### APPENDIX: PLANNING ACTION PLAN – PARISH CONSULTATION AND FEEDBACK – SCRUTINY RESPONSE

| Respondent                          | Date received | Suggestions for improvements  | Scrutiny Response   |
|-------------------------------------|---------------|---|---|
| Cllr Karen<br>Buckley               | 03 April 2023 | 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.  | The Action plan was 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. The action plan has been updated to include the full text. |
|                                     |               | The action plan should be strengthened by SMART targets.  | To allow monitoring of the implementation of the action plan, all actions now have a note to advise what success looks like. SMART Targets have been added to allow the overall impact of the action plan to be monitored.  |
|                                     |               | Continuous improvement processes and methodology needs to be embedded in this project from the outset so progress can be monitored and measured.  | Continuous improvement opportunities are identified throughout the plan and specifically addressed in actions 5.1, 7.1, 9.1, 14.1 and 14.2.   |
|                                     |               | It is not clear whether priority/deadline dates are for completion or commencement - please clarify.  | The action plan has been amended to make clear target dates are intended completion dates and to allocate them to each individual action rather than the recommendation.  |
|                                     |               | The new Internal Scrutiny Committee should be seized of this work at the outset to ensure member oversight, representation and transparency.  | This report seeks to establish the delivery and monitoring of the action plan through the scrutiny process.   |
| (Former) Cllr.<br>John Singleton JP | 15 March 2023 | 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.   | Any changes to existing practice and procedure should be justified  |
|                                     |               | This appears to be a knee jerk reaction when unfavourable comments are received from a few residents, councillors or outside bodies.  | Any comments about the operation of the Planning Service need to be taken into consideration in the context of all feedback.  |
|                                     |               | 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. | Comment noted   |
|                                     |               | Please beware, sometimes we have to bold enough stand up to unwelcome perceptions.  | Any changes to existing practice and procedure should be justified  |
| Councillor Peter<br>Collins         | 17 March 2023 | 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   | 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.   |
|                                     |               | Does not seem appropriate or acceptable to have High priority items with the only deadlines over a year away, nor clear what that means   | Target dates are based on the complexity of the changes proposed and as certain actions cannot be delivered until other actions are delivered. The plan has been updated to use the term "impact" rather than "priority".   |
|                                     |               | <ul> <li>Need to have interim milestones, monitoring, reporting and control How is this going to be<br/>done?</li> </ul>  | It is proposed that, following approval of the action plan by the Executive Committee, The Internal Affairs Scrutiny Committee will take ownership of monitoring the delivery of the action plan through a series of interim reports.   |
|                                     |               | Not clear what Deadlines mean. When the recommendation is completed, or when started?   | Action plan amended to make clear target dates are intended completion dates and to relate to individual actions.   |
|                                     |               | Overall Actions and Outcomes are not fully aligned, consistent or complete.   | The Scrutiny panel are asked to consider whether the action plan addresses all outcomes and they are consistent with the recommendations of the Peer Review Team.   |

- 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.
- The work needs a further review suggest by the FBC Business Improvement team applying best business continuous improvement practice.

#### 2. Vision & Leadership Theme e.g.

R2 - Only part of PAS Summary is being addressed

# 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.

## 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

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.

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.

(Paragraphs 7.11 – 7.13)

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. (Paragraphs 7.14 - 7.15)

#### 3. Service Delivery and Performance Management" e.g.

- 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

The nature of certain actions cannot be quantified and will have to be assessed having regard to opinion and experience. Quantifiable actions have been added to the plan to allow monitoring and SMART targets added to measure the overall impact of the action plan.

#### See below

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

The Action plan was 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 repletion, the commentary provided in the Final Report is summarised in the Draft Action Plan. The action plan has been revised to include the full summary.

Recommendations 3 and 5 are closely linked. The outcomes set out in the action plan are correct.

