

Service Inspection Report

June 2006



# Environment Planning

London Borough of Redbridge

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## Service Inspection

This inspection has been carried out by the Audit Commission's Inspectorate under powers under section 10 of the Local Government Act 1999 and is in line with the Audit Commission's strategic regulation principles. These principles embody the objectives of our Strategic Plan and Strategic Regulation. They also reflect the principles from *'The Government's Policy on Inspection of Public Services'* (July 2003). Audit Commission service inspections should:

- focus on public service outcomes from a user perspective;
- act as a catalyst to help inspected bodies improve their performance;
- concentrate inspection work where it will have most impact, so that it is proportionate and based on an assessment of risk;
- be based on a rigorous assessment of costs and benefits, with a concern for achieving value for money both by the inspected organisation and within the inspection regime itself;
- be, and be seen to be, independent of the inspected organisation;
- report in public, using impartial evidence to inform the public about the performance of public services so as to enhance accountability;
- involve collaborative working with other inspectorates and external review agencies to achieve greater coordination and a more holistic approach to the assessment of performance by audited and inspected bodies;
- share learning to create a common understanding of performance that encourages rigorous self-assessment and better understanding of their performance by inspected organisations;
- be carried out objectively by skilled and experienced people to high standards and using relevant evidence, transparent criteria, and open review processes; and
- enable continuous learning so that inspections can become increasingly effective and efficient.

We assess services using published key lines of enquiry (KLOEs) to inform our judgements. The KLOEs can be found on the Audit Commission's website at [www.audit-commission.gov.uk](http://www.audit-commission.gov.uk).

This report is issued in accordance with the Audit Commission's duty under section 13 of the 1999 Act.

## Summary

- 1 Redbridge is an outer London Borough of relative affluence with low overall unemployment, a high standard of education, good transport links, high home ownership and significant open space. The borough falls between the Thames Gateway and the London/Stansted/Cambridge (M11) corridor and is part of the Mayor's East London Plan growth area. It has a rising population which places increasing pressure on available housing and schools.
- 2 Planning is important if Redbridge is to achieve its vision of 'a better place to live' through provision of additional homes and school sites, the development of Ilford as a Metropolitan Centre, the regeneration of other district town centres, protection of the environment, reduction in traffic congestion, increasing employment opportunities and making its communities safer.
- 3 We have assessed the London Borough of Redbridge as providing a 'fair' planning service that has uncertain prospects for improvement.
- 4 The UDP, together with the London Plan and government planning policies, is providing a good policy base for determining future development. Local planning policies on which current applications for development are based are embedded in the revised Unitary Development Plan (UDP), which was adopted in 2003. The service provides a range of supplementary planning guidance in support of the UDP although many are still at the public consultation stage of implementation.
- 5 The Council has used recent research to identify local needs and priorities. It also has in place arrangements to continue the process of consultation with the community on needs and future planning policy.
- 6 The service is achieving significant benefits for the community by securing developer contributions for new development, for example the provision of a new library and community centre at Chadwell Heath. The planning process also supports the achievement of some corporate aims such as protecting the environment through the restriction of development in the Green Belt and requiring new developments to include recycling and waste facilities.
- 7 Users value recent improvements to service accessibility such as the introduction of on line planning and location of a duty officer at the one stop shop. The use of development briefs, partnership working with other departments and external agencies, and pre-application consultation with developers is encouraging regeneration and the speed of determining applications is now exceeding government target times. User satisfaction with the service is in the mid-range banding when compared to other authorities in England.

