

APPENDIX: PLANNING ACTION PLAN – PARISH CONSULTATION AND FEEDBACK

Respondent	Date received	Suggestions for improvements	Initial Officer Response
Cllr Gordon Smith of Treales, Roseacre and Wharles Parish Council.	03 April 2023	<p>The recommendations in the action plan should be exactly those in the PAS Report. Please double-check they have been carried forward accurately, not simply in the headings but in the detailed narrative.</p> <p>The action plan should be strengthened by SMART targets.</p> <p>Continuous improvement processes and methodology needs to be embedded in this project from the outset so progress can be monitored and measured.</p> <p>It is not clear whether priority/deadline dates are for completion or commencement - please clarify.</p> <p>The new Internal Scrutiny Committee should be seized of this work at the outset to ensure member oversight, representation and transparency.</p>	<p>The Action plan has been drafted to be read alongside the Peer Review Team’s Final Report. The recommendations of the Peer Review Team have not been altered in the plan, but in order to avoid unnecessary repetition, the commentary provided in the Final Report is summarised in the Draft Action Plan.</p> <p>Certain actions could be supported by SMART Targets. However, the nature of other actions, for example “1.2 Include matters relating to planning as a regular Heads of Service Standing Item to ensure senior officer awareness” are ongoing actions not considered appropriate for SMART targets.</p> <p>Continuous improvement opportunities are identified throughout the plan and specifically addressed in actions 5.1, 7.1, 9.1, 14.1 and 14.2,</p> <p>Amend plan to make clear target dates are intended completion dates</p> <p>This report seeks to establish the delivery and monitoring of the action plan.</p>
(Former) Cllr. John Singleton JP	15 March 2023	<p>We have to be sure we don't make changes just for making changes sake. Or changing for the few people who have an issue with planning in general.</p> <p>This appears to be a knee jerk reaction when unfavourable comments are received from a few residents, councillors or outside bodies.</p> <p>As a member of Staining Parish Council of 23 years I have had many occasions to contact Fylde planning department which all have been dealt with in a very professional manner. I would not wish to change this level of communication. This level of customer satisfaction stems from the CEO.</p> <p>Please beware, sometimes we have to bold enough stand up to unwelcome perceptions.</p>	<p>Any changes to existing practice and procedure should be justified</p> <p>Any comments about the operation of the Planning Service need to be taken into consideration in the context of all feedback.</p> <p>Comment noted</p> <p>Any changes to existing practice and procedure should be justified</p>
Councillor Peter Collins	17 March 2023	<p>1. Overall - Suggest that improvement processes should be aligned to processes adopted for FBC continuous improvement processes, so that planning staff can adopt and be trained on best FBC practice</p> <ul style="list-style-type: none"> Does not seem appropriate or acceptable to have High priority items with the only deadlines over a year away, nor clear what that means <ul style="list-style-type: none"> Need to have interim milestones, monitoring, reporting and control. - How is this going to be done? Not clear what Deadlines mean. When the recommendation is completed, or when started? Overall Actions and Outcomes are not fully aligned, consistent or complete. The Outcomes are not specific, measured, time-bound. Use of words like "reduced", "improved", "used efficiently", "clarity", "synergy", "challenge addressed", "strengthened", "appropriate", etc. There are omissions and errors - I've only given an example of each below. 	<p>The invitation of the PAS Peer Review Team to review Fylde Council’s Planning Service was made in line with the corporate philosophy of seeking continuous improvement.</p> <p>Target dates are based on the complexity of the changes proposed and as certain actions cannot be delivered until other actions are delivered.</p> <p>It is proposed that The Internal Affairs Scrutiny Committee take ownership of delivering the action plan through a series of interim reports.</p> <p>Amend plan to make clear target dates are intended completion dates</p> <p>Further clarification of this point is required</p> <p>The nature of certain actions cannot be quantified and will have to be assessed having regard to opinion and experience.</p> <p>See below</p>