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.

|  | <ul> <li>3.4 R9 - Will additional systems investment really be in place by Jul'23? The outcome seems technology rather than service improvement focused?</li> <li>3.5 R11 - Enforcement Priority Clarity - There should be monitoring &amp; control of the status of compliancy of the implementation of all planning approvals, as well as all emergent matters.</li> <li>Also on R11 - where the Enforcement Policy is grotesquely out of date, and the "refresh" should be subject to consultation including town and parish councils</li> <li>Welcome R14 for reporting customer feedback within performance reporting process - but this should define customers in categories (to avoid lumping together objectors and developers) and the feedback shared with town and parish councils</li> <li>R15.4 where the process for objections from town and parish councils should be reviewed - this too should have town and parish council consultation</li> </ul>  | 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 has been reassessed.  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.  Any amendments will be subject to appropriate consultation. Completion date will need to be amended accordingly.  All feedback, irrespective of its source, will need to be considered in order to inform overall service improvement.  The review process will be guided by the scrutiny process including, where appropriate, consultation with key stakeholders. |
|--|---|--|
|  | Accordingly, it will be appreciated by members if you will ensure these observations are duly considered and recorded.  | Actioned by means of this schedule   |
| Staining, Greenhalgh with Thistleton, Ribby with Wrea, Weeton with Preese and Westby with Plumptons. | 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.  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 tears. 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.  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  Regards  David John Kirkham         | Comment noted  |
| Little Eccleston<br>with Larbreck<br>Parish Council  | 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.  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.  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 | 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. The Action Plan has been amended to   |

|                                    |               | overall.  | include the supporting text as set out in the final report. Certain actions could be supported by SMART Targets, whilst the nature of other actions, would not be appropriate for SMART targets. SMART targets have All deadlines have been reviewed as part of the scrutiny process to ensure they are achievable.  |
|------------------------------------|---------------|---|--|
|                                    |               | 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 recirculated for review.   | 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, before it is placed before the Executive Committee for final approval. |
|                                    |               | Additionally, in advance of a further draft being circulated, we would ask that the following is considered and implemented:  |  |
|                                    |               | <ol> <li>Communicating the Project Programme</li> <li>Fylde BC's overall 'customer satisfaction' &amp; '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</li> </ol>  | SMART targets have been incorporated to allow the impact of the plan to be assessed  |
|                                    |               | That an explanation is provided as to how the document development and approval process will function   | The development of the Action Plan is documented via various reports to relevant committees  |
|                                    |               | <ul> <li>Engagement with the Town &amp; Parish Councils as 'Customers'</li> <li>Listen, Understand &amp; Act – more awareness / recognition is required, that the T&amp;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)</li> </ul> | The Scrutiny process is designed to allow appropriate engagement with all stakeholders.  Town and Parish Councils were specifically provided with an opportunity to comment on the draft plan and their comments considered by way of this scrutiny process.   |
|                                    |               | <ul> <li>Publication of all feedback received regarding the draft already circulated</li> <li>Fylde BC should make all related feedback available to all the T&amp;PCs, in the interest of transparency</li> </ul>  | This schedule (alongside previous iterations) contains a record of all written feedback that has received.   |
|                                    |               | Fylde BC should confirm how it intends to act upon the feedback received  | This will be addressed via the scrutiny process.   |
|                                    |               | 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.  |  |
| St. Annes on Sea<br>Parish Council | 22 March 2023 | PAS Review of the Fylde Planning Service and resultant Action Plan  |  |
|                                    |               | Thank you for the opportunity to comment on the action plan for the Fylde Planning Service.   |  |
|                                    |               | 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.  | Noted  |
|                                    |               | 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.  |  |

| reales, Roseacre<br>& Wharles Parish<br>Council | 14 March 2023 | 1. Introduction  |   |
|---|---------------|--|---|
|   |               | 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.  | Initial Induction training has been provided for all town & parish councils, with more specific training modules to be rolled out on a regular basis as per Action 15.2 |
|   |               | As mentioned if we can assist you in any way with the implementation of the action plan please contact me.   |   |
|   |               | 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.  | The funding of essential infrastructure will be reviewed as the new national legislation ar guidance emerges. This is reflected at Action 16.1.                         |
|   |               | 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. |   |
|   |               | R16 Review the approach to developer contributions   |   |
|   |               | If we can assist with the reviews relating to parish liaison meetings and the process for objections please ask.   | Noted   |
|   |               | This recognises the need for the different tiers to work as closely as possibly. 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.   | Noted   |
|   |               | R15 Taking steps to improve working relationships with town and parish councils  |   |
|   |               | 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.   | referred to in Action 5.2.  |
|   |               | 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  | It is proposed that this functionality will be rolled out as part of the IT software upgrade referred to in Action 9.2.   |
|   |               | R12 Optimise the Council's webpages as an engagement tool  |   |
|   |               | 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.  Turning to the action plan;  |   |
|   |               | 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.  |   |

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.