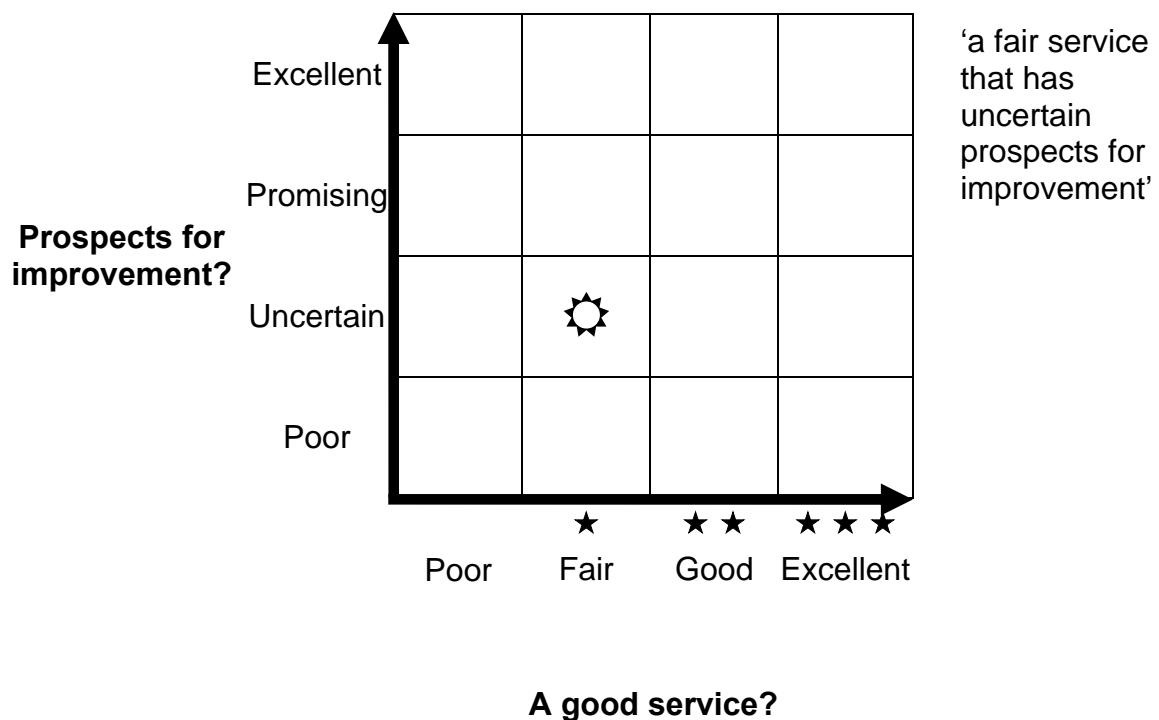
- 8 However, despite the introduction of an enforcement action plan during 2005, the service is not responding to, or resolving, complaints of potential unauthorised development within target times, and a significant backlog, although reducing, still remains to be considered, some cases dating back a number of years. The impact of some policies in supporting delivery of the Council's corporate aims, such as those for transport, has not been measured. Also the impact of planning decisions on the community are not known as processes for undertaking Equalities Impact Assessments are not in place.
- 9 Diversity, equality and human rights implications of decision-making are not being fully addressed. The quality of decisions on planning applications is being reduced through lack of communication during the planning application process, the high level of losses by the Council on appeals against refusals and inconsistencies in decisions. The principles of sustainability have been embraced within, but are still not fully embedded into the planning process in terms of design and quality. A value for money approach is yet to be developed within the service and the benefits to the service of procurement options to improve efficiency have not been fully pursued. Draft supplementary guidance for assessing planning contributions required from developers still has to be adopted and implemented and many Conservation Area Guidance Statements need to be updated.
- 10 The Council is aware of these short comings and whilst there has been recent significant improvement much work remains to be done. We therefore assess the current service as 'fair'.
- 11 There are some positive aspects to encourage further improvement in the service. The Council has established a clear long-term strategic planning policy to support the achievement of its corporate priorities and in particular, a safe and sustainable community. This is based upon up-to-date assessments of need. The new strategic approach is established within the new style land use plans, known as the Local Development Framework (LDF), and these are on schedule to be implemented by 2008 in accordance with government requirements. The approach is being clearly driven by the Leader of the Council, cabinet portfolio holders, the Executive Director of Environment and senior officers within the planning Service.
- 12 Staff are committed to the service and are generally positive about training and development opportunities. There has been a good track record in improved performance over the last year, and in particular, the achievement of government targets for the speed of processing planning applications.

- 13 Improvement Plan measures have focused on better access to the service and speed of decision-making. Improved performance management arrangements have been integral to the service's recent achievements. The use of development briefs has helped regeneration and supplementary planning guidance on amenity space has been introduced to try to ensure greater consistency on interpretation of planning policy. Cross-departmental working is much improved and collaborative working is starting to produce efficiency savings for the service. Partnership working is developing, for example, through the service's involvement in the cross-borough response to address the impact of the proposed Thames Gateway Bridge. The service has also been integral to the Council's success in securing ODPM growth area funding for Ilford and Gants Hill regeneration proposals. To help provide more effective strategic leadership the previously separate planning and regeneration departments have also been merged under one chief officer.
- 14 Although all of the above are positive features there are still a number of key issues that need to be overcome before the service can secure further improvement. Enforcement remains an issue. An updated action plan has only recently been drafted and is yet to demonstrate a positive impact. The loss of appeals and refusal rates are still high although reducing. Value for money is yet to be embedded within the service and outcome-based targets and measures are not yet fully developed to allow the service to demonstrate its contribution to achieving community priorities.
- 15 The capacity to bring about further change is in doubt. Case loads of Development Control officers are very high. There is no medium-term financial plan for the service and initiatives to increase service efficiency further, generate income and release resources for front line service delivery are in the early stage of development or implementation. Despite good progress on LDF preparation and difficult decisions already having been made on key development sites in support of delivery of community priorities, the effectiveness of measures to ensure consistent good quality decision-making in line with current and developing planning policy cannot yet be fully demonstrated. Members' understanding of, and commitment to the wider community needs is variable across all political groups with some strong resistance to the new strategic approach. There has been poor attendance at training sessions for members sitting on planning committees to date and this training has not been compulsory. The Committee system for considering planning applications although streamlined is still demanding on staff resources to administer.
- 16 We have therefore assessed that the service has uncertain prospects for improvement.

## Scoring the service

- 17 We have assessed London Borough of Redbridge as providing a fair, one-star service that has uncertain prospects for improvement. Our judgements are based on the evidence obtained during the inspection and are outlined below.

**Figure 1 Scoring chart<sup>1</sup>**



Source: Audit Commission

<sup>1</sup> The scoring chart displays performance in two dimensions. The horizontal axis shows how good the service or function is now, on a scale ranging from no stars for a service that is poor (at the left-hand end) to three stars for an excellent service (right-hand end). The vertical axis shows the improvement prospects of the service, also on a four-point scale.