		<ul style="list-style-type: none"> The work needs a further review - suggest by the FBC Business Improvement team applying best business continuous improvement practice. <p>2. Vision & Leadership Theme e.g. R2 - Only part of PAS Summary is being addressed</p> <p>Strengthen the governance structure to give Planning earlier and better strategic oversight of major development schemes. Embedding Planning input much earlier in corporate projects will help promote planning as an enabler rather than a blocker to development. This will give senior leadership comfort that projects are moving forward positively. It will improve risk management and ensure processes and protocols are followed.</p> <p>The following has NOT been included from the PAS report recommendation or addressed - yet is a HIGH priority item due for completion by June 2023 <i>The governance arrangement could consist of 2 'Boards'. A Planning and Regeneration Board (officers) - this holds more operational / professional focused conversations across service areas. The other board operates at a strategic level.</i> <i>It focuses on bringing the politics and regional considerations together. The operational Board reports to the strategic Board. This ensures that political and strategic considerations feedback directly. This will help keep the Planning Service aligned with the political landscape.</i> <i>(Paragraphs 7.11 – 7.13)</i> <i>Planning should not work in isolation. It should be formally involved from the beginning so that solutions to planning issues are found in a timely manner rather than appearing as surprises later in the process.</i> <i>(Paragraphs 7.14 – 7.15)</i></p> <p>3. Service Delivery and Performance Management" e.g.</p> <ul style="list-style-type: none"> 3.1 Suggest that the links and interdependencies for "Service Delivery and Performance Management" theme recommendations should be clearly shown, to highlight how any overlaps, inconsistencies and gaps have been addressed. Also need to show how oversight and alignment from the Vision & Leadership Themes is being embedded in service delivery. 3.2 R3 and R5 outcomes seem to have been swapped 3.3 R3 proposal to get "independent consultant" to review, rather than using "business as usual" process of continuous improvement required at R5 3.4 R9 - Will additional systems investment really be in place by Jul'23? The outcome seems technology rather than service improvement focused? 3.5 R11 - Enforcement Priority Clarity - There should be monitoring & control of the status of compliancy of the implementation of all planning approvals, as well as all emergent matters. 	<p>The action plan is placed before the Internal Affairs Scrutiny Committee for review. The action plan proposes the appointment of external consultants to review existing processes and make recommendations for improvement</p> <p>The Action plan has been drafted to be read alongside the Peer Review Team's Final Report. The recommendations of the Peer Review Team have not been altered in the plan, but in order to avoid unnecessary repetition, the commentary provided in the Final Report is summarised in the Draft Action Plan.</p> <p>The recommendation reflects that this matter could be addresses in different ways. Action 1.1 addresses this recommendation as does the revised Council Constitution.</p> <p>Action 2.1 addresses this aspect of the recommendation</p> <p>Recommendations 3 and 5 are closely linked. The outcomes set out in the action plan are correct.</p> <p>Recommendation 3 refers to an initial review of process carried out by an independent consultant, whereas rec 5 refers to ongoing review as part of the continuous improvement process.</p> <p>Improved technology will lead to service improvement and will address issues specifically raised by the Peer Review Team relating to data security. The corporate roll out of secured devices has been delayed and so the July 23 date needs to be reassessed.</p> <p>The enforcement charter, which is to be refreshed in line with this action, already sets out that monitoring of compliance with planning permissions and breaches of planning conditions are to be treated as high priority matters. It is not proposed to amend this aspect of the protocol.</p>
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Staining, Greenhalgh with Thistleton, Ribby with Wrea, Weeton with Preese and Westby with Plumpton.		<p>On behalf of Staining parish council, I would like for comments made at the recent parish council meeting, to be noted by Fylde Borough Council. This is in hindsight of reading the published Peer review as distributed to the parish and town councils.</p> <p>In Staining Parish Council's experience (and mine as clerk to 5 parishes), we would like to endorse the superb work undertaken by its officers and management teams. The liaison between clerk and planning is key and from our perspective, could not be better! Requests are considered timeously, enquiries answered without delay and advice received, from a planning and unbiased perspective, when asked. Emails are answered out-of-hours by Mr. Stell, which is above and beyond and is so helpful, as PC meetings are convened in the evenings.</p> <p>There is always room to improve and develop systems, however, in my personal opinion and that of Staining, plus some other parishes I work with, a first rate job is being done</p> <p>Regards</p> <p>David John Kirkham</p>	Noted