It is intended that the action plan will be developed through the scrutiny process. Feedback from the lead of the Peer Review Team has confirmed that they consider the Action Plan addressed their findings.

**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.

The document was distributed at the request of the Planning Committee to ensure Town & Parish Councils could comment on the emerging document and so be involved in its development.

**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.

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 whose scope was, in turn, established by the planning committee.

#### 2. Overview of Corrective Actions to Address the Issues in the Distributed Action Plan

The following observations and proposals are made:-

a) The Recommendations in the distributed Action Plan are not as would be expected to be exactly & fully as those in the PAS Report

*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).

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.

• Every Recommendation fails to carry over the references to the relevant PAS report paragraphs which give the important context of the recommendations.

The full supporting text for each action has now been added to the action plan.

been incorporated into the action plan.

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 repletion, the commentary provided in the

Final Report was summarised in the Draft Action Plan. The full explanatory text has now

- 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.
- 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.
  - *ii.* 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.

The full supporting text for each action has now been added to the action plan

### b) The Action Plan should be strengthened by SMART targets

*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.

All deadlines included in the action plan have been reviewed. 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.

*ii.* 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.

Each action now has a target date. These have been 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

### c) It is not clear whether priority/deadline dates are for completion or commencement

- *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.
- *ii.* 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.
- *iii.* 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?

## d) At variance to PAS, the distributed Action Plan seems to propose the seemingly unnecessary extra costs of commissioning external consulting contractors

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 independent consultants to process and re-engineer every aspect of the service...". The proposed scope articulated in both these statements seem to go far beyond that identified by the PAS. As such, this type of updating activity would be expected to already be very much the "day job" of a "continuous improvement" engaged organisation and the economic argument for appointing external contractors is not apparent. This is in accord with the observations made in PAS recommendations 5, 8 and 7.

- Fylde residents and Council Leaders of an employer have paid for people to provide on our behalf a planning & development management service to be proud of.
- The customer satisfaction feedback collected by FBC has indicated that the FBC Planning Function has consistently not achieved the same level of positive feedback as that of other FBC services.
- The previous and latest PAS reviews have identified and confirmed a series of underlying drivers.
- As advised by the FBC CEO, the latest PAS review has confirmed that the FBC Planning Function is sufficiently resourced to perform its required function and improvements.
- The recent FBC reorganisation involving the separation of Regeneration and Housing functions from Planning logically supports freeing up senior management capacity to further address improvements in the Planning Function.

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 and so the terminology has used in the action plan has been amended. SMART targets have been included to allow the overall impact of the plan to be assessed.

Deadlines are intended to be completion dates and the action plan has been revised to make this clear.

Deadlines have been amended to reflect the scrutiny process.

Terminology has been amended to reflect impact rather than priority

The PAS Peer Review Team Report leaves the implementation of the recommendations to Fylde Council.

The action plan proposes an initial external review of processes followed by a process of continuous review, which is proposed to be carried out internally. Fylde's internal team have confirmed that they do not have the capacity to be able to carry out such a review within the time frames envisaged.

The Planning Service needs to address a wide range of customers needs.

It is not appropriate to compare the customer feedback to other services. A year on year comparison that measures improvement is more appropriate. It is not considered appropriate to compare different services delivered by the council. A more appropriate metric would be to compare customer satisfaction with that of planning functions administered by other authorities.

