

# **Monmouthshire LPA**

## **PLANNING ANNUAL PERFORMANCE REPORT (APR) – 2019-20**

### **PREFACE**

I am very pleased to introduce the sixth Annual Performance Report for Monmouthshire County Council's Planning Service.

This report shows that Monmouthshire's Planning Service continues to perform very well, with none of the twelve relevant indicators in need of improvement against the Welsh Government's targets. We are performing well in dealing with all types of planning applications and I am pleased to note that the committee process is working effectively showing an excellent relationship between members and officers in this authority. The Heritage Team members deserve high praise for their outstanding quality of service and the commitment they have shown in establishing a joint heritage service with our neighbours at Torfaen Council and more recently with Blaenau Gwent Council. The Council's enforcement service improved its performance last year and is now investigating and closing cases far more quickly than the previous year.

Where we think there are areas that need improving, we have clear actions to improve those elements of the service.

Good planning is central to the Council's purpose of building sustainable, resilient communities while also generating growth in the economy and protecting the heritage and landscapes that make our County the beautiful place it is. It is central to achieving our well-being objectives for everyone who lives, works and spends time in our beautiful County. As part of this, Planning has a key role in assisting the local economy to recover from the Covid-19 pandemic and we are committed as an authority to ensure this happens.

Councillor Bob Greenland, Cabinet Member

## 1.0 EXECUTIVE SUMMARY

- 1.1 This is Monmouthshire's sixth Annual Performance Report, which looks at the performance of the Planning Service against nationally set performance indicators, Welsh Government targets, the Wales average performance, and Monmouthshire's performance last year. The results are considered in the context of the challenges, opportunities, priorities and resources (staffing and financial) available to us. The objective of the APR is to reflect on and celebrate good performance, identify areas for improvement, and look across Wales to identify potential areas of best practice that we could learn from or share with others.
- 1.2 The nature of the performance indicators means their focus is on decision speed and customer service rather than measuring whether or not better outcomes have been achieved. It has not yet been possible to identify an objective way of measuring outcomes, however we seek to prioritise securing the best scheme possible rather than traditional indicators relating to speed of decision-making. Research has identified that our customers' priority is securing planning permission: customers generally understand the benefits of good design and, within reason, do not see the time taken as a priority.
- 1.3 For the purposes of this report, performance is analysed across the five key aspects of planning service delivery as set out in the Planning Performance Framework:
- Plan making;
  - Efficiency;
  - Quality;
  - Engagement; and
  - Enforcement.

Owing to the absence of data from Welsh Government (WG) in relation to performance over 2019/20, in this year's APR, the Plan making element has been omitted. The performance of the Plan is more than adequately covered in the Annual Monitoring Report, also being submitted to WG in October 2020. For the other areas in the Planning Performance Framework, performance data has been obtained by Monmouthshire officers from the Development Management Quarterly Returns and our own back-office system. In the absence of all Wales data for 2019/20, comparisons have been made with the Welsh average performance for each measure over 2018/19 as well as our own performance against the measures over 2018/19. Performance is ranked as 'good', 'fair' or 'needs improvement'.

- 1.4 Based on the performance information in Section 6 and Annex A, we can be very pleased with the service we deliver. During this period:
- The proportion of all applications determined within 8 weeks or an agreed timescale rose to 91% and was well above the national target of 80% and was above the Welsh average;
  - The average time to determine all applications fell to 70 days (from 86 days in 2018/19) and was below the Welsh average of 77 days for the previous reporting period;
  - The proportion of major applications determined within agreed timescales was 85% and was almost 20% above the Welsh average in 2018/19;

- 84% of listed building applications were determined within approved timescales and we provided a valued Heritage service for Torfaen and Blaenau Gwent councils that is discussed later in this Report;
- The percentage of applications that were approved rose to 97%, well above WG average ;
- Over 2019/20, 154 planning applications stemmed from pre-application advice we gave. Of those that have been determined 77% were approved while 17 were returned, withdrawn or never became valid submissions due to a change in the applicant's circumstances. Only one application was refused and that proposal did not follow the officer advice given at pre-application stage. Consequently, we have a 100% success rate of applications that went to decision stage and followed our pre-application advice.

1.5 A summary table of our performance can be found in Annex A. This year there are 13 relevant indicators and of these 12 are ranked:

- Monmouthshire's performance is ranked 'good' against 9, 'fair' against 3 and there are none 'in need of improvement'. One of the 'fair' results relates to the average time taken to determine all applications in days; this just missed the target of 67 days but at 70 days was a good improvement on the previous year's performance of 86 days and was a priority in our Action Plan for 2018/19. The other two fair measures related to enforcement performance which improved significantly since they were in need of improvement in 2018/19. The new manager of that team has introduced more rigorous targets and the team has responded positively to these changes. The improvement of this area of the service is a work in progress so this element is kept as an action going forward. Our appeal performance improved significantly upon the 2018/19 period, and now stands at 86% of appeals being dismissed which is well above the expected standard of 66% and the previous years' performance of 46%.

Further commentary on the performance against these measures is set out in Section 6 and Appendix A.

- Our performance declined against two indicators,  
The declining performance related to:
  - a) Percentage of major applications determined within agreed timescales;
  - b) Average time taken to determine major planning applications

As regards a) above, we still turned around 85% of applications within the agreed timescale which is ranked Good. The average time to determine major applications rose significantly to 296 days but was artificially inflated by some longstanding applications that were refused. The use of PPAs to manage more complex applications will be promoted going forward to reduce such timescales.

1.6 In the light of the above and having regard to our key work areas, four actions are proposed going forward:

*Action 1 – Digitise information in relation to woodland / tree preservation order work to help customers self-serve and reduce the significant demand on the Planning Service's Tree Officer, the daily Duty officer and Support staff.*

*Action 2 – upgrade the Planning Service’s Uniform (planning application processing) software and the public access module that will provide business continuity and provide enhancements to our customers and ensure better GDPR compliance.*

*Action 3 – Continue to review and make positive change to the Planning Service’s enforcement function and its processes to speed up our decision-making, ensuring we are providing a good service for our customers.*

*Action 4 – Continue to review the collaboration arrangements in relation to heritage services with neighbouring authorities (Torfaen and Blaenau Gwent Councils) and to develop a Buildings at Risk (BAR) strategy to manage and prioritise any interventions to enable key heritage assets to realise a sustainable use for future generations.*

## 2.0 CONTEXT

- 2.1 This section sets out the planning context within which the Local Planning Authority operates, both corporately and in terms of Monmouthshire as a county, for the 2019-20 period.

### Corporate Context

- 2.2 The Council adopted its Local Development Plan in February 2014 and will be submitting its sixth Annual Monitoring Report in October 2020.
- 2.3 The purpose of the Planning Service is to help build sustainable and resilient communities that support the well-being of current and future generations in Monmouthshire, which is a shared purpose with the Council's public service board partners. This is at the heart of everything we do.  
We contribute to delivering the Council's well-being objectives, which align to the Public Service Boards objectives, as set out in the Corporate Plan 2017-2022, the specific objectives we contribute to are:

MCC Purpose	Building Sustainable and Resilient Communities
MCC Well-being	The best possible start in life
Objectives	Lifelong well-being Maximise the potential of the natural and built environment Thriving and well-connected county Future-focussed Council

- 2.4 The Planning Service's purpose links directly to Monmouthshire County Council's objective of building sustainable, resilient communities.
- 2.5 The Planning Service sits within the Council's Enterprise Directorate. The Enterprise Vision provides a strategic context for the development and promotion of an enterprising culture, which builds business resilience and creates high value outcomes for Monmouthshire's communities.
- 2.6 The Planning Service is made up of i) the Planning Policy and ii) the Development Management teams. The primary purpose of the Planning Policy team is to prepare and monitor the statutory Local Development Plan (LDP) and assist in its effective implementation through the Development Management (planning application) process. This ensures that the land use and sustainable development objectives of the Council are met ensuring the provision of an adequate supply of land in sustainable locations for housing, retail, education, recreation, tourism, transport, business, waste and other needs, whilst protecting the county's valued environmental, heritage and cultural assets. This work aligns directly with achieving four of the Council's Well-being objectives while being prepared to work innovatively aligns with the fifth objective regarding a Future-focussed Council.

- 2.7 The Monmouthshire Public Service Board Well-being Plan identifies a key issue as being the need to respond to demographic change, with the County having an increasingly ageing population. The Planning Service has an important part to play (alongside Housing colleagues) in readdressing the supply and mix of housing stock to ensure suitable and affordable housing is available to all demographic groups.
- 2.8 The Planning Service in its policy-making role and when making decisions on planning applications has a significant part in the Well-being goal that seeks to “Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change”. The PSB Well-being Plan acknowledges this by i) identifying Planning’s (and its partners’) capacity to improve the resilience of ecosystems by working at a larger scale (landscape) to manage biodiversity and maximise benefits such as natural flood risk management; ii) ensuring design and planning policy supports strong, vibrant and healthy communities that are good for people and the environment, and iii) enabling renewable energy schemes, especially community owned schemes, and developing new solutions including storage, smart energy, heat and local supply.
- 2.9 The Planning Service’s Vision is “To enable through the land use planning policy framework the building of sustainable and resilient communities that support the well-being of current and future generations.”
- 2.10 In addition, the Development Management Service undertook a System Review between 2010-12 where its purpose was established as being: “To advise on, give permission for and ensure the best possible development” which complements the overall service vision.
- 2.11 Key areas of work for the Service include:
- Carrying out a revision of the Monmouthshire LDP.
  - Preparing and co-ordinating thematic supplementary planning guidance to help to foster the interpretation and implementation of LDP policy.
  - Implementing the Council’s LDP through engaging and working with communities, and partnership working with both internal and external partners.
  - Depending on the outcome of legislative changes at the UK Government level, adopting and implementing the Community Infrastructure Levy. Infrastructure needs will be reviewed and consideration will be given to the best options for funding them alongside LDP progress.
  - Working with colleagues in Development Management to create a unified Planning Service focussed on enabling positive outcomes.
  - Monitoring and evaluating development plan policies, including preparing the statutory LDP Annual Monitoring Report (AMR).
  - Maintaining the LDP evidence base and ensuring fitness for purpose for future LDP revision.
  - Developing linkages with the Council’s emerging framework for community governance and development
  - Providing pre-application advice to customers;
  - Determining planning applications in accordance with adopted policy and material planning considerations, taking into account stakeholder comments and corporate objectives;
  - Securing financial contributions from developers to offset the infrastructure demands of new development;

- Safeguarding the County's 2400 Listed Buildings and 31 Conservation Areas, areas of archaeological sensitivity, the Wye Valley AONB and the Brecon Beacons National Park;
- Providing a heritage service for our neighbouring colleagues in Torfaen County Borough that works in a manner that is consistent and as well-resourced as the one provided for Monmouthshire.
- Taking robust enforcement action against unauthorised development that is unacceptable in the public interest.
- Preparing and submitting the Planning Services' Annual Performance Report (APR) to WG which assesses the effectiveness of the Monmouthshire's planning service and benchmarks it against other Councils' performance.

2.12 The main customer of the Planning Service is the applicant of any planning application, however there are numerous stakeholders including individuals, communities, businesses, third sector organisations, other Council Services and elected Members.

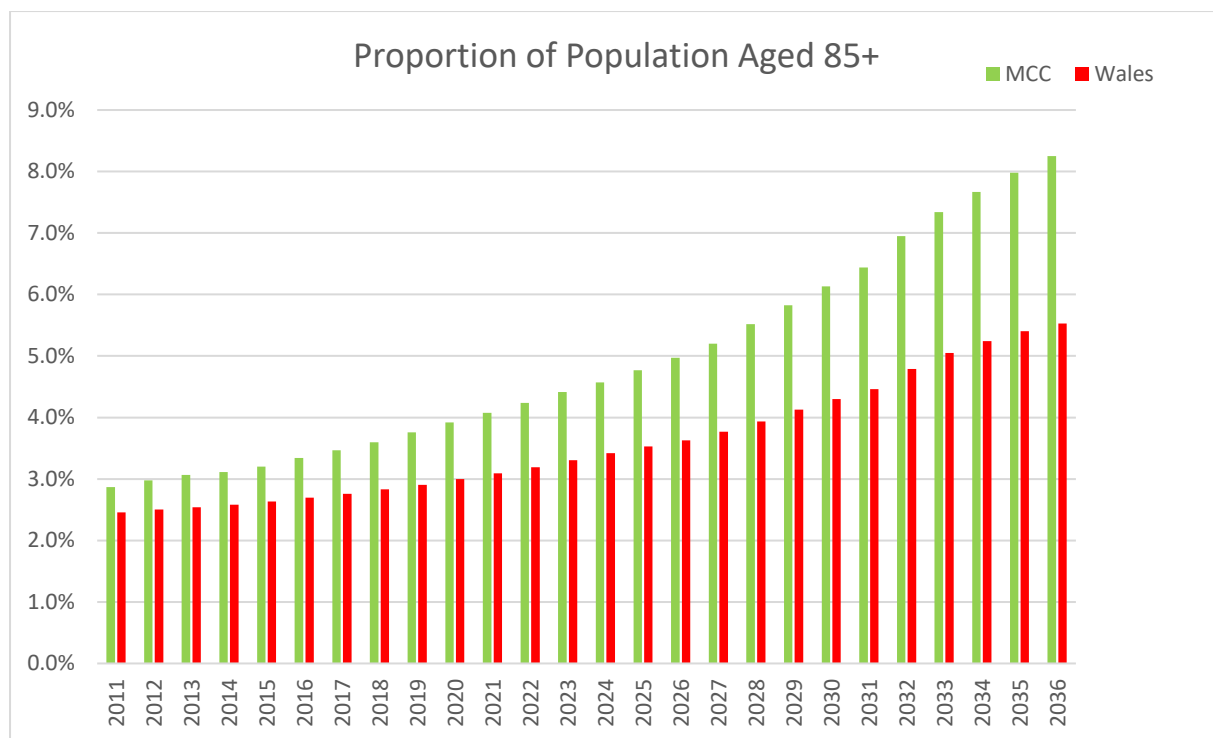
### **Local Context**

2.13 Located in South East Wales, Monmouthshire occupies a strategic position between the major centres in South Wales, the South West of England and the Midlands. The County shares a border with the neighbouring Local Planning Authorities of Newport, Torfaen and Brecon Beacons National Park (BBNP) in Wales and Gloucestershire, the Forest of Dean and Herefordshire in England, with Severn crossing links to South Gloucestershire. The County forms the gateway to South Wales, and is part of the Cardiff Capital City Region. This location gives the County a distinctive identity.