18 The service is a fair, one-star service due to the following.

- It has established the priority needs of the community which are reflected in updated and proposed new longer-term planning policies that sets a clear strategic framework for future development.
- Users' value recent improvements to service accessibility such as the introduction of on line planning and location of a duty officer at the one stop shop.
- User satisfaction is in the mid-range banding when compared to other authorities in England.
- A Statement of Community Involvement setting out how the service is to engage with the community on future planning proposals has been adopted.
- It is using the planning process to support the achievement of some corporate aims such as protecting the environment through the restriction of development in the Green Belt and requiring new developments to include recycling and waste facilities.
- It has secured a significant level of benefit for the community through planning contributions from developers for new developments, and achievement of grants to support redevelopment proposals for Ilford and Gants Hill.
- Development briefs and Action Area Plans have been produced to facilitate future regeneration.
- It is currently exceeding the government's national targets for determining planning applications.
- The application process is fair, open and transparent.

19 However:

- measurement of the contribution of policies to corporate aims, such as transport and sustainability objectives is inconsistent;
- despite the introduction of enforcement improvement measures during 2005, the service is still not responding to, or resolving, complaints of potential unauthorised development within target times and a high backlog, although reducing, remains to be considered;
- diversity, equality and human rights implications of decision-making and the full effects of planning decisions and planning policy on the community are not being fully assessed;
- quality of decisions is being reduced by lack of communication with users during the planning process, the high rate of successful appeals against refusal of applications, and inconsistent decisions;
- the principles of sustainability, in terms of design and quality, have been embraced within, but are not fully embedded in the planning process;
- a number of Conservation Area Appraisal and Design Statements have not been updated in accordance with government requirements;

## 10 Environment Planning | Scoring the service

- planning contributions from developers for new development are not being assessed in accordance with approved criteria in support of corporate and community aims; and
- the service provides adequate value for money in terms of costs, efficiency and outcomes;

### 20 The service has uncertain prospects for improvement because:

- enforcement remains an issue. An updated action plan has only recently been drafted and is yet to demonstrate a positive impact;
- the Council's corporate value for money approach is not yet embedded, so there has been no assessment of service cost relative to its efficiency and effectiveness carried out;
- outcome-based targets and measures are not yet fully developed to allow the service to demonstrate its contribution to achieving community priorities and fully demonstrate effectiveness of policies;
- although there has been good progress on the Local Development Framework, and difficult decisions have been made on key development sites to support delivery of community priorities, the effectiveness of measures to ensure consistent good quality decision-making in line with current and developing planning policy cannot yet be fully demonstrated. There is tension between meeting local wants such as protection of green space/amenity land, and meeting regional/national needs, for example affordable housing provision. Members' understanding of, and commitment to the wider agenda is variable across political groups with some focussing on maintaining the status quo to satisfy the demands of their local communities. This situation is not helped by member training on planning-related issues not being compulsory, and poor attendance by members at sessions provided to date;
- the capacity to bring about further change is in doubt. Very high caseloads continue in Development Control. There is no medium-term financial plan for the service. Initiatives to further increase service efficiency, generate income, release additional resources for front line service delivery (eg business process re-engineering and charging for pre-application advice), and reduce reliance on Planning Delivery Grant are in the early stages of development and/or implementation; and
- the e-planning investment strategy is not fully funded, and staff to take these initiatives forward are yet to be recruited.

## 21 However:

- an improved track record in the speed of decision-making for all application types has been maintained over the last 12 months following implementation of a service improvement plan and measures agreed by the Scrutiny committee;
- the improvement measures introduced have also increased accessibility to the service and are appreciated by users. These include the new regional committee structure, use of a duty planner at the One Stop Shop, and on-line tracking of applications and decisions;
- improved performance management arrangements have been integral to the service's recent achievements and weaknesses in systems for measuring performance against customer service standards are being addressed;
- the service has analysed the high number of refusals, appeals and appeals allowed and responded by introducing supplementary planning guidance on amenity space to ensure greater consistency on interpretation of planning policy;
- there are clear links between community strategy priorities, corporate strategies and plans, the service plan, and Local Development Framework policies. Planning guidance has been produced to facilitate housing growth, including Area Action Plans and development briefs;
- the strategic approach is being clearly driven by the Leader of the Council, cabinet portfolio holders, the Executive Director of Environment and senior officers within the planning Service. A merger of the service with the Council's Regeneration team under a joint chief officer will also provide additional strategic leadership capacity;
- there is a link between the service plan and individual performance and development plans and targets. Staff are committed to the service and are positive about training and development opportunities;
- the Annual Monitoring report provides a sound basis for recording use and effectiveness of planning policies;
- use of the development team approach for major developments demonstrates improved cross-Council working and ensures that the Council is seen as 'one body' to developers;
- partnership working is developing, for example, through the service's involvement in the cross-borough response to address the impact of the proposed Thames Gateway Bridge;
- the benefits of collaborative working will shortly be seen by way of efficiency savings gained through the Council joining the London Contract Supplies framework for the provision of professional agency staff; and
- the service has been integral to the Council securing ODPM £3.1 million growth area funding to support regeneration proposals for Ilford and Gants Hill.

