PLANNING TRANSFORMATION ACTION PLAN

February 2022

Aim

To enable the Development Management (DM) team and wider Planning Service to be appropriately resourced, organised and monitored to be able to meet its statutory targets and requirements, the needs of the development community and Croydon residents and businesses, within the context of the Mayor's Business Plan.

Objectives

- Continue improved performance for the determination of planning applications against government targets particularly in relation to non major applications.
- Maintain performance for the determination of major planning applications against Government targets
- Reduce backlog of planning applications in order to reduce the time taken to determine planning applications.
- Maintain quality of decision making having regard to the policies of the adopted Development Plan and other material considerations.
- Review enforcement practices and resources to reduce caseloads and focus resources appropriately.
- Review the structure of the service to ensure all aspects of the service are adequately resourced.
- Seek to retain the current knowledgeable and dedicated staff and promote the Borough to attract new staff
- Identify procedural and technological efficiencies to aid decision making and increase productivity.
- Re-focus the Pre Application Service to ensure that advice can be provided in a timelier manner.
- Work with residents and members, to prepare a communications and engagement strategy and to help interested parties gain a better understanding of the planning process
- Embed a culture of continuous officer support, learning and improvement in order to boost staff retention and morale.
- Promote health and well-being across the service, including mental health support given the focus on the service.
- Inform budget setting to facilitate a financially sustainable service.

Introduction

The Development Management team, including Planning Enforcement function of the Local Planning Authority (LPA) is a very public face of Planning. It is a high-profile service which receives a significant amount of scrutiny from politicians, residents and the development community. Over the previous two years the Council has experienced a significant amount of change both financially and politically. The backdrop of financial constraint, changing working practices as a result of the significant period of lockdown, an increase in planning applications during the lockdown period and a nationwide shortage of qualified and experienced planning staff, has had a significant impact on the service.

All LPAs are closely monitored by the Department for Communities and Levelling Up in relation to the speed and quality of decision making. Prior to March 2020 the Development Management Service had a healthy performance for speed of decision making against both major and non-major Government targets. However, due to the range of factors highlighted above the services performance in the non-major category reduced to close to the Government's performance minimal target at the start of 2022. In addition to this, it was clear that workloads had been unsustainably high for a long period of time. This was impacting on officer's health, morale, and the ability of the Borough to retain staff. As a consequence, this impacted on the level of customer service that the Development Management team were able to provide, which led to mistrust of the service with some customers and interested parties.

The Development Management team has a key role in delivering the Borough's objectives and therefore it is imperative that the service is able to provide a timely and effective Development Management service. With this in mind the Planning Advisory Service (PAS) were invited to Croydon to undertake the following reviews:

- Development Management Process Review
- Planning Peer Challenge.

The Development Management Process Review and the Peer Review were completed in June 2022. The Process Review included a review of the processes and practices which the team has in place and the Peer Challenge also included discussions and interviews with officers, politicians, customers and interested parties.

Both reviews have identified that the existing service has examples of best practices and the team benefits from knowledgeable and dedicated officers. There is good foundation to build upon to improve the delivery of the service. However, the reviews identified that the service is close to breaking point and that if improvement does not happen swiftly it will bring into the question the Council's ability to provide an effective Development Management Service.

Whilst elements of good and best practice are identified the two reviews undertaken by PAS make a number of recommendations for the Service. This Transformation Action Plan is one the recommendations required to set out the necessary work steams identified by the reviews.

Much work has already been undertaken since summer 2022 to reduce backlog and reduce the time taken to determine planning applications. However, as a service it is acknowledged that whilst more resource is required, improvements to the service are necessary beyond employing more staff and there is a need to increase productivity. This will very much be a process of continual development. However, it will not be possible for some of the recommendations of the PAS team to be achieved without additional resource or resource and input from other teams outside the Planning Service within the wider Council. It will be critical to secure additional resource in the form of a Planning Improvement Manager to drive the delivery of this Action Plan.

The recommendations of the PAS reviews can be grouped in the following areas:

- **Resource and Performance Management**
- **Technological Improvements**
- **Officer, Training, Development, Morale and Retention**
- **Internal Process Review**
- **Communication and Engagement**
- **Planning Policy, Procedure Development**
- **Planning Committee**

These have been supplemented by additional recommendations that have been identified through management review and analysis.

For each of the recommendations/tasks outlined below it will be necessary to identify measurable targets, individual tasks, milestones and outputs within an overall task timescale. These will be actioned by the new Planning Improvement Manager.