### **2.14 Our people**

2.14.1 Monmouthshire covers an area of approximately 88,000 hectares with a population of 91,323 in 2011 (92,843 according to the 2016 mid-year estimate), 7.9% of which resides within the BBNP area of the County. The County has a low population density of 1.1 persons per hectare – significantly lower than the South East Wales average of 5.3 persons per hectare – reflecting the area's rural nature. Only 53% of the population live in wards defined as being urban areas (i.e. with a population of more than 10,000).

2.14.2 Our population has been increasing steadily, up 7.6% between 2001 and 2011 compared with the Wales average of 5.5%. This increase is wholly attributable to inward migration, with natural change showing negative growth. The County has a relatively high and increasing proportion of older age groups, and a lower and decreasing proportion of younger adults compared with the UK and Wales averages. This trend is predicted to continue.



Source: Office for National Statistics

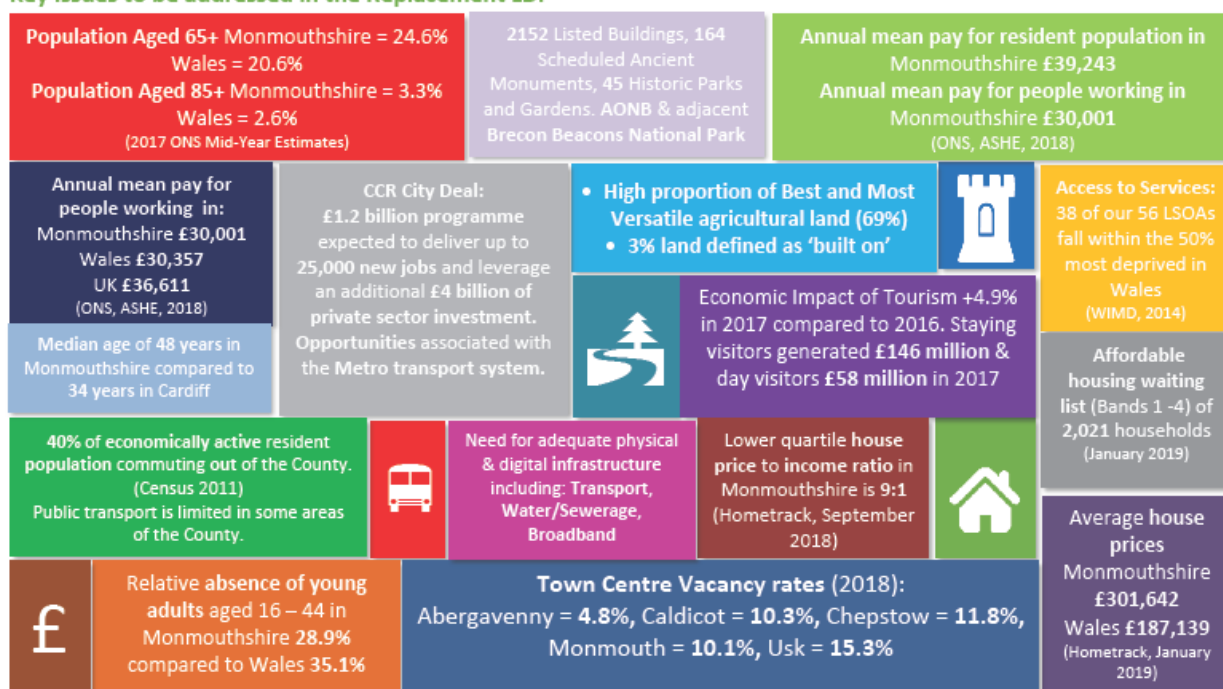
2.14.3 This demographic change has significant implications for economic activity and demand for services to enable our citizens to continue to live independent lives.

2.14.4 The following diagram encapsulates the issues that the Council are seeking to address during the development of the Replacement Local Development Plan (RLDP) over the next few years (Please see revised delivery agreement):



## Monmouthshire Replacement Local Development Plan – Issues, Vision and Objectives

### Key Issues to be addressed in the Replacement LDP



## 2.15 Housing and quality of life

### 2.15.1 The County has three broad categories of settlement:

- The historic market towns of Abergavenny, Chepstow and Monmouth have developed over many years to have a wide range of opportunities for employment, shopping, community facilities and public transport;
- The newer settlements in Severnside of Caldicot/Portskewett, Magor/Undy, Rogiet and Sudbrook where recent high levels of residential growth have taken place without the local jobs and community facilities to match. The area benefits, however, from a strategic location at the 'Gateway' to Wales with good access to the employment markets of Newport, Cardiff and Bristol;
- The rural area, containing the small town of Usk, the larger villages of Raglan and Penperlleni, and a large number of smaller villages, widely dispersed around the County.

### 2.15.2 Over the last decade, housing completions in the Monmouthshire LPA area have averaged approximately 245 dwellings per annum, although there have been significant annual variations with just 158 completions in 2009/10. To deliver the LDP housing requirement, 488 completions per annum are required (2013-2021). To date, completions since LDP adoption have averaged approximately 240 per annum. This is discussed in more detail in the LDP Annual Monitoring Report however 356 dwelling completions (including 82 affordable homes) were recorded in 2019/2020.

2.15.3 Average house prices are significantly higher than the Wales average (£301,600 compared to £187,100 average in January 2019) resulting in a significant need for affordable housing (source: Hometrack Housing Intelligence). Between 2006 (the time the Monmouthshire Unitary Development Plan was adopted) and March 2020, there have been 3,760 completions of which 797 were affordable, equating to 21% of all dwellings built. Since LDP adoption (2014) to March 2020 there have been 1,755 completions of which 424 were affordable, equating to 24% of all dwellings constructed.

2.15.4 Monmouthshire is generally a prosperous County offering a high quality of life for its residents. However, poor access to community facilities and declining local service provision is an issue for rural and ageing communities. The health of Monmouthshire's population is generally better than the Wales average, with greater life expectancies and higher proportion of residents classing themselves as being in good health (2011 Census). Fewer residents in the County suffer with a limiting long-term illness compared with Wales as a whole. The rate of reported crime in Monmouthshire tends to be lower than for Wales as a whole.

## 2.16 **Our economy**

2.16.1 The County has a high proportion of working age people in employment (62.8% in 2011) compared to neighbouring Authorities or the Wales average (58.2%). Our economy is reliant on the public sector and services for employment:

- The public administration, education and health sector accounts for 33.3% of jobs;
- The distribution, retail, hotels and restaurants sector accounts for 27.4% of jobs;
- Tourism, as part of the services sector, is also important in the County (see 2.16.3 below).

2.16.2 The County had 3,720 active enterprises in 2011, 27% of which were in the property and business services sector. Nearly 99% of the County's businesses are classified as small (i.e. up to 49 employees). Monmouthshire has experienced growth in eight of fourteen sectors in the decade to 2011, with the greatest increases in the property business services, hotels and catering and education and health sectors, while there has been a decline in the number of manufacturing businesses. Recent changes in Business Rates by the Welsh Government have disproportionately affected Monmouthshire.

2.16.3 Tourism is vital to Monmouthshire's economy and generates income to support a wide range of businesses that benefit from spending by visitors. According to figures supplied by tourism economic indicator STEAM (Scarborough Tourism Economic Activity Monitor), the sector brought in £204.43m to Monmouthshire in 2017 and supported the equivalent of 2,968 full-time jobs, accounting for approximately 10% of the workforce. Each visitor contributing to the county's economy by purchasing food and drink, fuel, services and accommodation spends on average over £66 per day.

2.16.4 Monmouthshire's tourism performance over the life of the previous plan displayed an encouraging 10% real growth in terms of economic impact, an increase of 8.7% in visitor numbers and a 1.5% growth in full-time jobs. The approved Destination Management Plan has been developed following a review of the previous plan and is based on Monmouthshire's best prospects for tourism growth as well as extensive consultation with

stakeholders. The Plan capitalises on key opportunities for Monmouthshire, including its location at the gateway to Wales offering an initial chance to make a great impression, especially now that the Severn Bridge tolls have been phased out.

2.16.5 The 2015 Welsh Government Commuting Statistics indicate that 58.3% of the County's residents work in the area. Although less than the Welsh average of 69.4%, this is an improvement of last year's figure of 54.5%. This suggests that there has been some progress in meeting the aspiration to increase the proportion of resident workforce working within Monmouthshire over the Plan period. However, the same data source suggests that Monmouthshire has a net outflow of 900 commuters – with 17,800 commuting into the Authority to work and 18,700 commuting out. There was significant in-commuting from Torfaen (3,000), Newport (2,900), Blaenau Gwent (2,800) and from outside Wales (8,000). The main areas for out-commuting were Newport (3,900), Bristol (3,400), Cardiff (2,500) and Torfaen (2,100), with a further 6,400 commuting to other areas outside Wales. A relatively high proportion of Monmouthshire's residents travel long distances to work, with a high usage of the private car. Heavy reliance on the private car and limited opportunities for public transport is a particular issue in rural areas. These figures should be treated with caution, however, as the data is based on a small sample survey.

## 2.17 **Communications**

2.17.1 The County is easily accessible from the rest of Wales by the M4, A40, A449 and A4042 and from England by the M4 and M48 Severn Bridges and the A48, A40 and A465. The good road transport links connect the County to major population centres such as Cardiff, Newport and Bristol. Monmouthshire is served by a number of local and national bus routes, with main bus stations in the towns of Abergavenny, Chepstow and Monmouth. In terms of rail provision, Monmouthshire has four railway stations, at Caldicot, Chepstow and Severn Tunnel Junction in the south of the County and Abergavenny in the north. As part of the Cardiff Capital Region, Monmouthshire is set to benefit from the proposed South Wales Metro proposals. The local community in Magor Undy is at an advanced stage of campaigning for a new Magor Undy Walkway Station, close to the Community Hub building that has now received planning permission. The announcement to remove the toll charge on the Severn Bridge has already had a demonstrable impact on house prices and, anecdotally, on speed of sales.

2.17.2 Public rights of way include 1,499km of footpaths, 71km of bridleways, 84.5km of restricted byways and 1.5km of unrestricted byways. These public rights of way are complemented by permissive paths. The County has three long distance regional trails (Usk Valley, Wye Valley and Three Castles) as well as the national trail (Offa's Dyke Path). The County also provides the start of the all-Wales coastal path. There are two national cycle routes within Monmouthshire, both of which run from Chepstow. The countryside access opportunities available in the County are one of its key assets, sustaining tourism and providing opportunities for economic regeneration.

2.17.3 The rural nature of the County and high proportion of SMEs means broadband and mobile communication are both vital and challenging. The Council is part of the Superfast Cymru

project rolling out BT broadband. Other local projects to roll out Broadband into less accessible rural areas are being explored.

## **2.18 Our natural heritage**

2.18.1 The County is noted for its rural beauty and has a rich and diverse landscape stretching from the coastline of the Gwent Levels in the south of the County, to the uplands of the Brecon Beacons National Park in the north. In addition, there is the picturesque river corridor of the Wye Valley AONB in the east and the Blaenavon Industrial World Heritage Site to the north-west. The landscape and countryside of Monmouthshire contributes not only to the health and well-being of Monmouthshire's residents but also supports the important tourist economy.

2.18.2 Monmouthshire has significant biodiversity and nature conservation resources, a number of which are internationally or nationally recognised, including:

- The Severn Estuary Special Area for Conservation (SAC), Special Protection Area (SPA), Site of Special Scientific Interest (SSSI) and Ramsar Site (Wetland of international importance);
- The River Wye, River Usk, Wye Valley woodlands and Wye Valley Special Areas of Conservation (bat sites);
- 49 nationally designated Sites of Special Scientific Interest (SSSIs) – covering some 2,087 hectares. Most are woodland or grassland sites with others designated for their wetland or geological interest;
- Two National Nature Reserves (Fiddler's Elbow (woodland) and Lady Park Wood) and one Local Nature Reserve at Cleddon Bog;
- Approximately 650 non-statutory Sites of Importance for Nature Conservation (SINCs) predominantly in relation to grassland and ancient and semi-natural woodland areas. The statutory sites cover 6,432 hectares, or 7.6% of the LPA area; 3,664 hectares of which comprises the Severn Estuary SPA.

2.18.3 Other key challenges facing the Planning Service include areas at risk of flooding (including most of the Gwent Levels and the flood plains of the Rivers Usk and Wye and their tributaries). There are, however, flood defences within the towns of Chepstow, Monmouth and Usk.

## **2.19 Our built heritage**

2.19.1 The Monmouthshire LPA area has a rich built heritage and historic environment which includes:

- Approximately 2,400 Listed Buildings, of which 2% are Grade I, 10% are Grade II\* and 88% are Grade II. Of note, around 176 Listed Buildings have been identified as being at risk.
- 31 Conservation Areas – designated for their special historic or architectural interest, covering some 1,648 hectares in total;
- 45 Historic Parks and Gardens – identified as having a Special Historic Interest, covering 1,910 hectares;
- 3 Landscapes of Outstanding Historic Interest identified by Cadw (parts of Blaenavon, the Gwent Levels and the Lower Wye Valley);
- 164 Scheduled Ancient Monuments.

2.20.1 The current LDP has been heavily reliant on greenfield sites to deliver its development needs due to a lack of brownfield sites. Air quality in Monmouthshire generally meets current standards, although there are two Air Quality Management Areas (AQMA) within the County, where objective levels of nitrogen dioxide may be exceeded. These are at Bridge Street in Usk and Hardwick Hill/Mount Pleasant in Chepstow. The Monmouthshire Contaminated Land Inspection Strategy has not identified any sites as being contaminated.