## Recommendations

- 22 The recommendations below offer cost-effective ways of improving the weakest parts of the planning application process and raising user satisfaction. Our recommendations identify the expected benefits for both local people and the Council. In addition we identify the approximate costs<sup>2</sup> and indicate the priority we place on each recommendation and key dates for delivering these where they are considered appropriate. We recommend that the Council do the following.

### **Recommendation**

*R1 Improve the quality of the decision-making process by:*

- *developing a clearer understanding of the reasons why the refusals rate, losses on appeals, and the occasions when officer recommendations are overturned, are so high and taking steps to reduce these to national averages;*
- *eliminating the backlog of complaints of potential unauthorised development to allow staffing resources to be directed to recent complaints and ensure more effective monitoring of enforcement action; and*
- *introducing formal Supplementary Planning Guidance to determine planning contributions from developers for new development.*

The expected benefits of this recommendation are:

- reduced service costs and improved quality and consistency of decisions through reduced levels of refusals, overturning of officer recommendations, losses of appeals and clearer policy guidelines;
- more effective protection of the built environment through speedy action on complaints of planning breaches and signalling to potential transgressors that breaches of planning policy will not be tolerated; and
- more equitable planning contributions for new development from developers.

The implementation of this recommendation will have high impact with low cost and we recommend that the Council introduces new planning contributions policy by August 2006 and eliminate the backlog of complaints of potential breaches of development by January 2007.

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<sup>2</sup> Low cost is defined as less than 1 per cent of the annual service cost, medium cost is between 1 and 5 per cent and high cost is over 5 per cent.

**Recommendation**

*R2 Establish a systematic approach to managing and improving value for money within the service by:*

- *using comparative data already collected, supplemented where necessary, to identify areas where performance is low and/or high cost compared to that achieved by other councils and challenge the reasons behind this;*
- *establishing value for money (VFM) indicators in line with the recently agreed corporate approach;*
- *maximising opportunities for benchmarking to improve understanding of costs and to learn from experience of better performing councils; and*
- *managers and councillors using cost information alongside measures of efficiency and effectiveness to challenge and drive up performance.*

The expected benefits of this recommendation are:

- improved cost effectiveness of the service;
- raised awareness of VFM within the service and externally; and
- enhanced capacity to target priorities and deliver benefits for users.

The implementation of this recommendation will have high impact with low costs. This should be implemented by September 2006.

**Recommendation**

*R3 Establish clear outcome and output measures and targets for the service and monitor progress against these targets, ensuring they are reported and acted upon to demonstrate:*

- *how the service contributes to achievement of community priorities; and*
- *overall effectiveness of planning policies in addressing local and national priorities.*

The expected benefits of this recommendation are:

- improved performance against national, corporate and service priorities; and
- clarity on behalf of councillors, officers and customers regarding what the service is achieving.

The implementation of this recommendation will have high impact with low cost. This should be implemented by April 2006.

***Recommendation***

*R4 Ensure that the Local Development Framework is driven forward, adopted and delivered by:*

- *requiring all members sitting on planning committees to receive training on the Local Development Framework and how this supports delivery of the Community Strategy; and*
- *the new political leadership championing the vision.*

The expected benefits of this recommendation are:

- desired community strategy outcomes are achieved;
- improved member clarity of local, regional and national needs and how these will be balanced at a local level; and
- more robust decision-making.

The implementation of this recommendation will have high impact with low cost. This should be implemented from May 2006 onwards.

# Report

## Context

### The locality

- 23** Redbridge, established in 1965, is located in the north east of outer London. The borough is known as the 'leafy suburb' and comprises an area of 5,652 acres, of which a third is Green Belt and 40 per cent is open space. The more rural areas are set in the north of the borough. Some 35 sites of Metropolitan, Borough or local conservation importance have been identified and there are 14 Conservation Areas and 120 Statutory Listed Buildings.
- 24** Being within the North East London Growth Area, the borough's population of 238,635 is expected to rise by 11 per cent by 2016. A predominantly residential borough, it is characterised by a very high rate of private home ownership and only 5 per cent of housing is Council-owned stock. Houses are becoming less affordable and some 6 per cent are in poor condition. Demand is set to grow for new, smaller and affordable homes and this in turn will place increased pressure on land availability as the Council continue to protect the environment and Green Belt.
- 25** The borough has an above average proportion of younger people and the number of older people is set to fall from 14 per cent to 12 per cent by 2007. Redbridge has the ninth highest proportion of non-white ethnic groups in England and Wales and is expected to grow over the next ten years.
- 26** The borough is relatively affluent with three Super Output Areas included in the most prosperous 10 per cent in England and Wales. The borough is ranked 154th of 354 districts in the national indices of deprivation with Loxford being among the 11 per cent most deprived in the country. The Council is concerned to reduce such inequalities within the community.
- 27** Ilford is recognised as a town centre of Metropolitan importance, being designated as an 'Opportunity Area' in the London Plan and is the focus of major regeneration. To protect open space in the borough, planning policies are attempting to accommodate growth in the urban areas with revitalisation of town centres such as Gants Hill and South Woodford. The borough is also influenced by the Thames Gateway London Partnership and London-Stansted Growth Corridor Regeneration Projects.
- 28** High education standards are attracting demand for school places from outside the borough and with an increasing population there is pressure for new land sites to be found to accommodate new and additional schools. Crime rates are not high, although the perception of the public is that they are, and residents place a safe community as one of their key priorities.

