planner system to advise if more detailed correspondence is needed. This allows good among between the teams taking account of 'workload and ability'.</i> - Continuity of responsible officer <i>All three case studies try to maintain consistency of case officers throughout the pre-application process and through to the planning submission allowing a relationship to develop with the developer and other stakeholders in the process.</i> -Electronic recording of pre-application advice <i>Case studies 1 and 3 record pre-application advice on an electronic database. In Case Study 3, this includes the recording of advice given by the duty planner, allowing others to quickly consult the advice given.</i>

WEAKNESSES

- Lack of formal allocation of pre-application advice requests

In the second case study, the allocation of advice requests is undertaken in an ad hoc manner and is heavily dependant on the person receiving the initial telephone enquiry. The Development Control manager in this authority acknowledges that this is exacerbated by a large number of part time employees.

- Failure to record, in a recoverable form, informal pre-application advice

Case Study 1 while recording formal pre-application discussions do not have a means of recalling the information provided informally by the duty planners. Case Study 2 has no process to record informal advice. The issues created by this are observed by the principal planning officer in the third case study, who stated, 'you need to record it so you can hopefully achieve consistency of advice, there is a tendency at times for someone who isn't happy with a particular answer to go to another officer to try and get a different answer'

- Lack of variety in staffing workloads

Within the second case study, it was acknowledged that there was limited scope for staff members to develop their caseload, with the senior staff picking up the majority of the more complex cases, and continuing their involvement at the planning submission stage.

OPPORTUNITIES

- Coordination of cases to create a varied officer caseload

The coordination of cases to create an interesting caseload is used to enhance the working experience of the planning staff. The Development Control manager in the first case study authority viewed this stage of the planning process as strategically important in maintaining a quality of workload for the staff and ensuring that the staff have the experience for dealing with future advice requests.

THREATS

- Advice in the early stages is provided by 'junior' planning staff who may not have sufficient awareness of all the issues

In the second case study, much external contact was coordinated through a council wide call centre. The guidance issued to the call handlers was to direct initial enquiries to junior members of planning staff. The principal planning officer identified issues this could cause including potential errors in advice through missing key issues and through additional delays caused by these staff attempting to find the appropriate information themselves.

- Applicants 'picking and choosing' case officers to gain altered advice

Within the third case study, pre-application advice is recorded, however, if this wasn't the case, the planning staff feel that potential applicants may attempt to pick and choose the advice they receive, 'there is a tendency for someone who isn't happy with a particular answer to go to another officer or to somebody else to try and get a different answer'.

- Absence of planning officer with 'case awareness'

Officer continuity has the potential to create difficulties if a member of staff with specialist case awareness is absent for a substantial period of time. This issue was identified by the Development Control manager in the second case study when discussing the application following pre-application advice from a retired staff member. This can be mitigated through detailed records although the established relationships will need to be rebuilt.

SYSTEM 3 (Performance Management)

STRENGTHS

- Clearly defined time targets with inbuilt flexibility

In Case Study One, the published guidance on pre-application discussions states that the pre application advice will be provided, where possible, within 21 days of receipt of the enquiry and the payment. The Development Control manager states that the planning officers will meet this target in the majority of cases, but it is not a rigid standard and can be varied, for example, if detailed input from an external consultee has not been received.

- Clear standards of the contents of pre-application advice

Case Study 1's guidance notes lay down clear standards of the quality of advice which is offered to developers. This includes:

- An understanding of the application of planning policies to the proposed development;*
- Identification of the need for specialist input;*
- Explanations of validation requirements;*
- Guidance on planning contributions;*
- Reduction in the time needed by the applicant with professional consultants;*
- Advice on procedures and timescales;*
- Indication of unacceptable schemes.*

WEAKNESSES

- Lack of clearly defined timescales

In the second case study there are no clear targets. The guidance provided to the public states that the pre-application advice will be provided as 'efficiently as possible'. The payment of a fee removes this advice from the authority's policy to endeavour to respond to general correspondence within 21 days. In the final case study, where the advice is not charged for, there are no timescales to be adhered to by the officers.

- Lack of clarity of pre-application advice contents

The final case study has no published guidance on the contents of advice, although the planning staff consider the advice to be an important tool in the application process. This creates informal standards to which the officers adhere to in order to provide high quality advice which will facilitate development. Developers do not clearly know what standard of advice they will receive and may not as a result be keen to participate in the process.

The published pre-application advice guidelines for the second case study focus predominantly on the justification for the fees in place with no clarity of the contents

OPPORTUNITIES

- Clear standards (of time and content) encourage the uptake of pre-application advice

The guidelines of the first case study authority are clear that developers who do not take up pre-application advice, and who subsequently encounter issues with their planning application which could have been identified at this stage. The planning staff are confident to conduct processes in accordance with these guidelines.

THREATS

- Developer expectations of the service

The principal planning officer of the second case study authority observed that, since the introduction of charges for pre-application advice, developers expectations of the service have risen as they now, 'are almost expecting a decision in advance'. The authorities should therefore make the service criteria clear to both internal and external stakeholders, such as developers.

SYSTEM 3* (Monitoring)

STRENGTHS

- Consistent overview of given advice by senior planning staff

In the first case study authority, the written advice given at the pre-application stage, is overseen by the area planners, and ultimately by the Development Control manager. This processing results in a clear overview and monitoring remaining in place prior to written advice being provided to applicants.

- Clear recording of the flow of pre-application advice

In the first and third case studies, requests for pre application advice are integrated into the Development Control IT system, and recorded as formal requests. It is possible to track the progress of an application and to readily access the advice itself.

WEAKNESSES

- Lack of overview of advice given.

In the second and third authorities, the planning staff were responsible for the advice given and this advice is not necessarily reviewed by a manager. This could lead to reduced confidence in the service as conflicts occur.

- Absence of monitoring of time periods

Even in the authorities (1 and 3) where requests for advice are recorded within an IT system, there is no established practice of monitoring the time taken to respond to these requests. Informal tracking, by the Development Control manager in Case Study 1, does take place but only as time allows: there is no formal; monitoring schedule

- Reactive monitoring of advice content and speed

A lack of formal monitoring has lead in the second case study to a reactive system of monitoring by the Development Control and planning manager, chasing enquires after complaints are received about either the content or the speed

OPPORTUNITIES

- Open Discussion of applications and exchange of ideas.

In all three case study authorities, the Development Control services are structured through the use of area teams. Within these teams there is a culture of open discussions between staff members in relation to both planning applications and pre-application advice. This enables a system of informal monitoring of the content of pre-application advice through team awareness and appraisal.

THREATS

- Inconsistent advice through lack of 'management' overview

In the second case study authority, advice is issued directly by the planning staff without any formal management or team overview. There is no formal monitoring of the advice provided. This authority relies on planning staff to seek assistance when they see fit.

- Lack of autonomy for officers to develop skills

In the first case study, all of the advice given at the pre-application stage is 'signed off' by the Development Control manager. This means that the Development Control manager is substantially involved within an 'operational' element (or the top level system). This results in reduced autonomy for the planning staff.

- Reduced staff engagement in the pre-application process

Reactive monitoring could lead to staff demoralisation as management engagement in the process in times of failure can be perceived as a lack of confidence in the staff member or 'side taking'

- Reduced Developer engagement

Lack of consistent and timely advice could reduce developer uptake of the service.

SYSTEM 4 (Intelligence)

STRENGTHS

- Sense of responsibility to oversee the external environment

In the three case study authorities, it is considered to be the responsibility of the planning staff to monitor the environmental changes which will impact on the advice given, such as changes in consultee policies, or in other planning policies.

In the first case study the planning officer also identified this role as being formally overseen by the Development Control manager and emphasised the amount of information which came from them.

- Clear routes of communication of environmental changes

In the final case study authority, the Development Control manual is a respected means of recording and conveying environmental changes which is actively used by staff members at all levels.

WEAKNESSES

- Lack of responsibility to monitor for environmental changes

Within the second case study, the principal planning officer accepted the responsibility to review the changes which would impact on the pre application advice given, but also observed that they had little time to keep up to date on these changes. The Development Control manager also observes that in theory the responsibility lies with himself, as manager, but feels that time is not available for this purpose. Therefore this role is being neglected and both the Development Control manager and principal planning officer identified situations where policy changes were not reflected in the pre-application advice offered by the authority.

OPPORTUNITIES

- Use of pre-application advice stage to gain intelligence for latter process stages

Information on the external environment, and likely future planning applications, can be gained at the pre-application stage. This element of the pre-application advice function is acting as an 'intelligence element of the application submission sub system.

THREATS

- Lack of time available for external monitoring

As illustrated above, the monitoring of external environmental changes is strongly threatened by the lack of time dedicated to this purpose. While the Development Control manager in the second case study acknowledges this process to be a significant part of their role, they admit that time is not dedicated to its execution. The professional planning staff also acknowledged that its monitoring is, 'more a matter of luck than judgement.

- Changes in external environment between pre-application advice and planning application submission

It is accepted by the participants in the three case studies that changes in the environment (for example due to political or economic circumstances) can take place between the pre-application process and the submission of a full planning application. These changes need to be monitored and clearly relayed to the developers at suitable times. Failure to do this threatens this subsystem through undermining the respect of developers in the process.

- Focus of Intelligence on the appropriateness of charging rather than on the information required for advice

In the second and third case studies the main focus of the senior planning staff/ management was towards the level of fees and/ or their appropriateness. As such, the monitoring of the environment for other changes appears to be neglected.

SYSTEM 5 (Policy)

STRENGTHS

- Strong policies laid down at a senior level

Within the first case study, the policy relating to pre-application advice was strongly laid down and supported by both the Senior Management Team and the elected members. For example, if a flawed planning application was received where an opportunity for pre application advice had been refused, there would be limited negotiation within the application process. The application would be quickly refused and negotiations offered outside the application timetable

Strong policies supported at all levels

The planning staff within the first case study were confident in the application of pre-application policies and were also confident of the support from both senior management and elected members in their application of the policies. As such, a relationship with the majority of developers had been created where pre-application advice was generally sought as a matter of course.

WEAKNESSES

- Focus of policies on charging structures

Within the second case study authority the published pre-application advice policy concentrated almost wholly upon the fee attached to the service. While this is important in the running of the service, the policies also need to look at the proposed content and context of the advice, whether or not a charging structure is in place.

- Lack of clear policies and procedures in the pre-application process

The principal planning officer in the second case study observed that there was little overall policy on the necessary contents of any advice given, or on those who should be involved in the process.

OPPORTUNITIES

- High levels of developer engagement

Within the first case study, most developers are aware of the policy not to negotiate serious issues within the course of an application if pre-application advice has not been sought (or if it has been sought and subsequently ignored). As such, the principal planning officer observed that there is now a culture of seeking, and adhering to, the advice.

- High Levels of staff engagement

The support given to planning staff in applying the policies laid down enables them to operate with confidence in their decisions and advice. This creates an environment in which they are proactive in encouraging developers to request advice which reinforces the process.

THREATS

- Lack of ownership of policy setting

The Development Control manager in the second authority indicated that the policy to introduce charging for pre-application advice was made in conjunction with the higher level management team.. He indicated that they would not be able to define the policy relating to the contents of, or changes to, the advice. Meanwhile, the principal planning officer stated that there needed to be clearer advice on the contents and context (for example consultee involvement) of the advice and that it was the responsibility of the management team to do so.

7.3.1 Case Study Discussion of the Pre Application Advice system

The analysis contained within Table 7.1 shows that, as in Chapter Six, Case Study One prevails in the discussions of strengths and opportunities while having only a limited representation in the discussions of weaknesses and threats. It is represented in the strengths of all systemic elements but only features in the threats alongside shared issues with the other case studies.

Case Studies Two and Three, which were selected to represent the mid range and lower end of the selection indicators have the majority of their practices represented in the discussions of weaknesses and threats although they also both feature within the discussions of strengths and opportunities although this is on several occasions this is when the strengths are shared across all the case study authorities.

7.4 Submission and Validation: Management Systems 2 - 5

A discussion of the processes involved in the Submission and Validation subsystem follows in Table 7.2 below.

Table 7.2 SWOT Analysis of Submission and Validation 'Management' Structures

SYSTEM 2 (Coordination)
<p style="text-align: center;">STRENGTHS</p> <ul style="list-style-type: none">- Formal coordination from planning support team leaders <i>The three planning support teams of the case study authorities had a team leader role in place with the responsibility of coordinating the workloads of the team.</i>- Strong ethos to 'get the job done' <i>In the first and second case studies there is a strong staff emphasis on getting the job completed through teamwork. This results in an informal coordination amongst the team to manage the job tasks in an effective manner.</i>- Strong leadership from experienced individuals <i>The interviewees representing the planning support teams all held considerable experience in their roles (a minimum of 5 years) and some members of their teams had additional experience. They indicated that these experiences were important in training new staff and creating new practices.</i>- Prioritisation of different application types <i>The final case study have an additional formal structure in place to prioritise different application types, such as those for telecommunication which are time limited for 28 or 56 days. These are pinpointed and validated as a matter of priority.</i>
<p style="text-align: center;">WEAKNESSES</p> <ul style="list-style-type: none">- Individual staff skills limited to specific tasks <i>Coordination opportunities of the teams were limited due to the restricted skill sets of the team leaders. It was unclear within the case studies where the power lay in increasing this skill set: with the team leaders or at a higher level of management. The team leader of the second case study stated that they would like to increase the skills of the team but struggled within their resources: stating that the Development Control manager was important in initiating any procedural change.</i>- Lack of overall responsibility (pressures from a number of sources) <i>The studied planning support teams carried out additional functions to application validation and decisions. For example, in the first case study a team member was also responsible for land charges searches. These are controlled by a different council department and pressure to carry out this work will come from another source. There was no formal means or structure to prioritising the work to be undertaken</i>- No allocation of planning officer throughout the validation process. <i>Within the second case study, applications are not allocated to a planning officer until after the validation process. This can cause issues as the validation team do not know who to approach for assistance and there is no clear channel for enquiries on the application</i>

OPPORTUNITIES

- Establishment of detailed checklists and guidance

In the first and third case studies a check list was used in processing applications available through the service team and through the Development Control manual.

- Informal liaison between planning and support teams

Participants from the first and third case studies observed the strong working relationships between the support team and the planning staff. This included the prioritisation of the validation of applications which would require additional time.

- Additional support to validation team from the planning professionals.

In the final case study there is an informal system of coordination between the support team and the allocated planning officer. This takes place with all major planning applications.

THREATS

- Absence of formal checklist

In the second case study no locally developed checklist was used. There was a local list for validation requirements but the team leader observed that this was so broad as to lose its value.

- Reduced coordination causes significant specific delays

The Development Control manager in the second case study observed that there can be issues within the validation process where applications are 'abandoned'. This is attributed to their large scale and the need for further input or additional time. However, it is often the case that these are the same applications which require more complex work by the planning team and which should be prioritised with regards to validation processing.

SYSTEM 3 (Performance Management)

STRENGTHS

- Clear targeted time limits for application validation

Case Studies 1 and 2 had clear targets, 5 days and 1 week respectively, for the registration of valid applications. These, are not always adhered to but are accepted by the planning support staff, planning staff and management as an ideal standard to be achieved where possible

- Clear timescales for issuing planning decisions

The presence of a set timescale for issuing a decision notice was present within all three case studies. This allowed planning staff to work with greater certainty that a decision would be issued in time, but also allowed the support staff the ability to plan and coordinate their workloads.

WEAKNESSES

- Lack of targets for key system processes

Some processes of validation, such as the external publishing of application data, are not given timescales within the authority. It has been acknowledged that there are delays in distributing the data for this communication process.

- Lack of adherence to targeted processes

The planning support officer in the final case study observed that planning staff often produced applications for decisions at the last minute beyond the targeted timescale for the support team to produce the decision notice.

OPPORTUNITIES

- Communication/ appreciation of targets across the planning team

In the first case study, the Development Control manager identified clear cooperation between the planning and support teams in relation to targets (for producing decisions). The planning team fully appreciated that the support team needed the time stated in the target to carry out their work and that this should not be encroached into.

- Clear timescales for publishing application data

The first case study had a set target of 5 days (after distributing consultation letters) to make application data available. This allows clear communication of the process to service customers

THREATS

- Reduction in customer confidence in the service

This can occur in two forms. Firstly, in the absence of clearly publicised performance standards, the public may not be aware of the processes being undertaken and feel that they are subject to unnecessary delays. Secondly, if targets are published and then not adhered to, customers will lose confidence in the value of the service that they are receiving. These were both identified by the Development Control manager of the second case study who observed that a significant amount of their time was spent explaining the systems to disgruntled service customers.

SYSTEM 3* (Monitoring)

STRENGTHS

- Informal monitoring of validation performance

In the first case study, the Head of Planning Support produces reports to illustrate the services performance on validation timescales. In the second case study these timescales are reviewed by the planning officers on their receipt of the applications.

WEAKNESSES

- Lack of monitoring of validation timescales

While the planning support team in the first case study produces reports, the teams observe that there is no reactive monitoring of these. The planning support assistant in this case study observed, 'we're 2 weeks behind at the moment and no one has noticed'. Similar reports were received in the 2 latter case studies.

- Lack of monitoring of data distribution

There is no monitoring in any case study of the publication of data on the internet, either in terms of when the data is sent to be published or the time taken following its distribution.

- Lack of proactive monitoring outside the planning support team

While the planning support team are informally aware of delays in their processes, there is little proactive external review of this within the case studies. As the principal planning officer in the second case study observed, 'if we are not aware that an application has been received, we may not be aware of its delay until a few weeks in'.

OPPORTUNITIES

- Formal processes of performance monitoring

Within the first case study, there is a reporting structure in place for the monitoring of the speed of validation. This could be incorporated into a proactive process to enable the quicker identification and mitigation of delays. The IT systems of the second two case studies could also be similarly adapted to allow for proactive monitoring.

THREATS

- Absence of monitoring of receipt of applications for a decision

None of the three case studies have a system to monitor when the planning support team receive an application from the planning professionals to issue a decision. As such, they could be operating in very limited timescales with no evidence of this. This can exacerbate pressure on other areas of the system as it reduces the ability to coordinate workloads.

SYSTEM 4 (Intelligence)

STRENGTHS

- Informal communication following pre application advice processes

The principal planning officer of the second case study identified pre application awareness as a key strength at this stage. The planning team can pass knowledge onto the support team and this awareness can be proactive in relation to both work volume and content. The planning support team leader of the authority acknowledged that this has 'made their job easier'.

- Monitoring of externally recommended practices

The Development Control manager in the first case study was acknowledged by their support assistant and planning officer, to be a key player in keeping the authority up to date with changes in recommended practices.

WEAKNESSES

- General lack of intelligence processes

The participants in the different authorities highlighted a number of incidences illustrating the absence of intelligence: in the first case study the Development Control manager acknowledged that there was no system to communicate potential new application and the planning support team leader indicated that the authority had been unaware of changes in the nationwide charging structure.

OPPORTUNITIES

- Detailed cooperation between the planning and support teams

This relates to the intelligence gained by the authorities through their pre-application subsystems. The planning teams are now frequently aware in advance of applications which will be received and this information can be communicated to the support team on a more frequent, formal basis.

THREATS

- Lack of awareness of foreseeable increases in workloads

In the first and third case studies, the planning support staff identified instances where prior knowledge of applications would have been beneficial but was not forthcoming. For example, when an application for a large housing estate which would require a large amount of processing time was due to be received.

- Lack of awareness of externally recommended practice changes

This lack of intelligence has the potential for great impact on the workings of the authorities: as they are unaware of changes in legislation, guidance or case law.

SYSTEM 5 (Policy)
STRENGTHS
<p>-Existing policies based on past experiences <i>The policies in the 3 case studies are predominantly based on past experiences of the authorities: using the knowledge of those in the system.</i></p>
WEAKNESSES
<p>- Absence of overall system responsibility <i>Within the first and second case studies, there is no clear body responsible for setting the policy in relation to validation and decisions. The planning support teams feel that the Development Control management should be responsible and the Development Control management leaving it to the planning support team.</i></p>
OPPORTUNITIES
<p>- Clear allocation of responsibility for creation of policy <i>The absence of a policy subsystem has been demonstrated to lead to issues in the effective working of the subsystem. Therefore, clearly allocating responsibility to form policy, by means of an individual or a group, will have a positive benefit to the system.</i></p>
THREATS
<p>- Absence of clear policy results in 'firefighting' and lack of structure to work <i>A lack of overall strategy within the system results in the planning support teams reacting to the workloads of the time. This causes some of the problems as previously discussed, such as processing the larger numbers of simpler applications rather than the large complex ones as a matter of urgency.</i></p>

7.4.1 Case Study Discussion of the Validation Management systems

The analysis contained within Table 7.2 illustrates a much broader spread of good and bad practice between the case study authorities in relation to the areas of good practice: the Strengths and Opportunities. However, as in Section 7.3.1, the practices of the first case study authority are represented to a greater extent than the second and third authorities. Conversely, the practices of the second and third case studies have a greater, though not exclusive, representation within the areas weaknesses and threats. These differences are not so pronounced as in the case of the pre application advice subsystem.

7.5 Involvement: Systems 2 – 5

Table 7.3 below presents a discussion of the Strengths, Weaknesses, Opportunities and Threats as illustrated in the Case Studies undertaken.

Table 7.3 SWOT Analysis of the Consultation 'Management' Structures

SYSTEM 2 (Coordination)
STRENGTHS
<p>- Use of IT systems to coordinate consultations <i>The initial consultations are coordinated in all three case study authorities through IT systems. These have been pre-programmed with data relating to the characteristics of the area and this triggers necessary foreseeable consultations.</i></p> <p>- Coordination on major applications between planning support and planning teams <i>The third case study authority has a team approach to major applications. A case officer is allocated at an early stage, and both the planning officer, and the support assistant, work together to ensure that all the relevant consultations are carried out.</i></p>
WEAKNESSES
<p>- Absence of clear procedural guidance. <i>The second case study authority lacks clear procedural guidelines in relation to the consultations and the procedure if further consultation requirements are identified. The principal planner observed that they dealt with requests for additional consultations as efficiently as possible.</i></p> <p>- Over consultation <i>In the third case study the planning support assistant acknowledges that they 'over consult' on applications so as to ensure that everyone who should be consulted will be. This could impact on the quality of consultees responses as some of their time is being used in a filtering process to establish which consultations required their input</i></p>
OPPORTUNITIES
<p>- Establishment of detailed checklists and guidance <i>The authorities all need to ensure that statutory consultees are consulted on planning applications. However, there are also non statutory consultees and neighbours who are consulted at the authorities discretion. Consultations, are laid down clearly in the first authority (in procedure notes) and the final authority (in the Development Control manual).</i></p> <p>- Liaison between planning and support teams <i>In the third case study authority, the planning teams and planning support teams work together in establishing the necessary consultations on major planning applications. This also happens in the first case study authority but on a less formal grounding.</i></p>
THREATS
<p>- Over reliance of IT prompted consultation processes <i>The principal planning officer of the second case study authority identified that, on occasion, the pre-programmed computer led systems do not necessarily establish all consultees: 'generally it is ok, it is mainly the big applications where you want a few extra things doing... and things can go pear shaped'.</i></p> <p>- Absence of overseeing responsibility <i>While the planning support teams are primarily responsible for initiating the consultation process, they rely on the planning officers to check the consultations during the planning process. There is not a coordinated approach to this process in any of the authorities.</i></p>

SYSTEM 3 (Performance Management)

STRENGTHS

- Integrated working between planning and support staff

The management of consultees is primarily conducted in the case study authorities through the sharing of knowledge between the planning and support teams. This is more formally established in the third case study but is also present in the first case study and to a limited, informal extent, the second.

Continual informal management and feedback learning

The interviewee from the planning support team in the first case study described how the team learn from any applications which are returned for further consultations; 'we do what we think is right, and then if it comes back we know for next time'.

WEAKNESSES

- No set time limits or performance measures

None of the case study authorities have any formal means of monitoring the performance on consultation procedures. The time limits which apply in the first and third case studies in relation to validation also cover this initial consultation stage of the process. However, these are not rigid time targets.

- Reactive identification of issues in relation to appropriate consultees

Missing consultations are predominantly identified when a complaint is made, or a specific issue comes to light. This may not have a significant negative impact on the overall process but will occupy management time and potentially delay the process of an application.

OPPORTUNITIES

- Random checks of consultations

As there is no formal monitoring process present in any of the case study authorities, it is proposed that a performance management system could be introduced to measure the consultation.

THREATS

- Delays/ missing consultations result in the exceeding of statutory time limits

The principal planner of the second case study observed that, when consultations are missed and not noticed until a later date, the consultation delay can result in the application exceeding its statutory time period.

- Missing consultations result in maladministration of the planning process

In extreme circumstances, an error in the consultation process could result in the maladministration of a planning application and the legal and political consequences which could stem from this.

SYSTEM 3* (Monitoring)

STRENGTHS & OPPORTUNITIES

- Monitoring of consultations by planning team

The consultees in the authorities are checked by the planning staff on their receipt of the application. Any omissions can then be conducted by the planning team.

- Use of existing computer systems to monitor timescales

As the consultations in all three case studies are generated through their various computer systems, the dates and time taken are already recorded and reports can be generated through these. Practices can be adapted to record when a check has been made on these consultations at a later date.

WEAKNESSES & THREATS

-Absence of clear process to monitor consultations

While the authorities have processes in place for the planning staff to check the consultations, there are no set time limits for this to be achieved within. Therefore, missing consultations can emerge relatively late in the process. In addition, there is no process of recording whether these checks have been made.

- Lack of monitoring of consultation timescales

This is closely related to the absence of timescales within the validation system. While two of the case studies, the first and second, have a stated target time scale for the two processes to be completed, there are no formal processes in place to monitor the time taken.

SYSTEM 4 (Intelligence)

STRENGTHS

-Review of changes in communication by the management team

In the first case study, the management team have demonstrated that they monitor the external environment. They have established that the means of communication are changing with an increased emphasis on electronic communication systems.

- Informal review of environmental changes

In the third case study the responsible for monitoring changes is undertaken by all levels of the service, and communicated by means of the Development Control manual.

WEAKNESSES

- General lack of intelligence processes

In the second case study, no responsibility is taken for the monitoring of the external environment, and there have been instances where changes were missed. The Development Control manager acknowledges that it should be an aspect of their role but states that there is not enough time available.

OPPORTUNITIES

- Integration of external consultation practices with technological increases

As technology changes, the consultees in the planning process are also adapting their communication practices. These changes to the processes need to be integrated into the practices of the authorities. In the first case study this is undertaken by the Development Control manager.

THREATS

- Inappropriate integration of external consultation practices.

In the second and third case studies, changes in the means of consultation, are integrated by either the planning support team or on a more ad hoc basis. This removes an element of overview of the process.

POLICY (System 5)
STRENGTHS
<p>-Policy overview at a Senior Management level</p> <p><i>In the first case study, the policy for consultation practices is the clear responsibility of the Development Control manager.</i></p>
WEAKNESSES
<p>- Absence of overall system policy responsibility</p> <p><i>Within the second case study, there was an absence of overall policy setting, with changes being reacted to as opposed to being proactively planned. The planning support team leader accepts that they create policy but do not agree that it is necessarily their responsibility.</i></p>
OPPORTUNITIES
<p>- Presence of clear policies with support at all levels.</p> <p><i>Within the first case study the policy for neighbour consultations is relatively restrictive but is clearly laid out and supported by the planning staff and the planning management. As a result the staff are confident in its implementation and in dealing with any enquiries about the procedure.</i></p>
THREATS
<p>- Absence of clear policy results in 'firefighting' and lack of working structure</p> <p><i>In the second case study there is no clear strategy or policy relating to work coordination or process. This could lead to a process of fire fighting and reacting to changes when forced as opposed to planning and coordinating the necessary changes to practice.</i></p>

7.5.1 Case Study Discussion of the Involvement Management systems

An overview of Table 7.3 suggests that the first and third case studies are currently operating with practices which involve greater elements of good practice in accordance with the principles of the Viable Systems model. Meanwhile, while showing these examples of strength, the third case study also features prominently, alongside the second case study, in the discussions of the weaknesses and threats.

7.6 Conditions and Obligations : Systems 2 – 5

In the final section of this stage of analysis, the work turns to examine the strengths, weaknesses, opportunities and threats of the final studied operational subsystem, Conditions and Obligations. Table 7.4, below, presents the discussion of this analysis.

Table 7.4 SWOT Analysis of the Consultation 'Management' Structures

SYSTEM 2 (Coordination)
STRENGTHS
<p>- Use of standardised conditions where possible <i>The second case study uses standard conditions to cover frequently occurring necessities. This includes a wide range of areas from highways through to building conservation. This facilitates various stages of the process from issuing the decision notice through to monitoring throughout the development.</i></p> <p>- Clear tariffs and guidelines relating to planning obligations <i>The first case study authority has a series of tariffs in relation to Section 106 agreements, which are the starting point for the negotiation process</i></p> <p>- Delegated approval of applications by Development Control managers <i>All application conditions are ultimately approved by the Development Control manager, following its consideration by elected members or under an authority delegated to them by the elected members. This provides a comprehensive overview of the service and the conditions and obligations attached.</i></p>
WEAKNESSES
<p>- Individual officer use of unique conditions <i>The Development Control manager of the second case study authority acknowledged that some officers still have preferences for different conditions. This can lead to slight inconsistencies between conditions and obligations.</i></p> <p>- Political demands on the system <i>Planning is a democratic process and therefore is subject to political influences. These can vary over time and, as the Development Control manager of the first case study observed, it can impact on the decisions that are made, and the obligations and conditions attached to them.</i></p>
OPPORTUNITIES
<p>- Negotiation skills of planning officers <i>There are many demands on a limited resource in relation to planning obligations. While the first case study has a clearly defined tariff system there is still a need to create a balance between the demands. The negotiating skills of the individual officers are therefore key in creating a balance to these demands.</i></p>
THREATS
<p>- Absence of Development Control manager <i>As the main form of coordination of conditions is the Development Control manager's overview of all applications, they are a key player in maintaining consistency. In their absence processes must be put in place, within the scheme of delegation, to allow process continuity.</i></p>

SYSTEM 3 (Performance Management)

STRENGTHS

- Section 106 trigger points based on easily monitored events

In the first case study authority, Section 106 agreements are negotiated with the practicalities of monitoring them as a key consideration. Therefore the trigger points are relatively standardised and are clear dates, such as the commencement of development.

- Cross service review of obligations

The second case study authority has a bi monthly review meeting of the progress of completed planning obligations, including representatives of the council's legal, financial, leisure and planning services.

WEAKNESSES

- No set standards of condition/ obligation fulfilment

None of the case study authorities have clear standards for when conditions have been fulfilled. Some conditions have clear thresholds at which they are fulfilled, whereas others are not so clear cut (such as the requirement of a line of sight on an access.)

- Unclear trigger points for conditions/ obligations to apply

All the authorities are aware that some obligations are monitored through unclear, or uneasily measured, points, such as the occupation of a certain number of dwellings.

OPPORTUNITIES

- Examination of conditions and obligations by those responsible for enforcement

In the first and second case studies the Section 106 officer and the enforcement officer were able (in some cases) to review conditions and obligations prior to the decision being issued. This allows potential monitoring issues to be foreseen and accounted for at an early stage.

THREATS

- Economic changes contributing to Section 106 renegotiation

In the first case study, the recent economic circumstances has created the need for the authority to renegotiate some of the previously completed Section 106 agreements.

SYSTEM 3* (Monitoring)

STRENGTHS

- Proactive monitoring of planning conditions

The final case study have a proactive policy for monitoring conditions, including a written process to remind applicants of the need to discharge.

- Structured recording of condition discharge

In the first case study applications for condition discharge are clearly recorded in the IT system with a separate record created for each condition. These records are clearly linked to their original applications.

- Informal monitoring of application progress

The elected members of the first case study authority have a good working relationship with the officers and informally monitor the progress of application construction works.

- Monitoring Officer

The final case study has a monitoring officer post, who is responsible for monitoring the progress of both conditions and obligations. They work solely on these without becoming involved in other forms of planning enforcement.

- Section 106 officer post.

The first case study has a post of S106 officer, who's main work role is ensuring that S106 agreements are fully complied with.

WEAKNESSES

- Absence of formal proactive monitoring of planning conditions

In the first and second case studies, the Development control managers acknowledged that there was no proactive monitoring of planning conditions. Monitoring did occur if issues were brought to the authorities' attention or if an application was made for application discharge but did not occur as a matter of course in the authority. The Development Control manager of the first authority succinctly stated, 'the monitoring of conditions is a thing which doesn't happen as a matter of course'.

- Lack of ownership of decision conditions

The planning officers in the first two case studies maintain, theoretically, the responsibility to monitor the conditions on applications. However, as the principal planner of the second case study observed, they can, at this point, become an enforcement responsibility.

- Focus of obligation fulfilment on developer obligations

In the first and third case studies, the focus of monitoring of the obligations is on the developer's obligation. However, quite frequently, either the authority, or consultee have obligations placed on them following the receipt of funding from the developer. These obligations are an essential part of the obligation but lack monitoring by the authority.

OPPORTUNITIES

- Publication of lists of applications for condition discharge

In the first case study authority, the applications for condition discharge are produced in list form which is distributed to a number of parties, including the elected members. This facilitates an additional system of informal monitoring through the local knowledge of these members.

- Use of an electronic database to monitor obligations

The second case study authority uses an electronic database to monitor Section 106 obligations. When these obligations are completed the details are entered. This database is the responsibility of one officer.

THREATS

- Focus on other forms of enforcement

The second case study has a Monitoring and Compliance officer in post. Unfortunately their role has developed to focus primarily on planning enforcement with no time to proactively monitor applications.

- Absence of monitoring can negate the purpose of the Development Control system

If conditions and obligations are not monitored, and therefore not fulfilled, the quality of the approved development will be less than was allowed in the application approval, to the detriment of the planning system.

SYSTEM 4 (Intelligence)
STRENGTHS
<p>- Strong relationships with external organisations <i>The majority of conditions and obligations are placed on, or associated with, applications on the advice of external parties. Therefore it is these organisations who hold the responsibility for monitoring the external environment. It is, however, important for strong relationships to be maintained with these organisations. This is the responsibility of the Development Control manager in Case Study One in conjunction with the Section 106 officer.</i></p>
WEAKNESSES
<p>- Lack of authority responsibility for external monitoring. <i>Participants from the local authority located the responsibility to monitor the external environment as belonging to the external consultees.</i></p>
OPPORTUNITIES
<p>- Use of a Section 106 officer to monitor external changes <i>The Section 106 officer in the first case study held some responsibility for liaising with, and therefore monitoring, the potential demands of the external consultees. This prior knowledge could significantly assist in setting the policies relating to the allocation of available funding and the use of conditions.</i></p>
THREATS
<p>- Changes in economic circumstances can impact on developers ability to deliver obligations <i>The Development Control manager of the first case study identified economic changes as a key factor in changes in obligations, as developers request amendments to agreements in the light of new economic circumstances.</i></p>
SYSTEM 5 (Policy)
STRENGTHS & OPPORTUNITIES
<p>-Involvement of elected members and officers in the policy process. <i>In the first case study, the balancing of demands on the resources are considered by the Senior Management team of the authority and the elected members.</i></p>
WEAKNESSES & THREATS
<p>Lack of officer engagement on the policy process <i>The principal planning officer in the second case study explained how the detailed negotiations of planning obligations were dealt with by the legal service of the authority with little input from the planning officer. This exacerbates the lack of a sense of ownership of the agreements</i></p>

7.6.1 Case Study Discussion of the Conditions and Obligations 'Management' systems

Once more, Case Study One is strongly represented in the discussions relating to the strong and opportunistic elements whereas the second and third case studies predominantly feature within the weaknesses and threats.

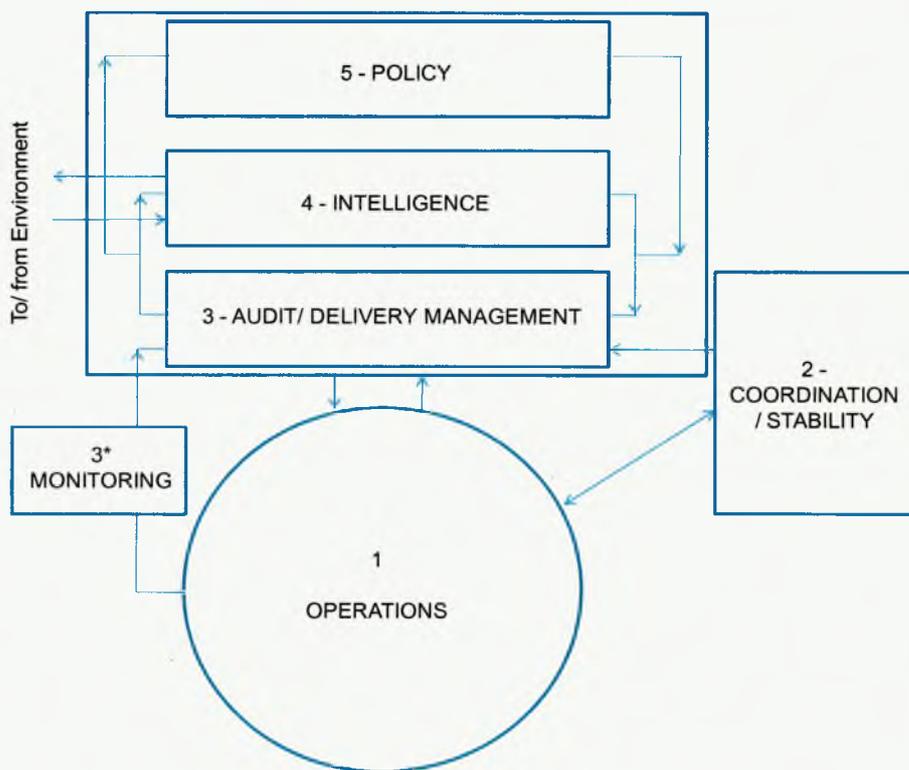
7.6.2 Case Study sub systems overview

The analysis contained within sections 7.2 to 7.5 has clearly demonstrated that Case Study One operates using a large number of characteristics which, with Viable Systems Thinking, are beneficial to the long term viability of the system. Case Studies Two and Three have elements of good practice but also show many features which will weaken and threaten the ability of the systems to remain viable in the longer term. This reflects the case study selection as Case Study One performed highly in relation to practice, awareness of change and acceptance of change. However, Case Study Two (the mid authority) and Case Study Three (representing the lower authorities) cannot easily be separated in terms of the levels of strong and weak features. This indicates that the Viability of System relies on the characteristics being present across the systemic elements as a whole.

7.7 Management of Discretion and Communication Flows.

The analysis continues to explore the discretion granted to players in the process at the two levels of recursion previously examined, exploring where this might lend itself to be enhanced, or where it may need greater support or monitoring. In conducting this analysis an examination will also be the essential flows of communication between these systems as illustrated in Figure 7.1, below.

Figure 7.1 Key Communication Flows in the Viable Systems Model



7.7.1 The Development Control Process

A key component of the Viable Systems Model is the ability of organisations to operate as a result of discretion and trust between the components. This has been briefly touched upon in the discussion of coordination: The DC manager of the first case study has confidence that his staff will work together to determine application within statutory time limits and the elected members have trust and confidence in the planning staff to carry out their roles in a professional manner. Indeed, the Development Control process itself, would not be able to operate

without the delegated decision making powers of the officers who determine around 95% of received applications in all three case study authorities. This process is summarised by the principal planning officer in the second case study who stated:

"we have a good dialogue [with councillors], and there is trust on both sides which I think smooths the process along."

However, the presence of discretion is also important in other areas. In this case it can be identified in the decision of the planning staff to approach the planning manager with reasons why an application needs to exceed the time limit, and consequently, when the planning manager is justifying his performance statistics to the Senior Management Team and committee.

This discretion applies to a greater extent within Case Study Two where planning officers are able, on the basis of economic development, to further justify a lack of performance on the target indicators. It does, meanwhile, appear to different extents in the other case study authorities.