### 3.0 PLANNING SERVICE

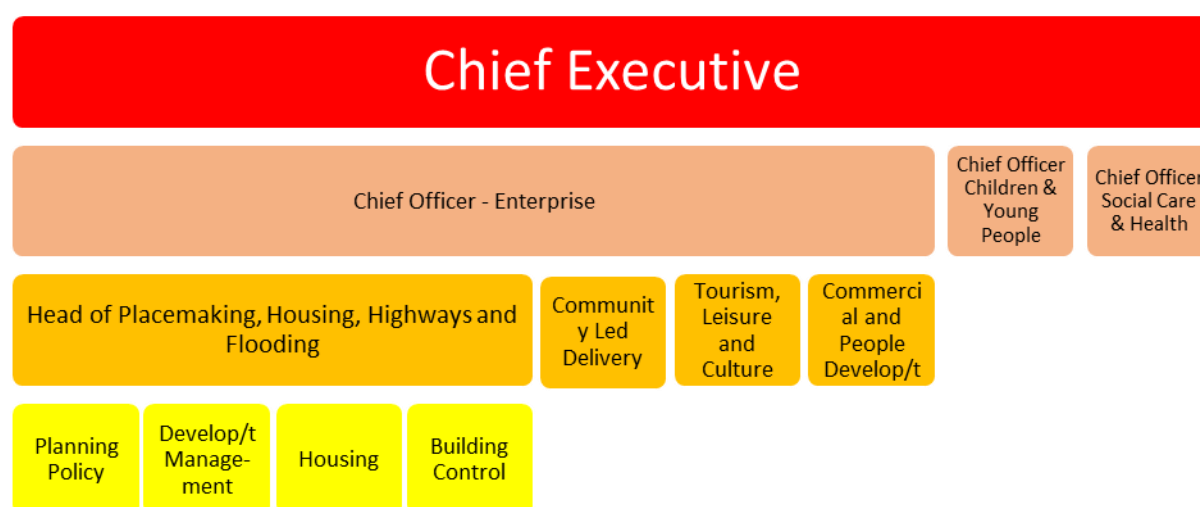
#### Organisational setting

- 3.1 During this period, the Planning Service underwent a number of significant changes, including a restructuring of management responsibilities. This resulted in a new head of service post, namely the Head of Planning, with the former head of service taking a more senior role in the Council as Head of Placemaking, Housing, Highways and Flooding. The new head of service was promoted internally from a management role in DM and that management post was not backfilled following agreement within the wider DM Management Team to absorb management of the successful candidate's responsibilities between the DM Service's Heritage Manager and the other existing Development Management Are Manger. Following initial concerns about the two managers' capacity to manage their enlarged teams, this has worked well and staff have commented that they feel that the management structure works effectively. It also enabled a departmental budget saving when application fees had fallen behind the targets in the DM budget (this is discussed below in the section on the service's budget).

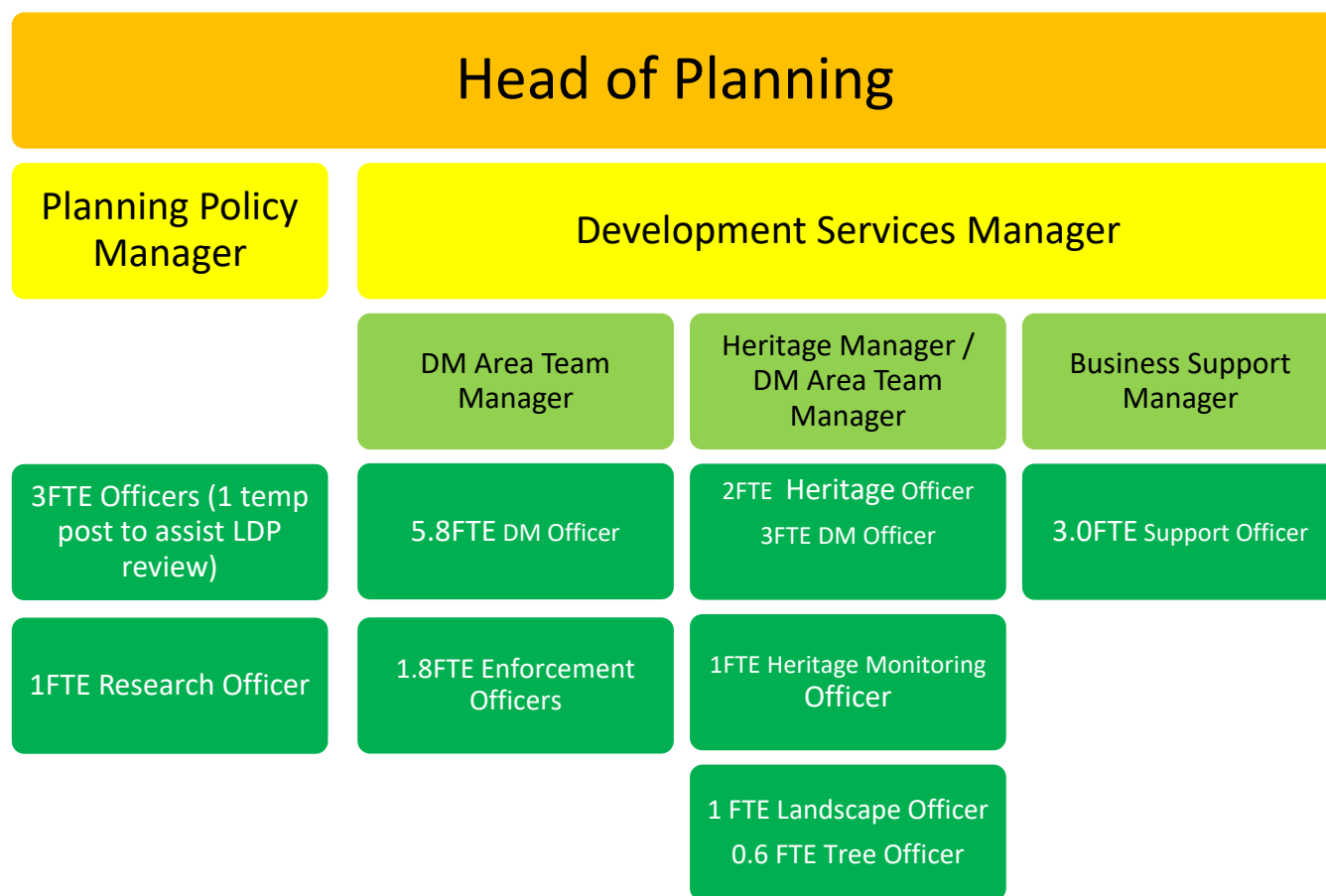
There was also a restructuring of the Support team service in DM which was carried out in recognition of the changes in roles of that team following the rollout of the Uniform application processing software and having regard to the increased use of IT replacing more traditional ways of working. As a result, a Support Officer's post was approved by Individual Cabinet Member to be removed from the establishment and following consultation with the team, voluntary redundancy was agreed with a colleague, the team reducing from four to three support officers, managed by their job-share manger's post. This also provides a budget saving in the medium to longer term.

In Planning Policy, the Principal Planning Policy Officer was on maternity leave during this period and her post was filled by an experienced member of staff from a neighbouring planning authority.

#### Department structure and reporting lines for the 2019-20 reporting period



### 3.2 Planning Service staffing structure for the 2019-20 reporting period



#### Links with other Council projects

3.3 There are a number of wider corporate activities that impact upon the planning service, or that the planning service supports and/or shapes:

##### 3.3.1 Budget management

Local Government budgets have been significantly reduced over recent years, and the Planning Service has had to make savings in the same way as all other unprotected services. This has comprised a combination of reduced expenditure, increased income budget lines, and reduced staffing costs.

For 2018/19, DM planning application fee income recovered significantly compared to the two previous years leading to a small overspend of £7k in DM, whereas the Policy team underspent by £186k. Much of this underspend is the rolled over reserve to fund the LDP review which will be used over ensuing years during the LDP review process.

However, the (ambitious) income target for planning applications (£629,000) was not met over 2019/20 leading to a modest overspend of £23k in DM due largely to savings in staffing costs and the Professional fees budget, whereas the Policy team underspent by £33k, leaving an overall underspend of £10k.

### 3.3.2 Service improvement/Systems Thinking

The Council has reviewed a number of its services via a Systems Thinking approach. Planning underwent this review between 2010 and 2012, and it is now fully embedded. The review seeks to strip the service back to basic principles: who is the customer, and what is important to them? As far as is possible (for example taking into account legislative requirements), activities that do not add value to the customer are removed.

In terms of the Planning Service, this has resulted in a high performing, outcome-focussed service. Officers are empowered to make decisions and take responsibility for their caseload from start to end. The outcome focus means that our emphasis is on securing a positive outcome where possible, rather than a focus on arbitrary performance targets. Performance against end-to-end times is monitored via monthly team meetings, however this monitoring is in the context that decision speed is only a small part of the wider picture, and is not always important to our customers.

The team applied this approach when implementing the roll out of a new planning application processing data base system that went live in March/ April 2018. This ensured disruption when changing over to the new system was minimised. It has also been used as method to seek ways of improving the service's web pages to improve the customer experience when accessing planning-related information online.

### 3.3.3 Development Team approach

A fee-paying pre-application advice service was introduced in late 2013 which has been well received by customers and is now embedded. This service includes offering a Development Team approach, which seeks to provide an integrated, round-table multi-disciplinary approach to pre-application enquiries. This has helped build positive relationships with other service areas, and help all parties to understand each other's objectives and priorities, leading to better outcomes. We also ask applicants if they wish the local ward member to be involved in pre-application discussions on major planning applications to improve communication and to promote transparency. Another improvement we have introduced is to ensure the council's Design Panel, made up of the council's planning committee chair, vice chair and opposition spokesperson and senior planning managers, is involved at an early stage for major planning proposals that have a design implication. Experience shows the subsequent planning application follows a smoother path during the committee process because of the inclusive nature of the journey. All applications that have undergone this process – including major housing proposals at Abergavenny, Monmouth and Caldicot that have been approved within agreed timescales.

During this reporting period, we received 474 applications for pre-application advice and closed 461. 78% were determined within agreed timescales for such advice.

Of these, 154 led to subsequent planning applications. 118 were approved (77%)

17 were returned/withdrawn or remain invalid (e.g. fee not paid, etc.)

18 are pending consideration.

Just 1 application that stemmed from the pre-application advice was refused – and in any case the officer advised in the pre-application submission response that the proposal would



not be acceptable. Consequently, we have a 100% success rate of applications that went to decision stage and followed our pre-application advice.

As part of the systems thinking revisit referred to in 3.3.2 above, it is intended to review our pre-application advice service to see how we can make this more effective for the customer and improve the timeliness of our responses. This is particularly important as we are looking to put in place fast track services for more complex proposals that will necessitate the Development Team approach. The Development Team approach is valued by customers as it provides a comprehensive service but it is more challenging to organise given the number of different officers involved.

### 3.3.5 Best practice benchmarking

We are involved in various regional and all-Wales working groups, which provide an important forum for identifying, learning from and sharing best practice, while recognising Monmouthshire's uniqueness. These groups include:

- Planning Officers' Society for Wales (POSW) (meeting of all Chief Planning Officers from Welsh LPAs; POSW is involved in benchmarking work among all Welsh local planning authorities undertaken for WG by the Planning Advisory Service (PAS) to understand the costs of running a planning service more accurately and comparably than CIPFA data;
- South East Wales branch of POSW (POS-SEW);
- South East Wales Strategic Planning Group (SEWSPG) (meeting of planning policy lead officers from the ten SE Wales LPAs and the Brecon Beacons National Park together with WG representatives, HBF, NRW and Welsh Water). Monmouthshire and Newport Councils jointly chaired this group during this reporting period, with Monmouthshire becoming the Chair Authority in January 2017;
- South East Wales Heritage Forum. Monmouthshire's Heritage Manager chaired this group during this reporting period.
- South Wales Enforcement Forum
- South Wales Development Management Group (meeting of the South Wales Development Management lead officers)

An informal group of DM officers and managers from the former Gwent Local Planning Authorities also meets occasionally to share best practice and procedures in the light of new regulations coming into force. The objective is to discuss consistency on a more manageable basis, and feed learning back to all LPAs in Wales.

In addition, we hold bi-monthly liaison meetings between the Planning Policy and Development Management teams to disseminate policy changes at national and strategic levels, to understand corporate strategies, to aid interpretation and implementation of the adopted Local Development Plan, and to review implementation of the LDP to help inform and shape the replacement LDP. This has provided a valuable forum to ensure a cohesive and consistent planning service is provided.

### 3.3.6 Asset Management

In response to budget pressures, in addition to a wider desire to use our assets responsibly, the Council is undergoing a process of reviewing its estates portfolio and where appropriate, disposing of those assets. The planning service plays a key role in enabling best use

of/return from those assets. As an example, planning permission has been granted for a solar farm on one of our own County farms near Crick. The revenue from energy generation can be reinvested into providing valuable services to our citizens. The Corporate Business Plan includes a commitment to deliver a second solar farm.

The Local Development Plan includes four Council-owned sites as strategic (primarily housing) allocations. During this reporting period, detailed planning approval was granted at Crick Road for a mixed use development as well as detailed planning permission being granted for the development at Mabey Bridge, Chepstow.

### 3.3.7 Well-Being Plan

There are four well-being objectives forming part of the Monmouthshire Well-Being Plan, two relating to people and two relating to place:

People/Citizens:

- Provide children and young people with the best possible start in life
- Respond to the challenges associated with demographic change

Place/Communities:

- Protect and enhance the resilience of our natural environment whilst mitigating and adapting to the impact of climate change.
- Develop opportunities for communities and businesses to be part of an economically thriving and well-connected county.

In tandem with the Well-Being Act and the Well-being Plan the Council's Planning Service is committed to securing sustainable development in the public interest for the good of the County's citizens and its environment.