In addition to removing Regeneration and Housing from the responsibility of the Head of Planning to assist capacity, the role of Director of Development has been removed.

| <ul> <li>The FBC Statement of Accounts and the FBC Performance Improvement &amp; Engagement<br/>Manager have articulated the substantive investment already made by FBC to provide the<br/>internal capability to deliver continuous performance improvement.</li> </ul>  | Noted  |
|---|--|
| <ul> <li>The senior &amp; management levels of FBC Planning Function staff &amp; members have been<br/>in post for many years. In most cases since before the last two recent PAS reviews and<br/>therefore would be expected to be knowledgeable of their roles and requirements. The<br/>latest PAS review did not identify a lack of knowledge within FBC.</li> </ul>  | Noted  |
| • The previous 2012 PAS report did note (para 14) that: "A can-do attitude to improvement (owned and driven by the highest levels of the organisation) needs to replace the culture of dependence on external input. Fylde must 'own' its improvement journey and this should be driven from the highest level of the organisation."  |  |
| It is therefore suggested that FBC may wish to consider that the proposed extra cost of commissioning external resources is avoided.  (1) This would be achieved by FBC utilising its already paid for investment in Continuous Improvement to enable the FBC Planning Function personnel cadre to own & build the capability of the FBC Planning Service and so deliver best practice levels of customer   | The Parish Council's opposition to the appointment of independent advisors is noted and the Scrutiny Committee is asked to consider the approach set out in the draft action plan.   |
| satisfaction & performance.  (2) This will also demonstrate lean practice at a FBC level, supporting residents by avoiding committing unnecessary costs in this current "Cost of Living Crisis"   | This would require a review of the existing workload and priorities of the corporate team to ensure they have capacity to carry out the review internally as they have advised they do not have the capacity to carry out this work at present.                            |
| e) To ensure effective, efficient and economic best practice is deployed; the FBC Governance Framework with FBC's, continuous improvement processes and methodology need to be embedded in this   |  |
| <ul> <li>i. The FBC Planning Function's Customer Satisfaction and Performance Improvement         Programme should be utilising the FBC: Governance Framework; continuous improvement         processes &amp; methodology; and common way of working from the outset. This will facilitate that         applicable best practice learning from other FBC functions can be readily transferred and         adopted. It will also enable effective and efficient programme monitoring, measurement, and         control.</li> </ul>                             | Inviting a team of peers to review the planning function of the council was part of the process of continuous improvement in line with the council's continuous improvement objectives.  |
| ii. It is unclear whether the flow down from the recommendations is currently matched consistently and completely by the actions & outcomes, priorities, and deadlines. Transparency of the methodology used would assist in the affirmation of that or otherwise. This should also cover interventions for implementing monitoring, control, and training. There will be substantive changes to the Action Plan in Recommendations, Outcomes and Objectives in response to the other feedback in this document, which have consequential changes in the rest | The initial scrutiny of and ongoing monitoring of the delivery of the action plan by the Internal Affairs Scrutiny Committee will help provide transparency. The Peer review team have confirmed that they consider the draft action plan addresses their recommendations. |
| of the content of the Action Plan.  iii. There should be continuity of effective oversight, with a smooth transition and then enhanced performance through the governance framework as FBC moves to its new organisation with reduced member numbers. The new Internal Scrutiny Committee will be an important function from the outset, to ensure member oversight, representation, and transparency of effective governance.  | The Scrutiny Committee will be overseeing the development and monitoring the delivery of the action plan.  |
| Next Steps     Response to Distributed Action Plan request for comments   |  |