Within Case Study One, autonomy can be identified in many areas of the system. In Operations it occurs in the distribution of workloads between staff and the personal management of staff workloads. In this authority both administrative and professional staff are not subject to in-depth intervention from forms of management. Autonomy is also present in the delivery management and monitoring systems, the DC manager has stated that he does not often need to run a report to monitor progress, and indeed, if he did so, this may produce tension in the organisation.

Finally, with regard to policy, it is clear to see that the Senior Management Team hold a significant amount of autonomy in relation to justifying and spending their budgets. They reacted to a drop in applications and fees by transferring staff to other work to ensure their continued employment. In addition, in the times of relative plenty, funds were invested in structures which would carry forward into the future, for example, in setting up systems for dealing with electronic applications and in ensuring staff training.

Within Case Study Two the discretion of the DC staff, and their autonomy, is

slightly restricted. For example, an application is required to be determined by the planning committee rather than under delegated powers if more than three objections are received, or if it is called to committee by an elected member. It is also apparent that the Development Control manager has confidence in his staff to leave them to work autonomously in relation to the determination of applications and the provision of pre-application advice

However, within Case Study Three the autonomy allowed to staff, or conversely, the lack of management systems, may itself cause issues. For example, the planning staff can cause issues to their support team by creating work at short notice. In this case, it may be considered appropriate to restrict this autonomy through the introduction of a formal time scaled process through which an application should progress unless the interests of the quality of development show otherwise.

Within the first case study it is particularly clear that the communication flows between many of the systems is enhanced by the presence of both the Development Control manager and the elected members in the majority of the systemic elements. Their involvement also allows the planning professionals to appreciate that their work is respected and they know that support in the work will be forthcoming. This allows them to work with autonomy knowing that they will be supported.

7.7.2 Pre Application Advice

The following sections will now analyse these communication flows and the management of discretion in relation to the Operations subsystems. . This section will also address the balance of autonomy within the elements as this is closely entwined with these communication flows.

7.7.2.1 *Operations and Coordination*

Within all three case study authorities, the team responsible for the coordination and for the operations of the subsystem consist predominantly of the same staff members. The responsibility for coordinating workloads varies with some allocating through area teams while some are allocated by the Development Control manager.

In Case Study Two, where requests for advice are allocated by the team, there is clear communication between the two systems. The authority appeared to experience difficulties as the enquiries were generally initially received by the junior planning staff, and it was their responsibility to determine when a more experienced member of staff may be required to work on the case. Conversely, in the first and last case studies, the requests for advice were allocated by the Development Control manager or the area team leader. This is advantageous with regards to workload allocation, both in terms of the quantity and complexity of cases. It also ensures that a member of staff consistently has a general overview of the cases in the authority.

These contrasting elements of communication also illustrate the balance which needs to be obtained with regards to the autonomy of those in the process. While the operational elements of the second case study have a high degree of autonomy in allocating the applications among themselves, they may also create difficulties through the lack of an overall vision of the situation. In addition, the amount of autonomy placed on the more junior members of staff may be a burden on them.

This balance also needs to be obtained within planning authorities between the strict allocation of resources and the maintenance of autonomy within a team. For example, if the area teams had the flexibility to suggest the allocations of the caseloads between themselves but then subsequently agreed them in conjunction with the Development Control manager. In this way the overview and coordinator roles are clearly distinguished.

7.7.2.2 Operations and the 'Management' Systems

The communication in the case studies between Operations and the three 'Management Systems' is generally conducted through the Development Control managers who, through their coordination role and their management roles are integral to both systems. In the first and third case studies, the communication between the operations and management systems is more clearly defined. In the first case study the operations staff view this as important element of the Development Control manager's job: a view also shared by the manager himself. In the third case study, both the Development Control staff

and the management view their Development Control manual as a key method to have policy and intelligence communicated to them. There are, however, less clear means of communication flowing in the opposite direction: from the Operations team to the Management functions.

The second case study authority illustrates few means of communication between these functions. There are no formal processes to report the progress of pre-application advice requests and, as the work is not allocated by the Development Control manager, there is no overview of the situation as a further method of conveying this information. This is reflected in the dissatisfaction expressed by both the manager and the planning staff with regards to the workloads created in pre-application advice and the expectations of developers from the process.

7.7.2.3 Operations, Monitoring and Audit/ Delivery Management

This communication flow primarily concerns the information channels between the operations and the audit and monitoring systems, ensuring that those within the operations system are aware of the means of monitoring and that the established forms of measurement are being monitored and communicated to the audit function to assess the performance.

In the first case study authority, the information flow is clearly present: through the role conducted by the Development Control manager. It is their role to monitor both the quality and speed of the advice provided and they are also acknowledged as being a key player in the establishment of standards for this advice. In the remaining case studies this relationship is not so clear cut, for example, the Development Control manager of the second case study clearly indicated that he did not study or monitor the pre-application advice provided by their team. Additionally, like the final case study authority, the management team omitted to monitor the timescales in which the advice was provided, unless an external enquiry was received in relation to a specific case.

The potential autonomy of those involved in this process is therefore substantial. The absence of a monitoring process means that the operations team remained in control of the quality and speed of the advice provided. While these teams indicate that they are not unduly concerned with this freedom, they

did express concern over the lack of awareness of the potential further pressures and workloads placed on them from the pre-application process. The principal planning officer in the second case study observed that there seemed no awareness of the work that they were undertaking. A monitoring structure, such as the informal ad hoc structure of the first case study, would assist this obstruction to the communication flow and mitigate these issues.

7.7.2.4 Coordination and Audit/ Delivery Management

This communication flow again operates successfully in the first case study, where the processes are primarily conducted by the same job role: the Development Control manager. They would be able, if necessary to adjust the standards expected in relation to the content or timescales of applications in relation to, for example, a high increase in workloads. In this respect there is also a communication between the sub systemic level of pre-application advice and the coordination of the Development Control service as an entirety.

There is limited communication present in the second and third case studies, primarily due to the limited presence of an Audit/ Delivery management system.

It is clear that the operational staff of the second and third authorities have a much increased level of autonomy in the speed and standards of the advice issued. This does not by itself indicate that the autonomy of those in the first case study is unduly restricted, as their management structure allows them to vary on the speed of delivery if they are subsequently able to justify this variation.

7.7.2.5 Audit/ Delivery Management, Intelligence and Policy

Once more, the Development Control manager in the first case study is a key link between these two subsystems, facilitating a two way information exchange, with intelligence and audit informing the policy and the policy informing the audit and intelligence. The Development Control manager views himself as being responsible for monitoring the environment and adapting the audit criteria accordingly. They are, in conjunction with both the senior management team of the authority and the planning staff, highly involved in the setting of the pre application advice policies.

Within the second case study, the main policy focus relates to the charges for pre application advice: led by the authority's senior management team in a drive to increase income. They acknowledge that since that decision there has been little feedback or assessment of the results of the decision.

In the final case study, there is a key quasi-formal means of communication across the service: its DC manual. This is a key means of identifying issues across the subsystems, including environmental change, and is available to the policy makers and those responsible for audit processes. They do not, however, have a clear means of communicating their limited audit results to the other management levels.

7.7.2.6 Communication Conclusions

This brief summary has illustrated that the communication links within the first case study are considerably stronger than those in the second and third authorities. This strength has shown to be particularly reliant on the Development Control manager who, within this authority, holds a significantly proactive role. The Development Control Manager is involved in the complete range of sub system elements and can therefore act as an information conduit between them. This heavy involvement does not, however, appear to unduly restrict the autonomy of the systems themselves and they are still able to react to environmental changes in their own right.

The third case study has some effective communication channels although they predominantly operate through informal channels including an in-house Development Control manual. This is used to communicate the formal information, such as policy changes, although these are also communicated by email and between teams. Autonomy is present within the means of communication and within the operating practices of the systems.

The second case study shows an overall lack of communication between the systems and the resultant issues which this can cause. The Development Control manager acknowledges that monitoring and communication do not readily occur but does not feel that there is the capacity to conduct them effectively.

7.7.2.7 Discretion Management Conclusion

This analysis has highlighted the importance of providing an appropriate level of autonomy within systems, and the difficulties encountered with balancing this with clear aims and objectives and monitoring. The systems have demonstrated strengths through the ability of the staff to cope with, and react to, changes in workloads. However, the case study analysis has also identified and illustrated that the staff at all levels accept that the processes are more supportive, and therefore responsive, when there are clear working guidelines in place with support from all systemic elements. As in the analysis of sections 7.1 – 7.7, Case Study One is clearly showing stronger and more coherent processes relating to the management of discretion within the system.

7.7.3 Submission and Validation

7.7.3.1 Operations and Coordination

The coordination of the validation subsystem in the case study authorities is primarily conducted by the same team members as those carrying out the Operation system. As such, there are clear and efficient communication channels between the work being done and its control.

However, while the operations system is run with autonomy within a framework of checklists relating to the necessary data and standards of applications, the coordination systems operate, to some extent in all three case study authorities, with a large amount of autonomy with little structure to work within. This freedom of practices is not necessarily appreciated by those holding the responsibility for this coordination. The planning support team leader of the second case study stated:

"I am left on my own sometimes to make decisions that I don't feel that I should be making."

7.7.3.2 Operations and the 'Management' Systems

The communication between the Operations function and the Management systems are less free flowing within the validation subsystem. The operational element is predominantly conducted by the planning support team while responsibility for the management systems is generally attributed to the

Development Control manager's roles.

Interview participants attributed difficulties in this information flow to a number of factors but a dominant reason identified by the second case study was the physical separation of the team from the other Development Control operatives. Similarly, in the first and third case study authorities, the planning support staff lie within a management structure operating independently of the Development Control team.

The planning support staff therefore operate with a high degree of autonomy, supported through the use of detailed checklists to guide the structure of their work but with less detailed guidance on the distribution and management of workloads.

7.7.3.3 Operations, Monitoring and Audit/ Delivery Management

The discussion contained within Section **Error! Reference source not found.** illustrates that there were limited standards and monitoring systems relating to the validation of planning applications. The operational element of this system dominates these roles while other informal processes are conducted by the planning staff, and, to a limited extent, the Development Control managers.

There is, as a result, a large amount of autonomy present within the validation system, although as discussed in Section 7.7.3.1, this degree of autonomy is not necessarily supported by the staff who interpret it as a lack of support and appreciation for the work being conducted.

The information flow from Operations to the informal monitoring systems also occurs naturally during the course of the application. Once the initial validation and submission processes have been conducted, the application progresses to the planning staff. They are aware of the date on which the application has been received by the authority and additionally the time taken for their receipt of it. This, however, does remain a reactive monitoring and communication system.

In the first case study, the planning staff and the planning support staff share an office. This enables greater informal communication between these team

members, and the planning support assistance observed that the planning staff can sense when difficulties are emerging and assist if necessary, but there is no obligation or formal procedure to enable this. The planning support assistant observed:

"we are about two weeks behind at the moment but no one seems to have noticed that."

In the second case study the principal planning officer observes that the planning staff assist the planning support team infrequently but when it is requested by the planning support team leader.

7.7.3.4 Coordination and Audit/ Delivery Management

Table 7.2 identified that there are weaknesses in both the coordination and delivery management processes of the submission and validation subsystem, predominantly as a result of omission of key systemic elements. In the case studies these weaknesses contribute to the communication difficulties between the coordination and audit systems.

The coordination system predominantly relies on checklists to coordinate the content of the service delivery rather than the distribution of resources is conducting the system service. A coordination system which reacts to communications of performance from the delivery management system is not clearly present with the submission and validation service of the authorities. It appears that, within the case studies, it is the coordination system which reacts to a drop in performance and, when the internal resources can no longer cope, will seek assistance from the other management subsystems.

This further illustrates the autonomy which is granted to the planning support staff in providing the submission and validation sub system. They are primarily responsible for the operations and the coordination of the system and the communication between these systems and the other 'Management' systems has been illustrated to be restricted in parts in all three case study authorities.

7.7.3.5 Audit/ Delivery Management, Intelligence and Policy

The communication between these functions is also restricted by the lack of

formal systemic elements. The previously examined difficulties in the Audit/Delivery Management functions restrict the flow of information to the Intelligence and Policy functions: there are no formal mechanisms to report the times taken to validate applications, or the difficulties encountered in these areas to the policy makers, or intelligence gatherers.

Similarly, there are no formal mechanisms for formulating the policy and gathering the intelligence in relation to the submission and validation of applications within the second and third case study authorities and therefore there is limited communication flow between these systems. The communication is strongest within the first case study where the roles are all undertaken, to some extent, by the Development Control manager.

7.7.3.6 Communications Conclusions

The discussion contained within Sections 7.7.3.1 and 7.7.3.5 demonstrates that communication flows in relation to Submission and Validation are at their most vulnerable within the second case study authority where there is a difficulty in the communications between the planning officers and the planning support team. Meanwhile, the first and final case study authorities show clearer flows on communication across the subsystems.

7.7.3.7 Discretion Management Conclusion

In relation to autonomy and the management of discretion, the above discussion clearly illustrated that while the planning support staff hold a high level of autonomy in relation to the Operations and Coordination systems, the extent of this independence is not fully appreciated by the staff responsible for carrying out these functions who interpret it as potentially adding additional pressure and responsibility to their work,

The management systems also operate with a degree of autonomy of individuals as there is limited regulation of the work being carried out, in particular in the second and third case studies. It is, informally, the responsibility of the management, planning staff and planning support staff to ensure that the functions take place, but there is limited formal allocation of specific tasks, in particular in relation to the monitoring of process and the

external environment.

7.7.4 Involvement

This chapter continues to examine and discuss the information flows between the elements of the Involvement subsystem. It will also examine the levels of autonomy present within these elements and the system's ability to adapt to environmental changes

7.7.4.1 *Operations and Coordination*

All three case study authorities involve both planning support staff and the professional planning staff in both the operational and coordinating elements of the subsystems. The communication between these two systems is particularly effective as the key players are involved in both of these elements. There is the possibility within the structures of all three case studies that there may be a delay in the coordination and liaison between the teams as a result of the absence of formal procedures of coordination. In particular, the officers in the second case study observed that they may not check the consultations which have been conducted until they attend a site visit, which may be a week after their receipt of the application.

The Coordination system in all three case studies is reliant on the use of electronic mapping systems and databases which identify the necessary consultations. The Development Control manager in the second case study acknowledged that there are no clear processes in place to update this, should issues be identified. A member of staff was seconded to the work to initially set the system in place and the maintenance was not considered an official element of their current workload.

The level of autonomy in this subsystem varies between the case study authorities. In the first and second case studies, it is the responsibility of the planning support team to seek the assistance of the planning staff if they feel they need advice of the necessary consultees. In the final case study, there is a procedure in place for the planning support team and planning staff to jointly determine the necessary consultations on major applications. This latter level of interaction was appreciated by both the planning support and planning staff.

Finally, when considering the coordination of workloads within the consultation process, there are many parallels with the submission and validation sub system. The coordination is primarily determined by the planning support team, although it is influenced by the number of staff members trained in the consultation element of the process.

7.7.4.2 *Operations and the 'Management' Systems*

There is more restricted interaction between the Operation element and the Management elements of this subsystem, primarily due to the different personnel involved in carrying out the functions. The Intelligence and Policy functions are, in this system, allocated by the interviewees as being the responsibility of the Development Control manager whereas the Audit, Coordination and Operational elements are considered to be the shared responsibility of both the planning staff and the planning support staff. It is acknowledged by the Development Control managers of both the second and third case studies that they are not significantly involved with these operational, monitoring and coordination elements and therefore there is a restricted information flow.

It has been demonstrated through an analysis of the case studies that a clearer flow of policy and information can benefit the Operations system. The first and third case studies have clear policies establishing which neighbour consultations will be conducted as part of the involvement subsystem whereas the second case study has no policy established. The planning support team leader of this authority expressed a wish for clearer guidance and support on this matter, although their requests for this policy are not understood by the policy setters.

7.7.4.3 *Operations, Monitoring and Audit/ Delivery Management and Coordination and Audit/ Delivery Management*

In this subsystem the discussion of these communication flows have been grouped together as the subsystem elements are closely intertwined. All three of these elements in each case study are conducted in a cooperative manner between the planning staff and the planning support staff, with the support of IT systems. The data primarily flows as a result of the application progressing

from one team to another, and through support at an early stage.

7.7.4.4 Audit/ Delivery Management, Intelligence and Policy

The communication exchange between these three management elements faces some issues in the case study authorities as a result of similar issues as to those that were raised when discussing the communication between Operations and the Management system. The Policy and Intelligence systems are allocated to the management of the Development Control team whereas the Audit/ Delivery Management is conducted in cooperation between the support team and the planning staff. The issues of communication are facilitated slightly in the final case study as a result of the use of, and respect given to, the Development Control manual in communicating changes across the entire team.

7.7.4.5 Communications Conclusion

Once again, the processes of communication in the second case study appear to be more limited than those within the first and third case studies. The team, at all levels, acknowledge these limitations. This, in turn, impacts on the discretion balance in the system which is discussed in 7.7.4.6 below.

7.7.4.6 Discretion Management Conclusion

It has been seen that, within this subsystem, there are varying degrees of discretion between the case studies. The discretion of the staff in conducting the consultation process is limited by external factors, such as legal regulations, but also by internal policy. There are two main areas in which the discretion is present within the system: determining the appropriate consultees and the coordination of workloads. It has been demonstrated, once again, that while the Operational team will work efficiently with autonomy, this is improved by the presence of clear guidelines to work within, which lead to support from other elements of the system. This, as in preceding discussions, was most clearly demonstrated within the first case study authority.

7.7.5 Conditions and Obligations

Finally this chapter will discuss the information channels and system autonomy in relation to the Conditions and Obligations subsystem. Following this

analysis, a summary of the operation of discretion will be produced and conclusions made in relation to this subsystem.

7.7.5.1 Operations and Coordination

The operational element of this system in relation to planning conditions and obligations is conducted by the planning staff and, in the first and final case studies, by a specialist officer (a Section 106 officer in the first case study and a monitoring officer in the third). There are two main elements present within the operational system of this subsystem: the initial attachment of the obligations (Section 106 agreements) and the subsequent monitoring and enforcement of these.

The planning staff are responsible for determining the planning applications, attaching the appropriate conditions and obligations within, as far as possible, the statutory time targets for application determination. All three case studies use standard conditions which assist in their application and enforcement as far as possible.

The practice for applying planning conditions varies in the authorities. In the first case study authority, the communications between the operational element and coordination elements work efficiently as a result of clear tariffs and standard conditions which can be used. The case officers are therefore able to use standard agreements for implementing agreements. The process is further facilitated by the awareness of Developers to the requirements of the system. In the second case study, the operational element of planning obligations is removed from the planning staff; the application is mainly conducted by the authority's legal team. The principal planner described how they were often unaware of the progress of these until an agreement was completed. This is clearly a weak point in the communication flow between the planner, as coordinator, and the legal team as the operations element in this situation.

7.7.5.2 Operations and the 'Management' Systems

The operational element of this subsystem needs to communicate effectively with the management elements of the system due to the frequent changes in policy which can occur in relation to both planning conditions and Section 106

obligations. These policy changes can occur from both outside the organisation as national priorities change or as a result of political changes within the authority. The impact of national and international economic change has also been highly visible throughout the course of these case studies.

In the first case study, the communication of these changes was clearly conducted by the Development Control manager who took the responsibility to liaise with the management and operational systems in addition to playing a leading role in creating and monitoring policies. In the second and third case studies, where the original policies were not initially so clearly defined, the communication of policy changes was not so clear and, indeed, the policies themselves were not clearly established. This created difficulties for the Operations staff who were unable to provide clear advice to applicants either prior to, or during the early stages of, the application process.

The discretion of those involved in this subsystem varies greatly between the case study authorities. In the first case study, where clear standards are present, there is clarity of delivery of both obligations and conditions. This restriction of autonomy results in greater trust being placed in the staff to complete legal agreements and take responsibility for the delivery of the application decision. In the second and third case studies, the planning and legal staff hold greater autonomy in the negotiating process but this creates delays and unpredictability into the system which is not popular with either developers or the staff themselves.

7.7.5.3 Operations, Monitoring and Audit/ Delivery Management

The first and third case studies have an appointed officer holding the responsibility for monitoring the delivery of obligations (Case Study One) and conditions (Case Study Three). In cases where these conditions and obligations are created through standardised formulae and set conditions, this process is facilitated. The section 106 officer within the first case study authority is involved in the review of the obligations but the monitoring officer in the final case study is not involved in the formulation of conditions within the authority. The Development Control manager of the second case study observed that some, non standard, conditions will be reviewed by the Planning

enforcement team prior to inclusion on an application. This communication pre-empted and can mitigate future monitoring and enforcement issues.

7.7.5.4 Coordination and Audit/ Delivery Management

There is less clear cut communication in the case studies undertaken relating to the coordination and audit functions, particularly in relation to the Audit/ Delivery Management of planning obligations within the second and third case studies. In these studies the responsibility for delivery of obligations is attributed to the planning officers, although as no targets are attached to their delivery, and the delivery is not formally monitored, the case study participants acknowledge that it is not conducted in a proactive manner.

In this instance, the autonomy of those responsible for this process could be considered to allow this important process to become neglected due to the other time pressures on the system. Only the second case study has a system in place to monitor those responsible for ensuring delivery and this would appear as an inherent weakness in the systems.

7.7.5.5 Audit/ Delivery Management, Intelligence and Policy

Considering the inherent difficulties discussed in the processes relating to the Delivery Management subsystem, it is not surprising that there is limited communication between this system and the Intelligence and Policy systems. However, some communication has been demonstrated in the first case study and the policy of creating obligations based upon clearly monitored trigger points has resulted in this feedback mechanism.

This case study also demonstrates a clear information flow between the Policy and Intelligence subsystems, with the Development Control manager indicating that the policies for planning obligations were, at the time of interview, being closely monitored and considered in relation to the changing economic environment.

7.7.5.6 Communication Conclusions

The flow of communication in the case study authorities in relation to conditions and obligations appears, in the case of both planning conditions and Section 106 planning obligations, to be strongly influenced by the presence of an officer

dedicated to their creation and delivery. These positions aid the flow of information to the operations and management systems, although, as Case Study One demonstrates, the need for clear information from the management systems appears to be influenced by the management styles of the authorities.

7.7.5.7 Discretion Management Conclusion

It can be seen that within the area of Conditions and Obligations, the autonomy within the system needs to be guided by clear policies. Where these policies do not exist, the lack of clarity and certainty can cause issues for many areas of the system. However, this observation relates to the autonomy within the system. It is equally important to allow the Policy element of the system the autonomy to react to external changes and reform policies where appropriate as the subsystem is particularly vulnerable to changes in its external environment. Failure to adapt to these changes would cause the overarching Development Control system to fail to achieve its identified purpose.

7.8 Complexity Modelling

Finally, this work moves to put forward a model of a system of Development Control services.

Figure 7.2 represents the model of the structure of Development Control, as discussed in Chapters six and seven. Examples of autonomy and discretion are indicated in red italics while the practices identified from the case studies are illustrated in green.

Figure 7.3 represents the examination of pre-application advice within a complexity model. In this model, and the remainder of this work, the red annotations detail the systemic elements, the green represent a brief explanation of the source of the observations while the purple annotation constitutes a brief discussions of the communication flows and the presence of discretion between the systems. The green and red elements are a visual representation of the output of the SWOT analysis contained in 6.6.2 and the purple, section 7.5.1.

Figure 7.4 below illustrates the preceding discussion in an adapted version of

the VSM model.

Figure 7.5 illustrates the preceding discussion in the complexity model as previously used in this work.

Figure 7.6 illustrates this discussion on the Conditions and Obligations subsystem

Figure 7.2 Viable Systems Model (with sources and autonomy) of Good Practice within Development Control services (adapted from Hoverstadt, 2008)

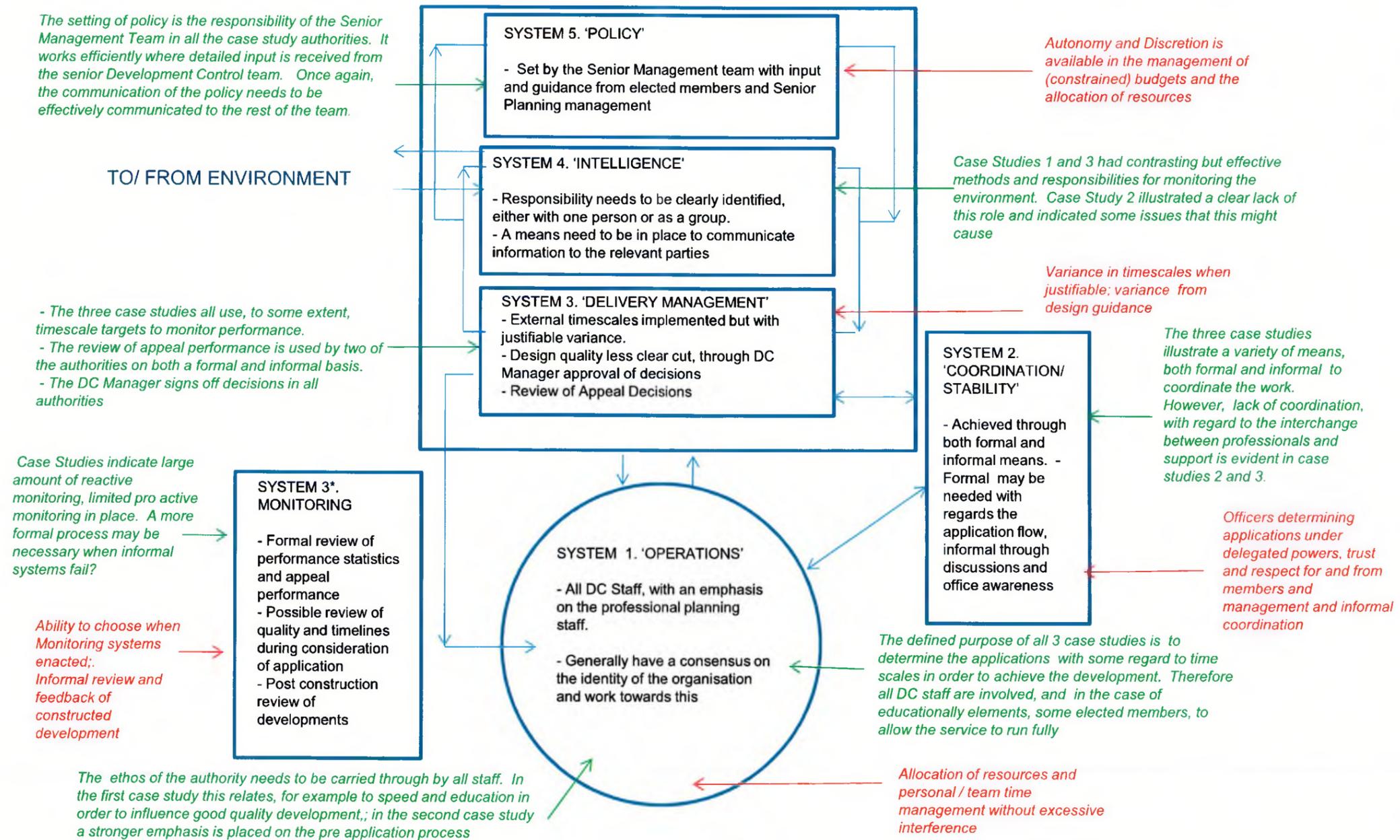


Figure 7.3 VSM Structural Modelling of Pre Application advice

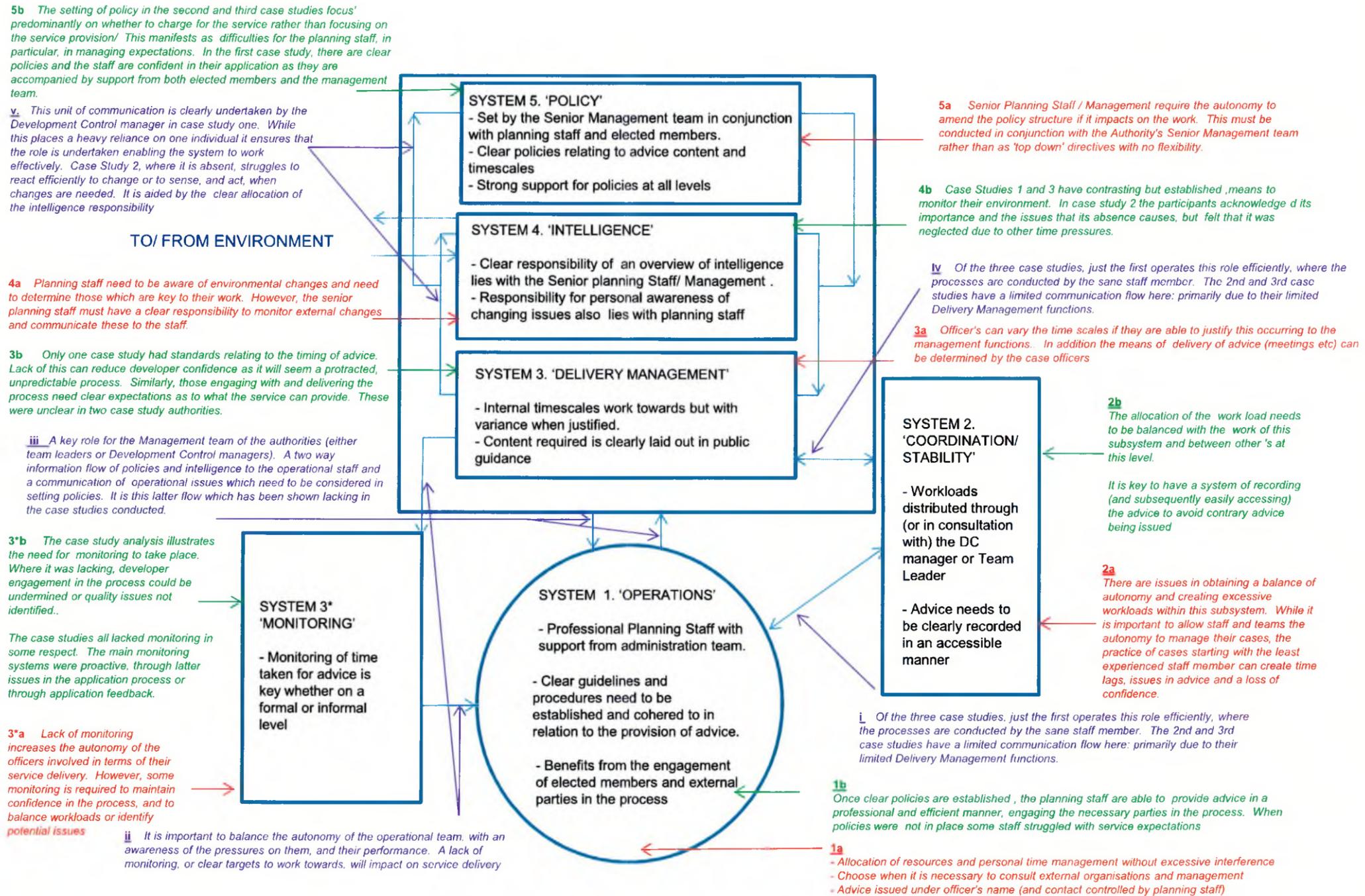


Figure 7.4 VSM Structural Modelling of the Validation Subsystem

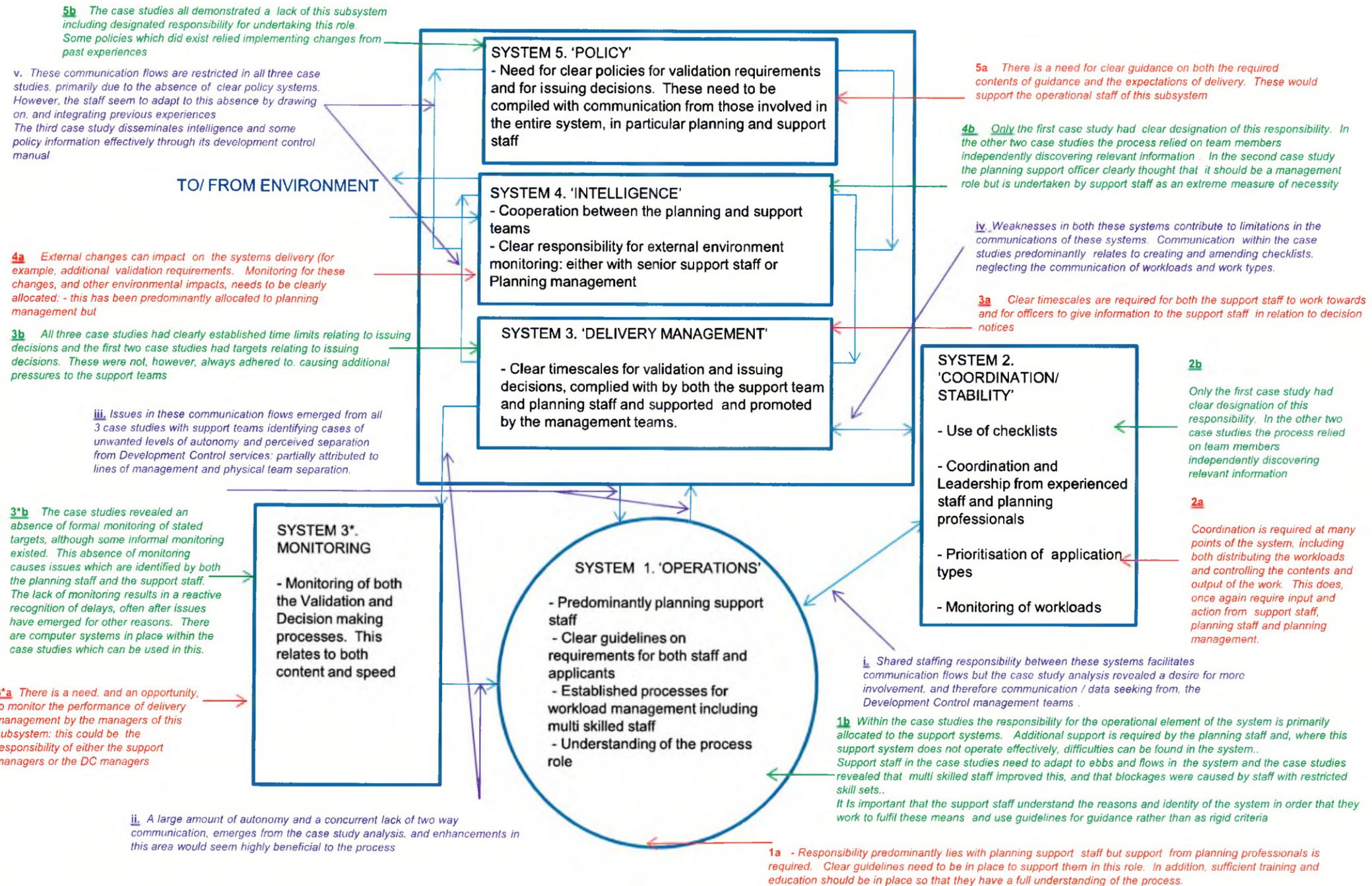


Figure 7.5 VSM Structural Modelling of the Involvement Subsystem

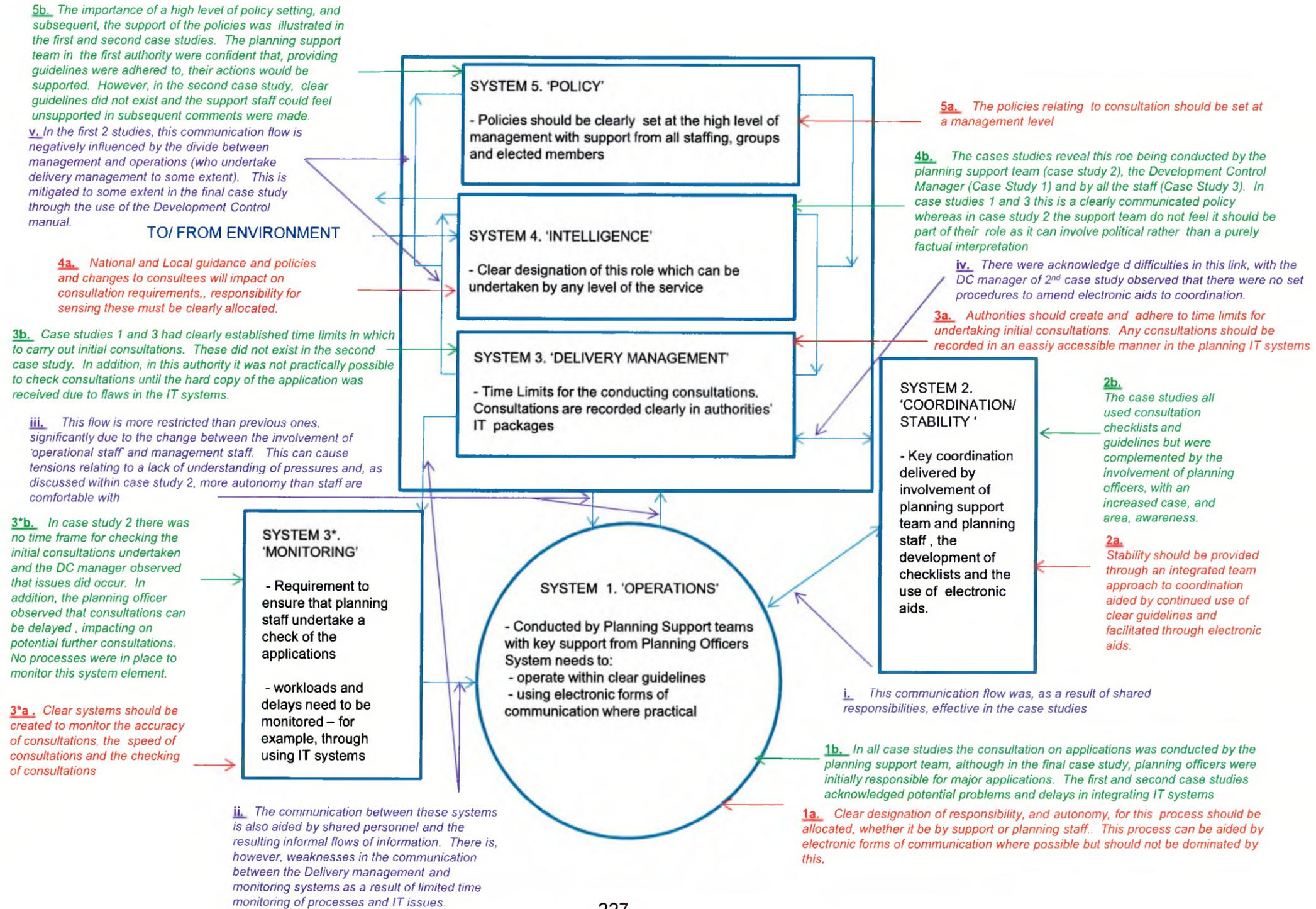
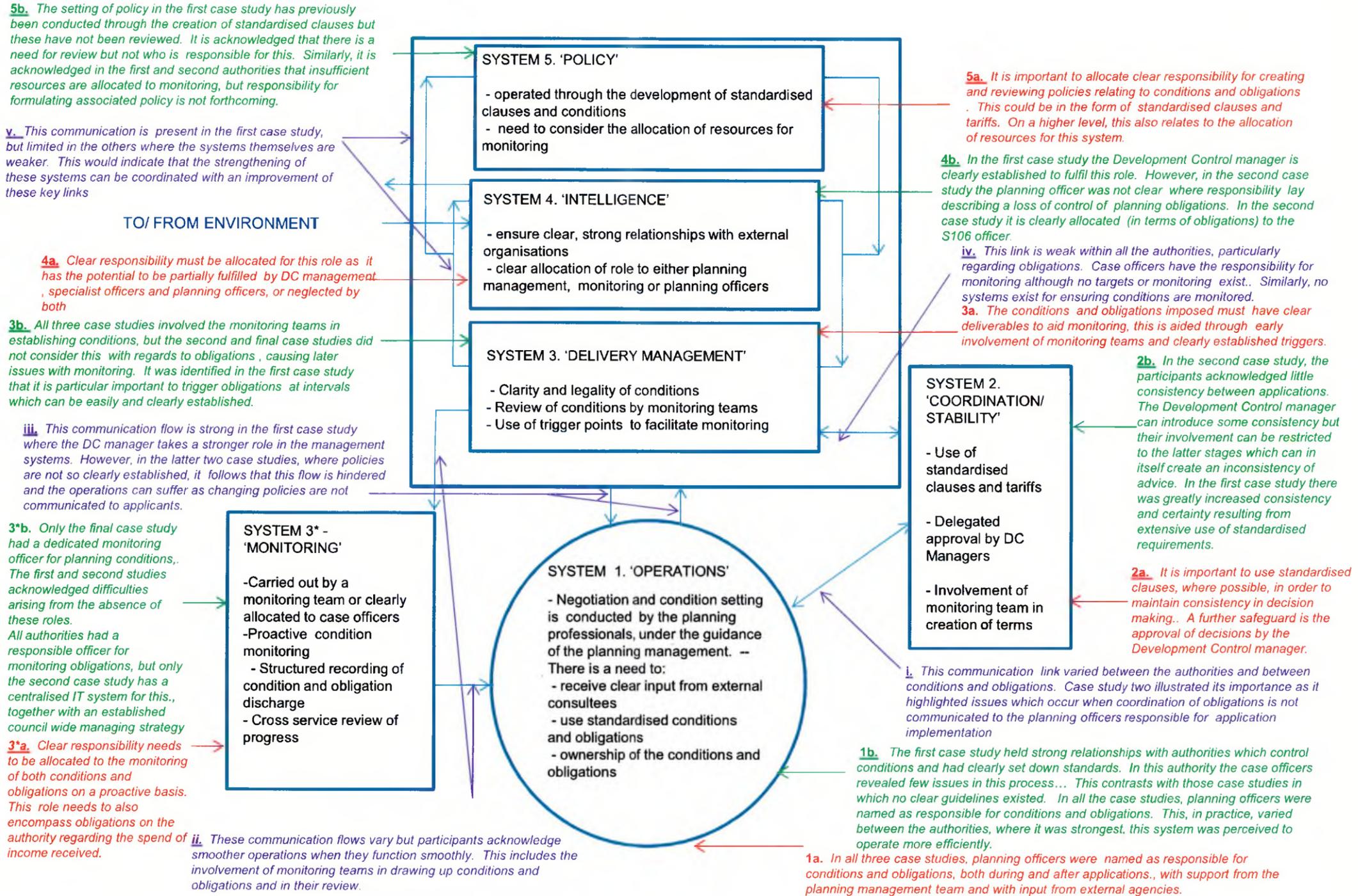


Figure 7.6 VSM Structural Modelling of the Conditions and Obligations Subsystem



7.9 Chapter Summary

This chapter has presented a detailed analysis of the management and regulation processes present within the Development Control system in the three case study Local Authorities. It has explored the strengths, weaknesses, opportunities and threats of the management functions of the system in focus and its subsystems at one level of recursion. It continued to study the communication flows between these elements while considering the levels of discretion which existed among these elements. The analysis demonstrated that, as was the case in Chapter Six's examination of the operational systems, the first case study appears to demonstrate the majority of the areas of good practice and the least areas of concern. It is also worthy of note that the final case, despite its selection as representative of the lowest measures, would appear to adhere more strongly to the principles of VSM than the second case study.