### 3.3.8 Local Transport Plan and Active Travel

We contributed towards the Council's Local Transport Plan in a previous reporting period, and will continue to work with colleagues to help enable delivery of the identified priorities and compliance with the Active Travel Act, whether this be via LDP allocations, planning application decisions or securing planning contributions. During this reporting period we have been involved in negotiating pedestrian and cycle links for larger housing schemes at Crick Road, Raglan, Undy and Caldicot, as well as holding discussions relating to new cycle routes in the Chepstow and Usk areas.

### 3.3.10 IT improvements and 'channel shift'

The Council has a shared IT resource with Newport, Torfaen and Blaenau Gwent Councils, and through this has implemented a new planning back-office system. Collaboration on reporting functions and training has been undertaken with Torfaen Council. Setting up the new system has been very resource intensive but the system went live in April 2018.

The Planning Service is a key frontline service in terms of visibility and customer access. We have already introduced agile working and electronic document management, and work has been undertaken to improve our website to improve the ability of customers and

stakeholders to self-serve where possible, as well as to comply with the Welsh Language Measures, although more work is needed to improve the customer offer in this area.

In recent years we have improved the layout and content of the DM service's web pages to allow customers to self-serve more easily. We have also moved towards a paperless office, resulting in printing and postage savings. Going forward we would like to scan old microfiche records so that these are also available via our website, however this is prohibitively expensive at present. We also introduced a Report It function on the web site so that the public could report possible breaches of planning control for the planning enforcement team to investigate.

### Operating budget

- 3.4 The operating budget for the service is shown below together with the changes from last year:

	Costs	Income	Net Cost	Change
<b>2013-14</b>	£1,648,800	£601,200	£1,047,600	
<b>2014-15</b>	£1,397,400	£614,900	£782,500	£-265,100 (-25%)
<b>2015-16</b>	£1,360,500	£669,900	£690,600	£-91,900 (-12%)
<b>2016-17</b>	£1,363,600	£572,000	£791,600	£+101,000 (+15%)
<b>2017-18</b>	£1,292,600	£430,100	£862,500	£+70,900 (+9%)
<b>2018-19</b>	£1,426,500	£653,600	£772,900	£-89,600 (-10%)
<b>2019-20</b>	£1,535,022	£669,300	£865,722	£+92,822 (+12%)
<b>2020-21*</b>	£1,443,355	£680,000	£763,355	

\*Budgeted figures are shown for 2020-21; actual figures are shown for the other years. The figures exclude Planning Policy's budget for Professional fees which is rolled forward each year for LDP review work.

- 3.5 The two main costs for the service are staff costs and the LDP budget (money is transferred from the above budget to sit in an LDP reserve, built up to fund the next LDP). Income is generated by planning application fees and pre-application advice (the latter amounted to approximately £50,000 over 2019/20) as well as the Planning Service's newer discretionary services that are discussed below.
- 3.6 Planning application income was lower in 2019/20 than in 2018/19 (£515k compared to £583k). Although the number of planning applications received remained broadly comparable to 2018/19 the income from major planning applications fell compared to the previous financial year. Fee projection work means there will be little application activity on larger allocated and unallocated housing sites over 2020/21. This is chiefly due to the lifecycle of the current LDP which is at the end of the plan period and is now under review. Delays to the review stages of the new plan will mean there will be no new larger housing sites coming forward until post Deposit/ Examination stage, probably mid-2022 at the earliest. Aside from the income target not being achieved the service has made savings in terms of staff costs (a member of the support team accepted redundancy and a senior management post was not filled because of a re-structure of the DM Management roles). There was also an under-spend in the professional fees budget. Agreement to stop

increasing the application fees each year by inflation was agreed by the Council given that the authority does not set the fees, they do not rise by inflation each year and fee income is dependent on economic activity which is also out of the Council's hands.

- 3.7 Research by the Welsh Government identifies that application fees recover approximately 60% of the cost of dealing with planning applications, although work is currently being undertaken by work commissioned by WG and endorsed by POSW to provide a more accurate picture of cost recovery across all Welsh planning authorities. Additional costs are incurred through the work involved in the statutory Development Plan, and via other services such as enforcement and heritage management. Increased planning application fee income is used to reduce the net cost of the service to the Council. In-year windfall extra income is used to balance the Council's budgets and offset overspend in other services. Conversely as has been the case during recent years, underspend in other services was used to offset DM's under-recovery of income, when economic and other circumstances resulted in a sudden drop in fee income. Application fee income has fluctuated significantly over recent years, and this poses a challenge for budget management going forward. Fee income is heavily influenced by the wider economy, for example house-building (which itself is affected by mortgage lending and development viability) and other funding streams (for example the feed-in tariff for renewable energy schemes).

	<b>2013-14</b>	<b>2014-15</b>	<b>2015-16</b>	<b>2016-17</b>	<b>2017-18</b>	<b>2018-19</b>	<b>2019-20</b>	<b>2020-21</b>
<b>Budgeted fee income</b>	£490k	£525k	£633k	£668k	£684k	£681k	£693k	£589k
<b>Actual income</b>	£596k	£584k	£664k	£560k	£430k	£653k	£666k	

N.B. Fee income includes planning application fees, pre-application income and the discretionary fees for fast track applications. The 2019/20 figure also includes payment from Torfaen Council towards funding the joint Heritage Service.

### **Staff resources**

- 3.8 Staffing levels for the reporting period are shown in the chart at paragraph 3.2 above. Key changes over 2019/20 saw a major change in that the former Head of Service was promoted to a more senior management role in the Council with the new Head of Planning post being taken up by a successful internal candidate within the DM Management team. That successful candidate's post was then not backfilled, the post remaining empty as a result of a management restructure within DM. This meant instead of three line managers (two DM area managers and one Heritage Manager) there was a reduction to two managers with the Heritage Manager assuming management of three DM Officers. This has resulted in a good response from the DM officers who find the new arrangements provide good management capacity and has been welcomed by the managers themselves, it allowing the Heritage Manager to widen her experience and depth of planning knowledge. The saving made in not replacing the manager's role was also welcomed given the on-going pressure on budgets.

There was also a re-structure within the Planning Support Team resulting in one 1.0FTE Support Officer post being removed from the DM Structure. This was because of a review of

the Support Team's role within the wider service and was influenced by the reduced input of Support colleagues owing to the introduction of the new Uniform application processing system that has changed responsibilities for tasks and automated many processes. In addition, the largely paperless systems we employ have reduced the need for repetitive printing tasks and old style, manual working. The role of the Support colleagues has changed to reflect a more technical, problem-solving function that is fit for purpose for a modern, innovative Planning Service.

In Planning Policy, the Principal Policy Officer underwent maternity leave and was replaced over this period by an experienced officer from neighbouring Newport City Council to help progress the Plan Review. Owing to the need to have adequate staff to undertake the LDP review, a three year temporary senior policy officer post was created in the last reporting period and filled internally by the secondment of a senior DM officer. The senior DM post has been backfilled to enable the DM team to be adequately staffed.

3.9 For the reporting period, sickness levels were very low, with an average of 0.8FTE days per colleague lost due to sickness in the DM and Policy team (target is 10.5FTE days). Team morale is good despite work pressures and the advent of the Covid-19 pandemic at the end of the reporting period with significant resource put into managing staff welfare through regular one to one meetings (via Teams) as well as a variety of other team meetings.

3.10 Training and development opportunities provided for colleagues during the reporting period included training provided by Welsh Government for members and officers regarding Gypsy and Traveller accommodation issues. Regular workshops have taken place to engage DM officers regarding LDP issues such as the candidate site process. This is in addition to in-house development opportunities provided via Development Management and Planning Policy Liaison Meetings. External training and development opportunities included attendance at events run by Frances Taylor Building Law on recent legal changes in planning law. A Design Tour was held for Planning Committee Members in June 2019 to review applications granted by committee and officers under delegated powers as well as a separate officer event later in June 2019.

A workshop was run in January 2020 organised by the new Head of Planning to establish our vision and objectives for 2020 onwards for the Planning Service which was well-received and helped with team building and working.

Several officers attended the annual Wales Planning Conference in June 2019. The enforcement team attended the Welsh Enforcement Conference in October 2019. Five staff within DM have undertaken Institute of Leadership & Management (ILM) qualifications over the last two years, three having qualified and two are underway.

3.11 All colleagues have had an annual appraisal during the reporting period.

## 4.0 YOUR LOCAL STORY

### Workload

#### 4.1 Key projects during the reporting period included:

- Work continued on the Replacement LDP including:  
An Issues, Vision and Objectives Paper, a RLDP Growth and Spatial Options Paper, the RLDP Preferred Strategy and a revised Delivery Agreement timetable. This work also involved a preferred Strategy Consultation and Second Call for Candidate Sites, joint working continued with Torfaen, Blaenau Gwent, Newport and Caerphilly Councils through progress meetings, as well as progress on jointly commissioning further evidence base work. There was also Member and Officer Involvement in the form of Workshops to discuss various RLDP related topics and Plan progress as well as an all staff seminar on the Preferred Strategy along with progress meetings with the Rural Housing Enabler and various internal departments including highways, education and estates. Candidate sites meetings were held following an initial sift of candidate sites and assessment of sites against the Preferred Strategy.
- Establishing a joint heritage service for Monmouthshire and Torfaen Councils. This commenced in January 2019 and reviews of its effectiveness took place periodically over the reporting period. MCC manages the service for TCBC via a memorandum of understanding (MOU) and provides the staff to deliver a resilient heritage service assisted by TCBC funding. The contract is intended to be renewed for a further 12 month period due to the confidence in its performance.
- Adoption of supplementary planning guidance (SPG) on the interpretation and implementation of LDP policy, including 1) Revised Affordable Housing SPG; 2) Infill residential development and 3) an Archaeology planning advice note.
- Promoting and delivering our bespoke application services including fast track applications for householder planning applications, listed building consent and certificates of lawfulness, as well as pre-purchase certificates and completion certificates.
- Achieving succession planning in the Planning Service via the promotion of excellent internal candidates to management roles, providing the leadership needed for the challenges in each team, including the review of the LDP.
- Undertaking reviews of the management structure of the DM team and the Planning Support Team to ensure robust management capacity and a fit for purpose, skilled and resilient support team service.
- Implementing prioritised elements of the Team's Digital Plan to improve our processes and customer experience – including upgrades to the Idox Document Management System (DMS) and Public Access (PA).
- Securing detailed planning permissions for two of the LDP's strategic housing sites at Crick Road, Portskewett (including an innovative close care facility) and Mabey Bridge, Chepstow, as well as the reserved matters major housing proposals off Church Road, Caldicot and Grove Farm, Llanfoist. A detailed application for an allocated site for a mix of affordable and market housing at Well Lane, Devauden was also approved.
- A review of the Planning enforcement function to improve its performance and speed of decision-making.
- Working with a Building Preservation Trust to seek to secure the restoration of a Listed Building at Risk including a CPO.

- Bedding in and implementation of the Green Infrastructure SPG with the role of the new Landscape Officer in the Heritage team given a leadership role in this process. This SPG is the first of its kind in Wales, and has broken new ground to fill an identified gap in guidance for developers and planners. There is considerable interest in the new SPG from stakeholders, including the Welsh Government and Natural Resources Wales and other local authorities. Crucially, it is having a tangible positive influence on Monmouthshire's landscapes and GI assets by encouraging higher quality planning applications. A review of 25 planning applications has been undertaken to evaluate the effectiveness of the SPG which has quite clearly shown the added value, as well some challenges/lessons to be learnt.
- At the very end of the reporting period the full national lockdown stemming from the Covid-19 outbreak took place and meant that new ways of working had to be brought in for our service, leading to 100% of our staff working from home, use of Teams technology for meetings and a suspension of site visits until the risk had been assessed and the lockdown eased. We also let agents know that all applications to be submitted should be done so electronically as the office was temporarily closed and paper forms of submission could not therefore be scanned for the case officer and consultation purposes.

4.2 Application caseload has increased slightly since the previous reporting period while the number of applications determined also marginally increased. The proportion of approvals was slightly higher than in previous reporting periods at 97%. During 2018-19, 95.5% of applications were determined under delegated powers (Wales's average 93%).

	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20
<b>Applications received</b>	983	1173	1284	1117	1188	1126	1134
<b>Applications determined</b>	852	1053	1085	1087	1071	1101	1106
<b>% within 8 weeks or agreed timescale</b>	70%	76%	79%	90%	91%	88%	91%
<b>% applications approved</b>	93%	95%	95%	96%	95%	95%	97%

4.3 During this reporting period, we received 474 applications for pre-application advice and closed 461. 78% were determined within agreed timescales for such advice.

Of these, 154 led to subsequent planning applications. 118 were approved (77%)

17 were returned/withdrawn or remain invalid (e.g. fee not paid, etc.)

18 are pending consideration.

Just 1 application that stemmed from the pre-application advice was refused – and in any case the officer advised in the pre-application submission response that the proposal would not be acceptable. Consequently, we have a 100% success rate of applications that went to decision stage and followed our pre-application advice.

The conclusion from the review of the bespoke service is that the pre-application advice service is working well. Adjustments were needed to balance the fees for smaller scale developments (the MCC Bespoke level 2 pre-application advice) to reflect the charges for the equivalent statutory (WG) pre-application advice service. These will be implemented in 2020/21.

4.4 A key area of work over the last two years has been the development of new, bespoke services. The most popular of these has been the Fast Track services for householder applications, lawful development certificates (LDCs) (existing and proposed) and listed building consent.