The new Planning Improvement Manager will lead this work in close collaboration with the DM Management Team and the Director of Planning and Sustainable Regeneration. This work will be over a two-year period with all recommendations initiating the first year, although phased to align with capacity.

Resource and Performance Management

	Recommendation 1 – Review the Resourcing of the Planning Service				
Action		**Timescale to Commence**	**Lead Accountability**	**Project Manager**	**Corporate /External Resource or Decision**
a.	Review and establish the appropriate resourcing (permanent and contractor) and structure of the Service to ensure the team can promote the benefit of good planning through the creation of jobs the creation of housing, jobs, infrastructure to benefit existing residents	Q2	Head of DM	Planning Improvement Manager	HR and Finance
b.	Review the resourcing requirement (skills, experience, and quantity) to effectively resource pre application and PPA services to optimise income.	Q1	Head of DM and	Planning Improvement Manager	HR and Finance

		Timescale to Commence	Lead Accountability	Project Manager	Corporate/External Resource or Decision
c.	Benchmark titles, experience, and salaries with neighbouring authorities to determine whether the current approach is reducing the ability to recruit. Consider use of further market supplements to retain and attract staff	Year 2 Q2	Head of DM	Planning Improvement Manager	HR and Finance
d.	Employ additional resources on a temporary basis to increase resources and address the applications backlog to ensure a manageable caseload	Q1	Head of DM	Planning Improvement Manager	Financial approval required
e.	Undertake a PAS Resource Review to identify the staffing resource required to deal with the ongoing workload demands and prevent the build-up of backlogs of both applications and enforcement cases.	Q3	Head of DM	Planning Improvement Manager	PAS and Finance approval required

Recommendation 2 – Enforcement Practices					
Action		**Timescale to Commence**	**Lead Accountability**	**Project Manager**	**Corporate /External Resource or Decision**
a.	Employ additional temporary staff to increase resources to enable the Enforcement backlog to be reviewed and reduced	Q1	Head of DM	Planning Improvement Manager	Approval from HR and Finance
b.	Review structure of Enforcement team to ensure appropriate senior management resource	Q2	Head of DM	Planning Improvement Manager	Approval from HR and Finance
c.	Review procedures for taking formal action by benchmarking against other London Boroughs	Q2	Planning Improvement Manager	Team Leader of Planning Enforcement	No

	Action	Timescale to Commence	Lead Accountability	Project Manager	Corporate/External Resource or Decision
d.	Review enforcement reporting so that it is given greater exposure to Members and senior officers	Q2	Planning Improvement Manager	Team leader of Planning Enforcement	No
e.	Regular enforcement clearance weeks	Ongoing	Head of DM	Team leader of Planning Enforcement	No
f.	Proactively close down files with targets to review and determine whether action is expedient or not.	Ongoing	Head of DM	Team leader of Planning Enforcement	No
g.	Undertake targeted enforcement initiatives that demonstrated delivery to the public and Members	Q2	Head of DM	Team Leader of Planning Enforcement	Yes
Recommendation 3 - Performance Management					
Action		**Timescale to Commence**	**Lead Accountability**	**Project Manager**	**Corporate /External Resource or Decision**
a.	Re-introduce the appeals monitoring process and include a regular report to Planning Committee.	Q1 To be reported to committee quarterly	Planning Improvement Manager	Team Leader Tech Support	No
b.	Monitor major appeal decisions and the Government quality measure using the PAS "Crystal Ball" particularly with reference to the appeals for non-determination	On going	Planning Improvement Manager	Area Team Leaders	No
c.	Identify Service, team and officer specific KPIs and ensure they are monitored and included as an integral part of the relevant meetings i.e., Service, Team and 1 to 1s	Year 2 Q 2	Planning Improvement Manager	Area Team Leaders	No
d.	Establish targets for reduced use of EOTs focused particularly on non-Majors	Q3	Planning Improvement Manager	Area Team Leaders	No

e.	Ensure the DM Manual is regularly reviewed and kept up to date.	On going	Planning Improvement Manager	Area Team Leaders	No