The thesis will now move to present and validate recommendations which follow from this analysis.

CHAPTER 8 RECOMMENDATIONS AND VALIDATION

8.1 Chapter Aims

This chapter will present the key recommendations which emerged from the analysis conducted using the Viable Systems Model to examine two levels of recursion of Development Control within three Local Planning Authorities.

This detailed analysis enabled the extraction of key recommendations in relation to these systems, the implementation of which will enable local authorities to improve their practices within Development Control. While many areas of both good and bad practices have been explored and identified in this analysis, these recommendations are those of vital importance to the viability of the Development Control system as the failure of the related sub systems severely impacts on the ability of the Development Control system to fulfil its established purpose.

It will summarise these recommendations and a justification behind them. It will then move to validate these recommendations using feedback from a participant authority, the internet publication of the results, feedback to a recently created authority and through the recommendations relationship with the qualitative, and some quantitative, survey responses. The process will assess the acceptance and practicalities of the recommendations proposed. Following this validation process it will present refined conditions which can provide a framework to local authorities to improve Development Control services.

8.2 Key Recommendations

8.2.1 The Development Control Process Key Recommendations

The preceding detailed qualitative analysis has revealed, and the systems diagram has illustrated, many of the features which are present in the systems of the case study authorities. This includes strengths and weaknesses in addition to revealing where the case study authorities share similar practices or achieve similar results through different means. Some of the functions and

communication means, however, are key to the successful operation of the subsystems. These are summarised below.

- Control of the costs of the service should be set and maintained by the Planning Management Team with autonomy granted to them by the Authority's Senior Management Team.

This does not imply that there should be unlimited funds allocated to the Development Control service, but that the budget available should be allocated by those close to the service who have more knowledge of, and clearer communication links to, the issues which need to be dealt with in Development Control. This will enable the service to react faster to environmental changes, such as the current economic climate.

- Elected members should be actively involved in the process.

In the first case study, where members worked closely with and owned the outputs of the planning service, their input was advantageous. It enabled a better communication flow between the members in their role of monitors and policy makers of the system, and enabled the planning staff to work with confidence that they would have support from these systemic elements. Meanwhile, in the second case study where elected members did not have the close relationship, issues could occur. This element has also been identified in the Quantitative analysis contained in 5.6.1.

- Clear responsibility should be allocated to monitor the external environment for changes, such as legislative or economic reform, which will impact on the Development Control service.

Development Control services lie in an inherently unstable environment and must continue to operate throughout. It is a key requirement that someone or some team is responsible for monitoring this environment in order to enable a swift reaction to the changes. This is the responsibility of the Development Control manager in the first case study and the entire team in the final case study. However, the second case study struggles to react to changes and none of the staff accept the responsibility for and to undertake this Intelligence role. In this case study, the staff acknowledge difficulties which can be related back

to the absence of this system.

- National Indicators are important as it is economically important to maintain some predictability of speed in the process as this study's literature review has established. However, the level at which these targets are met needs to be set and monitored by planning staff without undue interference from the authority's Senior Management Team.

The Development Control manager of the second case study authority identified the pressure felt by the Senior Management Team to be seen to be continually improving performance. However, the National Indicator targets (formally BVPI's) were originally established at a level which considered all the demands on planning services, including flexibility to take account of applications which justifiably take extra time. Planning Management occupy a stronger position than the authorities' Senior Management Teams to judge when time extensions are appropriate.

In the first case study, these indicators were controlled within the Development Control service as the manager monitored, controlled and justified when these were not met. Meanwhile, in the second case study there was an identified pressure from a higher level of management to heavily exceed the National Indicator targets. This was not appreciated by the planning staff in this service, who believed it to impact on their service delivery and could be viewed to conflict with their desired Identity Statement. Finally, in the third case study, the policy relating to these targets involved the prioritisation of economic development and the focus was not so intense.

- Monitoring of the quality of decisions should be conducted, either through a system of formal review or informal discussion.

The Identity Statement of all the Development Control services studied clearly involved the management of good quality development. Therefore a means of monitoring this is key to the performance of the service in order to maintain consistency and quality. The case studies have revealed a variety of means, including informal discussions and field trips by elected members and officers.

8.2.2 Pre-Application System Summary

The processes within Chapters Six and Seven have examined the system relating to the provision of pre-application advice within the three case study authorities. They have established a shared identity between the authorities, examining the strengths and weaknesses of the operating practices and the opportunities and threats presented by these. They have examined the effectiveness of the information flows between the subsystems. Primarily, the analysis has revealed the benefits gained through the presence of clear guidelines and standards and through having systems in place to monitor these standards. In the case studies where these guidelines and processes are absent, such as the second case study, the participants identify issues in the fulfilment of their roles. It has also been illustrated that the absence of these impacts on other key systemic elements and therefore implementing change in these areas has the potential to improve additional elements.

8.2.3 Pre Application Key Recommendations

The key recommendations which emerge from this analysis are outlined below.

- Clear guidelines (and advice) on the standards for pre application advice, in relation to both content and timeliness, should be laid down, adhered to and monitored by the authority regardless as to whether there is a charge in place for the service.

This recommendation addresses issues which emerged across each systemic element of the pre-application process. The highlighted elements in the complexity model (Figure 7.33) include the introduction of a process for delivery management (3b) and establishing monitoring procedures (3*a and 3*b). Implementation of this recommendation would also formalise the intelligence and policy elements of this system as the external environment will need to be considered in the review of the guidelines. This would overcome issues discussed in 4b and 5b of Figure 7.3. Conversely it would strengthen any existing communication flows between the management systems and the operational systems (iii) as information from these systems is required to effectively review policies.

- Advice at all levels should be clearly recorded in a manner in which it can be easily accessed at a later date.

This recommendation, if implemented, will also work to enhance the communication flows within the system in particular elements ii and iii of Figure 7.3. In addition to this it will also impact on the delivery of the coordination, delivery management and monitoring systems as information will be easily accessible.

These recommendations do not, by any means, cover all the elements identified through the examination of the case study authorities, but are considered to be those which can be implemented within the existing authority structures and which will have an appreciable impact on the delivery of the services' aims.

8.2.4 Validation System Summary

It has been illustrated that while the case studies show many areas of strong practice and opportunities to improve practice, the submission and validation processes in the local authority case studies are also subject to weaknesses caused by the absence of key systems and the restricted flow of information between systems. While these features have been examined in detail through both the SWOT analysis and the examination of communication flows and discretion, there appear to be some weaknesses and corresponding strengths which dominate the system's viability. These weaknesses primarily relate to the lack of monitoring of the performance of the operational element of the system and the impact of this on information channels.

8.2.5 Validation Key Recommendations

The key recommendations which emerge from this analysis are therefore:

- Workloads at this stage should be proactively monitored in order to maintain efficient processing of applications

This recommendation addresses a lack of monitoring of the validation operations system as revealed in 3*b of Figure 7.4. It also reinforces the communication flow between this and the management systems (ii) either

through the involvement of management in the process or by the creation of a formal mechanism for reporting the information. This will have an ongoing impact of improving the flow of information from the delivery management systems to the policy (iv) and intelligence (v) systems as the data which needs to flow is more clearly defined.

- Planning support staff responsible for this system should be trained to be multi-skilled in order to effectively adjust to fluctuations in demand

This recommendation relates to the operations and coordination element of these case studies (1 and 2). Where planning staff have restricted skill sets the coordination of workloads is hindered. Further discussion of this is contained in Table 7.2 and Figure 7.4 (1b).

- Validation should be promptly checked by a planning professional following validation and issues efficiently communicated and dealt with. Processes should be present to ensure that these checks take place

This is a recommendation which influences many systemic elements illustrated in Figure 7.4 in particular coordination (2a), monitoring (3*b) and intelligence (4b) and the corresponding communication flows amongst the systems.

8.2.6 Involvement System Summary

The analysis of involvement has once again identified both the strengths and weaknesses of the processes in place in the case study authorities and the levels of autonomy present within the system relating them to the flow of information between the system elements.

Primarily, the analysis has identified that the process needs to be conducted within clear policy guidelines which are communicated to the Operations team of both planning support and planning staff. The allocation and coordination of workloads between these staff needs to be coordinated in a manner to ensure that the initial consultations are checked promptly by the staff. A practice, such as that present in the final case study, of a set procedure for major planning applications, could be introduced as one means of promoting this balance.

8.2.7 Involvement Key Recommendations

The key recommendations which emerge from this analysis are therefore:

- Criteria for consultation and involvement should have a clear logical rationale which is established, supported and regularly reviewed by the policy makers.

This recommendation like others before stems from the identified need to increase clear guidelines and policies in the system and the communication of these guidelines between the teams.

- Consultations should be checked promptly by a planning professional following validation and issues efficiently communicated and dealt with. A system should be established to ensure that these checks take place.

Similarly this recommendation once more identifies the lack of monitoring of the operations, but also impacts of the intelligence, policy and coordination systems. As such, a large number of systemic weaknesses can be addressed through its implementation.

8.2.8 Conditions and Obligations System Summary

This analysis has identified three key areas which need to be considered in relation to the delivery of the Conditions and Obligations subsystem. Firstly, the system must contain the autonomy to sense, and react quickly to, changes in its external environment through the formulation of policies.

Secondly, these policies need to contain clear, enforceable guidelines to which those involved in the application process, and those involved in their later enforcement, must be able to clearly communicate, apply and control. There needs to be a clear line of communication between these three elements to enable these policies, and therefore the entire system to remain effective.

Finally, it is necessary to have processes in place to ensure that the monitoring of these conditions and obligations is conducted in an effective manner. The case studies have all illustrated that, to some extent, there are weaknesses in ensuring that these key elements are implemented, and if this is the case, the purpose of the Development Control system is severely called into question.

8.2.9 Conditions and Obligations Recommendations

As a result of this analysis, the following recommendations relate to the system of Conditions and Obligations:

- *Pro active post application monitoring of conditions should take place; either as the responsibility of planning staff or through a specific role. There should also be mechanisms in place to regulate, monitor and ensure that this process occurs.*

- *Pro active post application monitoring of planning obligations should take place; either as the responsibility of planning staff or through a specific role. There should also be mechanisms in place to regulate, monitor and ensure that this process occurs.*

- *Policies for the criteria for both planning conditions and obligations need to, as far as practicable, be clearly laid out. These need to be formally reviewed on a regular basis with input from those responsible for their monitoring and enforcement and in relation to environmental changes.*

8.3 Recommendation Summary

A total of fourteen recommendations were made relating to the overall management of the Development Control services and to the four subsystems in which a level of recursion was examined. These recommendations are summarised in Table 8.1 below.

Table 8.1 Summary of Key Recommendations

Ref	Category	Brief description
1a	Overall Management	Control of costs
1b		Involvement of elected members
1c		Environmental monitoring
1d		Departmental setting of Development Control performance targets
1e		Quality monitoring
2a	Pre Application Advice	Clear standard guidelines
2b		Clear recording and accessibility of advice
3a	Submission and Validation	Proactive monitoring of workloads
3b		Multi skilled staff
3c		Prompt checking of Validation
4a	Involvement/ Consultation	Clear, regularly reviewed Consultation criteria
4b		Prompt checking of Consultation
5a	Conditions/ Obligations	Clear, regularly reviewed conditions and obligations policies
5b		Clear responsibility for pro active monitoring of conditions and obligations

These recommendations will now be discussed individually in greater detail and a fuller justification provided.

8.3.1 Control of Costs

This recommendation was created following the VSM analysis of the first level of recursion; studying Development Control as it lies within the local authority structure. It stated:

"Control of the costs of the service should be set and maintained by the Planning Management team with autonomy granted to them by the authority's Senior Management Team."

This recommendation primarily arises from the different experiences of the first and second case studies. Broadly, the Development Control manager of the first case study has significantly greater financial freedom (within a set budget) than does their equivalent in the second case study. They are able to determine their budgets and suspend, rather than abolish, posts during times of economic uncertainty. Within the Viable Systems principles this is a manifestation of autonomy which allows quicker reactions and policy changes to changes in the external environment.

This is of particular importance as the costs of the service, and the service needs, are heavily dependent on staffing costs. Other service costs are known by planning management and they are in a strong position to judge the service needs, for example, staff training, and if they maintained control, they would be able to react faster to potential needs.

Available income is highly dependent on the receipt of application fees and an increase in these usually produces an increase in workload and therefore increased staffing demands. The staffing is often required relatively quickly and can be delayed through gaining more central approval, causing a workload backlog.

8.3.2 Involvement of Elected Members

This recommendation also emerged from the VSM analysis at the first level of recursion and as a result of the practices present within the first case study

which enhanced the communication flows between the systems, and emphasised the level of trust and autonomy of the systemic elements. It states:

"Elected members should be actively involved in the process."

In the first case study, where members worked closely with and owned the outputs of the planning service, their input was advantageous. It enabled a better communication flow between the members in their role of monitors and policy makers of the system and enabled the planning staff to work with confidence that they would have support from these systemic elements. This recommendation also emerged throughout the examination of the subsystems, for example, in relation to pre-application advice.

This issue also emerged strongly in the survey responses with both the proactive involvement and the negative impacts of elected members being identified by participants. The quantitative analysis of survey responses also revealed that elected member involvement was strong within the authorities.

It is also necessary to note that while this recommendation was put forward following the analysis at the top level of recursion, the subject matter also emerged as a specific feature in the analysis of the subsystems.

8.3.3 Environmental Monitoring

This is a further recommendation which resulted from the first level of recursion at which the VSM analysis was conducted. It states:

"Clear responsibility should be allocated to monitor the external environment for changes, such as legislative or economic reform, which will impact on the Development Control service."

This responsibility was undertaken by the Development Control manager in the first case study and the remaining interviewees clearly attributed this function as being a key part of their role. Contrasting this, the participants of the second case study attributed the responsibility of this role to the Development Control manager but they acknowledged that they did not undertake this function. In the final case study, the role was not formally undertaken or attributed to any staff member or role but was instead conducted by the entire team and

distributed by the Development Control manual. However, this may cause difficulties in maintaining communication flows and relationships with external policy makers such as the Senior Management Team of the authority. The service lies in an inherently unstable environment and must continue to operate throughout change in this. It is important to manage this environment to enable a swift reaction to these changes.

8.3.4 Departmental setting of Development Control performance targets

This recommendation relates to the policy management system of Development Control within the context of the local authority. Senior Management Teams are under pressure to be seen to be improving the services which they deliver. However the National Indicator targets were originally set at a level which considered the demands on planning services. There is a need for flexibility to remain in the system for those applications which justifiably take additional time. Planning Management staff are in a preferable position to judge when an extension of time is appropriate: the system of performance management needs to relate to the System's Identity Statement and not to fulfil external aims.

The proposed recommendation states:

"The level at which National Indicator targets are met or exceeded needs to be set and monitored by planning staff without undue interference from the Authority's Senior Management team."

The Development Control manager of the second case study authority identified the pressure felt by the Senior Management team to be seen to be continually improving performance. Despite this, the planning management staff occupy a stronger position than the Authorities' Senior Management teams to judge when time extensions are appropriate as they are more aware of the circumstances in which the applications lie. They are receiving information from the other management systems which is important when determining appropriate targets. It is also an important element of autonomy in the process, allowing the Development Control service to adjust these targets in reaction to environmental changes.

8.3.5 Quality Monitoring

This recommendation relates to the defined purpose of the Development Control system within all three case studies: 'to produce good quality development'. The identity of Development Control/ Management services clearly involved the management of good quality development. A means of monitoring this output is key to the performance of the service, to maintain consistency and quality. There were limited processes in place to monitor the quality of the development decisions. The recommendation reads:

"Monitoring of the quality of decisions should be conducted, either through a system of formal review or informal discussion."

This monitoring can occur through the informal mechanism such as review by the management team, elected members or the planning team, or through a more formal method of assessment or peer review.

8.3.6 Clear Guidelines for Standards of Pre-Application Advice

In the first case study authority clear guidelines were published in relation to the service which will be provided. These guidelines were made available to developers and were used as a guide by the planning staff. In the second case study, the staff indicated that a lack of clarity in the purpose of the pre-application advice service causes difficulties in their delivery. This relates to the importance of coordination within the process, and the appropriate levels of autonomy within the system. In conclusion, the justification for this recommendation is that where standards are in place, the systems for pre-application advice are perceived to work better, for both developers and for planning staff. Levels of service are maintained and the quality of the advice follows through to the application stage of the development proposal. This does not necessarily need to be accompanied by a charging structure, however, this may release further funding for the service. The guidelines may also increase the quality of the information received by the authority and their intelligence of potential future developments. The recommendation reads:

"Clear guidelines (and advice) on the standards for pre application advice, in relation to both content and timeliness, should be laid down,

adhered to and monitored by the authority regardless as to whether or not there is a charge in place for the service."

8.3.7 Clear Recording and Easy Accessibility of advice

This was identified as a key absence in the coordination element of the pre application subsystem in addition to impacting on the ability to implement an efficient monitoring system. This maintains the consistency of the advice given and can be linked to future enquiries and applications. It also allows a means to audit and monitor the advice given. The recommendation therefore follows:

"Advice at all levels should be clearly recorded in a manner in which it can be easily accessed at a later date."

All local authorities have, through the Government's e-planning initiative, electronic systems for recording planning applications. These systems have functions to record pre-application advice. This recommendation therefore predominantly relates to a change of culture and practice as opposed to a large technological investment.

8.3.8 Proactive Monitoring of Validation Workloads

This is a fundamental part of the planning application process. However, it is often conducted by employees with other workloads and responsibilities. Applications can be received in peaks and troughs while the time frame for their determination remains rigid. If they are delayed or mishandled at this point, problems can become exacerbated at later stages. Many case study participants identified issues related to delays at this stage of the process as they reduce the time available for the planning staff to consider the application. The case studies also illustrated the absence of a system to monitor the workloads and the related backlogs of this stage of the process and the associated coordination mechanisms. The communication flows between this element and the management functions are limited as the staff in some case studies report through a different management structure. This leads to a recommendation of:

"Workloads at the Validation stage should be proactively monitored in

order to maintain efficient processing of applications."

8.3.9 Multi Skilled Validation Staff

This recommendation also relates to tackling the delays within the validation subsystem. Workflow is not consistent in this area but preventing delays is the key. Staff need to be flexible to cope with a variety of tasks and be able to transfer between them where appropriate. In the first and third case studies, it was identified that the planning support functions are limited by the abilities of members of staff. The discretion of the team, and the processes of Operation and Coordination is limited. Therefore, the recommendation below was created:

"Planning support staff responsible for this system should be trained to be multi skilled in order to effectively adjust to fluctuations in demand."

8.3.10 Prompt checking of Validation

This recommendation relates to the Monitoring system of the validation process. Support staff cannot be expected to be aware of all circumstances of all applications and planning staff should be expected to check applications as soon as practicable after their receipt. Procedures should be in place to promptly correct any issues. This does not necessarily require a formal process but an ethos should be enforced. The case studies have revealed that where a formalised system exists for checking the validation, the overall application process is enhanced. This recommendation reads;

"Validation should be promptly checked by a planning professional following validation, and issues efficiently communicated and dealt with. Processes should be present to ensure that these checks take place."

8.3.11 Clear, Regularly Reviewed Consultation Criteria

While a large amount of the consultation criteria are set down by central government, there is also some scope for local autonomy. This recommendation addresses both this autonomy and the need to monitor the environment for changes to the nationally defined consultation processes. The planning support officer of the second case study identified that a strong, clear

policy would greatly assist in their work. The recommendation follows:

"Criteria for consultation and involvement should have a clear logical rationale which is established and supported by the policy makers."

This recommendation does not necessarily need to be solely allocated to one individual within the service, as was demonstrated in the final case study where the entire Development Control team accepted the responsibility for observing and communicating external changes and for formulating new policies.

8.3.12 Prompt Checking of Consultation Criteria

In a similar manner to the validation subsystem, the analysis has revealed the importance of prompt monitoring of the consultation criteria. Absence of monitoring of consultees can cause issues when missing consultations are identified at a late stage in the application process. In the first two case studies, the Involvement team had autonomy to consult planning staff when they felt it to be necessary, however, it was revealed that they did not want to interfere with the work of the planning staff. Therefore, a formal process of managing this discretion, such as criteria to introduce planning staff involvement, is key to this system. The recommendation states:

"Consultations should be checked promptly by a planning professional following validation and issues efficiently communicated and dealt with. A system should be established to ensure that these checks take place."

8.3.13 Clear and Regularly Reviewed Condition and Obligation Policies

This recommendation relates to all of the elements of the Conditions and Obligations subsystem and the communications between these. The theoretical basis of this recommendation stems from the need to introduce clarity to the conditions and obligations in order to enable effective monitoring and enforcement. If this enforcement is not present, the purpose of the Development Control system is not being fulfilled. These conditions and recommendations have to be established with regard to the external environment and need to be easily used by the Operational element of the team. Policies which are available for developers allow them to approximate

the desired level of contributions and therefore to be prepared for the potential demands on them. This leads to a more efficient process and negotiations once an application has been submitted. Where non standard obligations are required the justification should be clearly laid out as early as possible in the application process. Review is needed to ensure that demands continue to be appropriate, and therefore achieve their aims. The recommendation states:

"Policies for the criteria for both planning conditions and obligations need to, as far as practicable, be clearly laid out. These need to be formally reviewed on a regular basis with input from those responsible for their monitoring and enforcement and in relation to environmental changes."

8.3.14 Proactive Post Application Monitoring of Conditions and Obligations

As the discussion in Section 8.3.13 revealed, the monitoring and enforcement of conditions and obligations is an important process in promoting good quality development. Conditions are, by definition, necessary in order for a development to be acceptable. Therefore, if a development takes place but the conditions are not fulfilled, the quality of the output of the service is reduced. While applications for the discharge of conditions are now taking place, this is mostly upon the initiative of the developer. Failing to undertake this role may also create failure demand which creates additional, less predictable work for the authority. The case study analysis did, however, reveal that it is not strongly monitored or recorded within the authorities. Therefore, the following mechanism is:

"Pro active post application monitoring of conditions and obligations should take place; either as the responsibility of planning staff or through a specific role. There should also be mechanisms in place to regulate, monitor and ensure that this process occurs."

Having established the recommendations, and discussed the theoretical basis on which they were created, this chapter will now continue by examining the validity of these recommendations in a variety of ways.

8.4 Validation of Recommendations

This verification of the results was conducted in a number of ways. Initially, the qualitative replies of the initial authority survey were reviewed and, where appropriate, comments associated with the recommendations were extracted. These comments and observations both supported and questioned the recommendations. In some cases they provided practical examples of approaches to implementing the recommendations.

The validation process then continued by communicating the recommendations to the three case study authorities via a letter and through an email communication with a link to an internet feedback site. Responses to these recommendations were received from the Development Control manager of the second case study authority.

Concurrently, the recommendations and their justifications were also made available online to other local authorities who had expressed a willingness to participate in the case studies. These were presented on a survey website. This asked for feedback on whether the authority already operated within the recommendation, whether the respondent agreed with the recommendation, if they believed that it could be implemented in their authority and what barriers may exist to their implementation. Responses to this follow up study were partially received from three authorities. These responses are presented by means of quotations and summaries of the results received.

Finally, they were presented through the means of a semi structured interview with a Head of Planning and Housing at a Unitary Authority. This authority was created on the 1st April 2009 replacing three district councils and part of a county council. This interview was conducted in November 2010 as the council was in the process of restructuring its Development Control services.

A summary of the results of this process are presented in the tables to follow, with a brief discussion of the process following each section. The observations of the Head of Planning and Housing have been summarised, while the comments of the authorities have been made anonymous. In addition, the Coalition Government published its proposed national planning guidance in

September 2011. Some of the research recommendations also feature within this document and its discussion will be examined during the validation discussion. Where appropriate, reference will also be made to the quantitative data analysis contained within Chapter 5.

In summary, this section undertakes to fulfil the following objectives:

- To obtain validation feedback from local authorities of the recommendations;
- To assess and examine the applicability of the recommendations and to examine any barriers to its implementation;
- To refine further the recommendations in relation to any further feedback received.

8.4.1 General Management

These recommendations relate to the overall management of Development Control within local authorities. Table 8.2 below illustrates a summary of the validation data.

Table 8.2 Validation feedback for proposed Recommendations

1a. CONTROL OF COSTS
Head of Planning and Housing, Unitary Authority
<p>It is possible to control costs to some extent within the Development Control service: by appointing permanent staff to the level of demand troughs and then using more informal methods for rising levels of demand. However, changing or adding posts is a far more time consuming and process intensive. There is currently severe pressure within Local Government to drive to reduce the establishment. It is a lot easier to control these costs on a short time basis as this authority is delegated to the Development Control manager.</p>
Internet Survey of Recommendations to Authorities
<p>Control of costs of service delivery is controlled to some extent by service managers but the overall levels of expenditure (and expectation of fee income) are set corporately. Permanent staff recruitment is controlled corporately.</p> <p>Service level control of staffing would benefit the service but the need to control resources on a corporate level is appreciated and do not feel that this corporate control can be amended.</p>
Qualitative Survey Responses
<p><i>'In these difficult times we are getting increasing pressure to reduce costs to the service. This has to be balanced against the quality of the service, and how efficient we are. I am reluctant at this moment to reduce costs unless it can be proved there will be no impact on performance and service'.</i></p>
Case Study Feedback
<p><i>'Corporately the funding to DC is predominantly controlled by fee income. We are currently struggling to keep costs in line with this income and are under pressure to reduce rather than increase staffing levels. I do not see this control being relinquished'.</i></p>

1b. INVOLVEMENT OF ELECTED MEMBERS
Head of Planning and Housing, Unitary Authority
<p>The elected members of the authority are very interested in the operation of Development Control but are careful not to micromanage as they appreciate that it is a question of operational management. They have recently applied political pressure to gain an increase in resources in relation to Section 106 agreements and lawful development certificates. There is currently a high level of respect between officers and members – the authority needs to ensure that this continues with changes to the members.</p>
Internet Survey of Recommendations to Authorities
<p>In answer to whether members were currently involved in the service the following responses were received;</p> <p><i>'yes, but there is room for improvement'</i></p> <p><i>'yes members have ready access to planning officers'</i></p> <p><i>'no'</i></p> <p>All of the responders to this question viewed the involvement of elected members as a positive influence of the service as it <i>'promotes respect and mutual understanding'</i>. It was universally felt that more involvement could be carried out within the authorities and one respondent was actively pursuing it. However, some barriers were perceived in particular in relation to the legal implications of member involvement at the pre-application stage</p>
Qualitative Survey Responses
<p><i>This is an area of great concern regarding training, party politics, consistency of advice etc. which we are still considering'</i></p> <p><i>'We have recently introduced a member referral scheme which is available on the council's website. Also we have five neighbourhood boards in the borough where members are involved, and they receive weekly lists of new and decided applications. Members are required to undertake annual internal training courses before they can sit in planning committee. Also during the year courses are run by officers on specific topics'</i></p> <p><i>'Training is available for members but very few actually attend'</i></p>
Case Study Feedback
<p><i>'We try to involve members and run training for them, but there remains a barrier between officers and members: they tend to come forward when there is a problem rather than to help. This is discounting the committee chair we have a good relationship with them'</i></p>

1c. ENVIRONMENTAL MANAGEMENT

Head of Planning and Housing, Unitary Authority

In this large and busy authority the Development Control manager sits at a strategic level (rather than at the Head of Planning and Housing's previous authorities which were smaller), detached from the 'personable' level of service. This allows the job role to clearly include this function – their role is more akin to a Head of Service in other authorities.

Internet Survey of Recommendations to Authorities

Two authorities responded to this recommendation. The first stated that this role already existed whereas the second attributed this to being a role of planning policy. In the latter case, the respondent then continued to emphasise the importance of the communication flow between policy and development control

Qualitative Survey Responses

No qualitative feedback was obtained from the questionnaire survey in relation to this recommendation.

Case Study Feedback

'This should be part of my role, but I spend so much time fire fighting that there is no time. My manager works remotely and does not pick up on this'

1d. DEPARTMENTAL SETTING OF DEVELOPMENT CONTROL PERFORMANCE TARGETS

Head of Planning and Housing, Unitary Authority

You definitely need targets to work towards and to monitor and control progress, but they need to be more sophisticated than NI157. Agent feedback suggests that resolving things in around ten weeks is fine, they are more concerned when they go to eight weeks and get refused and the process has to restart. At this authority we would like to introduce a stepped approach, monitoring, perhaps 8 weeks (which is still important due to non determination), 10 weeks, 12 weeks etc., but this still needs to be implemented in this authority which is still only around halfway through a period of change following its creation.

Pressure has previously been applied in relation to lying in the top quartile; the performance indicators were an easy target in relation to the council's CPA performance.

Internet Survey of Recommendations to Authorities

While two of the authorities state that they are at least 'mostly' in charge of setting the level of performance in relation to targets, one response indicates that tensions may exist between the service and the wider authority, stating;

'not totally, we have an annual 'discussion' as to where to set NI targets, I consider that I have more knowledge as to what is achievable as opposed to being in the top quartile.'

In this case, these targets were perceived as additional pressure acting against achieving quality rather than a means of monitoring performance to improve the service.

Finally, the authorities expressed uncertainty as to the role of targets in the future, given the governmental change. One authority accepted the need for a standard of 'timeliness' but in a less 'crude' manner than the current form.

Qualitative Survey Responses

'I do feel that there is too much pressure in trying to determine applications within these targets: it does affect the quality of decisions'

'Basing the performance of an authority simply on the turnaround of applications ignores the decisions reached and what subsequently happens.'

'The housing and planning delivery grant implications imply a change in the significance of BVPI 109 (now NI 157). However, in reality, no authority wants to be regarded as not meeting targets. There should be some flexibility, eg. scope for graduations in meeting targets may allow Local Planning Authorities to make more balanced decisions on the timings of various applications.'

Case Study Feedback

'As I previously said, I accept the need for the measure but we do face too much pressure from the authority's Senior Management Team to meet unrealistic and impractical targets: we, as the experts and the people at the cliff face, need to set and meet these targets.'

1e. QUALITY MONITORING

Head of Planning and Housing, Unitary Authority

The authority needs to find ways of monitoring the quality of development in relation to its outcomes; it is something that it doesn't manage to achieve at the moment. There definitely needs to be a system in place which looks at how decisions and the development that follows fits with corporate priorities and the corporate development plan and establishing if sustainable development is being achieved. You cannot deny that targets do work, and have made a difference to the service provided; we just need to adjust the focus.

Internet Survey of Recommendations to Authorities

None of the respondents had procedures in place to monitor the quality of the decisions made. Two of the authorities believe that systems could be implemented but one stated that such a system would be 'unlikely' to be implemented due to resource constraints. Meanwhile, another respondent was working with CABE (Commission for Architecture and the Built Environment) to establish a framework while the other is also looking towards establishing a framework.

Qualitative Survey Responses

The holy grail of DC is to measure quality not quantity: offer a knighthood to anyone who cracks this one.'

'If BVPI 109 was supported by other 'quality' measures this would give a better reflection of the quality of the service.'

'barriers to other monitoring measures can include capacity issues which are reflected in budgets and economic circumstances.'

Case Study Feedback

"we would love to monitor quality as it is why we are here, but aside from informal monitoring when officers are out on site or on member committee site visits, I don't see us being in a position to introduce a formal system of quality monitoring."

8.4.1.1 *Control of Costs*

The validation process for this recommendation supports the ideas behind the recommendation, but the process has also highlighted the issues associated with a reform of the current processes. In an environment where there is a continued pressure to keep core costs to a minimum, the authorities did not feel that they would be able to increase levels of staff posts. However, the feedback also provided examples of the ways in which the authorities can work around this through vacancy management during times of low demand and temporary recruitment of staff during periods of high demand. While this will work on an authority by authority basis, it may have a longer term detrimental impact on the nationwide availability of staff during the periods of higher demand. Planning authorities will need to increase accordingly their monitoring of the external environment and policy decision systems to act as quickly as possible in periods of higher demand and to design schemes to reduce costs in the periods of lower demand.

It is considered that the ideas behind this recommendation remain valid but that its potential implementation is limited in its original form. The focus of the recommendation relates to foreseeing external changes in order that changes can take place within the authority structure and systems. It is therefore considered that the environmental monitoring condition be amended to clearly include monitoring the environment for potential cost implications.

8.4.1.2 *Involvement of Elected Members*

The validation feedback does support this recommendation. The authorities are happy to accept that the involvement of elected members could improve their service although concern was raised regarding the probity of members involvement in the process and the implications of pre judging a planning committee decisions. This issue has, however, been previously discussed within the Killian Pretty review (Killian Pretty, 2008) which stated:

"Legal advice that councillors should avoid all contact with applicants is simply wrong, and it is extremely frustrating that it continues to be advocated." (Killian Pretty, 2008, p105)

Implementation of this recommendation would introduce an important link between the systemic elements of the system and build support and trust between the areas of the process.

8.4.1.3 Environmental Monitoring

This recommendation has received mixed feedback during the validation process. Two authorities responded to the internet recommendations. One of these felt that this process was in place, while the other attributed as a responsibility of the planning policy service. This would indicate that one barrier to the implementation of this recommendation may be one of promoting its understanding. Finally, the Planning and Housing manager and the Development Control manager acknowledged that it was part of a Development Control manager's role. Their responses did, however, also illustrate a barrier to it being implemented: pressures of other workloads and the other managerial roles which are undertaken. In the larger, new Unitary Authority, this was not perceived to be as strong an issue whereas in the smaller authorities Development Control managers also have involvement with the everyday running of the process which can interfere with the intelligence and environmental monitoring role.

8.4.1.4 Departmental Target Setting

There is clear agreement across the responses on two key elements of this recommendation. Firstly, that some form of quantitative indicator is important in the monitoring, and therefore the managing, of Development Control performance. The responses illustrate that the professionals involved in the planning system feel in a stronger position to judge an appropriate means of monitoring performance than those from outside the planning service. The Coalition Government have already reduced the focus of councils on the CPA and this pressure may reduce as a result.

8.4.1.5 Quality Monitoring

The feedback indicates that the need to find a means of monitoring the quality of development decisions is accepted amongst those taking part. Two key barriers would appear to its implementation: finding an appropriate means of

measuring 'quality' and providing the resources to conduct this monitoring. Some practical proposals were put forward which would appear to indicate that some means of achieving this could be found.

8.4.1.6 Summary

It can be seen that the recommendations have generally been well received by those who received them. They also seem to have a well founded basis which corresponds with the qualitative responses to the original questionnaire surveys. There are, however, barriers related to the implementation of these recommendations, primarily due to the resources available to the planning services and as a result of their position within traditional local authority structures. While some of these can be overcome, some, such as the control of costs, will be difficult to introduce and need to be considered within the local authority context.

8.4.2 Pre-Application Advice

The validation process now continues to examine the recommendations proposed in relation to pre application advice. This area featured strongly in the Coalition Government's recently published Draft National Planning Policy Unit (Department for Communities and Local Government, 2011), where the Government seeks to encourage a greater uptake of pre-application discussions.

Table 8.3 Pre Application Advice Validation feedback

<p>2a. CLEAR STANDARDS AND GUIDELINES FOR PRE-APPLICATION ADVICE</p>
<p>Head of Planning and Housing, Unitary Authority</p>
<p>The authority has very limited guidelines but this will change in the near future (alongside the introduction of charges for the service). The authority appreciates the need for more structure and it is a key priority following the creation of the authority. In this case, the introduction of these standards will be related to the introduction of fees but the acid test is to have an accepted system which will provide good, clear advice and which is reasonably accessible. It is also important to ensure that the system is accessible without administrative barriers hindering access.</p>
<p>Internet Survey of Recommendations to Authorities</p>
<p>All three authorities stated that they had pre application guidance although one accepted that there was <i>'scope for further improvement'</i>.</p> <p>There is an acceptance, albeit reluctantly in one case, that this would improve the service although it was observed that the take up of pre application advice is reliant on applicants engaging with the process and taking any subsequent advice on board.</p>
<p>Qualitative Survey Responses</p>
<p><i>'we have recently introduced a new structured pre-application process. This gives more clarity and assurance to developers that they will receive detailed guidance'</i>.</p> <p><i>'although we have some leaflets available and some info on the website but are aware of the need to provide more'</i>.</p> <p><i>'we have a very detailed protocol for major apps which works well'</i>.</p> <p><i>'although councillors are involved at the pre application stage, the current guidance to them is unclear'</i>.</p>
<p>Case Study Feedback</p>
<p><i>'I appreciate that our advice consists of a justification of fees, the officers determine what the advice will include. We will hopefully amend this as it is still a relatively new development for us, but it depends on available resources and cooperation with developers.'</i></p>

2b. CLEAR RECORDING AND ACCESIBILITY OF ADVICE

Head of Planning and Housing, Unitary Authority

This is needed within the authority but will involve a full cultural change among both authority staff and external applicants. The system needs to be easy for staff to use and to give advice: it can be run off the electronic planning system which is not currently being fully utilised (and it is suspected that most planning authorities are not using their existing systems to their full functionality).