- 4.5.1 The Fast Track service accelerates the administration and processing of the application for a small additional charge. The offer is that Fast track applications are determined within 28 days following the submission of a valid application. This decision period varies for fast track applications for a certificate of lawfulness (10 days) and applications for listed building consent (35 days). There is an £85.00 additional fee (so £275 in total) although certificates of lawfulness are £190. A valid application is defined as outlined within Welsh Government Circular 002/12. In the unlikely event of not being able to achieve this target or agree a short extension of time (no more than 5 working days) we will refund the fast track service fee.
- 4.5.2 The *pre-purchase certificate* is a discretionary service aimed at people looking to buy a property in Monmouthshire. The application would provide the applicant with i) a planning history search; ii) details of planning permissions; iii) listed building consents and iv) enforcement history relating to identified breaches of planning control (this would not relate to unsubstantiated complaints). This service would include a site visit and identify whether there are any breaches of planning control and whether or not any breaches would be enforceable. The certificate confirms that any approved development at the site, up to the point of the request, has been carried out in accordance with approved plans and that there is no breach of planning control at the site. The fee for this service is £250 and we aim to provide a written response within 28 days. This service looks at compliance with all types of planning permissions including listed building consent: it does not provide a substitute to lawful development certificates. This fee was raised in 2019/20 from £180 to £250 to recover the costs involved in providing this service.
- 4.5.3 The other discretionary service we offer we provide is a *certificate of completion*. The certificate will indicate whether or not the planning permission and/or Listed Building Consent applied for has been carried out in accordance with the approved plans, and also it would confirm the status of all planning conditions and any approved amendments if applicable. The purpose of this service is to offer support to applicants, agents or any other interested party that the works are appropriate and acceptable once they have been built. If there is an issue of noncompliance this will be brought to the applicant's attention and an opportunity provided for the breach of planning control to be rectified. The service includes a site inspection and desk based research and investigation. The fee for this service is £200 for each application number requiring a certificate and we will aim to provide a written response within 28 days. Where an application for listed building consent and a planning application were required for the same development, they will be treated as one application.



- 4.6 These discretionary services have been in place since 1st July 2017 (they were rolled out slowly but have gradually gathered pace). The below table outlines the take up of these services and the amount of income that the additional services have generated. We are seeking to increase this with wider marketing, although the impact of the Covid-19 pandemic will undoubtedly reduce the team's capacity to meet the targets for FastTrack applications.

Type of service	Number of applications/enquiries complete 01/04/18 to 31/03/19	Income generated*	Number of applications/enquiries complete 01/04/2019 to 31/03/20	Income generated*
Fast track householder applications	47 (9 refunds due to a range of issues, but mainly because the number of objections led to the need for the application to be presented to the Council's Delegation Panel rather than be officer delegated)	£3230  (This figures excludes the refunded amount)	46	£3485
Fast track certificate of lawful development	Existing - 0 Proposed – 4	£760	1	£285
Pre purchase certificates	6	£1080	5	£1050
Completion certificates	2	£240	1	£250
Fast track listed building applications	13	£1925 (Included 6 refunds as applications were too complex to be determined in 35 days)	5	£1375
<b>Total</b>		<b>£7, 235</b>		<b>£6,778</b>

\*Beyond the standard fee for a householder or other planning application

- 4.7 In relation to enforcement workload, significant changes to the performance indicator definition were made over recent years, changing what is measured as an enforcement case and the definition of when a case is 'resolved'. While 2018/19 saw a decline in performance against the revised WG measures, the appointment of a new manager in the Enforcement Team midway through 2018/19 has seen an encouraging improvement in the team's performance following a fundamental review of its work practices. This intervention has

enabled the measures to move from Poor to Fair, as discussed in Section 6 and Annex A below. Action 3 for this priority area is retained to seek sustained improvement.

#### **Annual Monitoring Report**

4.8 The Council adopted its Local Development Plan in February 2014 and our fifth LDP Annual Monitoring Report (AMR) was submitted in October 2019 to cover the 2018-19 period. Our fifth AMR identified that although good progress had been made in implementing many of the Plan's policies and that overall the strategy remains sound, a number of key housing provision policy targets were not being met which indicated that these policies were not functioning as intended. The continued lack of a 5 year housing land supply remained a matter of concern that needed to be addressed if the Plan's housing requirements are to be met. The third AMR recommended an early review of the LDP was necessary because of the housing land supply shortfall. A full review of the LDP commenced during the previous monitoring period which culminated with the publication of the Final Review Report in March 2018. The report concluded that the LDP should be revised and that this should take the form of a full revision procedure, i.e. a fully revised LDP. It also concluded that the Monmouthshire LDP should be revised on an individual basis, rather than jointly with adjacent Local Planning Authorities. Work on this project has commenced and is described full in the latest AMR (2019/20).

4.9 As at March 2020, the status of the strategic sites is as follows (more detailed information is available in the Council's 2020 JHLAS and AMR):

##### **4.10.1 Deri Farm, Abergavenny (SAH1):**

Persimmon Homes submitted a full application (DC/2014/01360) for 250 residential units (201 market and 49 affordable units) in November 2014. The progress of the application was slower than anticipated due to significant issues relating to site viability, particularly affordable housing provision and the undergrounding of overhead power lines. However, these issues were subsequently resolved, the application was approved in the 2017 - 2018 monitoring period and 100 units have been completed to date.

The housing trajectory prepared in consultation with the Housing Stakeholder Group expects the site to deliver 188 dwellings within the Plan period.

##### **4.10.2 Crick Road, Portskewett (SAH2):**

In the last monitoring period Monmouthshire County Council and Melin Homes submitted a joint outline application (DM/2018/00696) for 291 residential units (218 market and 73 affordable units), this was granted permission in March 2019. During the current monitoring period a reserved matters application (DM/2019/01041) for 269 residential units has been approved (201 market and 68 affordable units). This is below the target number of units for the site (285) in the LDP. The changes that have resulted in a drop in density of the site have been driven by changes to the proposed house types and by positive improvements, such as embracing Green Infrastructure that forms the north-south axis of the site, the ecological implications of a badger sett on the site which has led to greater protected open space, whilst the highway requirements have resulted in safer, more accessible links. The employment allocation on the site has been replaced with a care home which will provide up to 32 beds on the area outlined for employment use. This is subject to a separate planning application, DM/2019/01629, which was granted permission on 26 February 2020.

The housing trajectory prepared in consultation with the Housing Stakeholder Group expects the site to deliver around 14 dwellings within the Plan period. The first completions on site are expected in 2021/22.

#### **4.10.3 Fairfield Mabey, Chepstow (SAH3):**

The landowner submitted an outline application (DC/2014/01290) in October 2014 for up to 600 residential units (350 to be delivered within the Plan period), commercial space including offices and workshops (Use Class B1), small scale retail/food and drink floorspace (Use Classes A1 and A3) and multi-functional green and blue open space. Progress with the application has been slower than anticipated due to various matters, including highways issues (Welsh Government Highways Division had a holding objection on the application for 18 months). However, the outstanding issues have since been resolved and the site gained outline planning permission for 450 units (432 market and approximately 18 affordable units on 1.5 acres of the site) in November 2017. A Reserved Matters Application (DM/2019/00001) was approved during the current monitoring period for 347 units. The application is for the market housing element of the site and does not include the land identified for affordable housing or employment land, these will be the subject of separate applications. Work on the site has now begun.

The housing trajectory prepared in consultation with the Housing Stakeholder Group expects the site to deliver 58 dwellings within the Plan period.

#### **4.10.4 Wonastow Road, Monmouth (SAH4):**

Outline permission was granted for up to 370 dwellings and 6.5ha of employment land in December 2014. The site developers (Barratt/David Wilson and Taylor Wimpey) submitted a Reserved Matters application (DC/2015/00392) for 340 units (238 market and 102 affordable units) which was granted permission in November 2015. The site is now nearing completion with 327 dwellings completed to date.

The overall LDP site allocation is for a total of 450 units. The additional units relating to this allocation are to be delivered as an extension to the site at Drewen Farm. An application for this element of this site has not yet been submitted.

The housing trajectory prepared in consultation with the Housing Stakeholder Group expects the site to deliver 340 dwellings within the Plan period.

#### **4.10.5 Rockfield Farm, Undy (SAH5):**

This site is allocated for 270 residential units and 2ha of serviced land for business and industrial use in the adopted LDP. An outline planning application was submitted in July 2016 (DC/2016/00883) for 266 units and 5,575 sq. m of employment land (B1 use). For the purposes of the AMR 265 units (198 market and 67 affordable units) are recorded as a net gain, the existing farmhouse has a residential use and is being demolished so has been taken off the overall figure. Progress with the site has been slower than anticipated due to various issues, including archaeology. These issues have, however, been resolved and the outline application was approved in March 2018. A Reserved Matters application (DM/2018/01606) was granted planning permission for phase 1 of the site during the last monitoring period for

144 residential units). The site is currently under construction with 16 dwellings completed during this monitoring period.

The housing trajectory prepared in consultation with the Housing Stakeholder Group expects the site to deliver 107 dwellings within the Plan period.

#### **4.10.6 Land at Vinegar Hill, Undy (SAH6):**

This site for 225 residential units is linked to the adjacent Rockfield Farm site and was expected to progress in tandem. However whilst initial progress has been slow, the developer (Bovis) submitted a hybrid application (DM/2019/01937) during the current monitoring period (November 2019). The application is for 155 dwellings, 72 dwellings as a full application and 83 dwellings as outline. It is expected that this phase of the development will be approved during the next monitoring period.

The housing trajectory prepared in consultation with the Housing Stakeholder Group expects the site to deliver around 8 dwellings within the Plan period. The first completions on site are expected in 2021/22.

#### **4.10.7 Former Paper Mill, Sudbrook (SAH7):**

A full planning application (DC/2015/01184) was submitted by Harrow Estates (Redrow confirmed as the developer) in October 2015 for 212 residential units (192 market and 20 affordable units). There had been a number of site viability issues associated with this application meaning that progress with the application has been slower than anticipated. However, these issues were subsequently resolved and the application was approved in the 2016 - 2017 monitoring period (November 2016). Following a re-plan of part of the site the number of residential units on the site has decreased to 210. The site is currently under construction, with 96 dwellings completed to date.

The housing trajectory prepared in consultation with the Housing Stakeholder Group expects the site to deliver 166 dwellings within the Plan period.

- 4.11 The AMR highlights issues surrounding the delivery of affordable housing, and developers continue to raise viability issues on some of the strategic housing sites above. This is a Wales-wide issue. The Council's approach to viability debates has now been established, and the links between a project management approach to these applications with LDP delivery are understood.

- 4.12 In response to the Council's lack of five-year housing land supply and the Welsh Ministers' decision to 'disapply' par. 6.2 of TAN1 the Council adopted an innovative and evidence-based approach to dealing with non-allocated housing sites. This was described in a report to Council considered on 21 February 2019 where Members resolved that the Council continued to give 'appropriate weight' to its lack of a five year housing land supply, insofar as those development proposals are otherwise acceptable in planning terms and that the 11 'ground rules' set out in the report were all satisfied.

An outline planning application (and subsequent reserved matters) for a major housing proposal was approved in the light of this policy at Church Road, Chepstow while another at Raglan was called in by Welsh Ministers and subsequently refused.

In the light of the Raglan appeal and subsequent Ministerial clarification that major housing proposals should only come forward as part of the Development Plan system, then this innovative policy approach has been abandoned.

- 4.13 In October 2015 the Council's Economy and Development Select Committee scrutinised the LDP's impact on enabling tourism-related development. As stated above, the tourism industry forms a key part of the County's economy and links directly to what makes Monmouthshire distinctive. This scrutiny identified a need to produce Supplementary Planning Guidance to clarify for customers and officers how the LDP supports different types of tourism development, and also identified a need for future revisions to the policy to allow greater flexibility for agricultural diversification for tourism purposes. The SPG was adopted during this reporting period and is now widely used by DM officers to consider proposals for sustainable rural tourism. The AMR shows that the clarity provided by the SPG has had a positive impact on tourism-related proposals coming forward and being approved.

### **Value of Planning**

- 4.14 RTPI Cymru has published a new toolkit which measures the value generated by a local authority planning service. The tool has been developed to capture the economic, social and environmental value at a local planning authority level across Wales. The tool and its 'Value Dashboard' has been designed to provide RTPI Cymru and the Welsh Government with a platform to demonstrate to local authorities, national policy makers, the private sector, researchers and other broader policy and media audiences, the value planning contributes and how planning is positively contributing to Wales' seven well-being goals. The data has been updated to reflect planning permissions and completions in the current reporting period (2019/20). The toolkit has been a very useful means of promoting the good work undertaken by the department that is often taken for granted. Over this period, the toolkit concludes that the service has contributed £115.2M to the local economy by the allocation of sites in the LDP, the safeguarding of land, the granting and implementation of planning permissions, the operation of its enforcement function and the securing of planning obligations. We aim to update this for the ensuing reporting periods. The 'Dashboard' data summarises the Planning Service's contribution below:

# Value of Planning in Monmouthshire 2019/20

## Planning service key data



28 FTE jobs in planning service



1,106 applications handled



£0.6m collected in fees

### LDP Land Safeguarded



20  
369 ha Green Wedge  
3,174 ha Local Nature Reserve  
434 ha open space  
7,942 ha minerals



**Residential**  
111 ha



**Retail & leisure**  
0 ha



**Commercial**  
244 ha



**Waste**  
0 ha

### LDP Value

**£2.1m uplift value**

(based on land allocated for whole plan period)

**Value adding policies ✓ 89%**

### Applications

9 major  
1,097 minor  
0 other



0 DCOs dealt with  
0 DNS dealt with  
54 LBC applications granted  
14 refusals appealed  
0 judicial reviews

### Decisions

✓ 925 approvals (84%)  
x 24 refusals (2%)  
153 subject to pre app

#### Refusals

■ Delegated ■ Committee

#### Approvals

■ Delegated ■ Committee

### Permissions



**Residential**  
958 units  
£40.4m uplift value  
18% affordable



**Retail & leisure**  
122 m²  
£0.0m uplift value



**Tourism**  
128 bedspaces  
128 self catering

### Permissions

■ Consistent with local plan  
■ Departures from local plan



**Commercial**  
7,546 m²  
£0.2m uplift value



**Renewables & other**  
6 MW  
0 tonnes waste  
0 tonnes minerals  
0 ha remediation  
4ha

### Contributions

#### Section 106 income

£1.1m  
Breakdown

■ Training and employment  
■ Sports and leisure  
■ Environmental  
■ Community/cultural  
■ Formal open space  
■ Primary health  
■ Education  
■ Infrastructure  
■ Active travel  
■ Highways  
■ Affordable housing



#### CIL income



£0 total value

### Completions



**Residential**  
354 units  
23% affordable  
£62.8m uplift value  
£0.5m council tax p.a



**Retail & leisure**  
650 m²  
£0.7m uplift value  
12 gross FTE jobs  
£0.0m business rates p.a



**Tourism**  
10 3 FTE jobs  
10 self catering units



**Commercial**  
17,300 m²  
£9.3m uplift value  
231 gross FTE jobs  
£0.2m business rates p.a



**Renewables**  
0 MW  
£500 community benefit

### Enforcement

297 enforcement complaints  
3 planning contraventions  
2 enforcement notices  
7 breach of condition notices  
0 stop notices  
2 section 125 notices



### Wider indicators



£194,000 spend on consultancy fees



8 internal consultees

0 Energy statements

0 EqlAs

2 Environmental statements



£20,000 health benefits of affordable housing provision p.a



£110,000 recreational benefits from open space created p.a

3 Travel plans

0 HIAs

8 Transport assessments

In 2019/20 the total value of planning was

**£115.2m**

SOURCES: Planning function outputs (LPA survey), Land and property value data (JLL estimates), business rates valuations (Valuation Office Agency), employment densities (English Homes & Communities Agency), Council tax rates (Stats Wales), Health benefits from Affordable Housing (Department for Communities and Local Government Appraisal Guide, based on various studies outlined in appraisal databook), Community benefit from renewables (Renewables UK Cymru). Some of the calculations require high level assumptions to convert between units/m2/ha. Where possible, benchmarks have been employed otherwise reasonable assumptions have been used. Business rate, council tax and gross FTE job estimates based on assumption of 100% occupancy and do not factor in any displacement. Numbers of applications and decisions are unlikely to match up as these can take place in different financial years for any given application. 'Value adding policies' refers to the proportion of policies the team has identified as adding 'intangible value' that are included in local plans. Approvals and refusals do not sum to 100% due to applications carry across years. The total value of planning only incorporates some of the metrics presented in the dashboard.