Little Eccleston with Larbreck Parish Council		<p>Little Eccleston with Larbreck (LEwL) Parish Council discussed this matter at its meeting on Thursday 13th April 2023 and instructed me to provide the following response.</p> <p>In his capacity as the Chair of the Fylde District Parish Liaison group, our Vice-Chair Councillor Stead held a telephone call with Councillor Buckley (Fylde Council Leader) on Thursday 6th April and expressed his concern that the 'Draft Planning Action Plan' released to all Parish and Town Councils for them to review, is not (yet) of a sufficient quality for this to be a worthwhile exercise.</p> <p>To spend time on a detailed evaluation of this version of the 'Draft Planning Action Plan' - which does not correctly reflect all of the recommendations of the PAS Peer Challenge review team, which is absent of SMART objectives and which indicates a number of deadlines which are unlikely to be achievable - would not be the best use of the limited and valuable time that the Parish Councillors have available to spend on their duties overall.</p> <p>Councillor Stead has been made aware that Councillor Buckley will be instructing the Fylde officer team to revisit the 'Draft Planning Action Plan', to rectify its current 'under-developed' format and to ensure that it is appraised by the Council's internal Scrutiny Committee at the earliest opportunity; in advance of it being re-circulated for review.</p>	<p>All recommendations set out in the action plan are as per the Peer Review Team's final report. In order to avoid unnecessary repetition, the commentary provided in the Final Report is summarised in the Draft Action Plan as the action plan is intended to be read alongside the Peer Review Teams' Final Report. Certain actions could be supported by SMART Targets, whilst the nature of other actions, would not be appropriate for SMART targets. All deadlines will need to be reviewed as part of the scrutiny process to ensure they are achievable.</p> <p>It is proposed that scrutiny of the action plan will be carried out via the Internal Affairs Scrutiny Committee in order to ensure the recommendations have been appropriately addressed, to ensure that the scrutiny process is transparent and to ensure that the action plan addresses the full spectrum of service users.</p>

		<p>Additionally, in advance of a further draft being circulated, we would ask that the following is considered and implemented:</p> <ol style="list-style-type: none"> 1. Communicating the Project Programme <ul style="list-style-type: none"> Fylde BC's overall 'customer satisfaction' & 'performance improvement' programme should be circulated, along with confirmation of what methodology will be followed to arrive at a more 'developed' and SMART set of project objectives That an explanation is provided as to how the document development and approval process will function 2. Engagement with the Town & Parish Councils as 'Customers' <ul style="list-style-type: none"> Listen, Understand & Act – more awareness / recognition is required, that the T&PCs are 'customers' of Fylde BC and as such, deserved greater engagement from Fylde BC, in advance of the 'Draft Planning Action Plan' being produced (this was requested by Councillor Stead – as Chair – at the last meeting of the Fylde District Parish Liaison group, when the PAS review was discussed and this request was recorded in the minutes of that meeting) 3. Publication of all feedback received regarding the draft already circulated <ul style="list-style-type: none"> Fylde BC should make all related feedback available to all the T&PCs, in the interest of transparency Fylde BC should confirm how it intends to act upon the feedback received <p>Therefore, considering all the points and requests made above, LEwL reserves the right to provide a more detailed and comprehensive response to Fylde BC, once a more developed and accurate further draft has been formulated and released to all Parish and Town Councils.</p>	<p>To be addressed via the scrutiny process</p> <p>To be addressed via the scrutiny process</p> <p>The Scrutiny process is designed to allow appropriate engagement with all stakeholders</p> <p>This schedule contains a record of all written feedback that has received.</p> <p>This will be addressed via the scrutiny process.</p>
St. Annes on Sea Parish Council	22 March 2023	<p>PAS Review of the Fylde Planning Service and resultant Action Plan</p> <p>Thank you for the opportunity to comment on the action plan for the Fylde Planning Service.</p> <p>As you know I have dedicated officer time to support our Planning Committee in their deliberations as a consultee in the planning process. Add to that a relatively high number of applications to consider (as St Anne's is the largest town in Fylde) and our own Neighbourhood Plan we are, I would suggest, in a better position than many parishes to provide balanced comment.</p> <p>I should mention that several of my planning committee members are also on the Planning Committee at Fylde as they represent wards for both our authorities. The remainder are also well versed in their understand of planning process.</p> <p>In wider comment the action plan appears to address main findings of the peer review; those matters which are more inward looking for Fylde Council are not necessarily for us to comment upon. That said St Annes on the Sea Town Council would welcome any actions that seek to improve the interface and engagement with the planning process generally.</p> <p>My colleague Darrel acts as Committee Clerk for our Planning Committee and has a very good working relationship with all the planning staff at Fylde. They are always receptive to any queries and respond promptly.</p> <p>Turning to the action plan;</p> <p><i>R12 Optimise the Council's webpages as an engagement tool</i></p>	<p>noted</p> <p>Noted</p>