Internet Survey of Recommendations to Authorities

All of the respondents to this question felt that their advice was clearly recorded. One comment observed that this was vital for consistency also questioned the long term validity of advice.

Qualitative Survey Responses

There were no relevant qualitative replies to the survey in relation to this recommendation.

Case Study Feedback

'We do now record advice, but our computer system only records that a request for advice is received and the date that the advice was given. The actual advice is recorded in the area file and in the case officer's brain'

8.4.2.1 Clear Standards and Guidelines

The feedback indicates that there is a general acceptance that clearer guidance on pre application advice would assist in the processing of planning applications and the overall Development Control process. It also illustrates that authorities are acting on this and have either established, or are establishing, guidelines in this area. In situations where guidelines have been introduced, even in limited circumstances, they have been appreciated and accepted as improving service delivery. In those areas where guidelines do not currently exist, their potential value is also acknowledged. The feedback does, however, also illustrate that the process is limited, at the outset by potential resource issues which will need to be overcome.

8.4.2.2 Clear Recording of Pre Application advice

The validation feedback relating to this recommendation again illustrates a broad range of practice in this area. The three authorities who provided internet feedback all stated that clear processes for recording, and then accessing, information were in place. Meanwhile, systems were acknowledged to be only partly present in the case study authority and were clearly acknowledged to be absent, albeit in development, in the newly formed Unitary Authority. The interviewee in this authority observed that a facility to conduct this recording exists in the majority of Development Control computing systems but may not be being utilised. The implementation of this recommendation relies more heavily on implementing cultural change rather than being reliant on limited resources.

8.4.2.3 Summary

The feedback and comments which relate to this recommendation indicate that these recommendations have been achieved, and are achievable, by local authorities. In comparison to the recommendations which relate to the general management of Development Control, there are no substantial external restrictions on the ability of the service to implement the recommendations.

8.4.3 Submission and Validation

This work now continues to explore and validate the recommendations in relation to submission and validation.

Table 8-4 Submission and Validation recommendation

3a. PROACTIVE MONITORING OF WORKLOADS
Head of Planning and Housing, Unitary Authority
<p>Currently in the authority, the workloads are not proactively monitored as they are intrinsically linked to the quality and use of available IT systems which are still in development at the authority. The authority is currently trying to get a handle on the issue but the only way to currently achieve this is through a cumbersome manual recording which we have introduced recently but which inhibits the work. One of the ongoing battles in Development Control is the delay in an application landing in the authorities' post-box and getting onto the planning officer's desk. It is hoped that that this will occur as a result of improved IT systems.</p>
Internet Survey of Recommendations to Authorities
<p>The authorities responding to this question all stated that workloads are monitored at this stage. One explains their system of conducting this role; by means of a weekly meeting between the senior planning team and the support team. These were introduced following a service review and the authority sees them as a positive part of their new business protocol which can react to changes quickly'.</p>
Qualitative Survey Responses
<p><i>The amount of information required and the range of areas it now involved often imposes an onerous burden on registration sections. There is limited recognition of this burden by Government and often internally.</i></p>
Case Study Feedback
<p><i>'We don't actively monitor this workload, we do tend to react when things are severely delayed. Again, it is something that we are aware of but we do rely on a good informal relationship between the teams'.</i></p>

3b. PROMPT VALIDATION CHECKS

Head of Planning and Housing, Unitary Authority

When the applications are received by the planning staff the validation is checked promptly. When they are delayed there are times when this check is delayed and it can cause issues with the application. It is hoped that this will be resolved as the process of transformation is completed. The authority is aware of it as an issue and hope to integrate it within its new procedures.

Internet Survey of Recommendations to Authorities

The three respondents all stated that the validation of planning applications are checked regularly by planning professionals: in one case *'giving them the once over'* as soon as possible.

It is also observed that *'teamwork and cooperation is essential'*.

All the respondents agree that this is an important contributor to overall Development Control performance.

Qualitative Survey Responses

'The authority has been through a business process re-engineering which has resulted in planning officers have started validating their own applications, partially as a response to the economic downturn, but also to ensure that validation is done right, first time'.

'Support officers cannot always be expected to know when information is missing and it may then be picked up when the details of the application are explored by the case officer'.

Case Study Feedback

'Our support staff do seek support from the planning staff and there are good informal relationships. The problems that do occur are when the application takes time to reach the planning staff and then other issues in validation are discovered, for example, on site visits or consultation'.

8.4.3.1 Proactive Monitoring of Validation caseloads

The responses and related observations once again show a broad range of current practice in relation to this recommendation. They do, however, in addition, illustrate a general acceptance of the potential workloads of the submission and validation section and of the need for this recommendation. The three authorities who responded to the internet survey of the recommendations all felt that this workload was effectively monitored while it was acknowledged that this process was not undertaken in either the case study authority or the newly formed unitary authority. The Planning and Housing manager at the latter authority saw the implementation of new information systems as being a key tool in the monitoring of this stage of the process. In the meantime, a system of weekly meetings was put forward as an effective form of monitoring in other authorities.

8.4.3.2 Multi Skilled Validation Staff

The majority of responses to the recommendations appear to accept the need for staff who are skilled in the majority of tasks which it necessary for the support service to undertake. The multi skilling of staff ranges from being a long established principle (in the case of a large authority) to being the subject of recent reforms following staff reductions in the current economic situation. In one authority, changes of this nature had already been introduced and anecdotal evidence suggests that this has reduced validation times for applications.

8.4.3.3 Prompt Checking of Validation

All the respondents and the supporting information indicate that there is an overall acceptance of the need for a process to ensure that the validation of planning applications is promptly checked. In some cases this is already an established part of procedures either as a result of long term procedures or after recent process changes instigated by the economic downturn and an associated drop in fee income and staffing level.

8.4.3.4 Summary

It has been established that, like the pre application advice recommendations, there are limited external barriers to the implementation of the recommendations which relate to the submission and validation stage of Development Control. The changes are accepted as necessary and beneficial to the overall process although it is acknowledged that their implementation would involve changes in the working culture of the service and that these changes will not necessarily be pain free culture changes.

8.4.4 Consultation recommendations

The work now moves to explore and validate the recommendations relating to the consultation process.

Table 8-5 Validation of Consultation recommendations

4a. CLEAR, REGULARLY REVIEWED CONSULTATION CRITERIA
Head of Planning and Housing, Unitary Authority
There is a clear procedure in place in the authority for both neighbour consultations and statutory and non statutory consultees. The review of this also lies within the remit of the Development Control manager. The Planning and Housing manager receives some complaints over consultation from neighbours to development but few complaints or comments in relation to other consultees.
Internet Survey of Recommendations to Authorities
This recommendation elicited a range of responses. One authority felt that it was now established through national guidance while one had its own protocols. The final authority stated that there was no clear criteria. This authority did acknowledge that the introduction of criteria would improve service and are working towards implementing the criteria. The other two authorities state that it does improve service (although the criteria cannot cover all possible situations).

Qualitative Survey Responses
<p><i>We have a Statement of Community Involvement which is a good tool. It is relatively new but will hopefully be reassessed in the future'.</i></p> <p><i>'we have good working arrangement with external consultees... this has been identified on our service plan and is set to be taken forward with other external bodies'.</i></p> <p><i>'our statement of community involvement outlines the processes for consultation on planning applications'.</i></p>
Case Study Feedback
<p><i>'we operate with statutory guidelines and use IT systems to coordinate statutory and non statutory consultees. Our main complaints come from neighbour consultations and it has helped now that we have defined a clear policy for conducting these consultations'.</i></p>
4b. PROMPT CHECKING OF CONSULTATION
Head of Planning and Housing, Unitary Authority
<p>This is part of the existing consultation criteria although the processes still vary from site to site following the council's amalgamations. Again, it is intended that this process be recorded and monitored with the introduction of new procedures and the integration of IT systems,</p>
Internet Survey of Recommendations to Authorities
<p>The three authorities all carry out prompt checks of the consultations which take place and view it as a key element of the service. In one authority, the processes include a check over on initial receipt of the application by the case officer and when undertaking a site visit.</p>
Qualitative Survey Responses
<p><i>'It is often the site visit that indicates any issues with the consultation on applications'.</i></p>
Case Study Feedback
<p><i>'like validation we can get delays before these land on the case officer's desk and then with issues occurring on site which can be a long time into the application, but most of it is supported through IT systems and informal communication and support'.</i></p>

8.4.4.1 Clear, regularly reviewed consultation criteria

There is an acknowledgement amongst the considered responses that this is also a recommendation which will improve the delivery of Development Control systems and the majority of the authorities participating in this validation process consider themselves to already adhere to set consultation criteria, and to regularly review these. The recently created Unitary Authority has already created this policy, amalgamating the previous policies of its constituent authorities. The case study authority, which does not have a consultation policy for neighbour consultations, identified issues caused by its absence by indicating that issues occurred around this area.

8.4.4.2 Prompt checking of consultation

The responses which relate to this recommendation once again indicate that authorities appreciate the need for promptly checking the applications to ensure that the necessary consultations have been conducted on applications. Most of the respondents had clear processes, allocating responsibility, to check that the necessary work has been completed. This cannot be an entirely desk based exercise and this checking needs to include a site visit. It is proposed that this recommendation should be amended to acknowledge this.

8.4.4.3 Summary

It has been illustrated that in this case it is again acknowledged that the recommendations are necessary and would improve the operation of the service. The recommendations made concurrently influence a number of key VSM systems and the communication between them. It also seems clear that such changes would not involve substantial change with minimal external restrictions on its implementation.

8.4.5 Conditions and Obligations

Finally, Table 8.6 shows the responses in relation to Conditions and Obligations.

Table 8.6 Validation feedback for Condition and Obligation recommendations

5a CLEAR, REGULARLY REVIEWED CONDITION AND OBLIGATION POLICIES
Head of Planning and Housing, Unitary Authority
<p>The standardising of conditions across the authority is a job intended for the Development Control manager, to be integrated with the new IT systems. The Planning and Housing Director considers that these conditions will be naturally reviewed in the beginning of their implementation due to the nature of the newly created Unitary Authority.</p> <p>The authority is aware of the need to establish clear guidelines but has not yet been able to complete this work while the main focus has been on delivery of a service. There is recognition that systems and standard instructions will work much better and are needed to overcome the new logistical challenges of the increased size of the authority as informal systems will increasingly struggle to cope.</p>
Internet Survey of Recommendations to Authorities
<p>All three authorities use standardised conditions where possible. However, all three also emphasised that these are not always appropriate. One authority acknowledged that these needed reviewing but had not been for reasons of capacity.</p> <p>The authorities have a range of practices in relation to creating obligation policies. One had no policies in place, while the other two had some. One respondent illustrated that they are reviewed in relation to environmental changes as they were currently under review with regard to the governmental change. One observed that while still providing a good guide, their existing policies are facing developer pressure as a result of the recession.</p> <p>All three authorities believed that the existence of these policies will improve the performance of the service. Barriers to its implementation rely on resources and uncertainty in the governmental and economic environment</p>
Qualitative Survey Responses
<p><i>'There is a need to review conditions to ensure these meet the required tests on circular 1/95 which needs to be revised'.</i></p> <p><i>'We have an adopted SPD for planning obligations and necessary Heads of Terms are made clear at the pre application stage'.</i></p>
Case Study Feedback
<p><i>'we use standardised conditions from our IT system where possible. Some of the conditions actually come from external consultess and as they are the experts we generally have to follow their advice. This can cause enforcement issues. We do run non standard conditions past our enforcement team to get their input.</i></p> <p><i>'we do not have clear policies, but I don't think that this is the main form of delays in this area. Our problems mainly stem from a process side of things, when agreements disappear to the legal department, the negotiation of terms is not the big issue'</i></p>

5b. CLEAR RESPONSIBILITY FOR PROACTIVE MONITORING OF CONDITIONS AND OBLIGATIONS
Head of Planning and Housing, Unitary Authority
<p>The authority does have proactive monitoring officers for planning conditions, ensuring that they are complied with during the course of developments. Section 106 agreements currently have little formal monitoring in place, although the new planned structure of the authority's Development Control service includes a post with sole responsibility for monitoring and implementing agreements.</p>
Internet Survey of Recommendations to Authorities
<p>One responding authority stated that it actively monitored conditions (a recently introduced change), whereas the other two responses were:</p> <p><i>'not as much as we would like to' and 'not outside the discharge process'.</i></p> <p>All 3 authorities agree that this is an important element of the process but state that resource considerations are the main barrier to implementing this. For example, one stated,</p> <p><i>'the difficulty with this is resources, it is always the first area to be seen as expendable'</i></p> <p>While 2 of the responding authorities state that they have clear processes for monitoring planning conditions which include regular reporting to elected members, one respondent had no system in place. However, this respondent did not consider barriers to be in place to its implementation and the authority was in the process of establishing a Section106 monitoring officer</p>
Qualitative Survey Responses
<p><i>'We do not have a compliance and monitoring team : the discharge of condition forms have helped but I am not convinced it is aiding the monitoring of conditions'</i></p> <p><i>'Processes are in place to monitor some, but not all, conditions'</i></p> <p><i>'We are in the process of developing a monitoring and enforcement policy that will address the monitoring of conditions – not currently done'</i></p> <p><i>'there is effective monitoring, but over a very limited range of decisions, due to resource constraints'</i></p> <p><i>'we monitor some conditions but not all as we don't have the resources'</i></p> <p><i>'monitoring of conditions doesn't occur proactively as a rule – only where an application for discharge is submitted or an enforcement issue is raised'</i></p> <p><i>We are finalising a process to monitor conditions and are trialling with nine conditions'</i></p> <p><i>'we are currently developing a Section 106 database to provide comprehensive monitoring information'</i></p>
Case Study Feedback
<p><i>'we do not do this[monitor conditions] proactively. We do have a monitoring and compliance officer but they spend their time dealing with enforcement issues, we only really have the planning staff picking up on issues when they are on site or in the area for other reasons'.</i></p> <p><i>'we do have an officer who has responsibility for monitoring Section 106 agreement using a home developed databases, but they do have to fit it around their other work. The system they use does work well now that everyone is aware of it and it is incorporated into council wide procedures'</i></p>

8.4.5.1 Clear, regularly reviewed Conditions and Obligations

The feedback from the authorities indicates that all participating authorities do use standardised conditions although practice appears to vary in relation to the review of these conditions. Once again, a reason for this lack of review is given as a lack of resources, and pressure on the resources. However, it is generally accepted that review is necessary.

The practice in relation to Section 106 agreements is not as standardised across the authorities. It ranged from an adopted Statutory Planning Document through to no formal written policy. The validating authorities predominantly acknowledged that clear guidelines assist in the completion of Section 106 agreements and therefore in the processing of planning applications. It was not, however, universally accepted that clear guidelines on the content of obligations would fully assist in the processing of applications, with the processing of the application being identified as another important feature. It is therefore proposed that a further recommendation regarding clear processes relating to obligations should also be drawn up (and monitored).

8.4.5.2 Clear responsibility for the pro active monitoring of conditions and obligations

Only two of the responding authorities stated that conditions were proactively monitored, the remainder of the authorities stated that there was either limited, or no, proactive monitoring of conditions. A recurring reason for this absence of monitoring was due to resource constraints. This issue remains even after the introduction of discharge of condition applications and the associated fee. There is, however, a universal acceptance that the proactive monitoring of conditions should be a key priority of the services.

Once more, there is a variance in the practice of the authorities, ranging from little or disparate monitoring through to the use of databases and the employment of Section 106 officers. Two authorities are in the process of establishing posts with the specific responsibility of monitoring and implementing the agreements. It was also emphasised that any process introduced to monitor the obligations must integrate with other areas of the

authorities.

8.5 Final Recommendations

Having validated the recommendations, and considered the potential barriers to their implementation, the following recommendations are put forward. These predominantly remain as were first proposed with the exclusion of that relating to control of costs and several minor additions and modifications,

Table 8-7 Summary of Final Recommendations

1a	Involvement of Elected Members	Elected member should be actively involved in the processes of Development Control.
1b	Environmental Monitoring	Clear responsibility, from within the service's management structure, should be allocated to monitor the external environment for changes, such a legislative or economic reform, which will impact on the Development Control service, in particular in relation to the allocation of costs and staff.
1c	Departmental setting of Development Control performance targets	The level at which targets are met or exceeded needs to be set and monitored by planning staff without undue interference from the authority's Senior Management Team.
1d	Monitoring of Quality	Monitoring of the quality of decisions and development should be conducted, either through a system of formal review or informal discussion.
2a	Clear standard guidelines for pre-application advice	Clear guidelines on the standards for pre application advice, in relation to both content and timeliness, should be laid down, adhered to and monitored by the Authority regardless as to whether there is a charge in place for the service.
2b	Clear recording and easy accessibility of advice	Advice at all levels should be clearly recorded in a manner in which it can be easily accessed at a later date.
3a	Proactive monitoring of validation workloads	Workloads at the validation stage should be proactively monitored in order to maintain efficient processing of applications.

3b	Multi skilled support staff	Planning support staff should be trained to be multi skilled in order to effectively adjust to fluctuations in demand.
3c	Prompt checking of validation	Validation should be promptly checked on site by a planning professional following validation, and issues efficiently communicated and dealt with. Processes should be present to ensure that these checks take place.
4a	Clear, regularly reviewed, consultation criteria	Criteria for consultation and involvement should have a clear logical rationale which is established and supported by the policy makers.
4b	Prompt checking of Consultation	Consultations should be checked promptly on site by a planning professional and issues efficiently communicated and dealt with. A system should be in place to ensure these checks take place.
5a	Clear and regularly reviewed Condition and Obligation policies	Policies for the criteria for both planning conditions and obligations need to, as far as practicable, be clearly laid out. This should include criteria for processing the agreements. These need to be formally reviewed on a regular basis with input from those responsible for their monitoring and enforcement and in relation to environmental changes.
5b	Condition and Obligation Monitoring	Pro active post application monitoring of conditions and obligations should take place; either as the responsibility of planning staff or through a specific role. The process should be incorporated across the authority. There should be mechanisms in place to regulate, monitor and ensure that this process occurs.

8.6 Chapter Summary

This chapter has proposed and justified recommendations in relation to many aspects of Development Control services. It has then moved to validate these results through feedback from local authorities of different types, one of whom had had no previous involvement with the study. Following this validation process, the recommendations were refined and amended to reflect a framework to local authorities in improving Development Control services.

CHAPTER 9 CONCLUSIONS

9.1 Chapter Aims

As the final chapter of this thesis, its primary aim is to present the study's conclusions. It will review the research's achievements in relation to the original aims and objectives. In addition to presenting and confirming the research's conclusions, and defining its contribution to knowledge, it will also review the entire research process and the benefits and limitations which have emerged. Finally it will move to propose potential areas of future research which have emerged throughout this research process. This will be achieved through:

- A presentation, review and discussion of the main research and its findings
- A discussion of the implications of the research
- A review of the possible limitations of the research
- Proposals of recommendations for further research

9.2 Research Process and Findings

9.2.1 Completion of Research Aims

The aim of this research was to produce a framework of recommendations to assist English LP in delivering efficient and viable Development Control services throughout environmental change. In order to achieve this aim, objectives were established at the outset of the research. These were:

- To explore existing practices of local authorities.
- To evaluate the current ability of authorities to recognise, and adapt to, changes in their environment.
- to undertake case study analysis of local authority practice to identify the strengths, weaknesses, opportunities and threats of current practice.

These objectives were achieved through five key research stages which will be briefly summarised below:

1. Literature Review

The literature review for this research was conducted and presented in Chapter 2 of this work. It introduced the history and complexity of Town and Country planning within the UK and the issues that must be considered when investigating the process and which will impact on any proposed implementation of change. In exploring the environmental factors of the system and the theories relating to the planning process it demonstrated that there is a limited body of research within the area of Development Control explored the relationships between these environmental factors and the theories of planning and governance, illustrating the changing theoretical perspectives of the planning process. It continued to review previous proposed changes to the system and the extent of their implementation and impact.

2. Methodology and Research Design

Chapters 4 and 5 continued to explore the possible means of investigating the area of Development Control. Chapter 4 explored the paradigmatic location of the planning process and the research and concluded that, under a realist research paradigm, the subject would be best explored through both quantitative and qualitative investigations. Chapter 5 then continued by exploring an appropriate means of conducting these investigations.

3. Quantitative Research Investigation

Chapter 5 established that an internet survey was the appropriate form for quantitative research. This survey was distributed to all English local planning authorities (334) and received a total of 106 responses. Analysis of this data was validated, manipulated and analysed using SPSS 20. This analysis showed limited relationships between the characteristics of authorities and their reactions to change and guided the selection of the case study authorities.

4. Qualitative Research Investigation

Following the Quantitative data analysis which revealed limited significant relationships between aspects of authorities and their awareness, acceptance and adaptations to change, case studies were selected based upon these factors. Three case studies were conducted by means of in depth interviews with a range of staff and members within the authorities. These interviews,

together with additional resources from the authorities, were analysed using a framework based on the Viable Systems Model. This analysis is presented in Chapters 6 and 7. This analysis formed the basis to a series of recommendations which could form a framework for best practice within Development Control services.

5. Recommendation Validation

Chapter 8 presented the recommendations obtained following the case study analysis and presented a scheme by which these were validated. Following the validation process, these recommendations were amended and refined.

9.2.2 Overview of Research Findings

The quantitative and qualitative research conducted during this study provided the following findings.

1. Current Practices within Development Control and authority ability to react to, and implement change

- The authorities surveyed were, at the time of the survey, already predominantly working towards implementing the proposals within the 6 month old government reports (Killian Pretty, 2008) (National Audit Office, 2008). The main areas where this recommendations were not being implemented, or where there were barriers to their implementations related to the involvement of elected members in the process and in community engagement. This element of research illustrates that the authorities were aware of, and were predominantly implementing, the recommendations.
- There is an absence of statistically significant relationships between the characteristics of authorities and their awareness, acceptance and implementation of change. This clearly implies that there are other processes, or an absence of processes, which impacts on the delivery of the Development Control service. This reflects the debates, and other areas of research, which are predominantly inconclusive on the influence of structure and demographics on the operation of Local Authority

functions. Clear relationships cannot be located between the characteristics of the authorities and this quantitative analysis therefore reveals that there are further processes and managerial characteristics of the authorities which impact on their abilities to sense and implement change. The examination of these is discussed below as a result of the case study analysis.

2. Case Study Analysis

- Case Study One clearly demonstrated a number of elements of VSM, whereas the second and third case studies, which were selected for their less strong manifestations of practices, awareness and acceptance.
- At the top level of recursion, at which the Development Control service was examined in relation to its role in the overall authority, the viability of the systems could be improved through an increased autonomy in relation to funding and costs, greater engagement with elected members, increased monitoring of the external environment and the introduction of processes to monitor the quality of development. However, the process of the validation of the results indicated that there would be difficulties relating to the introduction of increased autonomy of costs and expenditure and, as a result, this recommendation was not taken forward. It does, however, remain a recommendation which, if barriers could be overcome, would enhance the potential viability of Development Control services.
- The analysis of the pre application advice subsystem produced recommendations relating to the clear setting and guidance of the standards in relation to advice and recording the advice in a thorough and accessible manner. The recommendation relating to clear guidance requires initial input but will then be fulfilled, subject to regular review. The recording and accessibility of pre application advice is a recommendation which is, in the majority of cases, facilitated by the IT systems of authorities but which is not always fully utilised. This recommendation is therefore strongly dependent on a cultural change.

- The analysis of the validation subsystem, and its subsequent validation, provided three recommendations relating to the monitoring of workloads, skill sets of the staff and the prompt checking and regulation of the work which has taken place. Once again, many of the IT systems which are in place in authorities facilitate the monitoring of workloads and the checking of work. These recommendations primarily involve a change in culture in the organisations and an allocation of responsibility rather than creating additional workloads.
- Similar recommendations emerged from the VSM analysis of the subsystem responsible for the consultation. Firstly, the analysis revealed the importance of clearly laid down criteria for consultation parameters. Secondly, there was, once more, an identified need to establish procedures to check these consultations as soon as possible in the process.
- The diagnostic analysis of the Conditions and Obligations subsystem revealed a need to establish, review and maintain clear policies with regard to both conditions and obligations together with a coherent policy with relation to the monitoring of both. It is these recommendations which hold the greatest potential increase in resources, although it is concurrently recognised as key by a large proportion of both case study and validation, participants.
- An overview of the Case Study Analysis clearly indicates that the 'high performing' case study (Case Study One) shows the strongest relationship to the Viable Systems framework as its practices consistently featured in the Strengths and Opportunities elements of the SWOT analysis and in the examples of consistent communication flows and balances of autonomy.
- Conversely, the practices of the second and third case studies featured more prominently within the weaknesses and threats and in the examples of when VSM characteristics were limited or absent. Interestingly, it appears that Case Study Three showed more VSM characteristics than did Case Study Two which does not reflect their

positions in the selection indicators.

9.2.3 Summary of Research Findings

The two phases of research have therefore drawn some significant conclusions. Firstly, that the majority of planning authorities quickly become aware of external changes which will impact on their operations. However, they are slower to determine courses of actions and to overcome the potential barriers in meeting these recommendations. Secondly, the quantitative analysis contained in Chapter Five illustrated that performance and practices in Development Control are not statistically significantly related to the physical and demographic characteristics of authorities. Therefore, the research was not able to ascertain significant relationships between the physical characteristics of authorities and their ability to sense and adapt to change. The case study analysis was conducted on authorities reflecting the spectrum of change sensing, acceptance and adaptation. In this analysis it was consistently demonstrated that the authority selected for its strength across all three had the operational, audit and management systems in place, and appropriate communication flows, as defined within VSM.

The VSM case study analysis also produced a number of recommendations. A common theme to these was the importance of maintaining a clear responsibility for the roles of intelligence (and its subsequent communication flows) and to ensure clear methods for monitoring. The absence of performance management and audit functions was a recurring theme at both of the levels of recursion at which VSM analysis was undertaken in relation to both the establishment of clear standards and designating clear responsibilities for ensuring that these standards were adhered to.

9.3 Contribution to Knowledge

This study has therefore provided a significant contribution to knowledge in four key areas.

Firstly, it has taken the ideas of the Viable Systems Model and created a methodological framework to enable its application within a busy, local authority context.

Secondly, it has undertaken a quantitative analysis which has illustrated that there are limited relationships between the ability of authorities to sense, accept and implement change and their physical, demographic and structural characteristics.

It has also been clearly demonstrated that, in the authority which is considered to be performing more strongly, there are a clearly more characteristics of Viable Systems already present in its operation.

Finally, it has successfully studied the processes of the delivery of Development Control services, identifying key areas of weaknesses which will impact on the viability of these services.

These contributions and their implications are discussed in greater detail below.

9.4 Research Implications

This research has created a framework of recommendations in an area of relatively little previous research, successfully implementing a viable systems methodology to overcome some of the barriers which have existed within researching Development Control practices. It has successfully completed and analysed a nationwide survey of practice in local authorities and applied a Viable Systems Methodology in a diagnostic mode in the context of Development Control practice. The importance of this study, and the process involved in its application, are summarised below.

9.4.1 Development Control Research

This work is of particular importance as previous planning research has predominantly concentrated on the formation of planning policy and the quantitative analysis of Development Control services. This research has been successfully undertaken using both quantitative and qualitative methods within the context of Development Control. It has demonstrated that valid, reliable and generalisable data can be obtained from, and applied to, this context.

9.4.2 Development Control Practice

The research has added further evidence to the limited field of the influence that

the physical characteristics, administrative structure and demographics of an authority on its performance. This research specifically focused on the authorities awareness and acceptance of change (in relation to the two most recent reports at the time of the survey research) and on the previous performance change (as a proxy for the ability to implement change). The quantitative analysis of the data obtained no clear strong statistically significant relationships between these and a comprehensive range of variables. Subsequently, analysis based on VSM clearly revealed that the structures present within the authorities appears to bare a strong influence in the performance of these factors with their presence being strongly represented in the high performing authority.

Concurrently, the research has predominantly revealed that there are recurring issues within the structure of Development Control services, particularly in relation to monitoring and intelligence processes. These weaknesses impact on the ability of these services to remain efficiently viable.

The validation process of the research's recommendations has illustrated that a large majority of them have potential to be implemented by authorities without call for a large resource increase. For those recommendations, such as the promotion of pro active monitoring of conditions and obligations, the research has provided a detailed structured analysis which emphasises and supports the importance of these functions which can be used to provide justification for the resource intensification.

9.4.3 Viable Systems Model

The application of VSM to this context is also a significant contribution of the study. It has provided a clear structure to the study, allowing detailed exploration which extends beyond traditional hierarchical structures or quantitative techniques and has demonstrated that this methodology is appropriate, applicable and relevant to this specific area of research: VSM has not been applied previously within this context and has proved to be a useful and valuable tool within this setting. The research has clearly demonstrated that in the 'stronger performing' authority there were substantive elements of VSM in operation within their structures.

The use of the ideas of the Viable Systems Model in this research has produced a framework of recommendations which can improve the viability and day to day operations of a regulatory area of government which, as established in Chapter two, is a key element in the economic prosperity of the nation. These recommendations come at a time of continued change in social, political and economic environments.

9.5 Research Applicability

While this research was conducted and validated in the limited area of Development Control in English Local Planning Authorities, both the methodologies applied and the results obtained have the potential to be applied on a significantly greater scale.

Firstly the framework of recommendations can be taken and applied to those authorities who did not participate in the original research process. The validation process has demonstrated that the recommendations can be accepted and implemented in authorities. The Literature review in Chapter Two revealed that the problems identified within the planning system are present across the United Kingdom (Vanguard Scotland, 2011). There is, therefore, the potential to introduce these recommendations in this context.

Additionally, the initial recommendations (those provided through the analysis at the first level of recursion) have the potential to be applied within other services provided by local authorities. The issue of the pressure of target setting which initially influenced the research are also present within other governmental functions such as Policing (Loveday, 2006), Education (Black & William, 2006) and Health and Social Services (Alcock, 2004) and these are all areas which are run through a democratic system with boards overseeing the professionally employed officers.

Furthermore, the Development Control system is now located in a further period of sudden change, following the introduction of the Coalition's new planning framework. This further demonstrates the importance of introducing structures and processes which enable the system to sense, interpret and react to changes in the environment in which it is situated.

This demonstrates that the methodology used for this study is also an important applicable element of the work. The study showed that VSM techniques can be successfully applied within local authorities and the results accepted by those working in the field. The work has shown that the structures provided by the VSM methodology and adapted for this research can be applied to research subsystems in these other areas which are also situated in environments of continual change, but which must remain viable throughout these changes.

9.6 Research Limitations

9.6.1 Scope of the Research

This study, as previously discussed, has successfully demonstrated that the ideas of VSM can be successfully applied to the delivery of Development Control services, and, by implication in the wider context of the delivery of local and central government services. It does, however, hold a natural limitation in that it remains an in depth study of a small element of practice. This has been accounted for throughout the research process through the initial literature review, the methodological selection and the quantitative analysis contextualised the case study analysis and the subsequent validation of the proposed recommendations.

It is further necessary to appreciate that despite an initial motivation for the research stemming from the restrictive nature of Development Control statistics, they were used as criteria for case study selection. These reductionist statistics, do, however remain the most geographically comprehensive and available record of performance relating to the planning application process.

9.6.2 Methodological Restrictions

This study, and its research recommendations, was conducted and validated within the Development Control services in English Local Planning authorities and, relied on their participation in the process, both in terms of returning the original questionnaire survey and participating in the case study analysis and the validation process. Similarly, the survey was not completed by the same level of employee in every case. Indeed the analysis in Chapter Five revealed statistically significant relationships between the survey results and the level of

the survey respondent.

9.6.3 Practical Realities

This research was widely welcomed by the Development Control community throughout its research process. However, while its recommendations have been welcomed by the participants in the process, there are more limited avenues of achieving practical implementation of the recommendations. This is particularly true in a period of intense upheaval within the Local Government arena. The potential reach of the research would be enhanced if the recommendations could be taken and implemented and the impacts of the implementation of the recommendations assessed and their potential value more fully demonstrated.

9.7 Recommendations for further research

9.7.1 Clarification of VSM impact

The use of three case studies for this research, and their selection criteria, presents an immediate opportunity to extend the scope of the research. The first case study was selected due to its strong performance in relation to change awareness, change acceptance and change implementation. However, it would be beneficial to use further case studies to assess the impact of the presence of VSM related structures on these as individual elements in order to fully assess the benefits of the model.

9.7.2 Demonstration of potential impact

The completion of this research therefore presents an immediate key opportunity: to continue onto the next stage of the Viable Systems Model and implement the proposed recommendations and monitor the outcomes. This would hold the potential to produce valuable data, both in terms of increased validation of the Viable Systems Model in the context of Development Control and in ensuring that the recommendations can be implemented. It could also demonstrate to Local Authorities the benefits which could be gained by establishing VSM principles and practices both in the area of Development Control and other areas of their work. This work would greatly enhance the

value of this piece of research through the demonstration of the potential impact of its recommendations. It would also be beneficial to look at 'lower' performing authorities to further evaluate the principles of VSM and their impact as this research has demonstrated that while the 'stronger' authority demonstrates many VSM characteristics, the levels of strengths and weaknesses of the 'lower' performing authorities are not necessarily linear within the second and third case studies.

9.7.3 Wider application of methodological framework

This work has put forward, and implemented, a framework with which to apply the ideas contained within Stafford Beer's Viable Systems Model. It would also be beneficial to apply the methodology, the model's diagnostic mode, to other services within local authorities, both within the planning department, such as the Planning Policy, and within wider elements of the Local Authorities. This analysis could reveal, for example if some systemic elements are consistently absent from Local Authority services. This work would be of particular value in the current climate of substantial economic instability within local government and would significantly expand and enhance the work contained within his thesis. Furthermore, the structures put forward in this research could be applied, and further refined, through other areas of government services and beyond.

9.8 Chapter Summary

This chapter has provided a conclusion to the work contained within this thesis. It has summarised the research process and the key findings from the literature review before continuing to summarise the survey findings and to briefly explore the recommendations which were put forward following the case study analysis and validation.

The limitations of the research were then examined and the potential applicability of the results and recommendations in areas other than the direct area of study considered. Finally this worked highlighted potential areas in which the study, and its methods, could be extended in the future.

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A Viable Systems Analysis of Development Control Services in English Local Planning Authorities

Catherine Wynn

A thesis submitted in partial fulfilment of the requirements of
Sheffield Hallam University for the degree of Doctor of
Philosophy

Appendices

1. Introduction

Thank you for following this link to complete my Survey. Your responses are gratefully received. While the majority of questions are ratings on a scale of 1 - 5, there is, at the end of each page, a space to add any further comments. Please feel free to add any clarifications, or additional points within these boxes.

The survey is 8 pages long, with each page representing a different subject area of recommendations made in the recent reports, the themes of which are indicated at the top of the page. Your progress through is illustrated by the progress bar at the bottom of each screen. I trust that it will not take too much of your time.

While I do ask for your Authority details these will not be named without your prior consent within the research. They will be used to analyse the data, for example, in terms of the authority type and population to identify potential trends.

If you have any questions, please do not hesitate to contact me:

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Many Thanks again

1. Please provide your name and contact details

Name:
Address 1:
Address 2:
City/Town:
ZIP/Postal Code:
Email Address:
Phone Number:

2. What Local Authority do you work for?

3. What is your Job Title?

4. How would you rate your awareness of the recommendations put forward in the Killian Pretty Review?

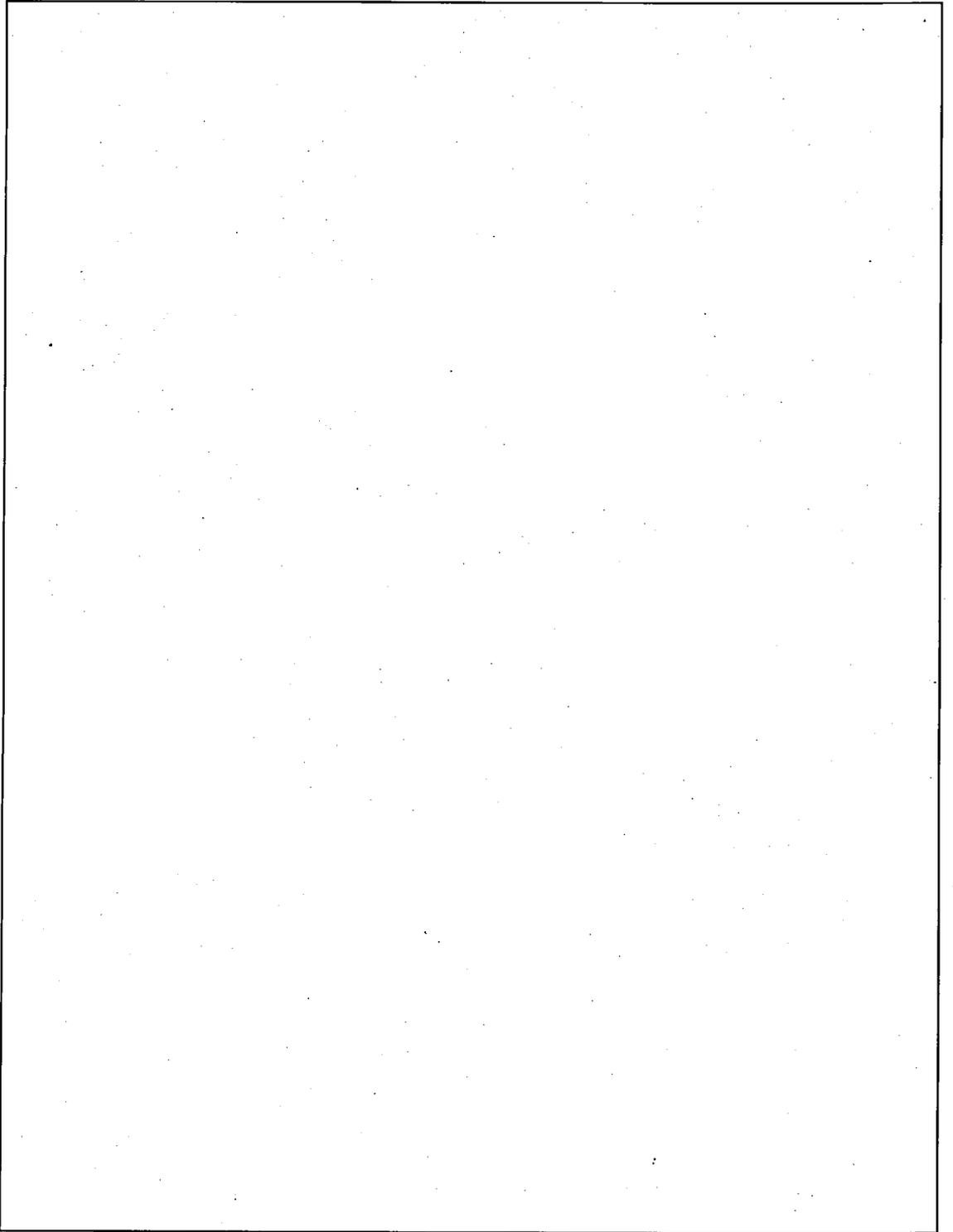
Please rate on the following scale, where 1 is Unaware and 5 is Very Aware

Unaware Very Aware

5. How would you rate your awareness of the recommendations put forward by the National Audit Office report, Planning for Homes?