ARUP

JLL

## **Service Plan priorities for 2019-20**

4.15 The Service Plan for the Planning Service identified the following priority actions:

- Work continued on the Replacement LDP (RLDP) including:  
The Issues, Vision and Objectives Paper was subject to further political reporting to reflect further amendments to the Paper following Council's declaration of a climate emergency on 16th May 2019. The Growth and Spatial Options Paper was reported to Cabinet in July 2019 for endorsement to be issued for non-statutory consultation between 8th July and 5th August. The consultation responses were analysed which have informed the preparation of the Preferred Strategy.  
The Preferred Strategy involved a significant amount of work by the Planning Policy Team which was endorsed by Council on 5th March 2020 for public consultation /engagement. The revised Delivery Agreement timetable was reported to the same Council meeting to reflect the slight delay in the plan preparation process for Council's agreement and submitted to the Welsh Government for the Cabinet Secretary's approval. Various reports and background papers to support/inform the Preferred Strategy were finalised including Housing Background Paper, Review of Candidate Sites against the Preferred Strategy, Growth and Spatial Options Background Paper, Initial ISAR and HRA, Employment Land Review and Larger than Local Employment Study. The Preferred Strategy Consultation and Second Call for Candidate Sites - public consultation and engagement on the Preferred Strategy, along with the second call for candidate sites commenced on 9th March. A series of public drop-in sessions were planned during the 6 week Preferred Strategy consultation period, together with officer attendance at Area Committee and Area Cluster meetings. However, as a result of the circumstances surrounding COVID-19, the decision was taken on 17th March 2020 to postpone the RLDP Preferred Strategy engagement events until further notice and to keep open, with an extended deadline, both the Preferred Strategy consultation period and the second call for candidate sites.
- Joint working continued with Torfaen, Blaenau Gwent, Newport and Caerphilly Councils through progress meetings, as well as progress on jointly commissioning further evidence base work for the respective RLDPs.
- Provision of evidence of the County's housing land supply, retail data and employment land take up. This provides data to inform the LDP Annual Monitoring Report (AMR) and RLDP.
- Regular attendance to ensure that MCC's policies and interests are effectively represented at regional fora, including SEWSPG and Pathfinders. This includes participation in the SDP Task & Finish Group meetings.
- Upgrade the Idox Uniform planning application data base software system and public access module to ensure system resilience and better functionality for system users
- Implement elements of the Team's digital plan for the future of the whole team and implement the plan. This has included improvements to the web site experience for our customers. The web pages have been redesigned to be more accessible and more relevant to users with less text and more links. Information regarding the DM team's recent discretionary services, including fast-track applications and pre-purchase certificates was added to the team's web pages, as were revisions to the pre-application

advice service; changes were also made to comply with the General Data Protection Regulations.

- Review the pre-application advice service to verify it is adding value, reducing waste and that it is valued by customers. This has been carried out although it is proving difficult to obtain customer feedback due to a lack of responses. Of the small proportion returned we understand that the general consensus is that the bespoke service is regarded as 'good' although it can be a little slow; it is regarded favourably compared to many other LPA's services. In terms of officer feedback, they consider that the Uniform Enterprise task works well to prompt them to carry out a task but that it can be challenging to get other internal departments to a meeting. The review has involved the introduction of an online form to enable customers to request pre-application advice. We also reviewed the charges for 2019/20 to more accurately and fairly reflect the time taken to do the work. This has led to an increase in the fee for pre-application advice we charge at Level 2 which now better reflects the statutory service (even though the latter does not involve a meeting with the applicant). The charges were increased from 3 August 2020 but this had been delayed owing to the Covid-19 pandemic. We also introduced a small charge for non-starters which always involve some work but were previously returned without a charge.
- Prepare the 6th LDP Annual Monitoring Report (AMR) and Annual Performance Report (APR). These will be sent to WG in October 2020 and published online.
- Continue the systematic improvement of the processes of the Planning Enforcement team. While significant improvement has been made it remains an action in the current APR.
- Cross-departmental working to ensure corporate plans and activities align with the LDP. This priority is on-going, although significant steps have been taken to improve cross-departmental working relationships, including work on s106 agreements, green infrastructure and the City Deal.
- Consolidate collaborative working arrangements with other agencies including neighbouring local authorities. This has led to joint working arrangements regarding the council's heritage service (with Torfaen Council) as well as joint working on the LDP review with Blaenau Gwent and Torfaen and for the employment evidence base there is a larger than local joint study on the Gwent footprint (including Newport and Caerphilly Councils). Managers also attend SEWSPEG and the DM regional managers' meeting to share good practice and discuss pending or recent changes in planning legislation.

### **Local pressures**

#### **4.16 Key local pressures include:**

- Enabling delivery of the County's housing needs: bringing forward allocated LDP sites; site viability; achieving good planning decisions, creating sustainable communities and seeking to achieve a good housing land supply;
- Consideration of whether to adopt and implement CIL;
- Securing timely consultation responses from consultees, both internal and external;
- The work associated with the review of the adopted LDP having regard to the current Plan's expiry date in 2021 as well as the challenging timetable for delivery;
- The need to help resource and deliver the Strategic Development Plan for SE Wales;
- Constant change caused by successive new legislation, national planning policy and procedures;



- The lack of income from major planning applications due to the gap between the implementation of the current LDP and the adoption of its successor with associated impacts on budgets to resource the service;
- Career and training support for staff in the light of limitations on budgets.

4.17 One of our key challenges is balancing our aim of creating quality places in a timely manner while ensuring schemes are viable and help deliver housing numbers. We are, however, clear that quality is more important than quantity. The introduction of a place-making emphasis in PPW10 is welcomed, as is its form that embraces the Well-Being of Future Generations Act.

#### **Actions from our previous APR**

4.18 Our 2018/19 Annual Performance Report identified four actions:

Action 1 – Complete the review of the effectiveness of the Council’s bespoke pre-application advice service and rolling out the use of Planning Performance Agreements, where appropriate.

Action 2 – Continue to improve the Planning Service’s web pages to deliver relevant, accessible and legible information so that customers can self-serve. This includes investigating the value of a chatbot to signpost users to information held online that can help them self-serve and reduce queries to the team via phone and email.

Action 3 - Systems review of the Planning Service’s enforcement function and its processes to speed up our decision-making, verify if we have the right resources and we are providing a good service for our customers

Action 4 – Continue to pursue an agenda of collaboration in relation to heritage services with neighbouring authorities and collaboration in other areas where possible, including the evidence base for the review of the Local Development Plan.

4.19 Action 1 was completed as discussed and resulted from the desire to ensure we provide a coherent and timely set of processes for our customers in delivering planning outcomes to reduce end-to end times for processing applications. Action 2 also overlapped into making our application processing more efficient in that signposting customers effectively so they can self-serve enables demand on our officers to reduce, freeing up their time to carry out work that is essential and valuable to the service.

4.20 While our evidence shows that customers prefer a positive outcome than a quick decision, we fully recognise that if customers are going to continue using our pre-application advice service (which streamlines the subsequent stages, improves outcomes and generates fee income), they must receive timely and meaningful responses. In addition, new regulations allow customers to claim an application fee refund if their application is not determined within a given timescale. We can reduce this risk by agreeing extended deadlines, which we do to good effect. Customers, however, will not be willing to agree a time extension if they cannot see a timely conclusion being reached or have previously received poor service.

- 4.21 Action 1 was carried out as referred to par. 4.15 (bullet point 6) above. The conclusion is that the bespoke service represents good value for money for applicants (particularly when compared to the more limited statutory service) and is valued by customers. Take up of the bespoke service was healthy over 2019/20 generating over £53k of income for the Council. End-to-end times for determination of such applications were shorter than those where no pre-application advice was involved and 98% of ensuing planning applications that reached a decision were approved indicating the service is generally working well. As part of Action 1, the use of planning performance agreements was also successfully continued into 2019/20 to improve project management of a further more complex proposal for a major housing scheme in Caldicot; however, because of the shortfall in major applications anticipated over 2020-22, this process will be difficult to consolidate, and will need to be rolled forward once the replacement LDP nears adoption.
- 4.22 As regards Action 2, this was partially implemented and improvements and updates were made to the Planning web pages to improve the online payments process and to provide more legible and up to date information on the planning applications process, planning policy (including SPG) and GDPR. The concept of the chatbot was pursued and while the conclusion was that it could be useful in reducing demand particularly on the daily duty officer role, there was a significant cost attached to it which at present needs to be balanced against other ways we can reduce demand that are more of a priority. The chatbot option is therefore set aside for a different, higher priority for 2020/21 that is discussed below (2020/21 Action 1). The chatbot will remain on the agenda for the longer term but will be subject to allowances in the service's budget.
- 4.23 In respect of action 3, this was instigated following a downturn in the performance of the planning enforcement function in 2018/19. Following the appointment of a new enforcement manager midway through 2018/19 it was decided to undertake a more holistic systems review of the Council's planning enforcement team that is a comprehensive piece of work that requires regular assessment and intervention. Measures were put in place to review all enforcement cases at the 10 week stage of the investigation. All officers provided data on cases approaching the 12 week deadline. In addition, quarterly 1-2-1s are now held with all Members of the Enforcement Team to review these figures and identify areas of improvement. In 2018/19 65% of all cases were investigated within the 12 week period as set out in WG Guidance. The investigation period took on average 107 days. In 2019/20 this improved to 75% of all cases being investigated within guidance and an average of just 64 days.
- 4.24 As regards Action 4, during this reporting period it has been possible to secure and manage a shared service between Monmouthshire CC and Torfaen CBC, also extended to provide a service to Blaenau Gwent CBC (on a lesser scale). The Heritage Manager drew up a Memorandum of Understanding and secured approval for the collaboration. This resulted in the appointment of a new Senior Heritage Officer to resource the collaboration, managed by Monmouthshire's Heritage Manager but funded by Torfaen. The service has been in place since January 2019 and has had the second review early in 2020/21. The feedback is positive and both authorities are pleased with the progress being made. It is anticipated that this will continue to be built on in the forthcoming period and it is hoped after the two

year trial period the collaboration will continue on a more formal basis. The collaboration has many benefits, including improved resilience and skill sharing, together with more opportunities to learn and build on the teams skill set. For the above reasons Cadw have been supportive of the new way of delivering heritage services and have endorsed the collaboration. The team has also been able to secure umbrella delegation for MCC named officers to 'sign off' listed building consent applications in Torfaen, meaning that applications in TCBC no longer need to go to Cadw for approval. This has been welcomed and supported by Cadw.

## 5.0 Customer Feedback

- 5.1 The number of formal complaints and letters offering compliments are recorded. There were 13 complaints received over 2019/20, compared to 13 in 2018/19. Two of these led to Stage 2 Complaint recommendations to remedy justified complaint but the elements that were upheld related to responses and communication being kept clear and open with those making representations in respect of other service areas. Any relevant issues are actioned and are raised when necessary at team meetings. Although this level of complaint is regrettable, planning is a contentious area dealing with individual's rights to develop land and where third parties' interests will be affected by planning decisions. Land-use planning will always be an area where complaints will be inevitable to some degree. We do try to learn from any issues of justifiable complaint. It is fair to say that complaints have generally risen across all sectors of the Council over the last year. We received six recorded compliments over 2019/20, the same as the previous period.

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20
Number of Stage 1 formal complaints received	17	9	5	5	4	14	13
Number of Stage 2 formal complaints investigations received	11	5	2	2	1	4	2
Number of Stage 2 complaints upheld or partially upheld	4 partially upheld	3 partially upheld	0 upheld	0 upheld	0 upheld	3 partially upheld	2 elements of the complaints partially upheld*
Number of Ombudsman complaints upheld or partially upheld	1 partially upheld	0	0	0	1 upheld	0	0
Number of compliments received	3	4	2	9	2	6	6

\*One of these did not relate to the Planning Service but other Council service areas in terms of communication with the complainants; the other related to the conduct of a case officer which has been discussed with that officer via one-to-ones.

- 5.2 Quality customer service continues to be a service and organisation priority so the momentum and desire to improve remain.