- 29 Unemployment fell from 7.2 per cent in 1992 to 2.7 per cent in 2005, compared to the London average of 3.3 per cent, but there are pockets of higher unemployment particularly in the southern wards. Redbridge has a small employment base with 59 per cent working outside the borough. However, the Council recognises the need to retain retail and business space and increase employment opportunities.

### **The Council**

- 30 Redbridge has a Leader and Cabinet administration. There are a total of 63 members, of which 34 are Conservative, 19 are Labour and 10 are Liberal Democrats.
- 31 The Council manages a net revenue budget for 2005/06 of £265 million and has approximately 750 staff. Planning cuts across the remit of the cabinet members for regeneration and community, and planning policy and regulation. There are Chair Persons for each of the Regulatory Committee and three Regional Committees responsible for determining all those planning applications not delegated to officers.
- 32 The Council's Comprehensive Performance Assessment (CPA) rating was two-star in 2005.

### **The Council's planning service**

- 33 The planning service consists of three sections.
- Planning policy which establishes the policy framework against which proposed developments are assessed. This section also includes planning conservation to ensure protection of the built environment against adverse development.
  - Development control which considers, and determines, planning applications in the context of the approved planning policies. This also includes the enforcement section which investigates complaints of unauthorised development and takes appropriate enforcement action against developers who are in breach of planning.
  - Building control which enforces compliance of development with building regulations.
  - Our inspection focuses essentially on planning policy and development control but also building control where appropriate.
- 34 The purpose of the inspection is to determine how good the service is and how it will improve, how the service works with other departments and organisations, how it is driven by the needs of the community and provides value for money, and how it delivers corporate, national and regional priorities.

- 35 The service has 62 full-time staff and had a budget of £2.6 million gross for 2004/05. The service has been operating on the lines of a traditional planning department but has been merged with the regeneration service under one chief officer from April 2006 to give more effective leadership in support of corporate objectives. The number of planning applications received increased by 47 per cent to 4,155 in 2004/05, one of the highest workloads among London boroughs, and the number of annual complaints received for unauthorised development is approximately 1,300.
- 36 Redbridge was designated a Planning Standards Authority (PSA) for 2004/05 by the Office of the Deputy Prime Minister for not meeting government time targets for determining minor applications, and again for 2005/06 for not meeting national targets for 'other' applications. Improvements to the service have resulted in Redbridge exceeding national targets during 2005/06 and as a result, the Council will no longer be designated as a Standards Authority for 2006/07. The service also received planning delivery grants (PDG) of £350,000 for 2004/05 and £457,000 for 2005/06.

## How good is the service?

### What has the service aimed to achieve?

- 37 We found the long-term aims of the service to be clear, challenging, addressing local needs and linking with community and corporate priorities. The aims particularly relate to a new strategic policy approach being established within the new style land use plans, known as the Local Development Framework (LDF), and these are on schedule to be implemented by 2008 in accordance with government requirements. However, targets and measurable outcomes need to be developed to allow measurement of the success of policies in achieving community aims.
- 38 The Council recognises that planning is important to support the corporate vision of 'making Redbridge a better place to live' adopted in November 2004. The vision has six corporate priorities which closely relate to those of the community strategy and aim to achieve:
- a safer place to live;
  - a cleaner, greener place to live;
  - a better place to live;
  - a better place for care;
  - a better place for business; and
  - a better place to live together.
- 39 What these aims and priorities mean in explicit site terms is developed within the draft LDF Core Strategy Preferred Options Report published in 2005. The Core Strategy envisages the development of Ilford Town Centre as a Metropolitan Centre; revitalisation of smaller town centres; provision of adequate housing and affordable homes, protection of the Green Belt and open space; provision of new health and education facilities; a reduction in crime; improvement in transport links with London and the South East; reduction in traffic congestion; and ensuring all sections of the community benefit from improvements in the quality of life.
- 40 The Council is a member of the Redbridge Strategic Partnership (RSP), a group made up of representatives for the public, private and voluntary sectors, the members of which work together to set a vision for the future of the borough. The RSP in October 2003 produced a Community Strategy titled 'Making a difference in Redbridge' setting out community priorities which closely relate to the Council's corporate priorities. The Council are assured therefore that their vision reflects the needs and aspirations of local people.
- 41 The LDF documents have been subject to a sustainability appraisal and the Scoping Report for the appraisal also identifies other key issues such as the need for waste reduction, improved air quality and deprivation of some sectors of the community.