		<p>One area that we, as officers here at the Town Council, have wanted from the Planning Portal is for us to be able to input our stakeholder comments directly. At present my officer must type out all our responses which are then emailed to both the generic planning email address and the individual planning officers. I presume someone in the Planning office then has to either re-type or upload our comments to the Portal. The ability to remove double keying would be a quick win here.</p> <p><i>R15 Taking steps to improve working relationships with town and parish councils</i></p> <p>This recognises the need for the different tiers to work as closely as possible. As mentioned we are in the fortunate position to have a good working relationship with the Planning Service. Anything that might be a little more contentious is usually handled by the Service Manager directly.</p> <p>If we can assist with the reviews relating to parish liaison meetings and the process for objections please ask.</p> <p><i>R16 Review the approach to developer contributions</i></p> <p>This is certainly an area where the Town Council would have an interest. Having an adopted neighbourhood plan was, we hoped, a catalyst for us to receive much needed funds for many projects in the town. In the absence of CIL we have had to rely on a small share of top sliced New Homes Bonus monies. Whilst this money was welcomed it would not have been at level we would have received through CIL bearing in mind new build numbers in St Annes over the past years.</p> <p>With the action point is to review the policy based on the Levelling Up Bill I would ask that town council and parish councils are considered to make sure there is provision for them to receive funds from the Infrastructure Levy.</p> <p>As mentioned if we can assist you in any way with the implementation of the action plan please contact me.</p> <p>One further point, with the impending elections I will not know until mid-May whom Council will appoint to our Planning Committee. With at least 2 of the 5 existing councillors not standing again I will likely have some councillors without experience of the planning process. The training being suggested as part of the action plans will be both welcomed and appreciated.</p>	<p>It is proposed that this functionality will be rolled out as part of the IT software upgrade.</p> <p>Noted</p> <p>The funding of essential infrastructure will be reviewed as the new national legislation and guidance emerges.</p>
Treales, Roseacre & Wharles Parish Council	14 March 2023	<p>1. Introduction</p> <p>a) In our view the distributed Action Plan document remains at a low level of development maturity. It requires considerably more work to be considered as an effective, efficient, and economic deliverable plan to fully meet the requirements of the PAS Review Report.</p> <p>b) It is not immediately clear to us why it has been distributed externally to the Fylde Parish & Town Councils (P&TCs) and presumably the FBC Planning Function's other customers and stakeholders in a preliminary state. An explanation would be expected as this appears to be an inefficient use of the commenters time, since it is apparent that the document will already require substantive change.</p> <p>c) Given that it appears to still be under development, it is also not clear how the PAS review customer satisfaction and performance improvement response action plan is being integrated within the FBC's continuous improvement methodology and governance framework. Notably, the document does not contain any statement of its purpose, its scope, nor how is it be used.</p>	<p>It is intended that the action plan will be developed through the scrutiny process.</p> <p>The document was distributed at the request of the Planning Committee to ensure Town & Parish Council's could comment on the emerging document.</p> <p>The purpose of the action plan is to respond to the recommendations set out in the Final Report of the PAS Peer Review Team and the scope is defined by the recommendations of that team who's scope was, in turn, established by the planning committee.</p>