## **6.0 OUR PERFORMANCE 2019-20**

- 6.1 This section details our performance in 2019-20. It considers both the Planning Performance Framework indicators and other available data to help paint a comprehensive picture of performance. Where appropriate we make comparisons between our performance and the all Wales picture, although the absence of up to date data for 2019/20 from WG means we have to compare performance to the Welsh average over 2018/19.
- 6.2 Performance is analysed across the five key aspects of planning service delivery as set out in the Planning Performance Framework:
- Plan making (this aspect is not covered in this APR as the information is more than adequately analysed in the latest LDP Annual Monitoring Report);
  - Efficiency;
  - Quality;
  - Engagement; and
  - Enforcement.

### **Plan making**

- 6.3 As at 31 March 2020, we were one of 23 LPAs that had a current development plan in place. We are proposing to submit an Annual Monitoring Report in October 2020. This document has been prepared and is being submitted to Welsh Government by 31<sup>st</sup> October 2020. Issues on the performance of the Plan are discussed in detail in that document and are not repeated here.

### **Efficiency**

- 6.4 In 2019-20 we determined 1,106 planning applications, each taking, on average, 70 days to determine. This compares to an average of 77 days (11 weeks) across Wales (2018/19). Following engagement with customers and stakeholders, Monmouthshire County Council has made the evidence-based decision that the outcome of planning applications is far more important than the speed of decision-making. Within reason, customers would prefer to continue working with us to secure an acceptable scheme and obtain planning permission, with as few pre-commencement conditions as possible, than simply have a decision made within an arbitrary 8 week deadline. The impact of planning decisions is long-lived and, while it is recognised that timely decisions can assist the economy, developers and investors also seek clarity and certainty and ultimately want planning permission. Our focus is therefore on the outcome, although we have seen a marked improvement in this figure (which is close to the 'Good' standard of 67 days) via actions to improve our pre-

application advice service and the information on our web pages, as well as more focussed performance management of individual case officers in the DM team.

- 6.5 91% of all planning applications were determined within the required timescales. This was slightly above the Welsh average of 88% for 2018/19. We also determined 84% of Listed Building Consent applications within the required timescales (compared to the Welsh average of 75%).

Over the same period:

- The number of applications we received increased by 8 applications to 1134;
- The number of applications we determined decreased by 5 applications to 1106; and
- The number and percentage of applications we approved increased (97%).

### **Major applications**

- 6.6 We determined 13 major planning applications in 2019-20, none of which were subject to an EIA. Each application took, on average, 296 days (42 weeks) to determine. This compares to 66 days over 2018/19 and so is a substantial decline. This can be largely explained by a small number of longstanding major applications being determined which had been held up awaiting information from the applicants who had wanted the applications to remain in abeyance rather than agreeing to withdraw them and resubmit. This figure is expected to improve although the expectation that there will be fewer major applications because of the lifecycle of the LDP and the impact of the Covid-19 pandemic will need to be monitored. The use of planning performance agreements, where appropriate, should help to reduce end-to-end times for these larger projects.

- 6.7 85% of these major applications were determined within the required timescales, compared to 68% across Wales. This measure is ranked as 'good'.

- 6.8 We have consistently performed above the Welsh average on this measure since 2014/15. Our particularly strong performance for major applications is due to a combination of an effective pre-application service, and a good working relationship with customers ensuring agreement to an extension of time. We are now rolling out planning performance agreements for major applications, where applicants can opt for milestones to be agreed in the processing of their application, based on best endeavours and prioritisation of these important applications.
- 6.9 Over the same period:
- The percentage of householder applications determined within the required timescales decreased from 94% to 89%;
  - The level of approvals increased to 97% (from 95%).
- 6.10 This slight decline in the percentage of householder applications will be monitored over the next reporting period to ensure staff are seeking to agree extensions of time wherever they can. However, overall this shows a very good level of performance over the period.

## **Quality**

- 6.11 In 2019-20, our Planning Committee made 76 planning application decisions during the year, which equated to almost 7% of all planning applications determined. Across Wales just over 6% of all planning application decisions were made by planning committee. Unlike most Authorities, Monmouthshire has a Delegation Panel system in operation whereby most applications (but not householder applications) with between 1 and 4 objections are reviewed by a group comprising the three lead Planning Committee Members. This system works effectively in reducing the number of applications referred to Committee while ensuring interested parties are reassured that their concerns have been heard and reviewed before a decision is made.
- 6.12 Of these Committee-made decisions, 4% (3 out of 76 decisions) went against officer advice. This compared to 8% of member-made decisions across Wales in 2018/19. This equated to 0.27% of all planning application decisions going against officer advice in Monmouthshire (0.4% across Wales). The relatively low proportion of Committee overturns is testament to an effective Member-Officer working relationship, the added value of Planning Committee visiting most sites before making a decision, and an experienced Planning Committee provided with appropriate development training.

- 6.13 The three overturned applications in question related to firstly, an infill housing plot in Portskewett that was judged by Members to be an over development of the plot and indeed, was dismissed at appeal; secondly, a retrospective application for a raising of garden land and a fence in a housing estate in Llanfoist because of concerns about land drainage harming the neighbours' gardens (since regularised via approval of a revised scheme) and a Council proposal for an events pavilion in the grounds of Abergavenny Castle, refused for amenity and impact on the setting of the scheduled monument.
- 6.14 In 2019-20 we received 14 appeals against our planning decisions, which equated to 1.1 appeals for every 100 applications received. This was the third lowest ratio of appeals to applications in Wales indicating our willingness to negotiate proposals to a positive outcome and the strength of our policy framework.
- 6.15 Of the 14 appeals that were decided during the year, 86% were dismissed. These decisions show a marked improvement on the last two years' appeal performance and may reflect the greater emphasis on place-making in appeal decision-making. The proportion of appeals we receive is very low. An appeal is essentially waste in our system as well as waste to the applicant. Our pre-application advice system has been useful in deterring the submission of applications that have little chance of success.
- 6.19 During 2019-20 we had no applications for costs at a section 78 appeal upheld.

## **Engagement**

6.20 We are:

- one of 24 LPAs that allowed members of the public to address the Planning Committee;
- one of 22 LPAs that have an officer on duty to provide advice to members of the public, and
- one of 21 LPAs that had an online register of planning applications.

## **Enforcement**

- 6.21 In 2019-20 we investigated 254 enforcement cases, which equated to 2.8 per 1,000 population. This was a relatively high figure in Wales but was a reduction of 16% compared to the previous reporting period. We investigated 75% of these enforcement cases within 84 days compared to 65% in 2018/19. Across Wales 77% were investigated within 84 days in 2018/19.



6.22 The average time taken to pursue positive enforcement action was 142 days, which was a substantial improvement on last year's performance of 232 days. Given the need to manage this small team's sizeable workload, the team have been undergoing a systems review of the Enforcement function to drive out waste and sharpen our practices, which has led to this marked improvement. As this measure is ranked as Fair instead of Good we have retained this action for the next reporting period to seek to continue the improved performance.

## 7.0 FINDINGS AND CONCLUSIONS

7.1 Based on the performance information in Section 6 and Appendix A, we can be very pleased with the service we deliver. During this period:

- The proportion of major applications determined within 8 weeks or agreed timescales increased and was well above 80%, and substantially above the Welsh average.
- The average time taken to determine applications has reduced significantly from 86 days 2018/2019 to 70 days 2019/2020;
- The number of applications we determined slightly increased (by 2.8%);
- The proportion of applications we approved remained high at 97%;
- Of those applications that had gone through our pre-application advice service, 98% were approved;
- We again dealt with a large number of applications for listed building consent (54 applications) and 84% of these were approved within agreed timescales;
- Enforcement performance improved markedly 2019/20.

This shows that, despite a challenging workload, our performance has been very good and our pre-application advice service is effective.

7.2 A summary table of our performance can be found in Appendix A of the APR. Of the 12 ranked indicators, 9 are ranked Good, while 3 are Fair and 0 are in need of improvement.

- The 'fair' results relate to the average time taken to determine applications (70 days) which just missed the Good target of 67 days but was above the Welsh average of 77 days for 2018/19 as well as the two enforcement measures that improved significantly due to a review (which is on-going) of the enforcement function.

	Number of indicators
Welsh Government target has been set and our performance is 'good'	9
Welsh Government target has been set and our performance is 'fair'	3
Welsh Government target has been set and our performance 'needs improvement'	0

- We performed above or at the Wales average in 11 of the 12 comparable indicators. The indicator for which performance was below the Welsh average related to the average time taken to determine "major" applications in days. Further commentary on the performance against these measures is set out in Section 6.
- Our performance declined against one indicator, which was the average time to determine major applications, as referred to above.

### 7.3 Four actions are identified going forwards.

*Action 1 – Digitise information in relation to woodland / tree preservation order work to help customers self-serve and reduce the significant demand on the Planning Service’s Tree Officer, the daily Duty officer and Support staff.*

*Action 2 – upgrade the Planning Service’s Uniform (planning application processing) software and the public access module that will provide business continuity and provide enhancements to our customers and ensure better GDPR compliance.*

*Action 3 – Continue to review and make positive change to the Planning Service’s enforcement function and its processes to speed up our decision-making, ensuring we are providing a good service for our customers.*

*Action 4 – Continue to review the collaboration arrangements in relation to heritage services with neighbouring authorities (Torfaen and Blaenau Gwent Councils) and to develop a Buildings at Risk (BAR) strategy to manage and prioritise any interventions to enable key heritage assets to realise a sustainable use for future generations.*

### **Digitising paper information and improving the resilience of our back office systems and public access module**

- 7.4 We still hold substantial information on tree preservation orders in the County as paper records in the Council’s ‘amber storage area’. Retrieving such information is time-consuming and inefficient and the lack of accessible information for the public leads to a high volume of calls and enquiries to the Council’s Tree Officer (who is part time, 0.6 FTE), the daily duty officer and also the Support team. Digitising this information will reduce phone calls and emails to all those officer sand will free up time to carry out work of greater value to the service and customers, such as processing submissions for pre-application advice and the applications themselves. The quality of the data also needs review (for example, some of the older TPOs need reviewing as the information will be out of date), although this will be carried out once the data is in a digitised format that is easier to manage and change (Action 1).

***Action 1 – Digitise information in relation to woodland / tree preservation order work to help customers self-serve and reduce the significant demand on the Planning Service’s Tree Officer, the daily Duty officer and Support staff.***

In addition, the Service’s planning application processing software, Uniform, must be upgraded over 2020/21 as the current system is now de-supported. This will achieve business continuity and more resilience for the service. Also, the public access module will need to be upgraded which will provide benefits to customers once they have registered with the software and will be more robust in terms of GDPR compliance (Action 2).

***Action 2 – upgrade the Planning Service’s Uniform (planning application processing) software and the public access module that will provide business continuity and provide enhancements to our customers and ensure better GDPR compliance.***

### **Speed of resolving enforcement cases**

- 7.5 The performance of the Council’s Planning Enforcement team had declined in relation to the two enforcement measures in the Performance Framework over 2018/ 19, resulting in complaints about delays from the public and the perception the service was poorly performing. These issues are certainly not unique to Monmouthshire, and the problem is at least in part due to a misunderstanding of the powers available to us and/or unrealistic expectations, a matter that had been addressed in some way by the training on enforcement that took place in May 2018 for community and town councillors. Over 2019/20 there were substantial reductions in the time taken to investigate enforcement complaints due to measures instigated by the new manager of this team. There remains, however, scope for continued improvement. The systems review of the Planning Enforcement function is ongoing and has already helped to improve this team’s practices and drive out waste. The action below therefore is a spin-off from last year’s (Action 3).

***Action 3 – Continue to review and make positive change to the Planning Service’s enforcement function and its processes to speed up our decision-making, ensuring we are providing a good service for our customers***

### **Collaborative Working and Buildings at Risk Strategy**

- 7.6 Monmouthshire has a wealth of heritage assets and has long invested in its heritage team to manage these assets in the public interest. It has become apparent in recent years that opportunities existed to work collaboratively with neighbouring Councils to provide a shared heritage resource. The previous reporting period saw the establishment of a shared heritage service with Torfaen Council that has been working well. This has given the opportunity to address issues of capacity and consistency of advice between Authorities. In addition, it provides an opportunity to increase resilience, knowledge and the skills base of aspects of Historic Environment Management through building and sharing of expertise and experience. It also acknowledges the agenda for collaboration in the

delivery of local government services being promoted by Welsh Government. An action from last year saw the team seek to extend the offer to other neighbouring local authorities which resulted in a memorandum of understanding being agreed to provide heritage services for Blaenau Gwent CBC. This has so far worked well and has allowed the service to provide resilience to BGCBC whose range of work does not need a full time heritage officer while not impacting on the team's ability to cover the demanding heritage workload in Monmouthshire.

There are competing demands on the Heritage Team and many requests from the community are received to intervene to stop the decay of several prominent listed buildings throughout the County. Officer time and financial resources are limited in this regard, but an action plan agreed by Members would help to prioritise the cases that warrant priority working and action. To this end a Buildings at Risk Strategy and action plan is proposed to be developed to manage this process more effectively and to help the communities understand the choices we make when opting to take appropriate action to save and protect such assets. The strategy would put a methodology in place for drawing out the worst buildings and then set out appropriate actions as to how these are tackled; in all likelihood there would be actions identified to address the worst 5-10 buildings at risk so it is a more manageable and transparent process.