- 42 The new planning policies also support the Government's strategy of achieving sustainable communities, the London Plan and the Thames London Gateway Growth programme. In particular the planning service demonstrates the sustainability principles through its key aims of protecting the environment and regenerating town centres. Redbridge's Local Development Scheme (LDS), which sets out how it will determine future local planning priorities, was approved by the Secretary of State in July 2005 and is on schedule to adopt all the necessary Development Framework Documents by 2008. The new LDF will replace the Unitary Development Plan (UDP), which was adopted in 2003.
- 43 Present decisions on planning applications for development are determined in accordance with the recently updated UDP which when considered in conjunction with the London Plan and regional and national policies is a good policy base for determining development. The UDP states that 'the overall vision of the plan is to first to improve the environment of the borough by ensuring that new development is sustainable and that the best of the borough's existing natural and built fabric is preserved. The aim is also to improve access to housing, jobs, services and facilities for the whole of the community'. The new LDF draft documents develop most of the UDP policies further but with more emphasis placed on growth and regeneration. In particular, the new policy documents are less constrained in terms of housing density and numbers of dwellings. The Annual Report provides a sound base for recording the use and effectiveness of the UDP policies but the conclusions need to be more developed and concise to demonstrate how successful these policies have been.
- 44 The redevelopment of Ilford is guided by a 30-year programme, set out in the document 'Progressive Ilford' published in 2002, including construction of approximately 6,000 residential units to house between 11,000 and 13,000 additional people. A draft 'Ilford Town Centre Area Action Plan' sets out a detailed framework to guide the regeneration.
- 45 The Council does not yet have a complete set of supplementary planning guidance (SPG) to help guide the drawing up of development proposals and planning applications. For example, SPG is available for Affordable Housing and Amenity Space and Residential Development, but guidance for Planning Obligations, Nature Conservation and Trees and Landscaping are still only at the public consultation stage of implementation. In addition, a number of Conservation Area Appraisal and Design Statements have not been updated to provide up-to-date guidance on development in conservation areas and in accordance with government requirements. However, all conservation areas have been appraised and there is a programme for updating them.
- 46 The planning service aims to deliver effective and efficient services and has set service and customer standards and targets in the Development Control and Customer Charters although these were not established in consultation with users.

## **Is the service meeting the needs of the local community and users?**

- 47 This section describes the planning service as it is at present. Planning has supported the Council's focus of protecting the natural and built environment. The service has identified the needs and priorities of the residents and has set up procedures to engage with the community. There has been a significant improvement in the speed of processing planning applications and user's ability to access the service. The application process is fair, open and transparent. Users satisfaction with the service overall has improved slightly but does not compare favourably with other authorities in the rest of England. Significant benefits are being secured through planning contributions and some corporate aims are being supported. However, the service is not totally focused on the delivery of user and community needs, pre-application advice is inconsistent and service standards have not been developed in consultation with users. The quality of decisions is being reduced. The service is not giving due consideration to equality, diversity and human rights and is not meeting, or responding, to complaints of unauthorised development within target times or significantly reducing a backlog of complaints. The full effect of planning decisions and planning policy on the community is also unclear.

### **Access and community focus**

- 48 The Council has used research to establish a clear understanding of local community priority needs and concerns but there are limited arrangements in place to meet with users to discuss service delivery or with minority groups to identify special needs (see paragraph 55). For example, consultation on the Community Strategy highlighted safety and the environment as key issues, the Council's Annual Residents Survey undertaken in 2005 highlighted the priorities of crime reduction, the need for cleaner streets, better health facilities, and a reduction in traffic congestion. The new Local Development Framework (LDF) incorporates a formal Statement of Community Involvement (SCI) that has been subject to consultation and describes how the Council will engage with local people about major new developments. The findings of the research will help ensure the new LDF policies are designed to meet current community priorities. However, the lack of arrangements to meet with user's and minority groups could result in reduced quality of delivery of service and inappropriate policies being adopted which may disadvantage some sectors of the community.

- 49 User's satisfaction with the service has improved slightly over the last few years and the satisfaction rate meets the government target. A MORI poll in 2003/04 showed a 68 per cent overall satisfaction of users with the service. When compared with other authorities this revealed performance within the second quartile of London authorities but worst quartile performance when compared with the rest of England. In-house customer satisfaction surveys in 2004 and 2005 show a slightly higher satisfaction rate at 73 per cent and 74 per cent respectively. A cross-section of users participated in the in-house surveys including architects, planning agents, builders, developers and householders. The results for 2005 indicated a fairly high satisfaction rate for most aspects of the service, for example 88 per cent of users said they had no difficulty in contacting planning officers. The most recent MORI poll in 2005 also recorded a satisfaction rate of 75 per cent confirming the results of in-house surveys. However, performance data indicates that the service was not meeting standards for responding to resident's letters and member enquiries. Inefficiencies in the operation of the APAS computer system has resulted in poor monitoring of performance data and, for example, there is no means of measuring telephone answering and response times.
- 50 Users value improvements made in accessing the service such as the allocation of a duty planning officer in the One Stop Shop and the development of the planning web site. The planning web site is now comprehensive and provides details of planning policies, applications, advisory notes for applicants, enforcements and appeals, and since December 2005 allows on-line submission of applications. The take-up of this facility is low in these early stages but the service has plans to promote its use. Users indicate that the web site provides invaluable information which helps in the submission, and progressing of, applications. Access is also being improved by locating a duty planning officer in the One Stop Shop (OSS) in Ilford each day Mondays to Fridays who is available to provide general advice on submission of applications and planning proposals in general. Full details of application files are on deposit for anyone to view and an internet facility is available for anyone to browse the planning website. The arrangement is being well used, and whilst users appreciate it was introduced to free up more time for officers to consider applications, a number have indicated that it is not now possible to meet the local planning officer considering their specific application, and who was knowledgeable of their area, and felt this was a detrimental step.