Technological Improvements

	Recommendation 4 - Review the current IT investment as part of a wider transformation programme.				
Action		**Timescale to Commence**	**Lead Accountability**	**Project Manager**	**Corporate /External Resource Or Decision**
a.	To invest in IT improvements and training staff as part of a wider Council transformation programme	Q1	Head of DM	Planning Improvement Manager	IT/CDS Finance approval
b.	To set up the Uniform system so that it can be used to its full capacity	Q1	Head of DM	Planning Improvement Manager	IT/CDS Finance approval
c.	To call upon support from other London boroughs to make best use of the Uniform system	Q1	Head of DM	Planning Improvement Manager	IT/CDS Finance
d.	Identify additional IT improvements which can help the efficiency and quality of decision making.	Q1	Head of DM	Planning Improvement Manager	IT/CDS Finance approval

Officer, Training, Development, Morale and Retention

	Recommendation 5- Job Descriptions (JDs), training and development

Action	Timescale to Commence	Lead Accountability	Project Manager	Corporate /External Resource or Decision
a. Include a clear approach to Development Management performance management throughout the JDs. Refer to developing and setting individual and team KPIs; and undertaking performance management functions such as 1 to 1s, appraisals, team meetings, coaching, mentoring etc.	Year 2 Q2	Head of DM	Planning Improvement Manager	HR
b. Review all JDs to ensure they accurately reflect the work that the grade is expected to undertake.	Year 2 Q2	Head of DM	Planning Improvement Manager	HR
c. Refer in all JDs the responsibility, at every level, to updating (or assist with updating), improving and implementing the DM Manual.	Year 2 Q2	Head of DM	Planning Improvement Manager	HR
d. Review training and development needs for the team, identify appropriate training opportunities to retain and upskill staff, 'to grow our own' and ensure skill gaps are met and to maintain succession planning at all levels within the team.	Q4	Planning Improvement Manager	Area Team Leaders and Deputy Team Leaders	HR
Recommendation 6 - Officer Morale and Mental Health				
Action	Timescale	Lead Accountability	Project Manager	Corporate /External Resource or Decision
a. Dedicated time for staff to share experiences and problem solve, as well as providing a safe space for voicing concerns. Croydon should programme in a whole department away-day focussed on staff morale and specifically the journey of improvement being undertaken.	Q1	Director and Head of DM	Planning Improvement Manager	No

	Action	Timescale	Lead Accountability	Project Manager	Corporate/ External Resource Or Decision
b.	Support for staff's mental health and wellbeing – setting up sessions where staff can voice how they feel and, critically, what will be done to support them. This is beyond the organisation's intranet resources.	Q1	CEO	Planning Improvement Manager	Yes
c.	Create time within the Development Management Team meetings to allow a discussion on staff morale and current issues.	Q1	Director and Head of DM	Planning Improvement Manager	No
d.	The existing programme of informal mentoring should be developed further to encourage peer to peer learning across all levels of the department.	Q1	Director and Head of DM	Planning Improvement Manager	No
e.	Wider staff retention and development strategy including the promotion of the positives/benefits of working for Croydon and providing clear paths that allow staff to develop themselves within the organisation	Q4	Director and Head of DM	Planning Improvement Manager	HR
f.	To use PAS for member and officer training, specifically mentoring options for key councillors and officers so that they can be provided with an outlet for discussing approaches to the very significant issues that are being encountered in Croydon on a day-to-day basis.	Q1	Director and Head of DM	Planning Improvement Manager	Demo Services

Internal Process Review

Recommendation 7 - Review the Council's approach to validation				
Action	Timescale	Lead Accountability	Project Manager	Corporate/ External Resource Or Decision

Action	Timescale	Lead Accountability	Project Manager	Corporate/External Resource or Decision
a. Consider the reversion of the validation of planning applications back to the Technical Support Team (following recruitment and training) to free up planning officer time to assess planning applications. This will require additional resources in the Technical Support Team	Q1	Head of DM	Planning Improvement Manager	Capita Terraquest Finance Approval
b. Hold a workshop session with officers and Tech Support as part of recommendation above to help break the cycle of delays in validation	Q1	Head of DM	Planning Improvement Manager	No
c. Provide the necessary technical support to ensure that the Enterprise system is set up to allow allocation of applications to take place without the use of alternative systems	Q1	Head of DM	Planning Improvement Manager	IT CDS IDOX
d. Ensure technical support experience of Uniform is shared and seek to limit reliance on specific individuals	Q1	Head of DM	Planning Improvement Manager	No
e. Work with agents/developers/applicants to work together and jointly own the performance issues	Q1	Head of DM	Planning Improvement Manager	Applicants and Developer Forum