***Action 4 – Continue to review the collaboration arrangements in relation to heritage services with neighbouring authorities (Torfaen and Blaenau Gwent Councils) and to develop a Buildings at Risk (BAR) strategy to manage and prioritise any interventions to enable key heritage assets to realise a sustainable use for future generations.***

#### **Opportunities going forward:**

7.9 The following opportunities for the coming year have been identified as a result of this Annual Performance Report, our LDP, AMR and our Service Business Plans:

- In tandem with our systems thinking approach, to use Team meetings and performance reports to drill down into specific areas of workflow and identify where problems exist and why, with a targeted approach to identifying solutions;
- Continue to roll out the project management of major planning applications, where appropriate, via planning performance agreements to seek by best endeavours to ensure timely and well-managed processing of such applications, providing a good customer experience for the customer;
- To digitise the Tree information held by the Council in paper form to improve the web site experience for customers and improve customers' pathways to information (Action 1);
- To upgrade the use of the more efficient database for planning applications to reduce waste for staff, including the production of standard letters and monitoring reports and to upgrade public access module to improve the customer experience (Action 2);

- To improve the speed with which we deal with enforcement cases via the continued systems review of the Enforcement function (Action 3);
- To continue to review the collaboration arrangements in relation to a Built Heritage Management Service with neighbouring local authorities, providing resilience, shared learning and consistency across those areas (Action 4);
- To develop a Buildings At Risk Strategy to safeguard some of our most precious but vulnerable heritage assets (Action 4);
- Continue with the replacement Monmouthshire LDP because of the need to address the shortfall in the housing land supply and facilitate the identification/ allocation of additional housing land as well as addressing the demographic and employment challenges of the County;
- To identify, implement and/or disseminate best practice via the Planning Officers' Society for Wales or other working groups, including the Welsh Government, the WLGA and the RTPi
- Promote the value of the work carried out by the Council's Planning Service by updating the Value of Planning toolkit on an annual basis and publicising the findings in each APR.
- To respond to the threat provided by the emerging Covid-19 pandemic to ensure business continuity. This will be reported in detail in next year's APR but can be summarised here as involving staff working almost entirely at home, signposting electronic submissions only, risk assessed site visits and remote committee and delegation panel meetings as well as meetings in general.

7.10 Progress will be measured via our 2021/22 Annual Performance Report, 2021/22 LDP Annual Monitoring Report, and our 2020-2023 Service Business Plan.

## ANNEX A - PERFORMANCE FRAMEWORK

### OVERVIEW

MEASURE	GOOD	FAIR	IMPROVE
<b>Efficiency</b>			
Percentage of "major" applications determined within time periods required	>60	50.1-59.9	<50
Average time taken to determine "major" applications in days	Not set	Not set	Not set
Percentage of all applications determined within time periods required	>80	70.1-79.9	<70
Average time taken to determine all applications in days	<67	67-111	112+
Percentage of Listed Building Consent applications determined within time periods required	80+	70.1-79.9	<70
<b>Quality</b>			
Percentage of Member made decisions against officer advice	<5	5-9	9+
Percentage of appeals dismissed	>66	55.1-65.9	<55
Applications for costs at Section 78 appeal upheld in the reporting period	0	1	2+
<b>Engagement</b>			
Does the local planning authority allow members of the public to address the Planning Committee?	Yes		No
Does the local planning authority have an officer on duty to provide advice to members of the public?	Yes		No
Does the local planning authority's web site have an online register of planning applications, which members of the public can access, track their progress (and view their content)?	Yes	Partial	No
<b>Enforcement</b>			

WALES AVERAGE 2018/19	Monmouths hire LPA 2018/19	Monmouths hire LPA 2019/20
68	89	85
232	66	296
88	88	91
77	86	70
75	89	84
9	4	4
68	46	86
0	0	0
Yes	Yes	Yes
Yes	Yes	Yes
Yes	Yes	Yes

MEASURE	GOOD	FAIR	IMPROVE
Percentage of enforcement cases investigated (determined whether a breach of planning control has occurred and, if so, resolved whether or not enforcement action is expedient) within 84 days	>80	70.1-79.9	<70
Average time taken to take positive enforcement action	<100	101-200	200+

WALES AVERAGE 2018/19	Monmouths hire LPA 2018/19	Monmouths hire LPA 2019/20
77	65	75
167	232	142



## SECTION 1 - EFFICIENCY

Indicator	05. Percentage of "major" applications determined within time periods required	
"Good"	"Fair"	"Improvement needed"
More than 60% of applications are determined within the statutory time period	Between 50% and 60% of applications are determined within the statutory time period	Less than 50% of applications are determined within the statutory time period

Authority's performance	85
<p>The team's performance has declined slightly from 89% over 2018/19. This element of the team's performance, however, remains strong over 2019/20 and is well above the Welsh average of 67.8%. We determined 11 out of 13 major applications within agreed time periods. To prioritise resources for major planning applications, planning performance agreements will be increasingly adopted with applicants for suitable planning applications, leading to better project management of these generally more complex applications.</p>	

Indicator	06. Average time taken to determine "major" applications in days	
"Good"	"Fair"	"Improvement needed"
Target to be benchmarked	Target to be benchmarked	Target to be benchmarked

Authority's performance	296
<p>The Council's performance declined under this measure due to a small number of long-standing applications being determined that skewed the overall figure. These applications were awaiting information from the applicant and had been 'held in abeyance' for lengthy periods – these applications involved i) a proposal for retail and food/drink uses at Dixon Road roundabout, Monmouth (subsequently refused and had been awaiting retail impact and surface water drainage information) – took 678 days to determine, and ii) a proposal for conversion of an office building to residential at the Job Centre, Abergavenny, that was impacted by significant design amendments and then the recommendation changed at the eleventh hour when it became clear the site had been let and was therefore viable for employment use – thus, refused after three years of consideration – took 1068 days to determine.</p> <p>If these two outlying applications were omitted this measure fell to 195 days, which would have been below the Welsh average. Although we acknowledge this could be improved upon.</p>	

It is worth noting that the continued use of PPAs should help the team to keep this measure at a good level of performance in future years.

Indicator	07. Percentage of all applications determined within time periods required	
"Good"	"Fair"	"Improvement needed"
More than 80% of applications are determined within the statutory time period	Between 70% and 80% of applications are determined within the statutory time period	Less than 70% of applications are determined within the statutory time period

Authority's performance	91
<p>91% of all planning applications we dealt with were determined within the required timescales, which is well above the 80% threshold for the 'Good' performance ranking. This compared to 88% across Wales and is a slight improvement compared to last year (88%).</p> <p>The slight improvement can be attributed to the bedding in of the Council's planning application back office system which was introduced in March-April 2018.</p>	

Indicator	08. Average time taken to determine all applications in days	
"Good"	"Fair"	"Improvement needed"
Less than 67 days	Between 67 and 111 days	112 days or more

Authority's performance	70 days
<p>In 2019-20 we determined 1106 planning applications, each taking, on average, 77 days (11 weeks) to determine. This is the same as the Wales average for 2018/19, also 77 days and just misses the 'good' target of 67 days. Given our focus on outcome rather than speed, this is a reasonable achievement and suggests we have struck a fair balance between these two objectives.</p> <p>This measure improved on the 86 days in the previous reporting period and showed the effects of the increased management of the planning application case officers by their line managers in terms of workload, target setting and output.</p> <p>This will continue to be a priority for the service.</p>	

Indicator	08a. Percentage of Listed Building Consent applications determined within time periods required	
"Good"	"Fair"	"Improvement needed"
Target to be benchmarked	Target to be benchmarked	Target to be benchmarked

Authority's performance	84
<p>This is the third year of its inclusion as an indicator and the performance has improved significantly since its first where 67% of applications for listed building consent were determined within agreed timescales. The Welsh average for this indicator was 75%. The Council's Heritage team has worked hard at improving its turnaround of listed building applications. The team of four officers (including a monitoring officer) also contributes to the pre-application advice process, the handling of appeals and provides consultation responses on planning applications in conservation areas. A similar service is also provided for Torfaen Council and to a lesser extent Blaenau Gwent CBC. The Authority has Cadw accredited delegation arrangements for grade II* and II buildings.</p>	

## SECTION 2 - QUALITY

Indicator	09. Percentage of Member made decisions against officer advice	
"Good"	"Fair"	"Improvement needed"
Less than 5% of decisions	Between 5% and 9% of decisions	9% or more of decisions

Authority's performance	4
<p>Monmouthshire's performance shows that 4% of Committee decisions go against officer recommendation, which equated to 3 planning applications out of 76 determined at committee during 2019/20 which was a similar rate to the performance over 2018/19. This compares favourably to the 8.2% average in Wales over 2017/18 and is below the 5% or less threshold to be rated 'Good'.</p> <p>Provided that Committee decisions are based on good planning judgement and material planning considerations, overturned recommendations are a perfectly acceptable part of the planning process. The difficulty only arises where decisions are made that cannot be substantiated at appeal.</p> <p>The three overturned applications in question related to</p> <ul style="list-style-type: none"> <li>i) A proposal for an infill detached dwelling in Portskewett, refused by Members as being incongruous and out of character which was then dismissed on appeal;</li> <li>ii) An open sided pavilion in the grounds of Abergavenny Castle, refused due to impact on local residential amenity and harm to the setting of the scheduled Castle; this decision was not appealed and no resubmission took place.</li> <li>iii) The third decision related to the raising of garden land and associated fencing at Jasper Tudor Close, Llanfoist which was refused by Members on the basis of the adverse impact of land drainage from the works on neighbouring gardens; this proposal was subsequently resolved via Committee's approval of a revised proposal for a reduced development.</li> </ul> <p>All appeal decisions are reported to committee so that Members can review and learn from such decisions.</p>	

Indicator	10. Percentage of appeals dismissed	
"Good"	"Fair"	"Improvement needed"
More than 66% (two thirds) of planning decisions are successfully defended at appeal	Between 55% and 66% of planning decisions are successfully defended at appeal	Less than 55% of planning decisions are successfully defended at appeal

Authority's performance	86
<p>This year saw a marked improvement in performance and went from 46% (red) to 86% (green) with 12 out of 14 appeals being 'won'. The placemaking agenda set out in PPW10 may be</p>	

providing a higher benchmark for appeal Inspectors' decisions which is helpful to our decision making process. The decisions are reviewed in the Planning Service's monthly Policy / DM Liaison meetings as well as at Planning Committee and detailed issues are shared and discussed.

The proportion of appeals we deal with is low at 1.1 appeals for every 100 applications received (Welsh average 2 appeals per 100 applications determined in 2018/19). This indicates our willingness to negotiate proposals to a positive outcome and the strength of our policy framework.

Indicator	11. Applications for costs at Section 78 appeal upheld in the reporting period	
"Good"	"Fair"	"Improvement needed"
The authority has not had costs awarded against it at appeal	The authority has had costs awarded against it in one appeal case	The authority has had costs awarded against it in two or more appeal cases

Authority's performance	0
<p>No awards of costs for unreasonable behaviour have been made against us this year.</p> <p>An action identified in the first APR was to report appeal decisions to Planning Committee every month for learning and discussion. This action has been implemented and has been welcomed by the Committee as useful. Committee members are also encouraged to sit in on appeal hearings or inquiries as further development training and to assist the case officer. The Council's protocol is that nominated members help to present the case where a decision is contrary to the officer recommendation.</p>	

## SECTION 3 – ENGAGEMENT

Indicator	12. Does the local planning authority allow members of the public to address the Planning Committee?	
<b>“Good”</b>		<b>“Improvement needed”</b>
Members of the public are able to address the Planning Committee		Members of the public are not able to address the Planning Committee

Authority’s performance	Yes
<p>Monmouthshire has an established and effective Public Speaking Protocol and also allows applicants, objectors, supports and community and town councils to speak at the Delegation Panel site visits prior to the Covid-19 pandemic. This has proven to be a valuable exercise in terms of making informed decisions and improved customer and community satisfaction, even if the final decision is not the one they hoped for.</p> <p>The Size and Composition of Local Planning Authority Committees (Wales) Regulations 2017 did not seek to control the public speaking element of a planning committee. If any future national protocol seeking consistency throughout Wales is published it is hoped it is provided as best practice guidance and does not curtail the successful delegation and public speaking systems we already employ.</p>	

Indicator	13. Does the local planning authority have an officer on duty to provide advice to members of the public?	
<b>“Good”</b>		<b>“Improvement needed”</b>
Members of the public can seek advice from a duty planning officer		There is no duty planning officer available

Authority’s performance	Yes
<p>We have a duty officer available every day from 9am to 5pm and although this is resource intensive, we recognise from feedback to previous customer satisfaction surveys that this is a service that the customer values.</p>	

Indicator	14. Does the local planning authority’s web site have an online register of planning applications, which members of the public can access track their progress (and view their content)?	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
All documents are available online	Only the planning application details are available online, and access to other documents must be sought directly	No planning application information is published online

Authority's performance	Yes
<p>Our public access element allows customers to view all public documents and plans relating to applications including officer reports and decision notices, and also allows customers to comment online.</p> <p>We implemented a new back office system at the start of the previous reporting period and now this has become well-established this has helped make savings in time in relation to automation and easier process steps. This has allowed officers to carry out more work of value such as determining applications for pre-application advice and planning applications.</p> <p>Navigational and functional improvements to the Idox public access module (e.g. to enable a customer to track changes to an application) have been actioned during this reporting period.</p>	



## SECTION 5 – ENFORCEMENT

Indicator	15. Percentage of enforcement cases investigated (determined whether a breach of planning control has occurred and, if so, resolved whether or not enforcement action is expedient) within 84 days	
“Good”	“Fair”	“Improvement needed”
More than 80% of enforcement cases are investigated in 84 days	Between 70% and 80% of enforcement cases are investigated in 84 days	Less than 70% of enforcement cases are investigated in 84 days

Authority’s performance	75
<p>This was a previously a disappointing area of performance and compared poorly to the Welsh average of 76.3% in 2018/19 when it was 65%. The appointment of a new Area Team Manager who manages the enforcement section saw the commencement of a systems review of the enforcement function in 2018/19. This measure rose to 75% over 2019/20 and while the key changes were put on place by December 2019 we would like to move much closer to 100% for this measure and thus the action to closely monitor the performance of the Enforcement Team is retained. Special attention will be given to this measure in the next reporting period.</p>	

Indicator	16. Average time taken to take positive enforcement action	
“Good”	“Fair”	“Improvement needed”
Target to be benchmarked	Target to be benchmarked	Target to be benchmarked

Authority’s performance	142
<p>Again, this indicator improved significantly and is now below the Welsh average of 165 days (2018/19). The systematic review of the enforcement service during 2020/21 will continue to seek to omit waste, poor working practices and find smarter ways of working to reduce this time further.</p>	