- 51 The service is not totally focused on the delivery of community and user needs, pre-application advice is inconsistent and service standards have not been developed in consultation with users. In some instances actions of staff are reducing the quality of the decisions made. For example, staff, agents and applicants we spoke with at Focus Groups on-site confirmed that communication with applicants is curtailed as the 8 or 13-week target deadline for determining applications approaches. Applications are often refused on this basis even if a telephone call to an applicant at a late stage in the application process may have resulted in an amended plan being submitted and which could have resulted in a consent being issued. Quality of decisions in such instances is being reduced. The quality of pre-application advice is inconsistent. Pre-application advice is currently made available free for all types of application and many of the professional users we spoke with take advantage of this facility and have a high regard for the officers with whom they meet and the advice given. However, some private individuals, many of whom were experiencing the planning system for the first time, considered that the duty officers had no time for their requests for advice and 'could not be bothered with them'. A User Charter has been developed and standards set, for example the requirement to respond to letters within fifteen days of receipt. However, many of these are not challenging enough and are not monitored. The standards are also not a reflection of local views on the service as they were set without any involvement or consultation with the users or general public.
- 52 Planning is contributing to the quality of life of residents by requiring planning contributions from developers for new development. The use of section 106 agreements has been used to provide contributions in cash, and in kind, for such benefits as additional affordable homes and new educational facilities (see paragraph 68 below).
- 53 The service helps to protect the community through the use of policies especially in the promotion of sustainable development. For example in approving applications for new residential development consents will now require the inclusion in the design provision for suitable waste disposal and recycling facilities. The Council's planning committees are also organised on a regional basis both to try to speed up the process of determination of applications but also to take try to ensure that individuals feel more able to participate in the process and attend committees which are held locally.

- 54 The Council does respond to criticisms of the service and the wishes of the public. For example a review was undertaken of all appeal decisions to try to establish the reasons for the high rate of refusal of planning applications and high rate of losses on appeals being experienced. As a result of the review supplementary planning guidance on Amenity Spaces and Residential Developments was introduced in November 2004. The SPG is intended to achieve more consistency of advice for applicants and in the decisions made. Since the introduction of the SPG there has been a slight reduction in the loss of appeals but no further analysis of decisions has been undertaken to establish the cause of the reduction. A more recent example is the proposed change in the draft Core Strategy policies for housing to permit 'cash in lieu' payments for the provision of 'off-site' affordable homes. The change in policy has been prompted by local opposition to the building of high rise housing blocks which included family units. The new policy will enable the proposed thirty floor high rise building to be developed in Ilford as part of the regeneration of the town which will incorporate high quality design apartments for one or two unit families. Cash in-lieu payments will secure the building of affordable homes in other parts of the borough.

### **Diversity**

- 55 The service is not giving due consideration to diversity, equality and human rights implications of proposed service decisions before action is taken and there are limited arrangements in place to meet with minority groups to proactively identify special needs. Planning Committee Agendas set out the need to take into account diversity, equalities and human rights legislation but individual reports to Planning Committees do not include reference to such aspects and there is no evidence that staff and members are aware of their obligations and how the rights of individuals are balanced against those of the wider community. The service can demonstrate examples of how it has responded to requests from minority groups such as the approval of sites for a religious faith in Albert Road in Ilford and a night shelter providing accommodation for the homeless and the vulnerable. The service, through the PATH programme, has also been successful in training and recruiting of planners who are from the BME groups. However, there are limited arrangements in place to meet with minority groups to discuss their special needs which are important as Redbridge has the ninth highest proportion of non-white ethnic groups in England and Wales representing 37 per cent of the community and expected to grow over the next ten years. The service is unaware of the effects of planning decisions and planning policy on the community and whether particular, and especially hard-to-reach groups are being disadvantaged by planning decisions and policies. Although the Council has approved an Equalities Impact Strategy and there has been an Equalities Impact Assessment (EIA) carried out on housing policy, there has been no comprehensive application of EIA'S to test the impact of service delivery.

- 56 The diversity in the community is addressed through the use of policies in the UDP. For example:
- Policy KR 37 sets a requirement that ‘in developments of 25 units or more the Council will seek to ensure that a proportion will be made available to own or rent for those on low or middle incomes who are unable to compete successfully in the private or rented residential market’;
  - Policy KR 39 makes provision for sites for travellers; and
  - Policy ES 1 requires new development to contribute to personal safety in an attempt to design out crime including ensuring good quality lighting is provided for streets and paths and landscaping and buildings do not create dark or secluded areas. In this respect, the service is proactive in consulting with the Metropolitan Police on a regular basis.
- 57 Equalities are also shown in planning policies such as ensuring that estates contain a mixture of housing types and tenures such as in the Newbury Park residential development. Access Statements are required for all major schemes and standard conditions are imposed with consents to permit disabled people access to buildings, shops and parking places. However, the Council has not fully implemented the requirement of the Disability Discrimination Act 1995 and only 55 per cent of public buildings provide for adequate access for the disabled. An implementation plan is in place to ensure compliance but this is not fully assessed, prioritised or resourced
- 58 The Regional and Area Committee system is fair open and transparent and provides the opportunity for local representations to be presented on any issue. Applicants and objectors are able to make representations at committee meetings and there is evidence that members adhere to the Council’s planning code of conduct.
- 59 The service uses the Newham Language Shop to provide interpreters in the major languages to help with face-to-face enquiries. LDF and other planning documents can, if requested, be provided in a range of different languages. It is important that language difficulties are not a barrier to effective service delivery. However, some individuals are still experiencing difficulties with the planning process simply through a lack of command of the English language as evidenced in a Focus Group of applicants with whom we consulted. A resident, because of language difficulties, whose application had been refused, was still unclear as to the reasons for the refusal and the process of appealing against the decision.