	<p>2.Overview of Corrective Actions to Address the Issues in the Distributed Action Plan</p> <p>The following observations and proposals are made:-</p> <p>a) The Recommendations in the distributed Action Plan are not as would be expected to be exactly & fully as those in the PAS Report</p> <p><i>i.</i> There are multiple recommendations that have omissions & resultant revisions, As a particular example, this notably includes the recommendation relating to P&TC working relationships (R15).</p> <p>It is not clear with what governance authority, effort has been consumed: to apply almost subtle grammatical changes; to make changes of terms that change the scope or tone; or to omit complete statements or multiple paragraphs.</p> <p>▪ Every Recommendation fails to carry over the references to the relevant PAS report paragraphs which give the important context of the recommendations.</p> <p>▪ Of the 18 PAS recommendations, there appears to be only two that have been otherwise copied over into the FBC Action Plan without some form of change.</p> <p>▪ There are then 10 recommendations that may be considered to have changes to material points and a further 4 that have major sections of text omitted or changed.</p> <p><i>ii.</i> Correcting all the omissions and revisions would then impact on the nature of the objectives, actions, resources, interdependencies, timescales etc. This will materially change the content of the Action Plan.</p> <p>b) The Action Plan should be strengthened by SMART targets</p> <p><i>i.</i> The outcomes in the distributed Action Plan are not specific, measured, nor time bound. It is not clear that they are achievable or adequately relevant. Use of words like "reduced", "improved", "used efficiently", "clarity", "synergy", "challenge addressed", "strengthened", "appropriate", etc. are not sufficient to measure nor manage progress.</p> <p><i>ii.</i> The application of the “SMART” approach (or the FBC best practice corporate equivalent) will have a material impact on the flow down of actions, resources, interdependencies, and timescales. This will materially change the content of the Action Plan. It can be expected to improve its effectiveness, efficiency, and economy.</p> <p>c) It is not clear whether priority/deadline dates are for completion or commencement</p> <p><i>i.</i> The priority/deadline dates as stated are such that it is not clear whether they are supposed to represent completion or commencement. This needs to be clarified in each case and it to be transparent as to how that has been determined.</p> <p><i>ii.</i> Any assessment of interdependencies between recommendations, subsidiary objectives, resources, or actions that might impact timescales is not apparent to support extended deadlines. This should be corrected.</p> <p><i>iii.</i> It does not seem appropriate or acceptable to have “High Priority” items with the only deadlines specified being over a year away. It is suggested that there need to be interim milestones, monitoring, reporting and control points. It needs to be explained how this is going to be done?</p> <p>d) At variance to PAS, the distributed Action Plan seems to propose the seemingly unnecessary extra costs of commissioning external consulting contractors</p> <p>It is noted that the distributed Action Plan proposes that an independent consultant will be appointed at Action 3.1. The Performance Improvement & Engagement function has stated that FBC "will be commissioning</p>	<p>The Action plan has been drafted to be read alongside the Peer Review Team’s Final Report. The recommendations of the Peer Review Team have not been altered in the action plan, but in order to avoid unnecessary repetition, the commentary provided in the Final Report is summarised in the Draft Action Plan.</p> <p>A summary of the PAS comments has been included to ensure the recommendations are viewed in context. Further cross referencing can be included if it is considered this will improve the clarity of the ation plan.</p> <p>The recommendations of the Peer Review Team have not been altered in the plan, but in order to avoid unnecessary repetition, the commentary provided in the Final Report is summarised in the Draft Action Plan.</p> <p>It should be noted that the priorities and deadlines set out in the action plan are established by the action plan and not the Peer Review Team.</p> <p>Each action has a target date. These need to be reviewed having regard to the scrutiny timetable and clarified as completion and not start dates. Whilst some SMART targets can be introduced, many of the outcomes will be based on perceptions of the process and are not, therefore, appropriate for SMART targets. Some priorities are dependent on wider pieces of work, whilst others will be seen as “quick wins”. The priority reflects the impact of the changes will have on the improvement of the service rather than a time frame for delivery.</p> <p>The PAS Peer Review Team Report leaves the implementation of the recommendations to Fylde Council.</p>
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		<p>2. This will be achieved by fully utilising FBC's common way of working and continuous improvement framework aligned to FBC's values within the FBC Governance Framework.</p> <p>3. The development and full delivery of the PAS Review & its Recommendations is one step in that improvement journey.</p> <p>It is hoped that this feedback is useful. It is intended to be a constructive contribution to assisting the FBC Planning Function to reach its full potential of delivering best practice customer satisfaction and performance, to be a <i>Planning Service to be Proud of by All</i>. If you have any queries, please just get in touch.</p>	