Please rate on the following scale, where 1 is Unaware and 5 is Very Aware

Unaware Very Aware



2. Pre Application Advice and Discussion

1. Please indicate your agreement with the following statements on the scale of 1 - 5, where 1 is to strongly disagree and 5 is to strongly agree

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
My Authority produces detailed leaflets on a variety of aspects of Development Control	<input type="radio"/>				
My Authority displays detailed information on its website on a variety of aspects of Development Control	<input type="radio"/>				
My Authority offers pre application advice to a wide range of applicants	<input type="radio"/>				
The Pre Application Advice offered is comprehensive	<input type="radio"/>				
Sufficient authority resources are allocated to pre application discussions	<input type="radio"/>				
The resources dedicated to pre application advice are supported by the Senior Management of the Authority	<input type="radio"/>				
External Consultees are fully involved in Pre Application discussions	<input type="radio"/>				
Elected Members are fully involved in Pre Application discussions	<input type="radio"/>				
Community Representatives are fully involved in Pre Application discussions	<input type="radio"/>				
The involvement of different parties in pre application discussions improves the quality of the discussion output	<input type="radio"/>				
Charging for Pre Application discussions does/ would reduce participation	<input type="radio"/>				
Charging for Pre Application discussions does/ would improve the quality of discussion output	<input type="radio"/>				
Charging for Pre Application discussions does/ would have support from the Authority's Senior Management Team	<input type="radio"/>				
Charging for Pre Application discussions does/ would have support from the Authority's Elected Members	<input type="radio"/>				
Charging for Pre Application discussions	<input type="radio"/>				

does/ would have support
from Case Officers

Charging for Pre

Application discussions

does/ would have support
from Applicants

My Authority would support
the introduction of a
national centralised
charging structure for Pre
Application discussions

2. Do you have any comments or general observations on your Authority's approach to Pre Application discussions. Please add anything you wish below. Please also include any clarifications that you wish to add to your previous answers.

3. The Application Process: Submission, Validation and Processing

1. Please indicate your agreement with the following statements on the scale of 1 - 5, where 1 is to strongly disagree and 5 is to strongly agree

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
My Authority has internal resources to analyse information submitted with planning applications	<input type="radio"/>				
My Authority utilises external agencies to analyse information submitted with planning applications	<input type="radio"/>				
The application process would be improved through the submission of technical summaries in place of full reports on specialist issues	<input type="radio"/>				
The validity of applications is assessed at an early stage of submission	<input type="radio"/>				
A checklist is used to assess validity	<input type="radio"/>				
Issues with validity occur later in the application process	<input type="radio"/>				

2. Who is currently responsible for determining whether submitted applications meet validation requirements

3. Please add any other comments that you may wish regarding the Submission, Validation and Processing of Planning Applications. Please also include any clarifications that you wish to add to your previous answers.

4. The Application Process: Planning Conditions and Obligations

1. Please indicate your agreement with the following statements on the scale of 1 - 5, where 1 is to strongly disagree and 5 is to strongly agree

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
Draft planning obligation 'Heads of Terms' are essential on initial submission of Planning Applications	<input type="radio"/>				
Terms of Planning obligations are resolved during the normal course of an application	<input type="radio"/>				
Standardised Clauses and Formulae are applied by the Authority	<input type="radio"/>				
Processes are in place to monitor the outcomes of agreements	<input type="radio"/>				
Excessive Planning Conditions are being placed on applications	<input type="radio"/>				
Processes are in place to monitor planning conditions	<input type="radio"/>				
Processes are in place to discharge planning conditions	<input type="radio"/>				
The introduction of a charge will assist/ has assisted in the discharge of conditions	<input type="radio"/>				

2. Please add any other comments that you wish to make on the use of, and monitoring and discharge of, Planning Conditions and Obligations. Please also include any clarifications that you wish to add to your previous answers.

5. Involvement in the Development Management Process

1. Please indicate your agreement with the following statements on the scale of 1 - 5, where 1 is to strongly disagree and 5 is to strongly agree

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
Elected Members are actively involved in the Development Management Process following the submission of an application	<input type="radio"/>				
Elected Members receive adequate internal training to enable them to effectively participate in the Development Management process	<input type="radio"/>				
Statutory consultees are efficiently consulted on applications within their remit	<input type="radio"/>				
Statutory consultees comment efficiently on applications within their remit	<input type="radio"/>				
The authority maintains good relations with external consultees	<input type="radio"/>				
The Authority makes effective use of Standing Advice	<input type="radio"/>				
The Local Community is efficiently consulted on Planning Proposals	<input type="radio"/>				
My Authority would change its means of public consultation if greater flexibility was available	<input type="radio"/>				

2. Please add any other comments which you have on involvement within the Development Management Process. Please also include any clarifications that you wish to add to your previous answers.

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6. Costs

1. Please indicate your agreement with the following statements on the scale of 1 - 5, where 1 is to strongly disagree and 5 is to strongly agree

	Stongly Disagree	Disagree	Neutral	Agree	Strongly Disagree
The cost of the delivery of Development Management could be reduced in my Authority	<input type="radio"/>				
Recommendations from an external agency, such as the Planning Advisory Service, would be supported by the Management of the Authority	<input type="radio"/>				
Recommendations from an external agency, such as the Planning Advisory Service, would be supported by the Elected Members of the Authority	<input type="radio"/>				
Recommendations from an external agency, such as the Planning Advisory Service, would be supported by the Planning Staff of the Authority	<input type="radio"/>				

2. Please add any other comments that you may have on potential reductions of the cost of delivery of Development Management Services. Please also include any clarifications that you wish to add to your previous answers.

7. Monitoring and Appraisal of the Development Management Process

1. Please indicate your agreement with the following statements on the scale of 1 - 5, where 1 is to strongly agree and 5 is to strongly disagree

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
BVPI 109 is a good means of measuring performance of the Development Management Process	<input type="radio"/>				
Other measures could be effectively used to monitor performance	<input type="radio"/>				
There are/ were barriers to the implementation of other monitoring measures within the Authority	<input type="radio"/>				
A decrease on emphasis of BVPI 109 will reduce the profile of Development Management within the Authority	<input type="radio"/>				

2. Please add any comments that you wish in relation to the monitoring of the performance of Development Management. Please also include any clarifications that you wish to add to your previous answers.

8. and finally

1. Please add any other comments that you wish to make relating to your Authority and the reactions to Killian Pretty Review and the National Audit Office's Planning for Homes, or clarifications to answers on this Questionnaire.

2. Thank you very much for taking the time to complete the survey.

Once I have analysed the results, I will be undertaking Case Study Systems Analysis of Authorities in order to more fully assess the potential implementation with Local Authorities of the recommendations put forward.

Might your Authority be willing to take part in these Case Studies?

APPENDIX 2. LOCAL AUTHORITY INTERVIEW GUIDE

1. What do you consider to be the 'Purpose' of Development Control in this Authority?
2. What do you feel that others see as the purpose?
3. What Resources do you see coming into the Service?
4. What other factors are important elements entering the service?
5. What does the service produce?
6. What other (internal and external) organisations impact on the service
7. What other factors influence the way the service operates
8. Who, in your opinion, is responsible for achieving the main purpose (Id.fied in 1)
9. Who do you consider (formally or informally) senses what the service is doing and how it is coping?
10. Who is responsible for implementing required changes - does this help the people/ service to work together?
11. Who looks outside the service for potential impacts?
12. Who, either internally or externally, is responsible for setting the direction of the service?
13. Can you briefly describe how pre application advice is handled?
14. Can you briefly describe how the process of submission and validation of applications?
15. Can you briefly describe the process in dealing with Conditions and Obligations?
16. Can you briefly describe the process of involvement of other parties (internal and external)?

Anything to add? Other processes carried out by Development Management...

Appendix 3 – Survey Qualitative responses

Pre Application Comments

- We encourage pre application advice with developers and householders but due to timescales – they usually want to see you within a week – we don't have time to fully engage all external consultees but where possible we do try and consult through email.
- Whilst we strongly encourage pre-application discussions we have not explored any charging regime to date. I personally do not support this
- The Council charges for pre-application advice – details can be found at www.xxxx.gov.uk/fees_for_planning_services_06.04.08new.pdf. We are looking to widen member and community involvement as part of the move to Development Management
- We find significant benefit from pre-app discussions and often refer pre-apps to a Panel of Members which meets weekly, applicants have indicated that they find this approach beneficial
- There generally isn't enough time given to pre-application discussions due to lack of staff
- I believe that charging for major apps would be appropriate but not for householder
- Already make a charge for pre-apps (Householders no charge). National Charge would depend on whether it truly covers the cost of providing service. In Bournemouth we encourage applicants to engage the community before they finalise and submit their applications. We also, in appropriate major cases, have established a Planning Control Consultative Forum
- On the last question, it would be right for London Authorities to charge more than for example Bradford or Hartlepool or less affluent authorities
- xxxxx currently charges for pre-application advice on large scale major and medium sized development proposals (details on our website) and was one of the 1st authorities to introduce charging. Charges were introduced in consultation with xxxxxx property owners and has generally been supported. Charging has allowed the Authority to manage the huge demand for pre-application advice because it has improved the quality of pre-application proposals and has limited pre-application discussions on schemes which are unlikely to be progressed. We are currently reviewing our pre-application advice service and are likely to be considering expanding charges to smaller scale development proposals. Although Councillors are involved at a pre-application stage, the current guidance available to members is unclear and there are probity concerns about their involvement.

- We do not currently charge for pre-apps but it is something which we may consider in the future
- We have a formal process for pre-apps for both major and minor development. It works really well and has had a significant effect on the quality of applications and the speed of their determination.
- We employ an external consultant who runs out 'Development Team Approach' to providing pre-application advice to potential applicants. This has the benefit of creating an impartial and designated officer to arrange all DTA meetings, invite relevant internal and external parties, and to provide accurate bullet point records and contact details for the benefit of all attendees/ participants. There is no charge for this service, and we hope that there are many benefits derived from it for an applicant in terms of securing timely access to relevant officers and at the right level within the organisation, structure to discussions and a record of negotiations. From the Council's perspective this enables the design agenda to be promoted, it enables a large proportion of negotiation to occur outside of the 8 or 13 week targets (ie at the pre app stage), it gives our Building Control a chance to canvas for business and it is a process that continues from pre-app, during the determination of the application and post decision (and ultimately until completion of the development).
- xxxxx is in the middle of a systems thinking review of the Development control process which makes it a little difficult to answer some of the questions in the way that they are intended.
- We are currently considering – many authorities that do charge exempt charges for householders and small businesses, which comprise almost all of our customers
- Community Representatives cannot always be involved in pre-application discussions when these are commercially confidential. We have an SCI that does involve them where they are not confidential – such as proposed housing sites allocated in the local plan or major housing applications
- Our planning department is under resourced. The only thing senior management are concerned about is statistics and because the total number of applications is down due to the credit crunch staff has been cut, however workload is up which in turn will reduce the amount of time spent on pre app discussions and the quality of applications.
- Authority already decided not to introduce charges for pre-application advice service
- Currently preparing a Good Practice Guide and a PPA Charter
- Some thought has been given to the introduction of pre-app charges but the views of senior management, members or applicants has not so far been

sought. Introducing charges could have implications if a view was given that planning permission would be forthcoming and then was not on submission of the application. It is not possible to cover every element at pre-app that would be addressed at full application stage.

- We are trying to be business friendly to help the city out of the recession, which makes pre application charging untenable.
- My Authority actively encourages pre app discussions and follows up those applications that have been received without pre app advice
- External Consultees are normally only involved in large scale major developments
- The involvement of elected members and community reps is usually undertaken through developers pre-apps consultation
- The use of a graded system for charging may be appropriate. Charging for householder development would be inappropriate and counter productive as it would discourage prior consultation and therefore increase the level of applicants refused consent. Charging for pre application advice for major developments may be necessary given the amount of officer time involved and the level of certainty that developers wish to have prior to submission of an application.
- We purposely don't have lots of information on our actual website as we signpost to other websites ie the Planning Portal, as encouraged by the Govt. We offer comprehensive pre-app advice but only based on internal consultees. We are currently proposing to charge for pre-app advice but evidence from other authorities shows that it puts off many applicants so they simply submit a planning application instead and then you are on the back foot trying to improve it and missing the chance at pre-app
- Charging for pre-Apps should not apply to householders, it can be seen as a second payment/ charge.
- For the return on fees it would be too onerous
- My impression is that this authority is more approachable and helpful in pre-application discussions than some other nearby authorities. Generally I believe that the service we offer, which is fairly informal, is appreciated. The speed we can deliver the service is dependent on other workloads. For example at the current time with the numbers of applications down we are able to provide a better responsive service compared with previous busy periods. Because of the targets to deal with applications in 8/13 weeks, applications will normally tend to take priority in an officers daily workload.
- We introduced pre application charging on 1 June 2009 please see our website

- The authority has traditionally valued the benefits of pre-app discussion, and has worked hard over the years at cultivating relationships with developers and architects. The evidence of this symbiotic relationship is the Council's performance figures on all forms of planning applications. For example, last month all majors were turned round in the 13 week target period, surely this is proof of the genuine regard between the planning service and local developers. This relationship was jeopardised throughout 2008 when the Council introduced pre application charging. It became a deterrent to developers and architects wishing to engage in discussion. Submitted schemes therefore fell below the required standard and this consequently affected our performance targets. Suffice to say, the Council has now abandoned the charging regime.
- Charging is not being considered at present but it is an option
- We have introduced pre-app charging and have found it very useful – the numbers of pre-app inquiries hasn't reduced as a result of charging. There are significant differences between authorities, however, and this does seem inconsistent. A national approach would therefore be supported.
- We will always try and identify the relevant issues, but that will not imply acceptance or rejection of their proposals. It is important that the public do not perceive pre-app as being pre-determination.
- Last Question – if it was national then even the Councillors would probably support this as at the moment they are concerned about unfair systems between authorities
- LBR already charges for pre-application advice
- The Authority encourages pre-application discussions for all applications. In such a remote rural planning context, where development is predominantly small scale, we tend to deal with relatively few professional architects and planning consultants, so there is much more 'hand holding' through the stages of the process at pre-application stage.
- We currently do not charge for pre-application advice however a report has just been taken to members to introduce a charging structure for larger applications. This has been approved by members and we are now going out to consultation.
- To clarify xxxx does not charge for pre-application advice for anything other than householder/ small scale advice. We will provide guidance without charge for developments but as soon as it involves specific schemes charges are incurred. These may be set costs or on a hourly rate as set out on our website.
- We have recently introduced a new process for pre-application discussions. This is now a more formal process, which is split into 3 categories: (i) major proposals (ii) General Development; (iii) householder. We only charge for major development schemes. This gives more clarity and assurance to

developers that will receive detailed guidance. It was not considered appropriate to charge for smaller schemes and householder as this would put people off from enquiring about their proposal. In particular, with regards to householder schemes we could not justify charging a % of the householder application fee.

- The extent and quality of pre-application discussion depends on the nature of the applicant and proposal.
- Recently introduced a charge for pre-application discussions
- Applications are already subject to fees. If there are charges for pre-application discussions there could be an expectation as to the outcome of applications. For larger applications it would simply not be possible to expect an application without some pre-app discussions if the application is expected to be dealt with in the normal timescale (13 weeks). We regard pre app discussions as essential to the smooth running of the process once the application is submitted. We can also advise against aspects that are unlikely to be supported – thus saving time (and cost) to applicants later.
- Without pre app discussion we will come 'cold' to each application and need to spend more time afterwards, when the clock is ticking re speed of processing
- We operate a pre-application charging scheme
- xxxxx already charges for all pre application advise that it deals with, including permitted development enquiries and have done since January 2009
- Although we have some leaflets available and some info on the website, we are aware of a need to provide more. Members are encouraged to get involved with pre application discussions, but many have shown a reluctance to do so.
- Charging is more relevant to major applications than others
- Very detailed protocol on major applications which are dealt with by a team and include the potential to present schemes to members. Similar schemes, applicants are encouraged to liaise with case officers.
- Elected members must be able to make decisions on recommendations made by planning officers at committees. Paying for pre-app advice may make it seem like a binding decision. It is already difficult when officers give pre application advice and discover that colleagues or councillors do not agree with it or that only part of the information was disclosed at pre-app stage which changes the advice.

Validation etc comments

- Validation is becoming more complex certainly the 1 APP with national and local lists has added to this process and in my opinion has made submitting applications more complex
- Reviewing the validation requirements is an important and sometimes neglected part of the pre-application discussions
- The council has recently been through a Business Process Re-engineering which has resulted in Planning Officers validating their own applications, partially as a response to the economic downturn (ie less applications) but also to ensure that validation is done right, first time
- Validation checklists and easy accessibility provides certainty
- As xxx has one of the largest application workloads in the country, validation of applications can not be the responsibility of just one or two officers
- We have a 24 hour validation check. On occasion issues on validation occur later in the application process as more information comes to light and we request that this is addressed under reg 3
- Although we have a checklist on our website, we did not adopt a local validation checklist, as we viewed the process which appeared to be adopted as commonplace as flawed. We are awaiting review of validation by CLG before implementing. This has not provided any problems to date.
- Again the systems thinking review is changing significantly the way we process applications so I have answered with one eye towards that
- We rarely get major apps with technical additional info requiring outside technical expertise to analyse; mostly it's bat reports and archaeology reports which we have internal staff to deal with; flood risk assessments go to the Env Agency
- A check list approach may simply add to the number of incomplete applications and increase delay, whereas a flexible approach can decide if a piece of information is essential for that application to be validated. We do use external consultants for specialist areas of appraisal, such as agricultural justifications for new dwellings.
- Occasionally apps are invalidated and the clock stopped if inadequacies are discovered on site visits.
- Validation is the first step in the process on receipt of an application. Validation is usually carried out by Admin officers on all applications except majors, but they would seek advice where necessary. Majors are validated by the case officer.

- Watford does not have a validation checklist
- Full reports, covering a range of topics, are necessary for an effective assessment to be made on a particular topic. However a technical summary is of great benefit, not only to the case officer, but also to the general public
- We have some internal expertise but also rely on externals for specialist areas. Now that 1APP is in place, the process for validating is more bureaucratic than before with less ability to be pragmatic so it has actually slowed the process and the agents think it is a retrograde step.
- The amount of information required and the range of areas now involved often imposes an onerous burden on registration sections. There is limited recognition of this burden by government and often internally. Registration which should normally take 2-3 days can now with complex applications take 2-3 weeks!
- It is often the site visit that indicates any issues with the validity of applications, in particular whether the correct ownership certificates have been served, etc
- Pre-application advice will assist validation process
- Whilst generally achieving a better quality of application, the introduction of local lists of requirements and consequent validation process has added significantly to the workload at submission stage.
- Mistakes are rare, where they do occur every effort is expended to ensure a swift solution
- We use a local validation list in addition to the national validation list. Again though a more thorough national list would be better for applicants in terms of consistency.
- Validation is only concerned with the submission of a document, not its quality. If too many are required, it just makes validation unwieldy
- Capacity issues often impact on ability to analyse information submitted with planning applications
- All full reports should include an executive summary
- We are entirely reliant on internal resources for validating applications. Again, the lack of professional input into applications submitted to us can make validation a difficult process, as members of the public do not appreciate the need for 'design and access statements' and other requirements such as bat surveys

- The application process would be improved by the provision of technical and non technical summaries to supplement full reports on technical issues.
- I do feel that technical summaries rather than full reports would help improve the process of dealing with planning applications. We have adopted a Local Validation Checklist but its interpretation has led to some problems ie level of information required. This does delay the process of applications. At least if the pre-application procedure is used, these can be ironed out at meetings with the case officer
- PPU [Plan Processing Team] created 3 years ago to 'clean' applications to make processing within the statutory timescale easier.
- We currently have no local validation lists as I take the view that many examples around are overly obstructive to the general application. Our concentration is centred on pre application advice and working with applicants at all levels. In particular we have a Development Team approach for significant schemes which is very popular and well supported by all involved.
- National Validation checklist has had some benefits but contributed to further problems for less able agents
- Technical summaries would be useful for the case officer and neighbours but the full report still needs to be part of the submission for the relevant consultee to respond to.
- External agencies used to assess some specialist areas eg agricultural applications
- State/ lack of progress with s106 obligations at submission is sometimes a difficult issue.
- Support Officers cannot always be expected to know when important information is missing and it may then be picked up when the details of the application are explored by the case officer. Thus some validation issues take place later in the process such as incorrectly served certificates etc.

Condition Comments

- We make sure that we are not placing undue conditions on the consent and where possible at the first stages information is requested to remove the need for a condition – ie landscaping, drainage, materials, boundary treatments. The discharge of condition forms have helped but I am not convinced it is aiding the monitoring of conditions. MBC have no compliance or monitoring teams.
- My comments on obligations are in relation to major applications
- Currently developing a S106 database to provide comprehensive monitoring information
- The introduction of a fee to discharge pre commencement conditions has focused the minds of officers to get them done and the formalisation makes it easier to manage.
- The introduction of charges for discharging conditions has resulted in applicants trying to submit all of the details in one go which is sometime problematic. Processes are in place to monitor some but not all planning conditions.
- Section 106 HoT's are normally agreed at pre-app. Conditions are only applied in accordance with the circular. Charging has not really helped – it should be for each condition rather than each submission.
- We would always encourage the submission of HOT's at the submission of the application, but even in the event that this happens, it is still on some occasions not possible to resolve issues before the target date for determination of the application. As we are a council which prioritises regeneration, resolving the s106 generally is often more important than merely hitting performance targets, which does depart from the stronger line taken elsewhere.
- We are in the process of developing a monitoring and enforcement policy that will address monitoring of conditions – not currently done. Thinking about charging but Trevor Roberts Assoc has cautioned strongly against
- Heads of Terms are normally agreed during pre-app or the application process, so that committee members know what they are approving. The detailed wording may be arrived at later. Charging for the discharge of conditions is obfuscated by the poor wording of the legislation.
- There is effective monitoring, but over a very limited range of decisions, due to resource constraints
- The charge on conditions has not resulted in assisting the situation but helps to get a quicker decision

- Depends on what you mean by 'excessive' – they always have a purpose but some people may argue that it's overkill. We monitor some conditions but not all as we don't have resources
- In response to the question of Heads of Terms the situation here is that we would like these submitted up front but in reality we have to deal with them during or after processing the application.
- Charging for discharge of conditions has formalised the process with clear paper trails.
- This authority is selective in condition monitoring
- To proactively monitor and discharge conditions would require extra staff resources in a unit which can only just maintain its high performance on planning application turn around.
- I don't believe the process of monitoring conditions is very comprehensive and it does need improvement, but where are the resources? Your questions are a little basic in places and don't allow a measured response.
- Monitoring of Conditions doesn't occur proactively as a rule – only where an application for discharge is submitted or an enforcement issue is raised
- Currently looking at the monitoring of planning conditions process.
- Heads of terms are essential for major applications and if possible should have been discussed at pre-app stage. We have an adopted SPD for planning obligations and applicants should be aware prior to submitting applications. Unilateral undertakings may need to be resolved during the 8 or 13 week process. We are finalising a process to monitor conditions and are trialling with 09 conditions.
- All these new procedures are placing greater pressure on the case officer who are having to balance these with their caseload to ensure targets are still being met. This sometimes leads to approvals having a larger number of conditions imposed because there is no time to negotiate with applicants.
- There is a need to review conditions to ensure these meet the required tests on circular 1/95 which needs to be revised
- Fee is simply an income generator
- Have a Planning Enforcement Monitoring Officer in place
- There are insufficient resources at present to monitor conditions. We are not yet pro active in this. Charging and the formal submission of applications to discharge conditions has made the system more transparent and raised the profile of conditions. Which is an improvement.

- The charge being linked with the timescale for response is as important as the charge. We do not impose unnecessary conditions but often the applications have such a paucity of detail that it can not be resolved in the 8 week period so that conditions are used instead. Pre-app discussion really helps when details are required.

Involvement

- xxx has a delegation agreement in place and very few applications are taken to committee. We have a good working arrangement with external consultees and have received training from them to assist both them and us on dealing with applications. This has been identified on the Departments Service Plan and is set to be taken forward with other external bodies. This has been positive.
- Use of press notices for application advertisement is out dated and better use of website and email notification via an interactive website system is the way forward.
- The removal of the requirement for press advertising would be beneficial
- The use of public advertisements is a waste of money in the internet age
- xxxx would stop advertising planning applications in local newspapers if there was greater flexibility as this is an expensive form of consultation that is much less effective than other forms of consultation
- Highways and EA do not have the resources to provide adequate responses. Stop advertisements straight away. They are a waste of money and resources. Targeted emails and text alerts are better value.
- Member training is offered but not always taken up – would be good if it were compulsory. Press notices should no longer be required as they are of little benefit and a form of advertising on the LPA's website should be used instead.
- We are not currently in a position where we can engage members in pre application discussions. This is an area of great concern regarding training, party politics, consistency of advice etc we are still considering.
- Some consultees very slow to respond – an objection received late in process is extremely unhelpful – also giving inconsistent advice at pre-app stage and when formally consulted; would save a lot of money if we didn't have to advertise in local paper – however local papers are widely read here.
- It is a complete waste of time and resources (over £130,000 pa in xxx alone) to have to advertise planning applications in the local press. None of the responses we get on planning applications arrive as a result of this process, which is a waste of money. We get responses by targeted neighbour letters, a good website and site notices. The sooner the requirement to advertise applications is removed, the sooner we can save a great deal of public money and improve turn around times of applications.
- Beginning the transition to Development Management with POS/PAS

- We would like to drop ineffective and expensive newspaper advertising and have more efficient and effective software for electronic consultation
- Use of email would be recommended
- Watford's public consultation on planning applications is significantly above the legal minimum requirements.
- Some statutory consultees are very slow in responding on planning applications which slows the process down. The requirement to advertise in the local press can be very costly and no achieve a high level of public awareness.
- There is flexibility on how to involve the public already and we use different techniques – bottom line is, they aren't often interested.
- Elected members are not supposed to be involved in the process, rather it is their role to be decision maker at the end of the process. Any involvement prior to this would prejudice outcomes.
- Final question – would depend on context
- xxxR has an adopted Statement of Community Involvement in place – outlining processes for consultation on planning applications
- We have recently introduced a Member Referral Scheme which is available on the Council's website. Also we have 5 neighbourhood boards in the borough where members are involved, and they receive weekly lists of new and decided applications. Members are required to undertake annual internal training courses before they can sit on planning committee. Also during the year courses are run by officers on specific topics. Eg use of conditions, what are material considerations etc
- Newspaper advertising is costly and does not necessarily reach the target population
- The requirement to publish in a local paper is outdated and expensive
- Training is available to members but very few actually attend. Members are very worried about fettering their discretion prior to a Planning Committee and do not therefore like to be involved at the pre app or app stage
- Standard of responses from Statutory Consultees varies
- Statement of Community development is a good tool
- There are agreed consultation procedures but the public expectation for LPA to explore the ownership of fields or sites nearby is often unrealistic. Perhaps applicants should be responsible for this to some degree?

Cost of Delivery

- Being a small rural authority we do not get a lot of major applications to warrant such intervention but it would be good to know it was there if required
- We have piloted Development Management techniques and have undertaken and are now implementing Business Process improvements with the target of improving customer service, reducing costs, delivering Development Management including a sharpening of focus on pre-application discussions.
- We have been a pathfinder with CLG on Business Process Improvement in the Development Control Process
- This authority delivers a lean and cost effective service It could even be under resourced
- The recommendations of external agencies are of interest to officers and members but support for the recommendations would depend on what impact the recommendations were likely to have on Westminster's planning service.
- PAS have already carried out a Peer Group Review (and a follow up revisit) and we have taken on board their comments.
- It would very much depend on what the recommendations were
- We have many priorities, of which improving our service is key. We have actively pursued a range of enhancements to the service delivery many of which tally with the recommendations of KP in particular. However, this must be balanced against falling application numbers and fee income, the consequent restructuring that we have had to do to reflect the changing needs, and the pressures this places upon the service. The move towards a total development management regime will be incrementally implemented, but at present there is no local political or community pressure to accelerate this.
- Systems thinking tells us that advice is best coming through a thorough examination of the issues and from those people who work in the system.
- Introduction of portal has increased some costs as we now have to bear financial burden of printing paper copies of plans (as do Parish Councils) – not always feasible to consider plans electronically only
- We have previously had the benefit of assistance from PAS to help with an Improvement Plan
- Can't comment on this very much as one doesn't know what they would say and how it would fit in with the aims of the councillors running the council. We do seek to continually improve systems and processes.

- We have been audited by PAS and had project management training, but it added little other than credibility to what we are already doing
- Cost of delivery can always be reduced – but the value of the service offered would also be reduced, and output would suffer
- Depends what you mean – of course this cost could be reduced (ie. You could have a skeleton staff) but any reduction would reduce service levels. PAS have some benefits but like many external consultants they tend to generalise, think that every authority has the same problems and do not get to grip with the actual issues. If they found the problem, and came up with the correct solution, they would be supported.
- The Council was subject to a Planning Advisory Service peer review in 2007 and the results were very encouraging with only a limited number of recommendations which would improve the planning service
- There is too much interference by government and QUANGOS in LPA business already and this is undemocratic
- We work hard to bring together all parties. Members and public would like to think we are finding local solutions. Outside Agencies would not facilitate this.
- Replace press adverts with website publicity. Stop sending out copies of approved plans to reduce postage costs.
- Very neutral answers as these in the main are my perception as xxxx have not involved PAS to date
- In these difficult times we are getting increasing pressure to reduce costs to the service. This has to be balanced against the quality of the service, and how efficient we are. I am reluctant at this moment to reduce costs unless it can be proved that there will be no impact on performance and service.
- I do not believe that they would have much to offer us having met with them as they agree that we are a progressive and well run LPA
- Unsure on what you mean by recommendations from PAS – recommendations on what? On process, or decisions
- Costs can be reduced. However, once potentially relatively minor inefficiencies are stripped out, the key is with the nature, scope and quality of the service we want to provide.
- We are currently looking into having PAS coming into our planning department as consultants.

- Recommendations would only be supported if they were seen to be feasible and appropriate within the budgetary restraints and were seen as beneficial. Advice would not automatically be supported or rejected.
- Significant large scale costs are associated with the requirements of other public organisations eg highways, flooding
- The only question I have ever put to PAS, I was told was outside of the remit of their service. When I reworded the question to move the issue along I was told they had no information to add. I really am unclear what advice they can give on planning applications/

Monitoring Comments

- Sorry I do not know enough on this topic
- A refocus on customer satisfaction combined with time bound processes (the 8 week target) will be still important to the Council if performance unlocks funding
- Planning is a high profile activity with significant political emphasis
- Determining applications as quickly as possible is important and BVPI 109 has helped to improve this but speed of determining applications is not the purpose of the development management process. The difficulty is finding a performance indicator that can measure the quality of development once it is built, assess its impact on the local environment and determine the value added by the development management process.
- I can not see a time when speed will not be a measure, but it needs to be less crude, more refined
- Needs qualitative as well as quantitative measures
- Measuring the speed of determination of applications has undoubtedly improved the service in my opinion. As with every performance monitoring regime however, there are pitfalls and loopholes. Personally, I would like to see design quality being recognised more in terms of the service we provide. Satisfaction would also be a good aspect to monitor in relation to performance. Unfortunately, planning has become an area where it is difficult to please everyone, be they applicants, objectors, consultees, cllrs, etc, so it would be a difficult area to reflect and link the two.
- Targets measure the wrong things. They encourage poor practice and on some occasions poor planning. Measures need to highlight a need to improve planning systems and help manage services. They also need to be set to help achieve a purpose which surely is achieving quality development.
- Emphasis needs to be on quality of decision making not just turnaround times; however how to measure quality...?
- BVPI 109 has proved its worth in focusing attention and resources on DC. There could be additional measures such as identifying the input of officers to amend and improve schemes as a measure of qualitative input to the process. Simply noting the % of cases in which a scheme is amended would be one simple but effective means of measuring this.
- Quality of services cannot be measured by speed of determination alone
- ... has had a beneficial effect on the profile of planning, resources made available and on service to the customer, albeit over emphasising speed over

quality of decisions, processes and outputs. There is now a move away from too many targets and that is desirable

- ...it is one measure of performance – but of course it lacks any objective measure of quality. Outcomes on the ground are often more important to the local community than simply speed of decision making. A quality service is more likely to raise the profile of the development management service
- BVPI 109 is not a comprehensive measure of quality!!
- BVPI 109 is now an accepted and well regarded part of the Council's performance management culture. It gives a ready impression of the efficiency of the planning service.
- There is too much emphasis on monitoring/ performance/ targets and not enough emphasis on the output of the process!
- If BV109 was supported by other 'quality' measures this would give a better reflection of the performance of Authorities. Quality is however notoriously difficult to define and therefore monitor
- The holy grail of DC is to measure quality not quantity. Offer a knighthood to anyone who can crack this one.
- Barriers to other monitoring measures can include capacity issues which are reflected in budgets and economic circumstances
- PI's are time driven rather than based on quality of decision. This cannot be good for the quality of place in the longer term.
- xxxx is a high performing authority when assessed against BVPI 109. However general opinion is that this is too target driven (quantitative) and the quality element is not measured. Most contributors would want to ensure a quality and right decision and not that a decision is made within a time limit.
- Reliance on [it] at present but cost etc is a barrier unless efficiencies can be found elsewhere
- I do feel there is too much pressure in trying to determine applications within these targets. It does affect the quality of the decisions.
- BVPI 109 is one dimensional and needs to be balanced by service quality indicator
- There needs to be a measure on speed of performance and to lose this will take DC performance back to where it was prior to PDG. I also think that appeal success is a crucial quality indicator but agree that there is a requirement for a quality measure. We still run BVPI 111 on an annual basis which measures applicant/ agent satisfaction and a national measure that

perhaps includes all stakeholders may have merit and sit with other performance measures. There is also a need to have a national measure for the cost of the DC process in order that it can move to self funding from planning fees.

- Basing the performance of an authority simply on the turnaround of applications ignores the decisions reached and what may subsequently happen, eg early refusals leading to revised applications where extended time limits might have allowed revisions to be agreed earlier, ie time for negotiation.
- The HPD grant implications imply a change in the significance of BVPI109. However, in reality, no authority wants to be regarded as not meeting targets. There should be some flexibility, eg scope for graduations in meeting targets may allow LPA's to make more balanced decisions on the timing of various applications.
- Much interest in design based indicators
- BVPI 109 measure process only. There is no measure of outcomes (although building for life standard may effectively do this for resi. Schemes)
- Time to determine applications without s106 or with an extensive need for consultation should be balanced with quality of outcome.

Any other comments KP etc

- Rather than constantly tinkering and tweaking through reviews the Government should aim to undertake thorough user driven approach to improving the delivery of Development Management
- The devil will be in the detail
- The biggest threat to the effectiveness of DC is the over complication of the process and trying to achieve too many often conflicting objectives. It's a bit like football – keep it simple and we'll maintain our effectiveness!!!
- Some of us have supported various recommendations of the KP report and are awaiting a translation of its aims into practice
- Killian Pretty goes over many existing initiatives and has some rather misguided ideas in my opinion. We need to get on with delivering the current modernisation programme and that means sorting out the sudden drastic loss of income due to the recession and the structure of the Planning Delivery Grant.
- The KP review makes many recommendations that the planning system has been calling for years and many authorities had already got on with. Many changes that have now been implemented ie increasing householder p.d. and discharging conditions have been badly written and created a mess rather than improved the system.
- The council has considered the review. The main thrust of the review was the current over-emphasis on bureaucratic assessments in various forms on major applications. This makes the planning system extremely difficult to use/ access for members of the public. The Design and Access statement is a case in point, it is largely ineffective particularly on the vast majority of small developments. It only goes to act as a further barrier for the public when submitting applications.
- Re Planning for Homes. Don't understand why an LPA would be able to have any reason to assess how long an applicant takes to address issues and put in an application. That is entirely up to their finances, programmes etc
- I feel that reviews like the Killian Pretty Review overstate the problems that exist with the planning application process, and place excessive emphasis on the planning process as a hurdle to be overcome. There should be more emphasis placed on the value added through the planning process, and the need to ensure that decisions are fully informed and carefully considered, rather than concentrating on simplistic 8/13 week indicators. The planning for homes report is not relevant to this authority as we do not receive major residential applications.

- An interesting and thought provoking survey. Am concerned about the effect of some of the Killian Pretty review and how from a DC they could be implemented but consider this authority can and is willing to move forward
- I personally support most of Killian Pretty recommendations as antidote for earlier initiatives that have seized up the development management system
- This is an excellent survey and I wish you every success with it – well done
- I saw the Killian Pretty Review as positive and helpful to planning services in that it recognised the real pressures we are under and the need to resource the service etc
- KP is being quoted as part of the justification in our reports to committee or Executive when change is being proposed

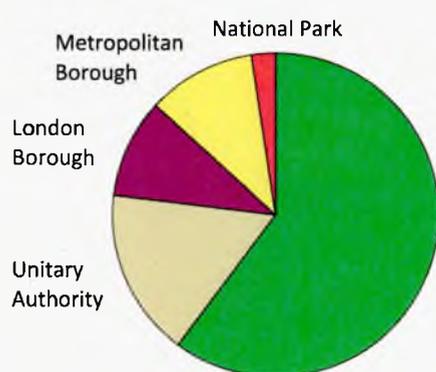
APPENDIX 4A – EXTERNAL VALIDITY TESTING

The following data provides a more detailed presentation of the analysis conducted to ascertain the external validity of the survey responses.

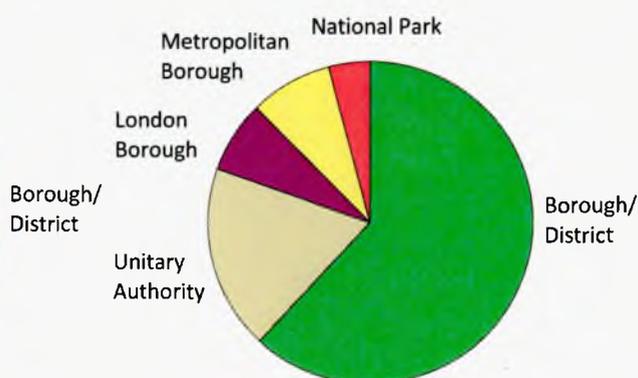
Authority Type

The following pie charts illustrate firstly the percentages of the population of the various authority types, and secondly those of the questionnaire respondents.

Pie Charts of Authority Types



Authority Type – Population



Authority Type (Survey Respondents)

Authority Region

The table below summarises both the responses received and the number of Authorities in the full population with regards to the Government Office Region in which the Authority lies.

Frequency Table of Regional Representation

	Frequency in Survey respondents	Percent	Frequency in Population	Percent	Percentage of Population
North West	14	14.43	45	11.84	31.11%
North East	4	4.12	13	3.42	30.77%
Yorkshire and Humber	6	6.19	24	6.32	25.00%
West Midlands	14	14.43	33	8.68	42.42%
East Midlands	12	12.37	46	12.11	26.09%
East	15	15.46	53	13.95	28.30%

South West	12	12.37	40	10.53	30.00%
South East	13	13.40	74	19.47	17.57%
London	7	7.22	33	8.68	21.21%
Total	97	100.00	361	100.00	

Cost of Planning

This indicator is an illustration of the amount that Local Planning Authorities dedicate to the Planning Service as a whole, encompassing all the planning functions. It should be noted, however, that this figure is the total amount spent, and does not take into account income received through Planning Application Fees. This formula is responsible for one highly noticeable outlier, the City of London, which has a proportionally small population when considering the development taking place in the area. As such, the data has been grouped to reflect the broad nature of the populations.

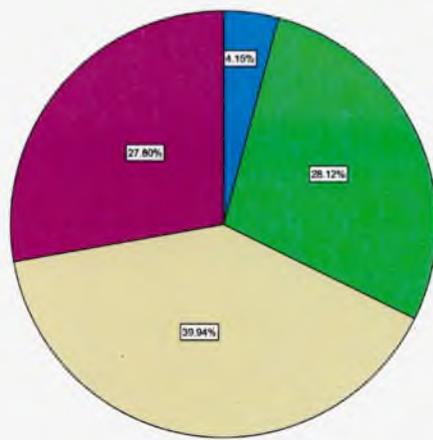
Frequency Table of the Cost of Planning

	Frequency in Survey respondents	Percent	Frequency in Population	Percent	Percent of Population
<10	27	28.4	100	30.2	27.00%
10-14.99	28	29.5	114	34.4	24.56%
15-19.99	25	26.3	75	22.7	33.33%
>=20	15	15.8	42	12.7	35.71%
Total	95	100.0	331	100.0	

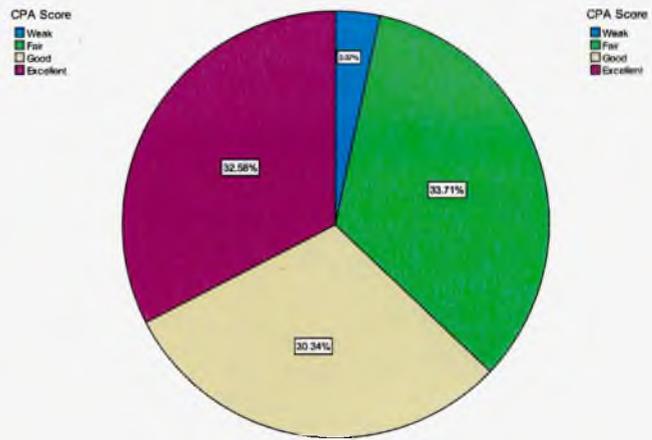
Overall CPA Score

This variable is an indicator as to how a council, and therefore a local planning authority, is performing over all its services, including development control, in relation to the central government targets in existence at the time.