	Recommendation 8 - Work more effectively with consultees to better use the resources available to deliver timely and quality advice for decision making			
Action	**Timescale**	**Lead Accountability**	**Project Manager**	**Corporate /External Resource or Decision**
a. Raise corporately the issues of internal consultee resourcing and the knock-on effect it has on planning.	Q1	Director	Head of DM	CMT
b. Investigate the increase of internal planning solicitor resource (and a clear long-term approach to external legal support) that can be more accessible and timely to ensure robust decision making	Q1	Head of DM	Planning Improvement Manager	Legal Finance

Action	Timescales	Lead Accountability	Project Manager	Corporate / External Resources Required
c. Consider the costs and benefit in relation to employing an in-house viability expert including a shared services approach with neighbouring boroughs	Q4	Head of DM	Planning Improvement Manager	Finance HR
d. Develop standing advice, template responses and officer training so that planning officers can make better informed decisions without the need for consultee advice in all cases	Year 2 Q1	Head of DM	Planning Improvement Manager	Corporate Consultees External Consultees
e. Make better use of consultation surgeries and regular catch-up meetings to ensure more timely and consistent responses are provided	Q1	Planning Improvement Manager	Area Team Leaders	Corporate Consultees External Consultees
f. Agree clear protocols on when consultee advice is needed and timescales for delivering the advice	Q3	Planning Improvement Manager	Area Team Leaders	Corporate Consultees External Consultees

Recommendation 9 - Cultivate the excellent best practice that is already being shown with the "Cobra" officer meetings				
Action	**Timescales**	**Lead Accountability**	**Project Manager**	**Corporate / External Resources Required**
a. Continue to operate the Major Applications officer briefings and ensure that they are given the priority status required	Weekly and on going	Head of DM	Area Team Leaders	No

Recommendation 10 - Quality of Officer Reports				
Action	**Timescales**	**Lead Accountability**	**Project Manager**	**Corporate /External Resource or Decision**
a. Introduce a standardised template for section headings in all officer reports	Q2	Planning Improvement Manager	Area Team Leaders	No

	Action	Timeline to commence	Lead Accountability	Project Manager	Corporate /External Resources or Decision
b.	Include a section within reports that reference relevant emerging policies and how they apply to the development as material considerations.	Q2	Planning Improvement Manager	Area Team Leaders	No
c.	Include within Reports statements on: Human Rights, Equality Act and Financial considerations.	Q2	Planning Improvement Manager	Area Team Leaders	Corporate Consultees
	Recommendation 11 - Refocus pre-application and PPAs procedures to provide better service to customers and maximise income.				
Action		**Timeline to commence**	**Lead Accountability**	**Project Manager**	**Corporate /External Resources or Decision**
a.	Review the current pre-application process in terms of the type of service offered and the fees	Q1	Head of DM	Head of DM	Yes
b.	Seek to streamline agency recruitment processes and SCP approval to enable staff to be brought in quickly to allow current officers to focus on PPAs where signed up to and paid	Q1	Director	Head of DM	Yes
c.	Relevant officers should join the national PAS programme on best practice in pre apps and PPAs so that they can share best practice from Croydon as well as learning from approaches taken elsewhere in the country	October 22 and ongoing.	Head of DM	Area Team Leader Central	No
	Recommendation 12- Scheme of Delegation and Planning Committee Code				
Action		**Timeline to Commence**	**Lead Accountability**	**Project Manager**	**Corporate / External Resources or Decision**

		Year 2 Q 2	Head of DM	Planning Improvement Manager	Legal input required through the Constitution Working Group
a.	Review wording in the procedures and code where there could be potential problems as identified by PAS.	Year 2 Q 2	Head of DM	Planning Improvement Manager	Legal input required through the Constitution Working Group

Communication and Engagement

	Recommendation 13 - Develop a strategy for effective engagement and communication to rebuild trust with local communities that works alongside the Plan Making engagement process.				
Action		**Timeline**	**Lead Accountability**	**Project Manager**	**Corporate / External Resource or Decision**
a.	The establishment of a learning through experience process to better understand both positive and negative community feedback so that officers can better engage with communities in the future	Q2	Head of DM	Planning Improvement Manager	RAs Residents Voice Board
b.	Carry out well publicised quick wins through improvements to the accessibility of the website and improved customer response times	Q1	Head of DM	Planning Improvement Manager	IT/CDS
c.	Better communicating how the Council ensures transparency in decision making and other conflicts of interest	Q1	Head of DM	Planning Improvement Manager	IT/CDS
d.	Improve communication with the development industry through a greater focus on local agents and re-enforcing the importance that is already being given to the developer forums	Q4	Head of DM	Planning Improvement Manager	

Action	Timeline	Lead Accountability	Project Manager	Corporate / External Resource or Decision
e. Promote the department successes and what we are doing to counter some of the negative stories	Q2	Director		?