This will be achieved via this schedule and the scrutiny process and is included in this i. It is requested that the FBC Planning Function publishes the full feedback they've received as a result of the distribution of this Action Plan and how they are going to act upon all schedule. aspects of it. The Scrutiny Committee on 20 June 2023 resolved to review the Action Plan via a mini This review has not sought to comment on the detailed content of this distributed spotlight review and refer the outcomes to Executive committee for consideration. The Action Plan due to its preliminary state and that given the required changes, commitment of timetable for the development of the Action Plan does not currently allow for further further time would be essentially of no value. When it is clear how the programme is to be consultation on the plan itself. Further engagement is, however, likely to take place to governed and customers engaged, it can then be collaboratively determined how best the inform the delivery of certain actions, e.g. the establishment of the District/Parish Planning maturity of the programme can be assessed on an ongoing basis. Liaison Meetings. b) Communicating the whole programme and how that is to be managed. Before the next draft is developed & issued, the overall Planning Function Customer The methodology and governance process is set out in the relevant background reports. Satisfaction & Performance Improvement Programme should be issued. This will, show the links to the methodology & governance process to be followed. This should include the document development & approval **Engagement of the P&TCs as customers** c) The action plan is intended to act as an overarching framework that addresses the DPLM agenda and attendee time was invested in receiving updates on the PAS Review. recommendations set out by the Peer Review Team. Feedback was offered and recorded in the meeting notes. It is not known how that was acted upon by FBC staff. At variance to the feedback, the subsequent activity appears to have been the distribution of a preliminary draft of the FBC Action Plan on 13th March requesting comments, but with the multiple issues described above, without explanation. The action plan incorporates proposals to deliver a formalised feedback process that will It is requested that FBC adopts an effective "Listen Understand & Act" customer document responses to suggested service improvements. The town and parish councils satisfaction improvement engagement cycle, or its FBC corporate equivalent for the FBC have been actively engaged in the process (both through being invited to make Planning Function. This is rather than just sending out yet another draft, which may otherwise representation to the Peer Review Team and asked for comments on the Draft Action Plan. give the unfortunate impression of it simply being a token engagement tick box exercise. d) Declaration of Senior Leaders' and Co-Sponsors' Programme Intent This will need to be addressed when the action plan is considered by the Executive To offer some bolstering of confidence in the full delivery of the required Committee. improvements, the co-sponsors may wish to issue a statement of senior leaders' intent to clarify what the Planning Function's Customer Satisfaction and Performance Improvement Programme might mean for all planning staff, customers, and stakeholders. an example of such a statement might be something like :-The Programme Sponsors' and Senior Leaders' intent is that: FBC will provide a Planning Service to be Proud of By All. As commented above, due to the nature of the planning service it is not considered 1. It will demonstrate levels of customer satisfaction & performance in line with appropriate to judge the customer satisfaction of the planning service against that of other the best of FBC's other services by September 2023 and demonstrate national levels services. of that best practice by June 2024. 2. This will be achieved by fully utilising FBC's common way of working and The delivery of the action plan is part of the process of continued improvement. continuous improvement framework aligned to FBC's values within the FBC Governance Framework. 3. The development and full delivery of the PAS Review & its Recommendations is Noted one step in that improvement journey.

process.

|               |               | 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.  |  |
|---------------|---------------|--|--|
| Freckleton PC | 22 April 2023 | Our thanks for the opportunity to make comments on the proposed action plan.   |  |
|               |               | There are several observations that should be considered before finally agreeing this proposal, as follows:  |  |
|               |               | 1) Consideration of Planning as an Integral Part of the Development Process 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.   | Noted  |
|               |               | 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.  | Noted  |
|               |               | It should establish the constraints on any development, which includes an assessment of the capabilities of  | Noted  |
|               |               | 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.   | Thotas and the same of the sam |
|               |               | It should define the controls to be applied and by which the development will be regulated.  | Noted  |
|               |               | It should not generate requirements on major issues for conditions to be fulfilled at a future date or that cannot/will not be enforced.   | Noted  |
|               |               | 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.  | Noted  |
|               |               | 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.  | Noted  |
|               |               | 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. | Noted  |
|               |               | 2 Implications of the Proposed Planning Service Review Action Plan   |  |
|               |               | The following comments on the Action Plan Recommendations result from the considerations described above.  |  |
|               |               | 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.   | This will need to be addressed in establishing the terms of reference for these bodies.  |
|               |               |  |  |

| 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. | Any staff authorised to issue decisions would need to be suitably qualified/experienced.                 |
|---|--|
| 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.  | Noted  |
| R6 Experience shows that time spent up front to get the process right and ensure all necessary requirements are identified saves time overall.  | Noted and to be incorporated into the proposed staff training improvements.                              |
| R9 Ensure this investment addresses cyber-security aspects.   | Noted and to be addressed via Action 9.1.  |
| 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.   | This process is established through national planning legislation and guidance.                          |
| R15 Make better use of local knowledge especially of existing infrastructure and the likely capacity issues.  | Improved communication with town and parish councils should ensure efficient transfer of this knowledge. |