Pie Charts of the CPA Scores of the population and respondents



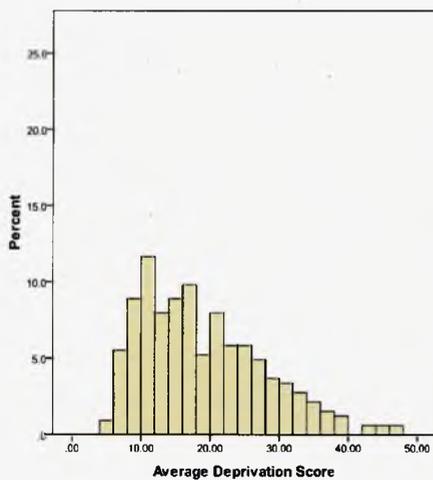
CPA Score – Population



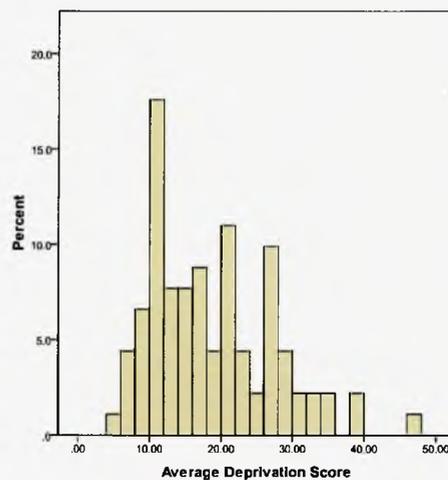
CPA Score - Survey Respondents

The following Bar Charts represent the Indices of Deprivation Indices for all Local Authorities, with the exclusion of National Parks for whom the data is not compiled, and for the participants in the survey research. In the case of the Unitary Authorities created in 2009, the data consists of the mean of the constituent authorities.

Bar Charts of the Average Deprivation score of the Population and Respondents

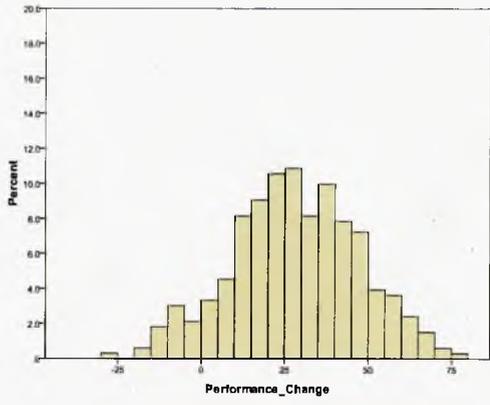


Deprivation Score – Population

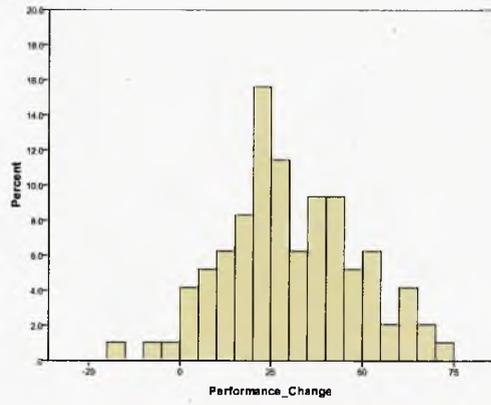


Deprivation Score - Survey Respondents

The final indicator which has previously been identified on which the relevance of the respondents can be assessed is that of the change in performance on major planning applications. The bar charts illustrate, once again, the performance change across the entire population and that of the survey respondents.



Performance Change – Population



Performance Change- Survey Respondents

APPENDIX 4B

Pre Application Advice

In assessing the performance of authorities in relation to the service of pre application advice, a number of factors were examined within the questionnaire survey. The questions related to this field are displayed **Error! Reference source not found.**below.

Table of the statements relating to Pre Application advice

Subject	Statement
Leaflets	My Authority produces detailed leaflets on a variety of aspects of Development Control
Website Info	My Authority displays detailed information on its website on a variety of aspects of Development Control
Pre Application Advice Recipients	My Authority offers pre application advice to a wide range of applicants
Pre Application Advice Quality	The Pre Application Advice offered is comprehensive
Resources	Sufficient resources are allocated to pre application discussions
Resource Support	The resources dedicated to pre application advice are supported by the Senior Management Team
Involvement of Consultees	External Consultees are fully involved in Pre Application Discussions
Involvement of Elected Members	Elected Members are fully involved in pre application discussions
Community Representation	Community representatives are fully involved in pre application discussions

It is, as previously discussed, also necessary to examine if these factors should indeed be used together to assess the current performance of authorities in this area, establishing the reliability of the data. The results of a Cronbach's Alpha test are shown below.

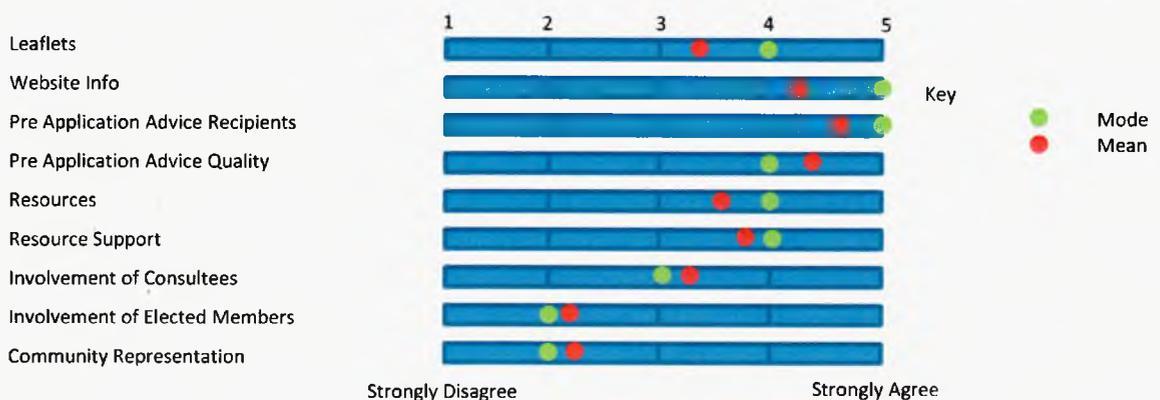
Cronbach's Alpha analysis of Pre Application advice

Subject	Mean Score	Cronbach's Alpha if item deleted	Cronbach's Alpha
Leaflets	3.34	0.890	0.889
Website Info	4.2	0.879	
Pre Application Advice Recipients	4.62	0.870	
Pre Application Advice Quality	4.29	0.868	
Resources	3.59	0.870	
Resource Support	3.91	.0869	
Involvement of Consultees	3.21	0.876	
Involvement of Elected Members	2.17	0.879	
Community Representation	2.19	0.885	

This Cronbach's alpha score increases the acceptance that there is consistency between the responses within this group and it can be considered that the subjects are reliably approaching the area of authority performance with regard to pre application advice. An analysis of this follows below.

The diagram below illustrates both the mean and mode responses to the questions.

Illustration of the Mean and Modal responses to pre application statements



This illustrates that the mean and mode of the answers lie close to each other across the factors. It also shows that there is a range of practices across the recommendations put forward in the reports. While many authorities feel that they provide good quality information, both online and electronically, and

allocate suitable resources for pre application advice, substantially fewer involve external agencies in these discussions.

As these external agencies will be consulted on, and inherently involved in, the application process, it seems appropriate, as the reviews recommend, that they should be engaged as early as possible within the process. These lower averages among the questionnaire respondents illustrate an area in which authorities may look to improve their practices and policies.

Submission, Validation and Processing

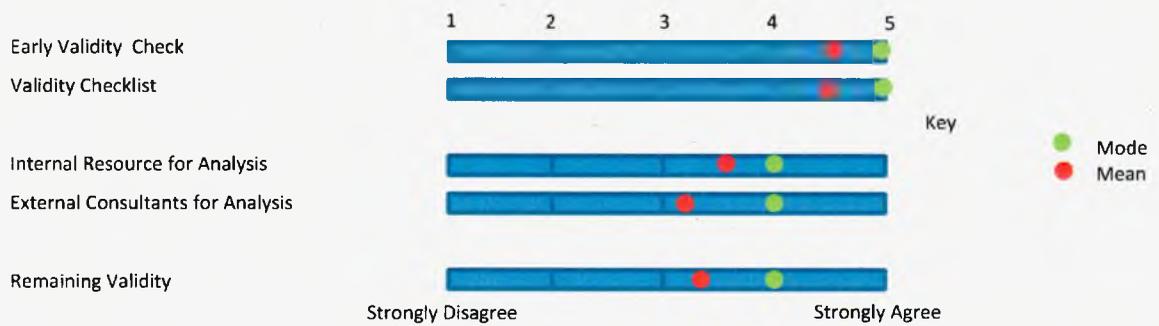
The following statements were considered appropriate to analyse the performance of authorities in relation to the submission, validation and processing of the planning applications themselves.

Proposed Statements relating to Submission, Validation and Processing

Subject	Statement
Internal Resources	My Authority has internal resources to analyse information submitted with planning applications
External Agencies	My Authority utilises external agencies to analyse information submitted with planning applications
Application Validity	The validity of applications is assessed at an early stage of submission
Checklist	A checklist is used to assess validity
Validity Issues	Validity Issues occur later in the process (needs inverting)

Initial analysis using Cronbach's Alpha reveals large potential issues in the data reliability as it produced a negative score. This clearly indicates that the reliability of these variables as a combined measure of performance requires consideration.

Mean and Modal values relating to Submission, Validation and Processing



The responses to the questions in this section which relate to the resources suggest that a large number of local authorities use both internal and external resources to examine technical information contained within planning applications.

The final factor included in this analysis relates to the outcome of the validation process, aiming to establish when issues occur at a later point in the process. The mean value, 3.3, appears to suggest that there are still difficulties emerging at this stage in the process. While it is on the positive side, the mode of 4, suggests that there have been a number of authorities who regularly experience difficulties with the validity of applications at a later stage in the planning process. This would indicate that further examination is required in this area, as Authorities are currently working in accordance with the practices recommended in the reports while issues are still occurring.

Planning Conditions and Obligations

The survey contained a section dedicated to conditions and obligations. The table below presents these factors and the related Cronbach's Alpha analysis to assess Internal Validity.

Variable Factors and Cronbach's Alpha analysis

Subject	Statement	Cronbach's Alpha is removed	Cronbach's Alpha
Heads of Terms Essential	Draft planning obligation 'Heads of Terms' are essential on initial submission of planning applications	0.826	0.837
Terms	Terms of planning obligations are resolved during	0.820	

resolved	the normal course of planning applications		
Standardised Clauses	Standardised Clauses and Formulae are applied by the authority	0.802	
Monitoring of Agreements	Processes are in place to monitor the outcomes of agreements	0.806	
Monitoring of Conditions	Processes are in place to monitor planning conditions	0.835	
Discharge of Conditions	Processes are in place to discharge planning conditions	0.774	

Involvement

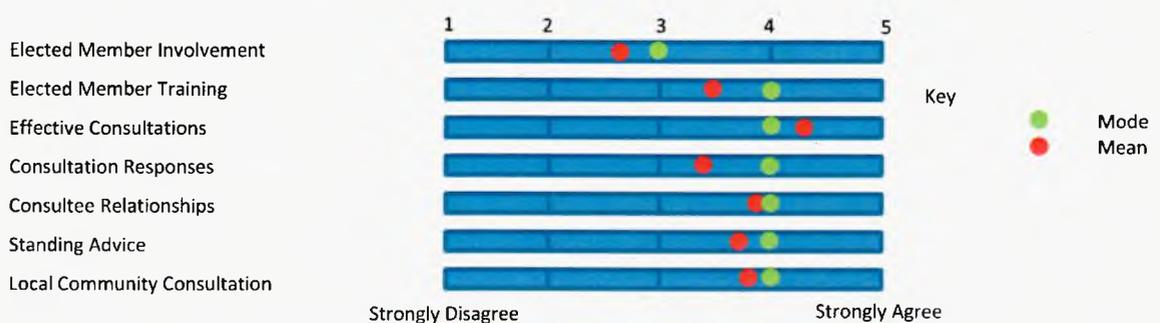
The table below summarises the variables studied in the Involvement section of the survey, and the associated Cronbach's Alpha scores.

Factors included in, and Cronbach's Alpha testing, of Involvement

Variable	Statement	Item Mean	Cronbach's Alpha if Item Deleted	Cronbach's Alpha
Elected Member Involvement	Elected Members are actively involved in the Development Management process following the submission of an application	2.74	.910	0.896
Elected Member Training	Elected Members receive adequate training to enable them to effectively participate in the planning process	3.44	.892	
Effective Consultations	Statutory Consultees are effectively consulted on applications within their remit	4.25	.868	
Consultation Responses	Statutory consultees comment effectively on their applications	3.35	.887	
Consultee relationships	The authority maintains good relationships with statutory consultees	3.94	.863	
Standing advice	The Authority makes effective use of standing advice	3.7	.876	

Variable	Statement	Item Mean	Cronbach's Alpha if Item Deleted	Cronbach's Alpha
Elected Member Involvement	Elected Members are actively involved in the Development Management process following the submission of an application	2.74	.910	0.896
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Consultation Responses	Statutory consultees comment effectively on their applications	3.35	.887	
Consultee relationships	The authority maintains good relationships with statutory consultees	3.94	.863	
Standing advice	The Authority makes effective use of standing advice	3.7	.876	
Local community consultation	The Local Community is efficiently consulted on planning proposals	3.89	.869	

Modes and Means of Involvement in the process



Acceptance of Change

The next step is to establish an indicator as to how receptive authorities are to change. Within the design of the questionnaire, some questions addressed the acceptance of change both of the Authority as a whole and of different elements

of the Authority, for example, the Senior Management Team, the elected members and even the users of the service.

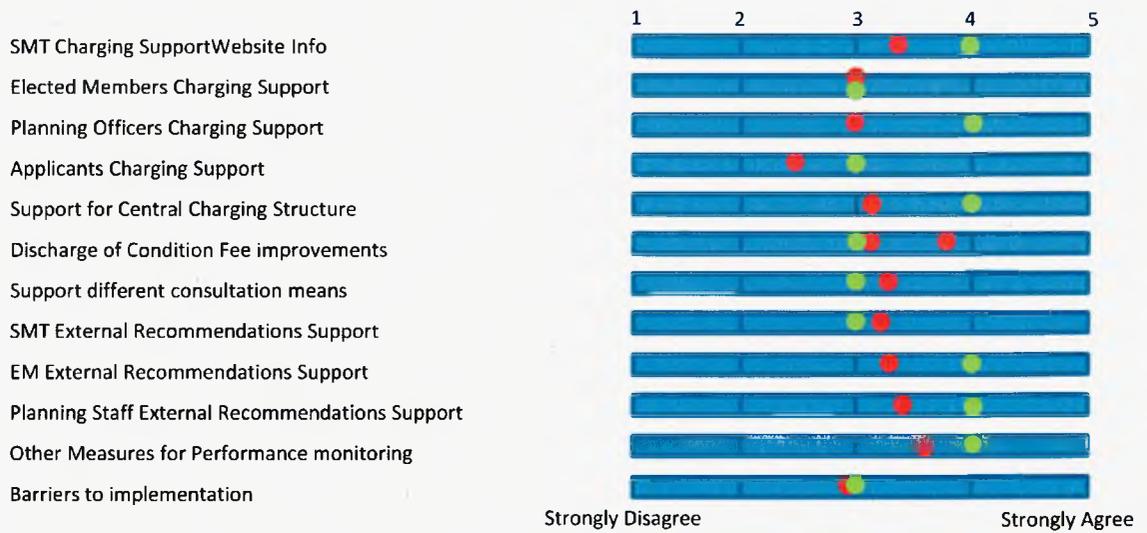
Factors included in assessment of the Acceptance of Change

		Item Mean	Cronbach's Alpha if Item Deleted	Cronbach's Alpha
SMT Charging Support	Charging for pre application discussions does/ would have support from the authority's senior management team	3.26	.698	0.755
Elected Members Charging Support	Charging for pre application discussions does/ would have the support from the Authority's elected members	3.06	.716	
Planning Officers Charging Support	Charging for pre application discussions does/ would have support from the Authority's planning staff	3.04	.698	
Applicants Charging Support	Charging for pre application advice discussion does/ would have support from applicants	2.46	.702	
Support for Central Charging Structure	My authority would support the introduction of a centralised charging structure for pre application discussions	3.21	.717	
Discharge of Condition Fee improvements	The introduction of a charge has assisted in the discharge of conditions	3.27	.758	
Support different consultation means	My authority would change its means of consultation if greater flexibility was available	3.42	.757	
SMT External Recommendations Support	Recommendations from an external agency, such as the Planning Advisory Service, would be supported by the management of the authority	3.48	.744	
EM External Recommendations Support	Recommendations from an external agency, such as the Planning Advisory Service, would be supported by the elected members of the authority	3.35	.743	
Planning Staff External Recommendations Support	Recommendations from an external agency, such as the Planning Advisory Service, would be supported by the planning staff of the authority	3.57	.750	
Other Measures for Performance monitoring	Other measures (than BVPI targets) could be effectively used to monitor performance	3.76	.762	

		Item Mean	Cronbach's Alpha if Item Deleted	Cronbach's Alpha
SMT Charging Support	Charging for pre application discussions does/ would have support from the authority's senior management team	3.26	.698	0.755
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Other Measures for Performance monitoring	Other measures (than BVPI targets) could be effectively used to monitor performance	3.76	.762	
Barriers to implementation	<i>Inverted Indicators</i> – There are/ ere barriers to the implementation of other measures within the authority	2.98	.781	

A representation of the means and modes of these variables is shown below

Mode and Mean Analysis for Change Acceptance



APPENDIX 4C – Cross Tabulations

Cross Tabulation of Authority Type and Acceptance of Change

			Tier		Total
			Borough	Single Tier	
Grouped Acceptance of Change	Lowest	Count	20	5	25
		Expected Count	16.7	8.3	25.0
	Medium	Count	20	9	29
		Expected Count	19.3	9.7	29.0
	Highest	Count	20	16	36
		Expected Count	24.0	12.0	36.0
Total	Count	60	30	90	
	Expected Count	60.0	30.0	90.0	

Chi-Square Tests

	Value	df	Asymp. Sig. (2-sided)
Pearson Chi-Square	4.069 ^a	2	.131
N of Valid Cases	90		

a. 0 cells (.0%) have expected count less than 5. The minimum expected count is 8.33.

	Value
Cramer's V	.213
N of Valid Cases	90

Cross Tabulation of Region and Performance Change

			3 groups performance change			Total
			<=30	30-60	>=60	
Grouped Region	North and Yorkshire	Count	43	24	8	75
		Expected Count	32.5	33.0	9.5	75.0

Midlands and South West	Count	41	51	11	103
	Expected Count	44.7	45.3	13.0	103.0
East and South East	Count	49	52	13	114
	Expected Count	49.5	50.2	14.4	114.0
London	Count	8	16	9	33
	Expected Count	14.3	14.5	4.2	33.0
Total	Count	141	143	41	325
	Expected Count	141.0	143.0	41.0	325.0

Chi Squared and Cramer's V

	Value	Approx. Sig.
Cramer's V	.158	.013
N of Valid Cases	325	

			Grouped Acceptance of Change			Total
			Lowest	Medium	Highest	
Grouped Population	<=100,000	Count	10	11	9	30
		Expected Count	7.7	10.2	12.1	30.0
	100,001 - 150,000	Count	9	8	13	30
		Expected Count	7.7	10.2	12.1	30.0
	150,001 - 250,000	Count	1	5	9	15
		Expected Count	3.8	5.1	6.0	15.0
	>250,000	Count	1	4	2	7
		Expected Count	1.8	2.4	2.8	7.0
Total		Count	21	28	33	82
		Expected Count	21.0	28.0	33.0	82.0

The next test is that for a relationship with Awareness of Change.

Cross Tabulation of Population and Awareness

	KP and NAO 2 groups		Total
	Low	High	

Population 3 Groups	<100,000	Count	18	14	32
		Expected Count	14.2	17.8	32.0
	100,001 - 150,000	Count	14	16	30
		Expected Count	13.3	16.7	30.0
	150,001+	Count	7	19	26
		Expected Count	11.5	14.5	26.0
Total	Count	39	49	88	
	Expected Count	39.0	49.0	88.0	

Chi Squared and Cramer's V

	Value	Approx. Sig.
Cramer's V	.241	.078
N of Valid Cases	88	

Deprivation and Major Performance Change

			Performance_Change	Average Deprivation Score
Spearman's rho	Performance_Change	Correlation Coefficient	1.000	-.078
		Sig. (2-tailed)		.160
		N	325	325
	Average Deprivation Score	Correlation Coefficient	-.078	1.000
		Sig. (2-tailed)	.160	
		N	325	326

Table of Deprivation and Acceptance of Change

b			Grouped Acceptance of Change			Total
			Lowest	Medium	Highest	
Grouped Deprivation	<=12	Count	6	8	13	27
		Expected Count	7.5	8.7	10.8	27.0

12.01 - 24	Count	16	13	9	38
	Expected Count	10.6	12.2	15.2	38.0
>24	Count	3	8	14	25
	Expected Count	6.9	8.1	10.0	25.0
Total	Count	25	29	36	90
	Expected Count	25.0	29.0	36.0	90.0

Chi Squared and Cramer's V

	Value	Sig.
Cramer's V	.236	.040
N of Valid Cases	90	

Cross Tabulation of Awareness of Recommendations and Current Practice

			Practice Grouped			Total
			<=85	86 - 95	>95	
KP and NAO 2 groups	Low	Count	16	20	8	44
		Expected Count	12.0	19.5	12.5	44.0
	High	Count	10	22	19	51
		Expected Count	14.0	22.5	14.5	51.0
Total		Count	26	42	27	95
		Expected Count	26.0	42.0	27.0	95.0

Transcript Council 1...

Participants – Planning Committee Chair, Head of DM, Senior Planning Officer (not recorded), Technical support...

Interview 1 – Chair of Planning Committee

To start with, what do you yourself see to be the purpose of Development Management within this Authority?

Basically, interestingly I suppose, it's controlling development in, and around the town as well. Not necessarily only within the town as we have a lot of cross border development which have been going on some of which are quite big, so its trying to keep tabs on those as well and its obviously because we are such a small borough it's very compact and that is one of the problems, trying to see how you can control things because anything that comes up is bound to be controversial for some people...

So its managing the controversy as well

Yes it is, it is really, its um trying to do the right thing, it's a balancing act as always, and its trying to do the best for everybody I suppose, you know you it's trying to talk to people that don't want something and saying, look this is the reason why , you know, its not that we disagree with you, but it has, you know, for the better good, sort of thing sometimes, that's part of it... getting through to people why things are happening.

So it's almost education side as well?

It is, and I think that's one thing where it's always been difficult, trying to get people to just get an overall view as to why things happen... ummm, because obviously people come along and you know they're just focused on one thing, that's it, they're not interested in anything else, and its trying to open them up a little bit.

So, what do you think people outside, or other people in the authority think as purpose of planning...

That's a good one in't it, umm, I suppose the majority of things people understand why, you know, we've got, sort of, various planning briefs for various areas around the town and you can see what the, you know, what the end is, what it's all going to mean, eventually, but it's long term, it's a long term thing, and I think that's what frustrates people a lot of the time, the fact that things don't come straight away, and bang get it done, out the way, finished, right that's it. Things drag on, you know, we've got a development, a big health campus, its 10 years sort of thing, I won't be here then probably

(how long have you been planning chair)

Since 2002, so what, 8 years now, it was more of a case as you're going to do that, when we took over from labour in 2002, it was suddenly a case of right, who does what... it's strange how quickly it goes, and it's a very steep learning curve, but I was interested in planning anyway, so as far as

that went it was quite intriguing I suppose, and then again dealing with the public and having to chair meetings when you've got something controversial going on, it's um, it's quite character forming. In some ways, I think it's actually easier being chair than trying to sit there and, you know, and trying to manage people – you're piggy in the middle between the people making decision and the people that don't want something or do want something and its trying to bring them together and keep them calm sort of thing...

So, what do you see as the resources that the service has available to it?

Um, ah, yeh, it's one thing actually that I, from the start, because we were a very very poorly performing council, that I came in, you know it was a case of you've got to get your act together or else you know we'll be put under measures, it was one of those things which had to change. It's like anything, when you have to change something quickly, it um you know, you have be, um, rather big headed about it, and you have to do it, it's one of those things, you could not carry on, and you have to keep it going... and that was one of the interesting things, just getting the right people to come in and make the big decisions, the hard decisions and just saying, we think this is what you need to do, do you agree, sort of thing, and its very difficult sometimes, being a member, a councillor and trying to deal with what you what you know needs to happen, but, being in the council a long time, you know a lot of people in the planning department and development control, that sort of thing and trying to balance *balance* it again, the fact that, certain people's you've got on with you think, well, you might be out of a job, it's hard like that, um, and again, it's one thing you get hardened to I guess, it's horrible really, you look back and think mmm yeh, I did that, oh god.

Do you see any other things as important influence in the way the service works?

Well, trying to keep the planning department sort of up to date and up to speed with technology, basically that was one of the main things I think, *cos technology changes so fast*, well it does, and there are so many things which make it so much easier, and easier for people out there to see and get things, we use UK planning site, things like that, it's so easy, it's simple, it might not be as up to date as you would like as obviously some councils do it in house and some councils outsource it, so, um, but um, it is useful and err, I can look at various things as and when I need to, and again, looking at Watford, going back to the ones with the councils that surround us, you can look at their sites and draw it all together, so, it's unfortunate, just before I went on holiday, we've a big site, but its a cross border thing between us and three rivers, and, we had our planning meeting before, and gave permission, but there was some bits we didn't particularly like, so we had to feed it into three rivers but they had their planning meeting when I was on holiday and I couldn't go to it, I was a bit miffed about that, but that's the way it goes.

So what do you see as the outputs (related to the purpose) of the service and the system, for example, do you think you achieve good quality development?

Well yeh, yes and no, its one of those things. A lot of the time you have to make a decision on a plan really, and that is, I think, one thing maybe that needs to be improved a bit, with computer modelling, that sort of thing, trying to get just ordinary people, members, that are going to make a decision, trying to get that through to them basically. I work on it, its part of my other job that I do

full time really, I can read plans, I can look at them I can understand it, but sometimes you think well maybe, trying to get people to tease out and can you really see how big that's going to be in relation to that bit, and I think its that really which could maybe probably be better, and trying to organise, we sort of try and do it once a year at least, just a study tour, going and looking at things and then getting an appreciation. So looking at it on a piece of paper and then actually going and looking at it, and seeing is that how you actually thought it was going to be, and the reality of it is that sometimes, it can be good, can be bad, yes, we make mistakes unfortunately, but again, it's part of the learning curve, I guess, and er, you try and cut out the negative things.

You working to achieve it and you accept what comes..

Well yes, someone has to make a decision somewhere, it's either us or an Inspector... one or the other gawd bless their little cotton socks

So you've mentioned the neighbouring authorities, do you see any other organisations as being key to effecting how you work

Well obviously we've got the county council, as we're a two tier authorities, they are the major player, especially the highways and the infrastructure, that sort of thing, the thing that we don't really get involved with, we're part of the East of England, sort of the next tiers up from that, you know they exist, and there are certain things but its looking at the even bigger picture but its how do they impact on what we do and its trying to see them sometimes, and you read things and go why? What are we doing with sort of sat with that, it doesn't seem right sometimes, perhaps it needs to be more local, you know, planning for big things does have an, an impact on the bigger area I suppose but I'd say that the vast majority of things are just a local thing, and its trying to make them fit into the right sort of box rather than trying to take the local picture rather than the bigger picture and, put that to one side a little and get things right where you are maybe. Cos we're not going to have an airport built here we're not going to have anything like that...

So, other factors that influence, do you see funding as a big factor or anything like that?

Yes, although the funding streams are drying up a bit now, because we were such an awful planning authority we made such great strides, and we were brilliant and it was a case of have some more money, great stuff, and that it, I guess, is where a lot of the upgrading of the computer systems and other bits and pieces, it was fortunate in a way that we weren't as good as we should have been because we got that funding to actually bring things in, and that was good you know, it did work, and uh, yuh, obviously there are more things that you can bring in, but it's like anything with IT, and whatever, you can change it every year if you want to but its always a case of is it a useful thing to do and do you need to spend money on it or can you carry on with what you're doing, and someone needs to make that decision somewhere ... and I leave it to others to decide... It's like GIS systems, I was pushing for GIS 6/7 years ago because I'd seen how it worked, and I tried to get it here but it was a real struggle,

Do you have the skills and staff to use it...

That was, well at the outset we did, but then the person who did know about it left, so you don't have anybody then, but GIS is not really a complicated systems as such, it's really anybody could really do it I guess, it's like any computer programme once you know how its structured and how it works. Because its such a useful tool for everybody, throughout the whole council **(are you integrated across the council?)** That I don't know, I have to say I don't know that one, I'd hope they are. Again you can put so much information on it, and um, tease things out a bit just by putting another layer on the top and seeing if that ties in with that, it's that sort of thing. I would like to be in on it really because I do that sort of thing at work and it getting people knowing there's something there and not missing something... why waste time looking for something when its already there **(but you need to make sure the information is up to date)** up to date, yeh, and it is up to everybody putting information onto it.

Who do you see as responsible for actually producing the work of the service?

Ummm, I suppose it starts with our main planners, the ones doing the LDF at the moment and all the new planning documents, that is where it is going to start from. And again, the fact is we are still using an out of date base. We're still on the local plan. The LDF is becoming so long, well, dragging its heels, I don't think the government never really covered themselves in glory by saying you tell us what you're going to put in it and we'll tell you whether it's right or wrong. We won't give you any sort of help to say what we want in it. Leaving it up to people, well, what do you want us to do? It's the sort of thing, you hear the horror stories of people putting it in, chucked out, putting it back in, chucked out, well, what's the point? We want to get it done, we want to get it up to date so that we have a living document, so we, when things happen, when developments take place, you want to be able to, things that surround the development may be need to be changed as well. You want to be able to do that constantly, you know, its rollover sort of thing. Which obviously, the district plan, 10 years ago, or whatever it was, your stuck with it. And you knew what you were doing was wrong but it was what the plan said so you have to do it like that. Which is what we've done but we wanted to be more proactive.

Do you see that there's anyone there sensing, either formally or informally, where things are going and how people are working together?

I think so, yeh, we have a Planning Advisory Group, that um, looking at all the new documents that we need to produce. But again its so long winded and again its probable lack of resources, I guess, but if you did have the resources, would you be able to do it, you'd rely on studies on retail and housing and other things and put it together but that takes time. Difficult one really, Chicken and Egg really, what do you do first? Everybody's just frustrated that every time we have a planning meeting it's I wish we had the Ldf... we've got a residential design guide which changes things a bit, so you've got a little bit more easy to interpret, we just want to get it moved on really....
Before I die.... **(or retire)**

This is related... do you have the people and resources to react to the things which emerge from that?

Ummm, we do, we have more people now than we had before, but again, it's when you have new people come in, its bringing them up to speed: what we're doing and how we're trying do it. I

don't really have that much input into that bit so I'm more the hands on than the plans themselves, but because you are a local councillor and you know the area, you do have input in, and that's what we're asked to do.

So do you, have someone who looks outside the council to Government policies and external factors in the environment.

Yes, ... , in charge of Planning and Development, in charge of the whole section so has overall responsibility for it. It was quite interesting that the previous incumbent, came from the government side, he actually wrote some of the documents so he had an insight and a little bit of nouse of how things actually worked. He was good because he just got on with it but he has moved on to pastures new... but we have someone who's got the remit to look at them and we just let them get on with it I suppose you can't do anything else.

And who would you say is responsible for acting on that and forming the long term policies of the section... deciding where its going... are you going to be a high performing council/ get good development...

I think, mmm, good question, I think everybody, people in the various departments, understand where we, 'the lowest of the low that make the decisions', over the years they've come to understand that we want quality developments, that we want the right development, and that's the one thing we've always pushed for, mmm, you know, you do get some situations where it's not bad enough to refuse, but we wish it was better, and you think, but I want it better, and it's trying to put that forward to the planners, saying, but I'd rather see it like this rather than like that, can we see what they're going to build it out of, what the bricks are going to be like rather than ok yeh, alright, build it. It's that thing, we don't accept it anymore, whereas previously I could take you to there's loads of places out there which were done 10/15 years ago and you think how in heaven's name did that ever get built. I've one in my ward, where I represent, where I think, how did they ever get that through? If you look back on it you think that's horrible. It's whether you can move forward and whether just members can influence the planners themselves. I think we have, we have a good working relationship between the planners and the councillors now. It was always a case of them and us really, and you know, its nice sometimes you hear in planning meetings, DC meeting, when someone's, a member of the public, really laying into the officers, and then you hear the members sometimes saying, I think that's a bit harsh, which is good, because the officers feel that they can sometimes be a bit bruised and sometimes our members do it to them but, for good reason, but there's a trust and respect for the fact that people understand that the planners are doing, doing, their job, but then again, they've got to be in a neutral position and not say one thing or another... that's their job... they can do, when you're reading a recommendation you can see that they're trying to get us to refuse this aren't you? It does happen... if you'd like to, sort of thing, it's reading between the lines sometimes, I do it as chair sometimes when I have briefings for meetings, I say, I get the feeling that you're not altogether happy with this... It's a bit like that sometimes and it's how you approach it, but think that trust is one thing that you have to have with officers.

How much do you get involved with pre application discussions?

Not at all. It's one thing that um, would be good, developers have public consultations, that sort of thing, which sometimes people go along to just to sit and have a little watching brief rather than take part because they obviously can't. But sometimes you think with some of the applications, when you do get them, you think, I wish I'd known that before, it's that sort of thing. And again it's trying to get members/ councillors to look at, we get a planning list every week every two weeks, take a look at it, see what's on there, and if it's within your ward or it's of interest to you go and look on the planning side just go take a look at it, and if you think there's something wrong with it, phone me up or someone else up and talk about it beforehand, so it's trying to get **but you don't know they exist really til they're registered**, no, that's part of the problem, but you do sometimes get them on the planning list, they do have pre apps coming occasionally, yes, but not that often, we do know that they go on but um some people register it as pre application application.. it's a case of knowing what they're looking for, because what you don't want to do is to waste people's time, with a lot of things, when someone puts a planning application in, you want to see that it's got a better than even chance of doing something but you know some developers won't do that, they just put it in and say right just say yes or no. and ok, we've done that and said that's a load of rubbish here's 25 reasons why you can't do it – you're wasting your time, your money and ours else well but um. It's just getting people to understand that we need to talk through it and get it somehow half decent really.

Do you get involved with the discharge of conditions and planning obligations?

We do occasionally, yes, no we see all the lists and we add other things in as we fit. Sometimes when we'll see planning conditions and local ward members can say I think you need to do something with traffic calming or whatever it might be um, yeh, you can have an input into that

.. and do you get involved after the application's been determined with the monitoring of them?

Sometimes, yes, sometimes. We've got one just next door with the coliseum where they're putting a new extension on it, the members weren't happy with the brick samples, so they **informally monitor it**, yeh, they're looking at it, saying they don't really like the colour of it, can you bring some more samples for us to see. Not saying no, just really, can we get the colour right. Umm, and sometimes members are happy that I do it on their behalf or they'll want to do it themselves, but yes, it does happen, not that frequently I have to say, not formal, but capacity is there,

And planning s 106 agreements

Don't tend to no, section 106 agreements are mainly county driven rather than local driven, a lot are to do with highways, that sort of thing. Used to have a lot on play spaces but every bit of development used to have the little bit of space put in and someone had to look after it... after a while twigged that it was a little daft.

Do members have much involvement in the control of costs in the department?

Um, it's always a budgetary constraint every year and um obviously with the recession of the last few years it was easy to see quite quickly the number of applications going down and it was a case

of when someone left do you replace them or do we put them somewhere else and get them to do other work. And that is what has been quite good because other work has been done, again the LDF and other things, when someone has said they've not got a lot on, you could say well do you want to spend a week or two working on that, and its been quite good because the people in office can see a wider area, it gives them more experience and its good, as long as they don't turn round and say they're going to work in there. Turning the situation to their own uses: why get rid of people if there's something else they can do to help another department and move things forward.

Do you think PDG and money related to performance impacted on member's decisions

No, I don't think it did. Um, it was nice to have but I couldn't really see the point of it, you know, if you're useful and good at planning you don't get anything because you're good so what encouragement is that and if you're bad you don't either. It was a bit of a blunt instrument I think perhaps.

So the monitoring of the system – do you look over it as a member and think I think that's gone well or do you look at performance or... ?

Yeh, I think we do, obviously you can see how even the odd little extension or house put there or whatever, as opposes to a block of flats, sort of thing, again, you just look and see whether its made any difference, again it might be right or it might be wrong, we have the reflective and again we have the same thing with refusals. We have a quarterly review that the DC manager does just going through all the different what the inspector said, whether he's allowed it, refused it, umm and the reasons why... we have it at the end of one of our planning meetings. Again, it's very useful to see if there's a trend with certain things that inspectors are looking at. We're having a bit of a spat with the inspectorate at the end of last year, beginning of this year and we've someone from the inspectorate coming in to go through our concerns as to what they're seeing as opposed to what we see. We think that they're not helping us, and it's trying to sort that out...

So it's beyond just looking at the numbers...

It'd be nice to see that we're right all the time, but we're not... but we like to be on the positive side rather than the negative side. And sometimes you can see that you won't turn something down for that as we know that we've not got a cat in hell's chance with the inspector, if you can see what they're thinking and um, sometimes we may think well blow em and it's down to them. Yes, it's nice to send it out to the other members as well, for those who are interested in these things. Everybody around the town, you get people who don't like a development saying you never turn anything down, and if you turn it down you always lose and we can say here you go, there's the figures... you can turn a negative to a positive.

DC Manager Transcript

You personally, what do you see as the purpose of development management within your authority

I suppose my views on that will have changed over the years, certainly having spent over 30 years in this line of work I would have originally thought that it was actually making sure that we controlled Development. I am one of those who can actually appreciate the distinction between Development Control and Development Management um, certainly I see the role now as much more as helping to shape the way in which Watford looks not just this year but in the next 20 – 30 years, so its, yes, it's still preventing things from happening which are undesirable or are considered to be undesirable, but at the same time its about helping to make things happen which are what we want to see... to use the current phrase it's place shaping...

So what do you think that people outside the service, either within or outside the council view it as.

I'm not sure that everybody has perhaps realised that subtle shift in emphasis which has been taking place in the last 18 months or so. I'm certainly not convinced that people living next door to an application site see it in that way, or will ever see it that way, because its still to them probably a neighbour protection exercise and always has been. I think that developers, the bigger developers are beginning to understand the change in emphasis, so that when we're talking to them they are at last beginning to get the message that there is something different afoot now.

What about other services within the council, do you think they think about it?

By and large, probably not, although we do have perhaps some useful contacts with our housing people, one in the housing facility works quite closely with us on affordable housing is currently studying for a postgraduate qualification which requires quite an input from planning. I'm not quite sure what it is she is studying, but she spent quite some time with us shadowing our DC officers and looking at the work they do. So, I think that there are, as far as individuals are concerned, and the same applies to environmental health officers, who I think appreciate the different approach and different angle now although I guess by and large across the council there is not a great recognition of that. I'm afraid it is almost certainly true of some of our estate colleagues: we are getting in the way of what they want to do with council property.