Freckleton PC	22 April 2023	<p>Our thanks for the opportunity to make comments on the proposed action plan.</p> <p>There are several observations that should be considered before finally agreeing this proposal, as follows:</p> <p>1) Consideration of Planning as an Integral Part of the Development Process</p> <p>Planning is a key process that should be undertaken prior to any commencement of ground works on a development. It is Planning that provides the integration of all requirements to permit a successful development outcome.</p> <p>It is essential that the process establishes all the project requirements at a sufficient level of detail and records these in a traceable fashion from the outset.</p> <p>It should establish the constraints on any development, which includes an assessment of the capabilities of existing infrastructure – drainage – both for surface water and sewage, utility supplies – capacities and routes, public rights of way, special provisions associated with protected areas, and other such considerations.</p> <p>It should define the controls to be applied and by which the development will be regulated.</p> <p>It should not generate requirements on major issues for conditions to be fulfilled at a future date or that cannot/will not be enforced.</p> <p>In the case of “High Risk Buildings” – currently defined in terms of multi-storey developments, but soon to be expanded to include flood plain developments, a “designated development owner” will be required to ensure all the components are in place and subsequently built to the necessary standards before a development can be signed off prior to use. This leads to consideration of the need for management plans to achieve all these requirements.</p> <p>The Planning activity has to work in conjunction with Building Control, which is the mechanism for ensuring the plan is executed properly, or revised by recorded agreement where the build shows the plan to need modification or appropriate standards have not been met.</p> <p>Only when the reconciliation of the Design (Plan) and the Build is complete should the development be signed off as complete and fit for use for the intended purpose. For HRBs, as an example, this will require a designated development “owner” to complete this work and who then assumes responsibility for maintaining the standards throughout the life of the development. Failure to do this will, in future, invalidate insurance of the facility in question. The responsibility for such developments will exist throughout the development life until the use ceases and the development removed.</p> <p>2 Implications of the Proposed Planning Service Review Action Plan</p> <p>The following comments on the Action Plan Recommendations result from the considerations described above.</p>	

		<p>R1 The issue here is that the recommendation is perhaps sensible, but the mode of operation between the two bodies is not adequately defined in terms of top-level responsibilities. The issue certainly relates to the comments made under section 1, above, in that it defines the overall constraint mechanisms and objectives to which Planning and Building Control must respond.</p> <p>R3 Delegation amongst a greater number of staff is a good idea, but those staff need to have the necessary training and experience to establish the competence levels required. Some form of professional registration should be demonstrated by such staff. Care is required with external consultants – experience shows they bring out what the staff already know and could contribute if they were listened to by management. Often the consultancy is expensive and fails to address the real issues – especially in public sector working.</p> <p>R5 Ensure all staff are familiar with and apply the approved processes correctly. Allocate specific time each week for looking at process improvement and encourage and allow the team to develop the ideas themselves. The key to success is do it right, do it once.</p> <p>R6 Experience shows that time spent up front to get the process right and ensure all necessary requirements are identified saves time overall.</p> <p>R9 Ensure this investment addresses cyber-security aspects.</p> <p>R11 Only apply conditions on planning that can/will be enforced. This goes back to establishing requirements at the outset and not permitting starts of physical work too early in the overall process. Too often, conditions have been imposed for subsequent work that cannot be implemented retrospectively – there are several existing plans where this has been the case.</p> <p>R15 Make better use of local knowledge especially of existing infrastructure and the likely capacity issues.</p>	Any staff authorised to issue decisions would need to be suitably qualified/experienced
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