Recommendation 14 - Utilise the willingness on all sides to re-set relationships and trust between officers and councillors				
Action	**Timeline**	**Lead Accountability**	**Project Manager**	**Corporate / External Resource or Decision**
a. Members and officers to meet in order for officers to understand the current administration's planning objectives	Ongoing	Director	Planning Improvement Manager	Demo Services and Members
b. Working together on creating more productive and collaborative Planning Committee meetings where councillors and officers work together to make sound and defendable decisions	Q1	Head of DM	Planning Improvement Manager	Demo Services and Members
c. Working together to review the existing Planning Committee code and scheme of delegation so that the community has their right to be heard whilst still enabling the Council to meet wider requirements on speed, quality and delivery. For example, the management of the Planning Sub Committee appears to be confused for all participants in its operation	Q2	Head of DM	Planning Improvement Manager	Demo Services Members and RAs Residents Voice Board
d. Better engagement with internal and external consultees and residents	Q1	Head of DM	Planning Improvement Manager	No Residents Voice Board
e. Member training for Planning Committee and Ward Members	Ongoing but review Q1	Head of DM	Planning Improvement Manager	Demo Services and Members
Recommendation 15 - Customer Service and Communication				

Action	Timeline	Lead Accountability	Project Manager	Corporate/ External Resource or Decision
a. Consider a better process for managing the complaints that identifies the most appropriate level within the organisation to respond and an administrative process for ensuring that complaints are responded to on time. This could include better communication on the Council's website to indicate what matters can be considered as complaints and what matters are outside the scope of the Council's jurisdiction.	Q3	Head of DM	Planning Improvement Manager	Complaints IT/CDS
b. Introduce a more formalised learning through experience process so that lessons can be learnt on all areas of Planning including a celebration of things that have gone well and where officers have been praised	Q2	Head of DM	Planning Improvement Manager	Complaints and Comms
c. Work with the communications team to establish approaches to counter negative media coverage and celebrate good stories	Q1	Head of DM	Planning Improvement Manager	Comms
d. Review the effectiveness of neighbour letters as well as site notices. If neighbour letters are still required then review the process notes to ensure that the process is robust	Q3	Head of DM	Planning Improvement Manager	No
e. Review CIL and S106 processes Improve communication on CIL and S106 spend with Ward members and residents	Q4	Head of Spatial Planning	Planning Improvement Manager	Yes
Recommendation 16- Improve the engagement with residents, partners and developers.				
Action	**Deadline**	**Lead Accountability**	**Project Manager**	**Corporate / External Resource Or Decision**

Action	Deadline	Lead Accountability	Project Manager	Corporate/ External Resource Or Decision
a. Regular reporting on such matters as: • Progress in Planning policy making e.g. listening to residents in revoking SPD2 • Reports on the positive decisions being made at Planning Committee - £X of value from planning decisions made, community benefits being delivered as a consequence of planning decisions, etc • X number of housing delivered in the borough • The community benefits derived from developer contributions, such as CIL and s106	Q2	Head of DM	Planning Improvement Manager	Spatial Planning Team Residents Voice Board
b. Review pre-application processes to encourage more active engagement with residents	Q3	Head of DM	Planning Improvement Manager	No
c. Review publication of pre-application processes	Q4	Head of DM	Planning Improvement Manager	No
d. Participation at Develop Croydon	On going	Director		No

Planning Policy Procedure and Development

	Recommendation 17 - Empower officers and councillors to work together to review the Planning policy direction of the Council.			
Action	**Deadline**	**Lead Accountability**	**Project Manager**	**Corporate/ External Resource Or Decision**
a. Continue to hold Local Development Framework working Groups with cross party representations.	Q1	Head of Spatial Planning	Spatial Planning Team Leader	Demo Services

			and Members

Management and Monitoring of the Action Plan

To continue the ongoing implementation of the Action Plan further discussion is required regarding the correct establishment of the team a, further resource is required in the form of a Planning Delivery Manager. Once a Delivery Manager is in place a monthly project meetings of all team leads chaired by the Director of Planning and Sustainable Regeneration will take place to report on progress. All work stream leads will be required to attend and submit 3 days before a highlight report within the required template. Targets will be measured on a quarterly basis unless otherwise stated.