So what do you see as the resources available to the service? Do you see people as most important or funds coming in, or technology?...

I see the most important resource as people, without a doubt, I hope we never get to the day where we can actually plan by computer, put a few parameters in and press a button and the computer comes out with yes permission or, no refuse. I always thought that the people we have in the service are the most valued resource we have and without properly trained, qualified and *enthusiastic* staff then we're never going to be able to deliver a service.

Do you think there's any factors which influence how those kind of things will happen?

I suppose first of all you've got to attract the right staff, so it's got to be a good authority to work for, as an employer it certainly looks after its staff, it's got to be an attractive place in which to work, as far as planners are concerned, it's got to have lots of interesting things going on to attract people to it, one of the big pluses there is that it's a major regional centre so it punches well above its weight in terms of its size, its population. There are some really major schemes going on which for a town of 80,000 people, you wouldn't really expect to see, because of its regional function. So this attracts people in the first place, and once you've actually attracted them, of course you've got to hold onto them. And that's where the sort of things we do in terms of investing in staff and qualifications as well because of the way we give them a variety of applications in order that they can gain experience in more interesting, more complicated proposals. And so hopefully we manage to hang onto them. They grow with us and that's certainly been the case in the 4 years I've been here. We've lost one or two who have gone to bigger and better things, but it's normally been for personal reasons – one to Australia and a trip around the world, but for the most part we have had very stable staff over the last four years and still retain their interest.

Going back to the purpose, do you see anything else as the output: what the service produces?

The nature of this business is of course that it produces, I hesitate to use winners and losers, but it's always about striking a balance and hopefully getting the right balance... it shifts over time, something may be right at one point on something but completely different for others...

What do you see as the variables which affect what is right and wrong and how the service performs.

I think that one of the things that has always fascinated me is that, what are there are 300/ 400 other planning authorities in the country all operating the same legislation but all doing it in their slightly different way, we are creatures of statute so we obviously have to operate within the law, within the framework of local government which is, of course, politicised, so we do have the political framework that we work within, and clearly that will shift from time to time. This is an authority which elects its councillors by thirds every year so we're always running an election (except when a county council election is on). The balance of power at the moment is very heavily lib dem, 30 councillors and only 6/7 who are not lib dem, so the odd seat change here and isn't going to make a difference, **so a bit of political stability**, it does yes, when I was at my previous authority it was an authority which elected a whole council every 4 years so you knew that when an election came round there was going to be uncertainty as to what was going to happen but once it was over it was clear where the direction was going to go for the next four years **and a bit of electioneering before the election?** Unfortunately so, yes, we do get the odd bit of electioneering in DC but by and large it does tend to be an apolitical committee and not a lot of politics comes into play in making planning decisions, but you can see how at this time of year the remarks made by councillors are carefully calculated to enhance their or their parties standing in the election.

Do you see any factors from outside the authority?

The major influence has to be said is from government. This has changed over time, with some governments being very centralist and others perhaps having a slightly more liberal view about that and the role of local authorities. It is certainly my impression that the present government has certainly over the years taken more and more control back to the centre and propose either through legislation or government advice and circulars which make it quite plain how things are supposed to be, and ultimately appeals, members here can think that a proposal is not acceptable and has to be refused and yet they can be overturned. We are having a battle with the planning inspectorate with a number of issues concerning our residential design guide which we adopted back in November 2008. We started using it in DC decision, members see it as a way of making an impact as part of the place shaping agenda in terms of quality design and is important and they feel that we've produced a design guide which shows how they want to see residential areas developing over the next 20 years, and they've been very disappointed, and certainly officers have been very disappointed, that over the last year or so, we don't appear to have been very well supported on appeal. So we've actually written a complaint to the inspectorate and are in the process of setting up a meeting with the assistant director to come down and talk things over. The SPD has been subject to all the appropriate publicity and requirements, but while the inspectors are referring to it, 'I have had regard to', they are then coming up with a decision which is completely contradictory to what the policy says...

Who do you see as the key player in producing and shaping places?

Everybody's got a part to play. The key role, I think, rests with the planning officers because that's where all the initial contact and all the detailed everyday contact happens between those who want to do something and those who are charged with the task of actually managing what it is that people are wanting to do. Yes we've all got a role to play in the process, most of the decisions are made at officer level anyway, 94/ 95%, members do only get to look at a very small minority, yes, it includes all the big schemes, all the majors, but in many ways it's a lot of the little stuff which cumulatively can probably have more of an effect on the way a place looks and feels than an occasional major scheme. They're perhaps not felt immediately beyond the immediate neighbours but it does affect neighbours if that is a benchmark. Most decisions will have some sort of precedent. You need to make rational decisions rather than treat each one in isolation.

Do you feel there is a process existing to sense changes, or is there a formal way of keeping an eye on what's going on.

I suppose essentially, that is my role. As the officer who's charged with responsibility of issuing decisions on delegated applications, some people delegate it even further down to team leaders, we don't do that here, we're such a small authority, it is not necessarily to do that in that the number of decisions issued at officer level does not make it impossible to deal with by one person. But even at my previous authority, probably twice as many applications, the Development Control manager was responsible for making Development Control decisions. I think it is helpful to have that focus in one person, who can exercise that overview of individual officers in terms of the ways they are handling cases and seeking modifications and negotiations. One of the advantages I think again is that in a small group of people working together as one team, they do all talk about their cases, they are all located physically in the same part of the office *and you're in with them so*

everybody's aware of how everybody else is operating so there is less chance of someone going of completely differently to everyone else, of them going out on a limb, in a way it is sort of self managing, some of them are at the same level of knowledge and experience, others are more so and some of them less so they're all in that sense pooling their combined knowledge and experience and learning from each other, and that way it does produce and overall consistency of approach, which I suppose if I sat down and analysed it would be fairly consistent. It is very rare that I find myself taking a different view from a case officer, it does happen I can't agree with them always but considering the number of applications which pass over my desk, it is probably one a month which I disagree with.

And do you have the power and control to take the action if you did notice issues?

Yes, the authority rests with me, or in my absence, the head of planning. But yes, if I don't feel comfortable with a particular recommendation, my approach is not simply to reject what is in front of me, but to go back to the case officer and we'll 'discuss' it, I'll listen to what they have to say, and sometimes I can be persuaded. It may be perhaps that all the arguments would be plain on the face of the report which I was looking through, and there were other factors in play which were not covered through quite as clearly in the report and I can be persuaded. Every application has a full officer delegated report which is almost as long as a committee report. It contains all the same standard headings and all of that is published on our website so members of the public can see officer delegated reports. We have templates which were set up by my predecessor so they do work to give a checklist of things which they should be focusing on. It is useful for newcomers but most of our staff have been here for around 4/5 years now so I don't know if they need it but it does maintain consistency, the reports are consistent between officers, it's a standard layout and you know where you are when you read a report and what to expect where.

Do you feel that there is someone, or a body, who's responsibilities involve looking outside the organisation to see what impacts there may be on yourselves?

That's one of the roles that I tend to perform. What I do there is that I try and pick up things that are happening or are likely to affect us and make sure that we bring them to a discussion forum at our monthly team meetings, and it's a useful way of disseminating that information, sometimes it has reached the stage where it's changing the law or something like that or PPS 4 is coming out or something people need to know about that or we've a whole lot of consultation documents coming out from CLG, so we have a regular monthly team meeting of all the Development Management staff plus a representative from the planning support team as well and that's a useful forum for sharing all sorts of information: concerns that individual officers have with issues arising from their work which they want to bring to a wider audience or in this instance for me to be able to share with colleagues things which have happened or are likely to happen in the near future which may affect the way in which we need to work, to be aware of what might happen at a reasonably early stage. People are expected to attend, if other demands arise such as it's the only time you can arrange a meeting with a particular developer then the day to day needs of the service come first, but if people are around then they are expected to attend and by a large it reasonable well attended. We fix the day in advance so that we know where we are and fix an agenda and write minutes for each meeting which are circulated with what we've discussed with,

where appropriate links to documents. The old minutes and agendas are available so there's no excuse really... ***Do have meetings with policy as well, so the whole section?*** We have had, but they're fairly rare, I have a more regular meeting with the head of planning and head of policy so part of what I do with my team is to disseminate down to them any appropriate information that's come my way from those fortnightly management team meetings. We have had occasional meetings with all staff but it has not happened a lot in the last 18 months or so as the policy team has been severely depleted, without a manager for the last year, so the head of planning has been dropped into that. The two Principal Planning officers in the policy team both only work part time, 3 days a week, so they're paths only cross on one day a week so the team's been really struggling to pull together a core strategy. In fact my officers have been helping out with a lot of survey work, an employment area study, which has helped which we're able to do with our reduced workload. It also gives them another aspect to look at which is helpful in seeing the other side to a planning authority apart from the planning applications policy formulation which is good as they are the ones who eventually have to implement the policy, and they can say that at least then say that we had a hand in shaping the policy and hopefully have a better understanding and ownership of it rather than, 'here's the core strategy, go ahead and implement it' without knowing how it's been arrived at and what it's there for, a better understanding of the whole picture.

Who do you think has the responsibility for maintaining the direction of the service and overall strategy in the long term?

Well ultimately I think that has to be a member, beginning really with the LDF although our members don't often have a chance to be involved with dealing with day to day applications as they don't see such a large number of them. Nevertheless they do have some very strong views about the way we should be developing. Interestingly, I've come across some committees before who are really interested in dealing with applications and that aspect of it, at my previous authority there was always a queue of members wanting to get seats on the Development Control committee, it was always the most popular, this was before the days of cabinets and it was just the committee systems, and there's still, apparently, quite an interest and waiting list to join the committee here. Members are genuinely interested I think in the town as a whole, there is a planning advisory group of members who's job is to oversee the development framework and they do have a pretty clear idea of the way that they want to see the place developing over the next 10/15 years and there is, I think, about 3 members from that group who are also on development Control committee and the planning portfolio holder is also on the Development Control committee so there is a pretty good buy in from members from the Development Control committee to the policy side of things and one of the things which is quite noticeable is that when they are dealing with applications, they are always keen to be referring back to the policies, and particularly when they want refuse an application they'll always be looking to try and fit it with a policy, they are particularly aware if they have an officer recommendation for approval and they want a refusal they know that they've got to link it back to the development plan in some way to justify taking that action. There is one member of the committee who always comes with his copy of the local plan in his hand and probably the local design guide, so there is this good link starting with members and they to are making it perfectly plain that they want high quality developments no matter what the scale of the proposal and so that filters down to officers decisions because we

know that if we reject schemes under delegated powers which don't measure up as good quality schemes, then we know a, that we're doing what members want us to do, and b, that we'll be supported by members for taking that approach. So ultimately they do take a strong lead. ***So in a way it gives you more autonomy on your decisions***, yes, I have the authority, if you like, from the members, if challenged my applicants who don't like the way we treat applications, it is not just the officer's whim, this is the proven practice of the authority which is easily demonstrated by looking at the decisions that the committee themselves have made.

How is pre application advice handled?

Pre application advice is something for which for a good many years now we have sought to engage in as a serious level. All our requests for pre application advice are logged onto our application system, Uniform, and they go through a set procedure which involves the admin team as well and a file is actually created. We have, I suppose, two levels of pre application advice. We have a duty planning officer system, with a duty planning officer available every morning from 9 till 1 downstairs in the customer service centre so that people who call in either face to face, or on the telephone, can be put through to duty planning officer for initial advice. Usually, private householders who avail themselves of that advice at that informal level, and although a record is kept of the contacts that we have there, they will just make a brief note of each caller that calls or he speaks to, just a brief note about what the subject was about and the advice that was given, that's really just so we can get a measure of how well the service is being used and what issues are being raised, nothing more than that, because no view is given in writing at that stage, it is more informal advice. The more formal pre application advice is that which is given on paper and is logged and classed as such. We do have a procedure, there is a guidance note which has been produced and we do charge a fee for certain types of pre application advice. We divide applications, or pre application advice, into 4 categories, the first one we make no charge for and the other 3 progressively on a scale which is all laid out and the guidance note has attached to it a very brief one page application form where we ask certain basic details as well as providing us with a fee and a certain level of information which can then use to give a formal written response which we attempt to do within 28 days. For the big housing schemes there will be a series of meetings set up and agreed and at relevant points, we will, if appropriate include people like the Highway authority (the county council) and the Environment agency. Both those bodies, as are most external consultees, are much more geared up to accepting direct approaches from applicants, the environment agency actually welcome that I'm not quite so sure about the County Council. ***And would they cc you into any correspondence?*** It does happen, I wouldn't say all the time, the EA are pretty good these days, we have a single point of contact and in fact they came over to talk to our last team meeting, they come about once a year just to update us with information from their side of things. I have to say, compared to the sort of service we used to get from them 20 years ago, it has completely transformed and we do get prompt, good, responses from them and they do, quite happily accept approaches direct from developers and let us know what they've said. So we do take pre application advice very seriously here and do encourage developers to avail themselves of that, to the extent that if it's a case where we think that there should have been pre application advice sought and there wasn't we will have no hesitation in refusing an application which doesn't measure up and we won't, when the time is running, we will

not negotiate, the opportunity was there, was offered, and was well publicised, you do this before you put your application in, if you don't and you put your application in which is not satisfactory, we are not going to give you the chance when the clock is running. So we make our position quite plain on that.

How does the process work for negotiating conditions and obligations, and do you think you have process in place once an application has been determined?

Lets split it into 2 - firstly the obligations - one of things that we do here is the extensive use, at the moment anyway, of unilateral undertakings, it may all change when the regulations come in, with the interpretation of regulation 122 which is extremely convolutedly worded, but assuming that we are still in a position to use Section 106 for the time being, we do make a lot of use of unilateral undertakings. On residential schemes we have, in a way it is almost a tariff based system, the council seeks contributions on residential schemes for open space, children's play facilities, health care facilities which we actually pass straight on to the PCT, and the county council has a toolkit which it has adopted, back in 2008, for contributions to do with education, libraries, traffic, highways, which again is a tariff based system depending on the size of the development. The case officers are highly instrumental in negotiating these undertakings on residential schemes where the policy applies. They will actually be proactive in drafting the undertaking on the basis a set template and just offering it to the developer and saying sign this or you will get a refusal. We don't use legal services for unilaterals. We got their input into the drafting of the template and because these things basically don't change, it's just the name of the parties and the entitlements involved, and the description of the development and the figures which go into the various clauses which we change according to the size of the development involved. It is all pretty straight forward, most land in the borough is registered titles so we get the applicants to supply us with up to date office copy entries which simplifies the land ownership side.

So does the officer have the responsibility to create the balance between the different demands?

It all boils down to the case officer to initiate that process although at the end of the day it is a unilateral undertaking it is made plain to the applicant that on the basis of policy in the local plan that if there isn't an undertaking in place then the application will be refused. Indeed application that go to committee for the major schemes where we don't use unilaterals but use a full undertaking, where we do use our own in house legal services, we will inevitably have a two part recommendation to committee which is subject to an obligation being entered into planning permission be granted subject to these conditions and second recommendation, in the event that a signed obligation has not been received by such and such date that the Development Management section head be authorised to refuse planning permission and I have had to do that, in one case with a major house builder, it was a perfectly acceptable scheme subject to an obligation which they were willing to enter into. They discovered that they had a problem with a housing association which they were dealing with. An issue arose, which had nothing to do with a planning application, but I think the housing association felt that they had certain leverage and in order to get something out of the arrangement which they wanted they were not going to sign any document which was needed until they got their just dues, and without that they weren't able to complete the planning obligation. It meant that we didn't get our completed obligation on time so

I utilised the authority which was to refuse, they pleaded with us not too, but it had nothing to do with the planning situation that arose but it was something which they'd known about and should have got sorted out, in land ownership terms which they should have dealt with much earlier in the process but didn't. As a result they weren't in a position to complete the planning obligation in time and so they had to resubmit the planning application. Which given they'd already had one free go, they lost their fee.

So what about monitoring them?

We do have a section 106 officer, who'll be leaving us but the post will be advertised and filled, and it is the responsibility of that post to monitor developments which are subject to planning obligations and to ensure that contributions are paid as and when they fall due. ***liasing with other services?*** The officer has copies of all obligations and keeps records of those and knows when various things are due to happen. It's always a tricky thing actually keeping tabs when development is due to start on site so she uses information from our building control colleagues about starts on site. We prefer as standard commencement on site as it's a lot easier to measure. We've had lots of pressure during the recession to renegotiate bigger planning obligations to defer contributions based on occupation rather than commencement of works which in a small number of cases we have conceded too but that's potentially going to make monitoring more difficult when it's phased on the larger schemes to the occupation of the 100th dwelling, and when that's with flats as well it's going to make it rather awkward to actually go and count, there is always the notification requirement put into all our obligations even for commencements, some builders remarkably do do that, they write and say we're just about to begin our development which we are bound to give you notice and here's our cheque for...

So who keeps an eye on the conditions?

That's an area where we are not terribly proactive. It worries me to an extent that we could do more. The monitoring of conditions is a thing which doesn't happen as a matter of course, unless we are aware that the developer is in the process of seeking a discharge of conditions, in which case we will make sure that if they are engaged in that process that they do cover everything that they were supposed to cover so in effect you are alerted of the fact that they are preparing to commence a scheme because they've submitted samples of materials or whatever then you can take the opportunity to remind them don't forget landscaping, fencing this that and the other which you've also got to discharge before you can start on site. But the monitoring of conditions both in terms of supply of information, but also more generally, on making sure that development is taking place in accordance with the conditions generally, is not something that we are pro actively engaged in. We charge a fee but I'm not convinced that £85 is sufficient in covering our costs when dealing with discharge.

Who would you say is responsible for looking at the costs of the service?

Interesting question that, at my previous authority the section heads had considerable responsibility for their budgets. It doesn't appear to happen in quite the same way here. It's something which happens much at Departmental head level. Maybe because it is a smaller authority and there is no need for it to be devolved downwards. I do have access to budget

figures but only at a very superficial level. I don't have any large say in setting budgets so I am more or less told that's it, it's been decided, here are your figures for the next year. Admittedly in my work that I'm, things don't change dramatically from year to year, it's not as if we're dealing with one set of projects this year and next year's got a completely different set of projects which is going to cost something different, most of what we do carries on from year to year so long as inflation is counted for and the basic elements of what goes into the budget doesn't change **What about the drop in fees, does that not significantly impact?** It has been significant this year. We've lost over £100,000 I think, and at the moment that is a cost that the authority is carrying centrally, yes, we've offset that by not filling two posts, but that hasn't completely offset the drop in income, but for the time being as least it seems that the powers that be are content that that situation should continue and I'm not under any pressure to lose any further staff but the overall responsibility for the costs of the service doesn't rest with me, it's the Head of Planning who has all the discussion with finance about setting budgets, I can access high level figures and see this is how much I've been allocated and this is how much I've spent so far but I don't have much say on that, it would seem.

and much of you electronic conversion, was that covered by PDG?

It was, and that was something that my predecessor set in train. It was, I suppose, perverse in a way that at the time when we needed money most to invest in new systems and new processes, it was at its worse performing and so wasn't getting with regard to the government because it wasn't meeting any of the targets. With the new systems in place and the miraculous turn around, the council is getting hundreds and thousands pounds a year. When I arrived, despite the fact that the fund had been put in place and been spent quite significantly, there was still over half a million sitting in it. The turn around meant an improvement in fortunes. Three members of staff were sponsored on their masters course, which was out of the planning delivery grant, improvements to technology itself, the updates to the system were also paid for, as was a Smart Car for site visits rather than paying officers individually for their own vehicles, we have actually bought a council car out of the proceeds of PDG which is still being funded from that. So the Planning Delivery grant has come about as a result of the council investing in the service, we're still spending the money, we just used some to make a direct connection between uniform [the planning database system] and the planning portal [public planning access website] because we're getting so many applications from it now, perhaps a third of our applications are coming in that way now, it will avoid getting the applications through the email, downloading them, printing them out, entering them by hand into uniform and that's five and a half thousand pounds and its coming out of the PDG, and it'll save time later on. Hopefully it'll work and that saves the work involved in the applications coming into the inboxes. We can't do a paperless office just yet.

Is there much influence on the meeting of the targets, is there a level higher than you looking at how you're performing?

The planning portfolio holder has a fortnightly meeting with the head of planning and I know one of the things that they look at every quarter is called, not surprisingly, the quarterly review, is the planning department service plan and included within that are the NI [National Indicator] 157 performance figures for the department, so I know that at least once a quarter, the planning

portfolio holder will be reviewing those figures, and they will want explanations of any significant variance between one quarter and the next in those figures. It does happen at the moment because our majors have been so low, if you have one major one quarter and none the next, then the figures will go from 100% to zero it is just simply a action of the numbers involved and nothing more than that. So I know that review happens on a quarterly basis and a member is involved as well, keeping an eye on things. Apart from that there's no other monitoring formally carried out beyond what I do. We look at the figures on a monthly basis at our team meeting so that everybody knows how we're doing and the categories and we compare each month by month with the same period last year and the previous three years. Everybody in terms of case officers and me and the team are fully aware of all the time periods that they are working too. I don't have to keep looking over them and saying this application is due for this etc. There is a system set up to monitor that if I need to use it, an access report, linking to the system which I can go into and find out which applications expire in 7 days and which case officer is involved but I don't need to use it. I even at times hear the admin team saying to a case officer, 'you've got an application that's due tomorrow, where is it'. So the team are on top of it. I don't need to use the systems as it's just ingrained into the way that they work to do that. And if something's going out of time because it has to go to committee then so be it - that's part of the delegation scheme. Very occasionally someone will say, 'I've got an application which I think is going to go out of time because...' and if there are good reasons for it and we talk it through, I am not averse to that happening now and again, because we are doing so well anyway that the odd one doesn't meet the target doesn't matter. Now I wouldn't want you to go away with the impression that I am just driving targets because I don't think that is right actually, they are useful and they are a useful measure of how you are performing but at the end of the day it is important that we get the right decision, what actually takes place out there on the ground is key. **...there was no mention of targets and the money coming in on the outputs.** I am a big believer that you can actually do both. If you've got the processes set up and the resources in terms of staff then you can deal with most developments satisfactorily, get a good outcome and still make the decision within the allotted time period. Yes, there will be some schemes that won't fit that - we've a major healthcare campus which the statutory period has long been exceeded - it's been on the books now for seven years, and the last 15 months or so just waiting for all the parties to sign the section 106 planning obligation: you've got several bits of the health service, what used to be the development agency, the county council, ourselves, there are about 9 different parties to the agreement and it's been doing the rounds for signature for about last 6 months. The Head of Planning understands that it should be done just before Easter [one week from Interview]. So then we can release the planning permission which was decided on in early 2008 by the committee subject to the completion of the agreement. That's one application, ok it's been a very long time coming, but once it's gone past the 13 weeks it doesn't really matter how long it takes. I had the Head of Planning last week asking me to make sure that the decision goes out in April, not March, so that it features in next years figures rather than this. In the hope that we may have a few more major applications which will counteract the one that's gone over, with the few this year, it will make a bigger percentage difference.

Planning Support Team Member

What do you see as the purpose of Development Management in Watford? What do you think you are aware of when you're processing applications? Are you aware, say, of targets?

That is it really. The only thing really is targets. As soon as we get behind it's, you know that the longer it takes us to get stuff down to the guys to do, you know, they can't do their job and then we get them back at the end.

What do you think about people outside the authority? What do you think, they think you do?

I think that they can't understand how long applications take, why they take 8 weeks if everything's ok, and I suppose I can understand, because if you're not in that environment then you no perception. Especially when it comes through the planning portal and then the neighbours have got to have their 3 weeks and then they can start doing it from there. I think, no they have no concept, they think that they can just put it in on Monday and by Friday it's done. ***Do you get people on the phone asking what is happening?*** That's also from lack of communication from their agents, there's a lot of that. The agents take the money, don't put in the applications when they say they're going to put them in, it could be a month down the line, so the applicant is thinking that it's our fault, when their agent hasn't put it in.

What do you think are the main inputs? for example, the quality that you are receiving?

Yes, normally most agents are ok, it's when the householder tries to do it themselves. The standard of drawings isn't so good but then you get it from some agents anyway. ***Do you then go to the planning officer to talk through if it'll be ok?*** We do it to a degree but then the guys are pretty good that when they're down there they will give it to us back, and what's been happening lately is because we've been so snowed under, they've been doing the descriptions for us and looking at the plans so that when we actually go to register it we know that it is good plans and a good site so we're saving time that way. That's what's happening, because I think that the other day there were about 50 in the box, 2 weeks worth, we are so short of staff that it builds up quickly.

Do you think that there's anything else, other than the staff that you've just mentioned, that effects how you work?

No, I don't, if we've got the staff in, I mean sometimes we can get up to 10 /12 applications in a day and sometimes, well obviously with the recession and that we were right down so it averages about 8 - 10 a day. ***And can you all do everything?*** We can all do applications, but just a couple of us do decisions, that's just how it's worked out. Obviously we have, applications are our bread and butter, so we try and we do a rota so one person's supposed to be doing something but the rest of us can help if needed.

Do you think that, in terms of getting the applications out in time, everyone's involved in that process?

It is very much a team effort, that's what you've got to have. Mostly everything's ok, everyone's aware of it and gets on with it.

Do you carry out the consultations?

We send the letters out, yes, when they return they get given back to the case officer.

Do you experience any issues with IT?

On a weekly or a daily basis? Because that is what you rely on. It's absolutely vital.

Can you think of anything else which upsets the flow of an application?

Not really, no, it is normally IT which stops us, maybe for a couple of days of not being able to produce anything. With the portal it is vital, even with printing. I mean, I know that it is easier for people to send them in via the portal, but we still need to print them out and that takes our time. We need copies for a few consultees. Most don't need copies of the plans now, but that's just a recent thing. At one time we were having to send everybody we consulted a full set of plans, but its only fairly recently that we don't have to. Obviously if they ask for them we send them some.

How do you go about, if they've not submitted them electronically, what is the process for getting them online?

When we put the application on Uniform, we then have to send it off to a firm which then scans it in for us. I think we do keep the copies, depending on the application is, but they put it online. It is supposed to be online within 5 working days of us sending the neighbour letter going out, but it depends, we don't send them off on a daily basis, but we send them off when we have a wodge of them to send, and that doesn't include weekends, so if something's done on Wednesday, it might not be put online until the following Thursday. But again, people can't understand why they can't view it as soon as they get the letter, even though it says on the letter and website, but they don't see that it is out of our control once we've sent it off. But they are good there's never been a big delay. They were thinking of doing in house scanning, but nothing has progressed.

Do you think, does anyone keep an overall eye on things to see where delays are occurring or conflicts might occur?

Well we have the target update report, for the decisions and then I know that the Head of support does various reports to make sure the figures are ok, but like I say, the delays we have now on of about 2 weeks, that has not been picked up on. The only thing that I'm aware of is the monitoring of decisions. I am aware of them and the planners know that there is a hold up.

Would you say that anyone looks outside the council to see what impacts there might be?

If they have they haven't discussed it with us, but I suspect that just generally you would think that things would be picking up but I don't know above my station. You know what your work is and you try and do it.

Do you log pre application advice or is that completely separate?

It gets put onto uniform like any other application would, and gets passed down to the planners. We create a separate case for each individual bit. We treat pre apps like planning applications and give each an individual number and then we generate the letter as we would a normal application, checking the fee, and then they get a letter and everything gets passed down once its been registered to the planners. Most people know about the fee, or they've seen the duty planner before they put in for pre app advice so they know.

So you check the validity when applications come in. Is that with a checklist?

It's mainly in my head, I think. You know that the OS map shows where it should be and its outlined in red, and the drawings should show what they should be showing, with Majors we generally ask the team leader for advice on who he wants consulted and the neighbours, he's very good. ***You do the neighbours from a map and other consultations?*** We have a checklist which is generated from uniform which will trigger off consultations and if it has to go in the paper and things like that.

Do you get involved with the discharge on conditions?

We just log them in and give them a number as we would any other application. We give them a new number because each individual discharge has to have a separate number and then mention the original application number in the description, in case they are not all discharged, but the fee is just once for all of them.

So are consultations mainly electronic?

Yes. It comes from the checklist on Uniform, for example if it's near a major road... and if we miss anything, the planners will come back to us with a note. We do what we think is right, and then if it comes back we know for next time. Or they might decide they need a site notice to cover but you can only find that out once they've been on site.

Do you get involved/ have any opinions on other ways of measuring how you're doing apart from the targets?

One of the things that I'm involved with is the numbering and naming which is quite nice as it gives you something else to do but time has to be given to the applications, and then you fit in what else around it. I mean I don't know how much other admin are involved with targets and things like that.

Can you think of anything else that you do that we've not covered?

We've got the procedure note for registering an application and one for decisions. Generally we try and register things the week they come in, the intention's there but it doesn't always happen, we know that if it's delayed at one end, it's going to be more frantic at the other. It cuts down on the time at the other end to look at it.

Transcript Case Study 2

Planning Support Team Leader

So what do you personally see as the purpose of Development Control?

Well it's a service there which obviously wants to protect the environment and development ensuring that there are certain controls which are adhered to, you know, policies, obviously, that certain areas are not over developed, making, protecting certain areas, like conservation areas etc, just monitoring, controlling what's going on.

What do you think others see it as, either within the council, or outside?

Outside the council, I think that there is a lot of naivety, personally we get people phoning, extending their properties or doing unauthorised works, and they don't actually know what they are supposed to do. They don't know whether they needed planning permission or not, so they need, you know, more education, communicating to the public more. Again, within the council I don't think that people do know exactly what development control do. From the call centre point of view, they can't, they won't take on our calls or queries because they are too many grey areas, it is such a specialised service.

What do you see as the resources coming into the service?

Well, we use other departments, getting advice from Conservation and Environmental Health, getting advice from outside bodies, such as the Environment Agency, Natural England. There's the money aspect, the fees.

What do you see as the main outputs?

It's the quality of the decisions that we make. Obviously people are paying fees and they want to see why they are paying their fees and get the outcome and that service pays for other services and they're important to the decisions.

What other organisations are involved?

There's the list before, the others are Highways, Crime Prevention Officer, they come into the office to see the applications but normally we send an electronic consultation by email. There's also trees, United Utilities, I'll stop there.

Can you think any variables which affect how the service performs?

Well, we consult neighbours, they can have an input, there's councillors, they can put their oar in and call applications in unnecessarily, and theirs is the planning committee obviously. If we've recommended an application for approval and they refuse it and vice versa.

So who do you see as responsible for the main output, producing that good quality development?

That's the planning officer, obviously, they're the main person. They outsource to collect and collate the information and then they make the decision.

Do you think there is anyone, or system, who keeps an eye on how the decision is going?

Well, obviously there is the Development Control Manager, he's the one who signs the applications off so ultimately he is the one to give the decision. He can refuse an application that is to be granted, changing the recommendation, it has happened, in particular with one particular planner, but they've not collated the information properly. That is, I think, where the onus comes down to the particular officer to do their bit so that then takes some of the work, well the stress, off the Development Control Officer, looking back over the application, making sure that they have done their job properly.

Do you think that there is anyone who looks outside the organisation to see how changes in the environment will impact on the work carried out.

Well, we have to submit our PS returns which emphasise which types of applications we've approved or refused. But to be honest, I'm not sure that they have an impact, because they are just monitoring. I'm not sure that there is any tool to react to them. They go to the DGLC.

Who do you think is responsible for determining the direction in which the service is going?

Well, everyone who's being consulted on it. From my point of view, they are giving their opinions on whether it should be approved, and putting certain conditions on the application but then it's up to the officer to see whether they put them on.

Can you briefly describe how the service deals with pre application advice?

It has just changed. From my point of view, well, at first we didn't charge for Pre app advice, but now we make it more official and I think that it has streamlined the process. So now before we deal with an application, all that is needed with the application is dealt with at a pre app stage. So it makes my job a little bit easier with validation and registration. They don't have to go through pre app but from my perspective, the number of pre apps has gone up and we found that the local agents are using the pre app stage a lot more than they used to. *How much is it?* It's just gone up actually, there are two sections, we charge for letters, for a minor it is £75 and for a major it is £150 and on a strategic major it's £200. And then for pre app meetings, which are £150 for a minor, £225 for a major and £300 for a strategic major and the agents don't mind, it is the Permitted Development enquiries that people mind more which was £35 and has gone up to £52. They can get external people in for the meetings and they charge per meeting.

So, can you describe the Submission and Validation?

It has got a bit better. Now the guidance has come out for validation and the National requirement checklist, so it's made it easier for us guys because we can just quote the list and if they haven't got it then it doesn't get validated. The application comes in, it gets logged straight away and receipted, the application part gets put on the system and then we try to validate it that day or the day after. We validate it against the national requirements and the local requirements.

We have a checklist. Then, once it's validated, we register it, consult neighbours and statutory consultees and it goes through to the planner on a daily basis. ***Do you know who the planning officer is going to be when you're validating it?*** Not when we're validating, which is something that we need to look at because it is frustrating, as our planning support goes on the bottom of the letter, so we can get a lot of calls. If we're not sure of anything we can go to the officer, and after a couple of days later when the planners initials are in then calls can go through to them.

Do you get involved with conditions and obligations?

We just log them on the system and then they get passed through, and check the money.

How do you consult the consultees?

They are all electronic apart from the Highways and the Crime Prevention Officer. The neighbours are done by a map and then we rely on the planning officers when they go on site to check any that we have missed. We now work off adjoining boundaries, taking out the road. With a bit of common sense. But it's not officially adopted. I would have liked it to be official policy and then we could refer people to the web and say look, this is what we do so we'd have the back up.

Do you get involved with costs?

No, we just get on with what we need to do.

How would you say that how you perform as a team is monitored?

The manager tends to leave it down to me, as to how the support team is run, and I think I do a good job. If things did start to go wrong and applications build up I would have to go and tell him, I must admit, I would prefer a bit more for the manager to be involved, because I do feel that I am left on my own sometimes to make decisions that I don't feel that I should be making, and there's no means to pick up on things.

Can you think of any other roles that you do?

Well, I do the financial monitoring. I submit quarterly returns so I have to make sure that I have all the figures, all the budget codes for Pre Apps, PD's, non material alterations, discharge of conditions, so when the fees are paid in, because we don't do that, I have to ensure that they are put in the correct budget code, so I have to monitor on a weekly basis whether its been put in the correct slot and that they've paid the correct amount. We've given them all the information but they don't necessarily refer to it, they just see planning, and put it as a planning application.

Principal Planning Officer

What do you personally see as the purpose of Development Control?

The purpose of DC is to manage development.

What do you think other people see it as, either within the Authority or outside?

I think that outside people see it as a fairly irrational way of controlling things whereas we just make decisions on a whim, we are controlling but there is no rationality behind that control whereas we're doing it in a very rational way as we make decisions in accordance with policy and so there should be a consistency because of that policy.

Internally, I would say that Development Control staff by and large are trying to do the same, to manage the development that goes on, and by doing that you are protecting the environment, you are protecting the quality of your town, you're protecting all the good things, you are still enabling work to happen but anything that is a material consideration has been looked at and the decision is made on that basis.

What do you see as the key input into the service?

What we need to be able to do our job properly? We need very clear guidelines, we need clear policies which we can work towards, that helps us in our decision making. We need good management and leadership so that there is consistency and we are all working together, we are aware of changes in legislation, and I think that that is a management function to make sure that everyone is singing from the same hymn sheet, and then on a day to day level, we need practical resources to actually do the job, like a proper IT system, personally, you get a different view from who you ask but I think that it's not bad. I've recently had new bits and pieces and it does crash, today I didn't get into it until about 10, which is ridiculous, it is too complicated our system, it does too many things and you only need about 2 programmes and we don't use it to its full potential.

We need good support staff and a good support system which I think that we have got, and that's in making sure that the application is right from the start so that we are not chasing our tail trying to get things right and during the course of doing an application we have got that back up and I think we do very well at that. A lot of it comes down to personalities. What else? I could go on. What I think helps me personally is a good working relationship with councillors because at the end of the day, a lot of applications are going to be determined by them. So if we have a good dialogue, and there is trust on both sides I think that that smooths the process along. I think that it is better than it ever has been but I think that it could be improved. We have a couple of measures going on, we have work shadowing, I had a councillor the other day, and we've another coming in from the DC committee, which is good. I think they asked if they could come in and we said, yeh great, I think that helps. I think we could do with better support from other departments, like legal, you've caught me on a bad day because I've just had a row with our solicitor but I think it'd help if we had better internal relationships.

What do you see as the main outputs?

The decisions we make, yes. And not only planning, it can be appeal decisions, we've not talked about appeals, we've not lost one for a good while now, we're doing very well.

Who do you see as the related organisations who impact on your work?

Legal, Environmental Health, Local Plans, Conservation is an obvious one who we work very closely with. External ones, it depends what the issue is, and the issues change, for example, at the moment protected species have become a big thing, applications have to be accompanied by a proper survey, English Nature and the Wildlife Trust as well. Flooding is a big thing, the Environment Agency has new advice so we have to work closely with them with developing in flood plains. Again, depending on the type of application, it could be English Heritage.

Do you see any other variables which affect your work?

I think that, sometimes, the weight of objections can be a bit of a hindrance, I'm thinking of big applications that we've had recently, we had one for a supermarket and a multi storey car park, a huge number of objections, and there's a huge lobby against it, and that is actually a hindrance, I think people think that they are getting involved but if I've heard the argument once, I don't need hundreds of letters saying the same thing or a million phone calls in a week, it just gets in the way. It is very very annoying and it'd be better if I could hear the objection and be left to make a decision or a recommendation. Objectors, whilst we welcome them, too much can just be too much pressure on getting the job done.

Well, mm, we're still getting planning applications even though the economy's changing and things aren't necessarily happening on the ground. They're still coming in even though there may be a few less. If the IT isn't working that can be a problem, or if we're not getting enough support or feedback from management, then that can hinder. I suppose ultimately if an application is recommended for approval and elected members overturn it then that is a problem. You've worked hard and done your bit but then they are entitled to make that decision, it is still an output.

Who do you see as producing the main output of the system?

I think that that is the actual officers. I think the DC Manager obviously has an input in looking that the decision notice is ok in terms of the actual decision and then in making sure that the detail is right in the conditions, he picks things up but he doesn't tend to argue with me.

Do you think there is a system to ensure and monitor the consistency that goes on?

I think that is what the DC manager does. He checks every single decision that goes out which is very good so hopefully there would then be feedback if there wasn't consistency. I think that there should be more team meetings with just DC, to make sure that we are all singing from the same hymn sheet. I think that informally, and I think that it is a good system, that we have all got a very good working relationship in there so that we are discussing decisions between ourselves but it is not formal. In terms of formality I think that the less experienced staff tend to ask the

senior staff in their area but it's not with every single application, it's the controversial ones, they will ask about that but it is a great working relationship between officers in there. I mean we share information.

Do you think there's any other method to react to disagreements or inconsistencies?

I suppose it would be if people made a complaint, or if things were going to committee and they are picking up bits and pieces. We had an incident recently where we'd lost a decision with a smoking shelter, and appeal decisions set a benchmark, if you've lost an appeal you are going to think twice, you wouldn't do the same thing again, you'd learn from that, and the committee do pick things up, in that we've had a similar decision and we refused that so what's different, what is going on here? It comes down to the DC Manager again. And then you have case law and things that are changing, the DC manager should keep an eye on that.

So, do you think that there is a role to look for changes in the external environment?

Ok, this is where we have a problem I think. There is nothing, there is nothing formal, I think that it is a bit hit and miss as to whether we even know about things that are changing. There was a recent change to the GDPO [General Permitted Development Order] and everyone just got that by email. It is difficult when you're busy and you get an email to actually read and assimilate it. It is so much easier if, in a team meeting, someone can say you've all got it and this is what it says. So I think that is a bit of a problem. So basically there is nothing, that's a clear answer isn't it?

Who do you think sets the long term strategy as to where the service is going? Or do you think there is a long term strategy?

I would like to say that is the head of the service, but I really don't think he knows what is going on. There has been an incident recently where we have all got slightly different terms and conditions and the DC Manager didn't know anything and the Head of Service even less and that's going to have a big impact, they're broadening paybands so there is no difference between the senior officer level and the principal officer level, so in terms of responsibility everyone will be doing that, or we don't know, we don't know how it will operate or where the service is going. **How about councillors do they have influence over, for example, the quality of decisions?** They probably do actually, they probably have more of an impact than we are aware of. They don't interfere on DC issues. I think that they are quite professional, they will ring and ask questions but I've never felt that they were trying to influence a decision. But they might influence behind the scenes, in terms of conservation, what they might want to see in an area.

How would describe how Pre App advice works?

People now have to pay for pre app advice, and I find it quite difficult. Because people are paying, they're expecting a level of service greater than we used to give, and almost they are expecting a decision in advance I think, and we are having to do a lot of work for it, we've a big one coming in, for a mixed use scheme, for housing, in a flood plain, in a conservation area, it is going to take a long time to give advice and all this is done on the basis of what they've paid, and they'll, it's almost giving them a decision I suppose, before we get a planning application. Everyone is

involved who would be in the planning application, the officer, the environment agency, the highways officer, the conservation officer, and as part of a fee we'll give a written response and any subsequent discussions will be ongoing. I don't think it's improved the quality of the applications, I think that what it is doing is getting rid of non starters, if something is a clear no when someone applies for pre app and we say that we don't think it is going to get planning permission then they don't apply. People do try to circumvent it, I had a woman on the phone, saying can I just ask you a few questions and the few questions lasted half an hour, and then she asked if she could get back to me again, and I had to say that we charge for pre app, and she was like, 'yes, no but it's just a few questions'. So you do have to ask when does pre app advice start, where do you draw the line.

Can you describe your submission and validation?

It is done in technical admin, we have got involved when they had a staffing crisis we did a little bit of validation but now they do it all which works very well I think, they come through fine, they do very well, you have the odd hiccup but that's human. I think that it is important to get everything right at the validation level but that it's quick and timely so you're up and running. They come through all the time, an ongoing thing.

Conditions and Obligations, how are they dealt with?

The conditions are logged now, I think. There is a pro forma that we send out saying you've applied for the discharge of conditions, you need to pay, and can you apply formally, and then that is logged on I plan system and if we reply that is there too. **What if they don't apply?** I suppose if they don't apply it is an enforcement thing and we have to decide if a development went ahead without conditions being discharged we would have to see if it was expedient for us to pursue it. Sometimes it might be, sometimes it's not. It's a reactive thing without a doubt, there's no active monitoring. It is a staffing/ resources issue not a question of will. **And obligations?** It is a bit difficult because legal get involved in obligations and it is sort of taken away from us in a way and people are negotiating at a different level and I always feel slightly out of the loop on it. It is a funny situation in terms of obligations, because you've got your heads of terms and you know what it is that they are talking about, like affordable housing or whatever the issue is, and then it goes off to someone else to deal with the nitty gritty detail and I hear nothing and one day I'll get told that the agreement's been signed and here's a copy. When setting the Heads of Terms, it is down to me, and planning committee I suppose, but you tend to know what that is going to be, as it's mainly down to policy. It is included in pre app as well, yes, because, for example, I've just had a countryside site where we wouldn't normally have housing but it has come in as an 100% affordable scheme and there is a rural exception policy where there's a local need so I've said to them as part of the pre app that it needs to be part of a legal agreement and we need it up front saying exactly what the tenure is and the mechanism for allocating the housing etc, so the application should come in with the heads of terms at least or if not a draft agreement, and it came with neither so the advice was really taken to heart. **What about getting the money in afterwards?** I've never had any involvement, we have a system that people use lot, a database, it is used by the Head of Service and Directorate to see what we've got and what's going on. I think legal take over a bit there as well.

So how are consultations done?

In the first instance they are done in admin, all of them, if something comes up where we haven't consulted, we give them to admin and they do them. I think that all they do now is tell them that all the information is on the web and they can look it up themselves, they don't need to send them all the documents. Generally it is ok, it is mainly the big applications where you want a few extra doing, for example, this rural exception site, it wasn't wrong, but we needed both policy and housing strategy team consulting, and that for some reason went a bit pear shaped, it is the non standard things. But it easily rectified because hopefully you get the application relatively early, you pick it up relatively early, you need to check it quickly though, I hope they don't get offended when we take them back. They don't say anything to our faces anyway. They come through quite quickly at the moment, within about a week.

Do you get involved with costs at all?

No, never, I never think about that. The only time I really think about it is at an appeal where you can apply for costs, we're encouraged to do that more actually now following the costs circular and I think we are personally encouraged too, I personally don't like the culture because you're almost looking for things to apply on. And then if you've applied for costs you've got to start thinking about what time you spent, and the people involved, and I think that is the only time I've ever thought about it.

So you think there's any system in place council wide to monitor how you perform?

I think it's really important, because at the moment it's all set up to look at how quickly we do things, and how long it takes, but not about the quality of the decision. I think that we are doing well on the quality because we are winning appeals, if we were losing appeals we would be doing something wrong. To me the main thing is the decision we are making but not the time it takes. Timeliness is important but it's not as important as the quality of the decision. But I think that we do get it right because of the appeals but I think that that is down to our informal system of discussion, and we have good policies, we've got a good local plan which provides that level. We get the appeal results distributed as a matter of course when we get an appeal and they are reported at committee so people know how we are going, enforcement is also reported and the performance targets.

Is there anything else that you think you do that is important?

Probably but I can't think of them.

DC Manager

So what do you personally see as the purpose of Development Control?

To produce Good Quality Development

Who do you think influences the output

So you've got your politicians looking into in and you're stakeholders can still have an influence on it can't they and everything's ticking the box but a stakeholder can stop it, with the consequential test, but that is when you, as a determining authority have to weigh it all up. It shouldn't be these days much technical problems as money has been thrown at it these days.

So who in the authority is responsible for the main output, the production of Good Quality Development?

Ultimately it has to be your professionals, your design officers, your conservation officers, your planning officers, your sustainability officers. It's everyone with that expertise who decide which boxes need ticking to get that end result of quality. But then it's, as authority, having those sections in place to all feed into the pot isn't it. Somebody with the expertise and expertise is getting diluted all the time so you might have to go out to consultants to get that expertise, whether it is design, whether it sustainability, if people have these qualifications to do the assessment on the code for sustainable homes and all that jazz. There's not many people here who'd know where to start, there is one person in policy, but if she said to me, where do you start on it, but then there's computer programmes that you can run, we were looking at that.

Do you think there is a system or person who looks to monitor what is going on?

It should be your Head of Service, and if not your head of service it should be your Development Management Manager... I've made the suggestion hear that you should change the name.

Is there anyone who would react if a problem was identified?

It really is, well the way it is here, it would have to be, if it wasn't being bought on lone with the various agency's, it would have to be the case officer and ultimately the development manager, the buck would have to stop there. If that site wasn't being delivered because you haven't got that agency involved then that would come down to whoever was managing the process I think. The blame culture, it's your fault, it isn't delivered. I don't know who's getting the blame in one case here. The public blame the council, their perception is that it is the council's fault, with planning performance agreements you are almost agreeing to deliver an end product, and the developer expects an approval. It is a useful tool for managing the process but you also need to manage the expectation.

Do you think there is anyone to look outside for changes?

Probably more at director level, looking outside and seeing what will influence what we are doing. He feeds it down, not so much as he used to because we used to have a regeneration management team but we don't really have that any more as communications have been diluted with the Business Manager reshuffle and restructure. We need to forge more links with PPD [Planning Policy and Design], but it needs to be on a more formal basis with everyone involved, rather than operating with two distinct operations. We've just had a peer review and that was identified as one of the areas which needs to be improved, the linkages between Development Control and PPD. I think they should all filter in and the DC Officer is the one to pull it all together, you only do it on selective things, identifying what is important and where resources need to be pulled together, by the internal management team, but we've not really got one. We are only a small team anyway, but if you imagine if you were in a larger authority, like the new authorities.

Strategy – who do you think have the overall influence.

Well ultimately it all comes down from Central Government and then there is the local input of what do you achieve in terms of, you need to know what to do with employment, housing, environment, what needs to be protected, you know what it is important, and what are the local aspirations. I mean here the aspirations are to protect its environment, create affordable homes and create employment, now they are going to work against each other at times and need balancing. They shouldn't do, if you've got your policies in place and your local plan in place and your allocations then at least you've got certainty in certain areas, housing, environment and employment are protected. Sustainability now, as well, is the big buzz word but what we are all failing on is what is sustainable? Where's transport, who's paying for what, the bypass.

Can you describe your pre application advice.

Transcript Authority 3

Interview 1 - Team Leader

What do you personally consider to be the purpose of Development Control within this Authority?

Well the standard answer is controlling development in the public interest. Which is what we try to do here, we have to take into account the council's objective of course, and the council plan and do all of that within the policies and guidance. **so what do you class as the council objectives?** They are written out in the council plan.

What do you think that others, either within the authority, or outside the authority, see as the purpose?

I think that some people have a negative view, yeh, I think that a lot of people think that developers, particularly big developers have a lot of say in shaping the environment, but more and more we're getting more and more guidance and there's more and more for planning to do, more demands on planning coming in.

What do you see as the main resources for the service?

The main resources are the staff I think. **any other inputs?** well, the Planning Delivery Grant was a great help, but not so much now. **It Support?** Yeh yeh, it is more and more important, we get most of our information through IT so its been very important over the last few years.

What do you see as the main outputs of the service?

Well, High quality development, protecting the environment

What other organisations do you think are important to running the service, either internally or externally?

External as well, there's so much in terms of flood risk so Environment Agency and we've lots of designated sites along the estuary so Natural England, there are the two main external ones, we have our own highways.

What do you see as the main variables impacting on how you perform?

There's delays sometimes in getting responses back from statutory consultees so that can affect our performance figures, but nowadays there are required, or they're meant to respond, within so many days but obviously there are some schemes where it takes longer to get a response. **Are they any other factors that you can think of?** Well, Government Policy, the state of the Local Plan, we're still doing out LDF so we're still using the Local Plan, we have some SPD's that we use.

Who do you see as being responsible for producing the outputs of the service?

Well, everyone's involved, yes, from the moment the application comes in through to when it's decided.

Do you see that there's anyone who overlooks it to sense when changes occur and monitor it, a person or a role?

Do you mean in terms of performance or quality? *either...* performance would be the Development Management Manager, umm, for quality, we don't really go back and have a look at developments that we've approved and have been implemented. We used to do a trip out with councillors and they'd go and have a look at some implemented permissions and see if they thought they'd made the right decisions but they haven't done that for a while. but as planning officers we don't really go back and access if we've done the right thing I suppose. We see them when we're out and about and we learn from our errors. We discuss them as a team as well.

Do you think there's any other procedures where you react to things you see and put things in place.

We've got a Development Control manual that we have developed over so many years so we have procedures in there which we update from time to time, procedures for all sorts of things, *when you say we?* we have been on a rolling programme of updating things and we're still doing that at the moment. If anyone has a bugbear they can raise it at a team meeting. We have a big team meeting every month with everybody and then we have, well one of the teams, has a weekly meeting. and we're just getting our team together to do the same.

Do you think there's any process looking outside the service to see how things are changing and how it impacts the service?

Well, in terms of performance, obviously the statistics are sent off, and so if we're not performing it gets picked up on there.

Who do you think formulates the long term strategy for the service?

Well we would do that, the Senior Management Team, *does that include people from outside the service, from the council senior management team?* we have meetings, I think that they are monthly, with agents and developers so there is a forum there and getting their feedback on what we are up to, in terms of how we process applications so we do take into account their feedback and Senior Management in terms of our targets on performance.

How would describe how you offer your pre application advice?

We offer quite a lot of pre application advice, wither on the phone or through letters or emails or through meetings, we don't charge for it. *If you did charge do you think it would put people off?* Yeh, we have discussed it, and that's the current view. The informal advice is recorded. We have a system on our computer for preliminary advice screen where we do record everything on there. It usually remains consistent through to the planning application, they'll be the odd one where it isn't. *Do elected members get involved?* not generally at that stage. We try to maintain officer consistency through to the planning application.

Can you briefly describe the process you go through when an application comes in with submission and validation?

When it first comes in, it is allocated a file and it's given a planning reference number and the basic details are inputted into our system. Then it goes through to our technical advisors and everything's checked, the forms, the fees, the certificates and they are all checked to see if they're valid. They have a check list, we have information

in the planning manual to help them do that so that is the process that they go through and then they have to, if it is valid, they have to work out who to consult, with the statutory consultees and the neighbours and any publicity which needs to be carried out they do. Then any site notices that need to be drawn up are done at the technical stage and then the case officer is given the site notice to actually put up when they go on site. **How frequently do you use site notices?** Quite often, yes. **How long do you reckon on average, it takes to get to a case officer?** I'd say, about, well it depends what it is because some applications are prioritised, such as 28 day applications and major applications, but I think it's a 5 day target for an ordinary application and 10 days for an ordinary application, but we do have targets for that. **How frequently do you get issues with validation coming up during the course of the application?** It does happen, sometimes you'll find that consultees or neighbours have been missed, occasionally you might get a problem with a red edge but it's not a frequent thing. I mean on a major application the technical advisors will always go through, when they get the application they go through it, and then they sit down with the person who's going to be the case officer and they go through it together to make sure that everything is sorted so that it doesn't hold it up any longer.

How, as an Authority, do you deal with conditions?

Through the formal process of discharging conditions, since that's come into force we do that now. Everything is given a application number, the same as the original then we just add an a or b or c, **Do you think that if people don't apply to get them discharged, is there a process to pick up on them?** yes, we've got a compliance officer in enforcement and when we make a decision on the application the decisions go through to the compliance officer and she writes a letter to the applicant or agent saying you know you've been granted planning permission, these are the conditions and these are the ones you've got to comply with before you start work, and then she monitors them after that. **Is that full time? yes and she doesn't deal with any other enforcement?** she looks at Section 106's. just the compliance, not the negotiation.

So consultation is the technical team?

Yes, the technical team do our consultations.

Where in the service do you think deals with the costs that are incurred?

When you say costs? **the costs of running the DC service.** Through the application fees but that doesn't cover everything, it was helped by the PDG, **As an officer are costs on your mind,** ummm, not really, in terms of appeals we are always very wary of getting costs when your drawing up reasons for refusal you've got to be absolutely sure that you can defend each reason for refusal, and when you're putting on conditions, you've got to make sure that they are able to meet the tests so there is not a reason for appeal, so that's what we look at, but other costs, we are aware of the costs of deciding applications but it doesn't effect us.

Can you think of any other roles/ parts of the service that we've not discussed?

Corporately we get involved with meetings with other parts of the council, to talk about things like regeneration and derelict properties. **So the long term strategies as well as the reactionary applications?** Yes, and of course we are involved with the forward policy, spatial futures is what they are called.

Interview 2 - Technical Support Officer

So what do you see as the purpose of DC within the Authority?

Just making sure that like, there's not a massive mansion in the middle of a field or anything like that, making sure that development is up to standard.

What do you think other people might see it as?

I'm not sure really **So what do you think are the main things coming into the service?** People wanting to know if they need planning permission for certain developments, or if their neighbours have permission for certain developments, providing lots of information

Do you see any other related organisations?

Not me particularly, but I do know that we deal with the Environment Agency, the Officers have meetings with them, building control, and different departments within the council like the highways department and the architects. The main one for me is the agents submitting the applications. Quite a lot of the time it is mostly recognisable ones but we do get the odd time when it's the first time putting one in or when it's the actual householder putting one in. You get to know the agents, you'll know what to look for, some of them tend to do the same thing wrong even though you tell them. You'll look at who the agent is and know that you've got a good one.

What other things do you see in the service?

We can do searches on application sites, so if someone's buying a house and they want to know the planning history on it, there's the compliance as well: once things have been dealt with, making sure that they are built in accordance with the plans, if there are any set conditions on them, making sure that they are actually complied with.

Who do you see as being responsible for doing all these things?

When it first comes in it comes to us and we do all the technical side of it. Making sure that all the consultees and neighbours are consulted on it and then it goes to the planning officer to actually make a decision, and then it goes to our manager to just check over it and make sure that the decisions ok before it is typed up and sent out, so everyone has a part in it. We are generally left to get on with our own jobs, but if I have a query with it then I can take it to the planning officer who it is going to go to. **Do you ever hurry the officers along?** No, it is up to the Planning Officer, they know what the target date is, so it is up to them to get it done before the target date. There are some complex ones which can go over the target date.

Do you think there's anyone who keeps an eye on the overall process?

Yes, my supervisor runs a list out weekly for the officers, it's emailed directly to the officers, a weekly list of all the applications which are ongoing, with the target dates; just in case they have forgotten about one, they are able to say, I need to get this one done but its their responsibility overall.

Do you think there's anyone or any system looking outside the service to see how things are likely to impact?

We have got a service improvement officer but I'm not quite sure of her role. Obviously, if she thinks we can do something better or she has a look on the website and sees that we can do something to improve how we do things then she'll bring it up.

Do you, in technical support, get involved with the pre application advice?

No, that's just the planning officers. If a phone call comes through we can find out which officer is dealing with it or if we've got one in, and if we get a planning application on a site we need to check if there has been any pre application advice on the site and link it on the system so that they are both together. **Do you do planning histories?**

Yes, we look at the history cards for them, for example, if it's a resubmission, we need to look and see if it is a free go or not.

So submission and validation it comes to you first?

Yes, and we check it over. **Are you happy doing that?** Yes, but obviously a lot of stuff does change, when you get new legislation or something like that. You've got to remember it all. Once you've got it into your head, if you pock one up, half the time you know what consultees need to be done and things like that. **So who spots the new legislation if it comes?** It gets descended down from the actual managers, emailing it round, and to the service improvement officer, she's got the DC manual and there's links to the websites and things like that. Each technical officer has a different way of doing things, but I'm training someone tomorrow and I don't need to get the manual out to show her how to do things but everything is covered in it. **If you wanted something changed in it, would you be able to get it done?** Yes. We have team meetings every month and if we have any issues there, we can bring things up and it gets cascaded down so we all know what's happening in the end.

Do you get involved with conditions?

Yes, what happens now is that when it gets decided, the applicant has to put in a details of discharge application to discharge those conditions. They come to us, we deal with them and then it goes to the officer to make the final decision as to whether to discharge them or not. It goes to the compliance monitoring officer who gets a list of all the decisions that are done. She checks them out, sees if there's anything she needs to act on, sends them out a letter telling them to put in the details to discharge.

And you do the consultations?

Yes, but we can check things that we are unsure of with the planning officer. There are some consultees who are not statutory for us to do but discretionary for the officer so like Anglian Water and things like that so they will come back to us for us to do them. We are usually over cautious just in case, we don't want them to be picked up at the last minute and to go over the target date. **and you're happy and confident in the way you do them?** yes.

Most of them are done electronically, all the council ones are done electronically, we sent some letters out to all the other ones trying to get them to go electronically but some of them don't have the facilities to do that, but we don't have to print off as many as we used to. The applications from the portal can create more work as you've

actually got to print them all off, and if you've got a consultee who isn't electronic you need to then go and print another copy off. **But the IT's ok, yes.**

Can you think of anything else that you do that we haven't covered?

My supervisor deals with appeals [the questionnaires] on applications but I don't do those myself. She also does a weekly list which goes out to councillors once a week, letting them know which applications we've had in and been made valid in the last week so they can look at them on the website and she also does an advert that goes in the paper every week - I cover that if she's ever off. **Is the weekly list just applications and decisions?** Yes, it doesn't include pre application advice, their just put on the system and they are just internal, they don't go out externally.

Interview 3 Development Management Officer

What do you consider to be the purpose of DC?

For me it's gone from looking at applications and deciding appropriate development to development in the right place. It's changed from more of a control, it's not so much of control as it used to be, it's more the involvement of architects, environment agency and different bodies all working together to get something that's good rather than nothing at all in some cases.

What do you think that others might see as the purpose?

1. Introduction

May I thank you for taking the time to visit this feedback site for the recommendations of my research. This feedback area presents each of the recommendations, with their justifications and asks your opinions in a number of areas: do you feel that they are present within your authority, do you feel that their presence would/ does enhance your service and if they do not currently exist, do you think that they could be implemented.

I appreciate the pressures on you time and would like to express my sincere appreciation for your contribution to my work

There are 16 recommendations ranging from the management of the entire service through to aspects such as pre application advice and planning obligations. The responses follow the same structure throughout. I trust that the responses will not take up too much of you time and please be assured, that I will treat the answers confidentially. They will be valuable in validating, or otherwise, the results of my research to date.

I also hope that these recommendations may be of interest to you and your authority and could assist you in your work.

If you have any queries on this research or this exercise, please do not hesitate to contact me at catherine.m.wynn@student.shu.ac.uk or 07751 217820

Many Thanks

Catherine Wynn

1. Please provide your name, authority and Job title. These will not be presented in the research but will be used in analysing the content of the feedback.

2. Please give your email address and telephone number

Email Address:

Phone Number:

2. Recommendation 1 - Management of costs and expenditure.

This recommendation relates to the control of the costs and expenditure of the service.

RECOMMENDATION

"The control of costs and expenditure of the service should be set and maintained by the Planning Management team"

JUSTIFICATION

The costs of the service, and the service needs, are heavily dependent on staffing costs. Other service costs are known by planning management and they are in a strong position to judge the service needs, for example, staff training, and if they maintained control, they would be able to react faster to potential needs. Available income is highly dependent on the receipt of application fees, and an increase in these, usually produces an increase in workload and therefore increase staffing demands. This is often required relatively quickly and can be delayed through gaining more central approval, causing a workload backlog.

Please react below to this recommendation.

1. Does your service have control over its costs and expenditure?

2. Do you think that this does/ would improve the operation of your service?

3. If your service does not have control, do you think it could be implemented?

4. If not (for either question 2 or 3), could you very briefly explain how/ why not.

5. Please add any additional comments that you wish to make on this area.

3. Recommendation 2 - Involvement of Elected Members

This recommendation relates to the involvement of elected members in the planning process.

RECOMMENDATION

"Elected members should be actively involved in the process, and its management"

JUSTIFICATION

Where members work closely with, and owned the outputs of the service, their input was perceived as advantageous. Where their involvement was more remote, they were seen as a barrier to the smooth operation of the service.

Please react below to this recommendation.

1. Are your elected members actively involved in the service?

2. Do you think that this does/ would improve the operation of your service?

3. Do you think that members could become more actively involved in the service?

4. If not (for either questions 2 or 3), could you very briefly explain.

5. Please add any additional comments that you wish to make on this recommendation.

4. Recommendation 3 - Monitoring for external change

RECOMMENDATION

"Clear responsibility should be allocated to monitor the external environment for changes, such as legislative or economic reform, which will impact on the Development Control/ Management service".

JUSTIFICATION

The service lies in an inherently unstable environment and must continue to operate throughout changed in this. It is important to manage this environment to enable a swift reaction to these changes

1. Does your service have a role (or roles/ responsibility who proactively look for external change?

2. Do you think that this does/ would improve the operation of your service?

3. If your service does not have this present, do you think that it could be implemented?

4. If no (to either question 2 or 3) could you briefly give reasons

5. Please add any additional comments that you have regarding this recommendation.

3. Recommendation 4 - Pre Application Advice Standards

RECOMMENDATION

"Clear guidelines and advice on the standards for pre application advice should be laid down by the authority (whether this is charged for or not)"

JUSTIFICATION

Where standards are in place, the systems for pre application advice are perceived to work better, for both developers and for planning staff. Levels of service are maintained and the quality of the advice follows through to the application stage of the development proposal. This does not necessarily need to be accompanied by a charging structure, however, this may release further funding for the service. The guidelines may also increase the quality of the information received by the authority and their intelligence of potential future developments.

1. Does your service have clear guidelines for pre application advice?

2. Do you think that this would/ does improve the service?

3. If your service does not have clear guidelines, do you think that they could be created and implemented?

4. If you have answered know, to either question 2 or 3, could you briefly give your reasons.

5. Please add any further comments that you may wish to make on this recommendation.

6. Recommendation 5 - Pre Application records

RECOMMENDATION

"Advice at all levels should be clearly recorded in a manner where it can be easily accessed at a later date"

JUSTIFICATION

This maintains the consistency of the advice given and can be linked to future enquiries and applications. It also allows a means to audit and monitor the advice given.

1. Does your service have a clear procedure for recording pre application advice?

2. Do you think that this does/ would improve the operation of your service?

3. If your service does not have a system, do you think that one could be implemented?

4. If you answered negatively to either question 2 or 3, could you provide brief reasons below.

5. Please add any other comments that you may wish to make on this recommendation

6. Please add any other comments that you may wish to make on this recommendation

7. Recommendation 6 - Submission and Validation workloads

RECOMMENDATION

"Workloads at this stage of the process should be proactively monitored to maintain efficient processing of applications"

JUSTIFICATION

This is a fundamental part of the planning application process, however, it is often conducted by employees with other workloads and responsibilities. Applications can be received in peaks and troughs while the time frame for their determination remains rigid. If they are delayed or mishandled at this point, problems can become exacerbated at later stages.

1. Does your service proactively monitor the workload at the validation stage of an application?

2. Do you think that this does/ would improve the operation of your service?

3. If your service does not proactively monitor this work, do you think that it could be achieved?

4. If you answered no to either questions 2 or 3, could you give brief reasons

5. Please add any further comments that you wish to make on this recommendation

8. Recommendation 7 - Planning Support Skills

RECOMMENDATION

"Planning Support staff with involvement at this stage of the process should be trained to be multi-skilled in order to adjust to the changes in demand".

JUSTIFICATION

Workflow is not consistent in this area, however, preventing delays is the key. Staff therefore need to be flexible to cope with a variety of tasks and be able to transfer between them where appropriate

1. Are the planning support staff in your authority skilled in all the stages of the validation process?

2. Do you think that this does/ could improve the operation of your service?

3. If your planning support staff are not multi-skilled, do you think it could be implemented?

4. If you answered no to either question 2 or question 3, could you briefly give reasons.

5. Please add any further comments that you wish to make on this recommendation.

9. Recommendation 3 - Validation checks

RECOMMENDATION

"Validation should be checked promptly by a planning professional as soon as possible following validation. Issues should be communicated and dealt with efficiently".

JUSTIFICATION

Support staff cannot be expected to be aware of all circumstances of all applications. Therefore planning staff should be expected to check applications as soon as practicable after their receipt. Procedures should be in place to promptly correct any issues. This does not necessarily require a formal process but an ethos should be enforced.

1. Does your service maintain quick checking of applications by planning professionals?

2. Do you think that this does/ would improved the operation of your service?

3. If your service does not have prompt overviews of validations, do you think that it could be implemented?

4. If no (to either question 2 or 3) please could you provide brief reasons

5. Please add any further comments that you wish to make on this recommendation

10. Recommendation 9 - Consultation criteria

RECOMMENDATION

"Criteria on consultation requirements should have a strong, clearly laid down, logical rationale".

JUSTIFICATION

Consultation requirement need to be clearly understood by those conducting the initial consultations and any additional ones should be clearly explained. Excessive consultations should be avoided due to their cost and the potential to cause later delays in the process. It is appreciated that the statutory consultees cannot be amended.

1. Does your Authority have clear consultation guidelines?

2. Do you think that this does/ would include the operation of your service?

3. If your service does not have these clear guidelines, do you think it could be introduced?

4. If you answered negatively to either question 2 or 3, please comment below.

5. Please add any further observations that you wish to make on this recommendation.

10. Recommendation 10 - Consultation checks

RECOMMENDATION

"Consultations should be checked promptly by a planning professional and issues dealt with efficiently".

JUSTIFICATION

Support staff cannot be expected to be aware of all circumstances of all applications. Therefore planning staff should be expected to check applications as soon as practicable after their receipt. Procedures should be in place to promptly correct any issues. This does not necessarily require a formal process but an ethos should be enforced.

1. Are consultations checked promptly within your Authority?

2. Do you think that this could/ does improve the operation of your service?

3. If your service does not promptly check consultations, do you think that this could be implemented?

4. If you answered no (to either question 2 or 3) please give brief reasons

5. Please add anything further that you wish in relation to this recommendation

12. Recommendation 11 - Pro active condition monitoring

RECOMMENDATION

"Pro active post application monitoring of conditions should take place: wither as the responsibility of the officer or through a specific role".

JUSTIFICATION

Conditions are, by definition, necessary in order for a development to be acceptable. Therefore, if a development takes place, but the conditions are not fulfilled, the quality of the output of the service is reduced. While applications for the discharge of conditions is now taking place, this is mostly upon the initiative of the developer. Failing to undertake this role may also create failure demand which creates additional, less predictable work for the authority.

1. Does your service pro actively monitor application conditions?

2. Do you think that this does/ would improve your service?

3. If your service does not currently pro actively monitor conditions, do you think that it could be implemented?

4. If you answered no to either question 2 or 3, please give brief reasons below

5. Please add any further comments that you have on this recommendation

13. Recommendation 12 - Planning Obligation standards

RECOMMENDATION

Policies for the criteria of obligations need to, as far as possible, to be clearly laid out and reviewed on a regular basis

JUSTIFICATION

Policies which are available for developers allow them to approximate the desired level of contributions and therefore to be prepared for the potential demands on them. This leads to a more efficient process and negotiations once an application has been submitted. Where non standard obligations are required the justification should be clearly laid out, as early as possible in the application process. Review is needed to ensure that demands continue to be appropriate, and therefore achieve their aims.

1. Does your authority have, where possible, clear up to date guidelines on the required level of contributions?

2. Do you think that it does/ would improve performance?

3. If your service does not have up to date guidelines, do you think that they could be introduced?

4. If you answered no (to question 2 or 3) could you provide brief reasons below

5. If you answered no (to question 2 or 3) could you provide brief reasons below

6. Do you have any other comments in relation to this recommendation?

14. Recommendation 13 - Pro active monitoring of obligations

RECOMMENDATION

Pro active monitoring of obligations should take place, either as the responsibility of the officer or through a specific role.

JUSTIFICATION

As with planning conditions, if monitoring and enforcement does not take place, the quality of the output of the service is reduced.

1. Does your authority undertake pro active monitoring of planning conditions?

2. Do you think that this does/ would improve the operation of your service?

3. If you do not undertake pro active monitoring, do you think that it could be implemented?

4. If you answered negatively (to qu. 2 or 3) please provide brief reasons below.

5. Please add any further comments regarding this recommendation below

15. Recommendation 14 - Costs

RECOMMENDATION

"Planning staff should be aware of, and consider, costs within their work".

JUSTIFICATION

Part of responsibility of controlling the costs of a service, for example, office efficiencies, should lie with the staff in the office. However, the role of costs should not become stronger than the need to maintain application quality.

1. Are the staff in your service aware of the costs considerations in their work?

2. Do you think that it does/ could improve the operation of the service?

3. If your the staff in the service do not consider costs, do you think that this could be changed?

4. If no, to either question 2 or 3, could you provide brief reasons below

5. Please add any further comments on this recommendation

16. Recommendation 15 - Control of targets

RECOMMENDATION

"The level to which National Indicator targets are met should be set and monitored by planning staff without undue interference from the Authority's Senior Management Team".

JUSTIFICATION

Senior Management Teams are under pressure to be seen to be improving the services which they deliver. However the NI targets were originally set at a level which considered the demands on planning services. Therefore there needs to remain flexibility in the system which takes account of those applications which justifiably take additional time. Planning Management staff are in a preferable position to judge when an extension of time is appropriate.

1. Do you think that the extent of which targets are met/ aimed for is within the control of the planning management team?

2. Do you think that this does/ would improve the operation of your service?

3. If this is not the case, do you think that it could be implemented at your Authority?

4. If not, to either question 2 or 3, could you give brief reasons

5. Please add any further comments that you wish to make on this recommendation

17. Recommendation 16 - Monitoring of Quality

RECOMMENDATION

"Monitoring of the quality of decisions should be conducted, either through a system of formal review or through other informal discussion".

JUSTIFICATION

The Identity of Development Control/ Management services clearly involved the management of good quality development. Therefore, a means of monitoring this output is key to the performance of the service, to maintain consistency and quality

1. Does your service have any means of monitoring the quality of the content of its decisions?

2. Do you think that it would/ does improve the operation of your service?

3. If you do not have a means to monitor the decision quality, do you think that one could be implemented?

4. If no to either question 2 or 3, please could you give brief reasons below

5. Please add any further comments that you may wish to make on this recommendation.

18. Thank you

1. Thank you for taking the additional time to complete this review. If you have any further comments or questions, please write them below.

As I have already stated, your contribution is valuable in this work.

Thanks Again

Catherine

Appendix 9: Transcript, Validation Authority

Overall management of DC as an organisation: funding, income/ staffing: staffing v income – how quickly can DC react and recruit new staff and create new posts: who controls it and creates them

All liable to change due to govt consultation on fees: make DC like building control. Department staffs to the troughs or a base level and then have some sort of arrangement to deal with the peaks and that's fine in the short term. Normally form of agencies, consultants/ casual arrangements with part time staff on an ad hoc basis. Where it gets harder is to make the decision to make the decision to take on more permanent staff, and that is getting a lot harder. There are lots of responsibilities along with permanent staff. Once they're there you can't suddenly downsize again. This council, like most local government, the drive is to reduce the establishment. Unless you've got something very specialist/ unusual that you can't get from a casual arrangement then you're unlikely to get a permanent staff member.... Eg waste and minerals... etc. Become a minerals planner... advertise for these at a time when cutting back. When we do – to create a new post needs approval of strategic director.. council has 14,000 employees... planning and housing is 200. Strategic Director level is a handful of people, high up the tree. Agency is a lot easier...can be team manager/ head of service. Within development manager budget holder with that authority. Quite a lot of vacancy management going on – keep posts on books but filled with an agency person.

Elected member involvement in the decision making process.

In council very interested in structure of the service but would be careful not to micromanage. Interested and like to be kept informed but wouldn't overstep and are aware that end of day it is about operational management. Have been political pressure about workload and decision for greater resources for planning and legal teams (in this case in relation to historic section 106 agreements) and lawful development certificates so at times there is te intervention but generally interested and informed but an operational matter and service running... not just cabinet level, regular chairs and vice chairs meetings and a member sounding boards for DC... there is respect between officers and members.. high calibre of councillors with long experience in dealing with planning – will change in elections so influx of new ones.

Does Dc manager have responsibility to look at changes and how it impacts..

Fee consultation is planning and development manager (DC manager)... sits at a strategic level themselves as 3 former boroughs merged and one of the 10 most busy planning authorities.. can't be as personable and strategic so sit at that higher level... can't do both with 3700 applications (in a recession) – have to be systematic. More akin to a head of service in most authorities/ organisations.. clearly defined as part of the role.

Pre application advice.

Currently limited guidelines as to what is on offer... about to come much clearer with the introduction of charging. At the moment everything is free although we do offer the pd service there is a charge but about to become a lot more structured. At the moment the council is working on IT issues through intergration of 3 councils IT systems (including history within different versions) complete by April and allow for better pre app monitoring.. current is not what future will be. People will need a bit of culture change – more rigorous and disciplines within the authority and by the agents. So long as they get the right advice they will not be too much bothered about being more systematic or paying.. will meet resistance.. big boys not bothered but hit hardest at small/ medium end. Change and adaptation of thinking. Acid test is if a better service is obtained. Can't be too cumbersome... reported as ST***that you need to fill in hundreds of forms and an associated rigmarole... need a system which is reasonably accessible – aiming to pitch there. Needs to be easy for the staff to use and give advice... you can run it off the planning system (swift) which has a pre app module which can be used although I suspect that most planning authorities do not use their existing systems to their full functionality.

Submission and Validation – are the admin teams workloads monitored.

It has been a real issue for us because to do that you need effective IT systems. We've been trying to get a better handle on this but the only way we can really do it is by manual recording which is cumbersome and tricky with the volumes. One of the battles, which was the same in my previous authority, is the delay in the app landing on the councils letter box and getting it on the officers desk... previous authority used to struggle with 3 and a half people here I don't know how many people it is, 30 or something, across 2 towns as each borough had individual set ups... going thru a process of consolidation... a lot of pain for people involved...– big difference in telling people they're going to be working somewhere else 50 miles a day... but way forward is getting people together with new IT system which will enable that kind monitor the caseload, backlog: doing all the sensible stuff which you should be doing but which, at the moment, the only way is by manual monitoring which is very time consuming and that was introduced relatively recently and isn't that great. Will be mainly a series of technicians fundamental to do everything. Historically people doing each type with different hierarchies... got research into structures to back this up... systems/ structures/ shifting paper is different so pulling it all together.. concept is to get people being multi tasked.

Consultation – is there a clear rationale behind the criteria

Yes, is a criteria based on distance – sure it could be better – I do say as complaints is people not being consulted... where to draw the line and the rest of it... it is fairly established... don't get the flack about it so assume it's working ok.

Obligations

Do you review the criteria for obligations and what you have

Not at this point... aiming to have a list of agreed criteria... lots of work and contention around this issue. One authority had a good spd but the others didn't. 'so big issue as to borrow M's and applying to the whole and the policy issues... SPD for M only valid for the bit which was M... lots more needs doing around the agreements... huge effort involved in getting things together and big big staff turnover... interim arrangements following creation of authority only just got a permanent dc manager... on the list of things which needs to be done while focus has been on keeping an adequate level of service going.. not had management capacity for driving service through. S106's very much on the radar but not well developed... far too slow and cumbersome... Mcaught up in a corporate legal thing... larger organisations if don't have slick systems it becomes more cumbersome... recognition that systems and standard instructions/ agreements much better... need standardisation but culture change from decision to needing an agreement and nipping to legal and having a chat and it being sorted... doesn't work in a big organisation need the discipline... even through short distances and not knowing people. Complete different model – need systematic, more in personable model.... Not the personal organic operation which doesn't work.

Responsibilities same for small district and unitary authorities... difference is in terms of volume, not in terms of complexity – systems for volume handling.

Monitoring 106's

Limited proactive monitoring... new structure has a new system 106 monitoring officer – full time post. It is not as complete as it should be as it is still working off legacy systems... one was most advance with an responsible officer sat within enforcement.

Do planning staff think of monetary costs.

At the moment no, but current la changes and review are changing that.. cultural change a lot more now than a year ago and massively now from 5 years ago.. IF fees are reviewed looking in detail at costs of service as recovering all the costs through fees.. introduction of timesheets.. would hope it would impact on the quality of development hopefully not because focus on the level you want. Barnet model Ryan air of planning services.. political decision about running services.. good service has a higher costs which is reflected in fees. Trade off with the householder paying more... in some parts of the area takes extraordinary times – judicial reviews... they have the money.. cynically think if high fees are charged do you prevent investment... impact on house building... interesting trade off's but probably end up with householders paying more... extra £100 on the cost on an application.

National Indicators.

Need a performance indicator but much more sophisticated by NI 157. What you get is a mad rush to achieve 8 weeks and if you don't achieve 8 weeks it doesn't matter between 57 days and 157 days so really poor indicators... here would like a 6 week, 8 weeks (still important because of non determination), 10 week, 12 week – a stepping up thing. Agent feedback like to resolve things in 10 weeks is fine don't like getting to 8 weeks with a problem and then refusing it so the process takes 18/20 weeks... and the things passing the 8 weeks getting in the slow lane... much more graded.. 99% householders dealt with in 20 weeks. PDG hasn't been influence in this authority. At previous authority was an incentive; had national target and was beneficial but the perverse impact... but now pretty much it'll be 8 weeks whereas 10 years ago you couldn't say. Pressure for higher performance coming from achieving top quartile from the CPA inspection regime... planning ones were an easy win. Especially when pdg became focused on planning delivery.

Monitoring of the Development that takes place.

Authorities have historically said proactive monitoring within the enforcement teams. Where that hasn't gone further is to make the link into outcomes... all around complying with conditions as opposed to seeing whether sustainable development is achieved. Fitting in with corporate plans or statutory development plan: that is the monitoring which is absent and is something which still needs working on... more than a statistical/ logistical exercise.. there is pressure in terms of enforcement but wider council issue on sustainability. Challenge for next year.