### **Service outcomes for users and the community**

- 60 The previous sections showed that the planning service understands and aims to respond to the needs of the borough's communities and to deliver a high quality service to them. This section compares the actual outcomes for local people with those aims. One essential requirement for a planning service is an up-to-date plan, and an effective mechanism whereby the differing interests of stakeholders can be resolved in a way that is fair, open and accountable. This objective must go hand in hand with the delivery of a quality planning service which is effective, consistent and timely.

- 61 The service is providing up-to-date evidence of need through new research to inform the new strategic approach and supplement present local policies. The UDP although adopted in 2003 is partly based on research and reports carried out in the 1990s such as the 1994 and 1998 Town Centre Health Checks. The new research includes:
- an Open Space Audit completed in October 2005, which concludes that much of the open space in the borough is accessible but there is a shortage of open space in the South East;
  - a new Housing Requirements Study completed in December 2005, which identifies a need for a five-year requirement for an additional 4,000 dwellings; and
  - a Retail and Leisure Study completed in February 2006, which concludes that 'high quality, retail development is the critical driver for enhancing the overall image of the town centre of Ilford'.
- 62 The planning process is supporting the achievement of some corporate aims but poor monitoring makes assessment and measurement of the impact of other policies unclear.

### **A safer place to live**

- 63 The Council recognises that the layout of developments and the design of individual buildings can have a considerable effect on crime. The service has accordingly been proactive in consulting with the Metropolitan Police on the layout and design of new developments and 'alley gates' have been introduced to protect vulnerable areas in residential areas. Proactive work with schools has also resulted, for example, at St. Aidan's School in the building of a high parapet on an outside walkway to provide a safe outdoor area, and the installation of high windows to ensure privacy. At Newbury Park developers have provided two enclosed courtyards which give a natural surveillance over the playground and make the existing buildings more secure from break-ins. The overall development is based on the home zone concept in terms of use of street space. The pedestrian dominates the street by design with traffic calming measures included within the scheme. However, there is no systematic monitoring of new development to provide evidence of how safety policies within the UDP are helping to reduce crime.

### **A cleaner, greener place to live**

- 64 The service is using the planning process to protect the Green Belt and Metropolitan Open Spaces within the borough and is therefore supporting the primary aim of the UDP. The only loss of Green Belt in recent years has occurred in the Five Oaks Lane. This is a 15 acre site of former plot lands that has been degraded through a long history of planning contraventions. The site has been approved for residential development that will improve the environment and on balance justify the loss of the Green Belt.

- 65 Protection of the environment is also being encouraged through supplementary planning guidance on 'Sustainable Design and Construction' which provides minimum standards for developers and is to form a material consideration for all planning applications, and for 'Urban Design'. However, the former was only published in May 2005, and is currently only used voluntarily. The Annual Monitoring Report makes no assessment of the success of policies for bio-diversity or sustainable construction. For instance there is no data relating to the requirement for new development of over 1,000 square metres or ten units to provide at least 10 per cent of energy requirements from on-site renewable sources. Environmental impacts are also carried out on large developments and new residential developments are required to provide suitable waste and recycling facilities. In 2003 100 per cent of new homes were built on previously developed land but in 2004 it was only 87 per cent.
- 66 The service is protecting the heritage of the area through the designation of fourteen Conservation Areas and the provision of SPG on Shop Fronts, Guidance Statements and Enhancement Schemes. However, many of these documents have either only recently been adopted or are in need of updating and there has been inconsistency in decisions relating to them (see also paragraphs 78 to 79). At present there are eleven Listed Buildings of Architectural importance on the 'At Risk' Register and funding has been secured to secure improvements to Valentines Mansion and Park. The residents with whom we spoke were clearly of the opinion that the service is effective in protecting the heritage of the area. A further example of this is the Repton Park housing development on the former Claybury hospital site. Footprint for footprint replacement has ensured compliance with the UDP but has also secured restoration of one million square feet of derelict buildings and includes conservation measures to preserve the green belt.
- 67 The principles of sustainability, in terms of design and quality, are embraced within but not being fully embedded into the service. There is no built in design check, such as that approved by the Commission for Architecture and the Built Environment (CABE), applied when assessing planning applications. Staff we spoke to at focus groups also expressed concern over the lack of time and attention given to design aspects of individual applications. There is no annual check by the service on the quality of development and core output policies are not always recorded on the planning application process. It is unclear therefore if policies relating to minerals, waste and renewable energy are being effective in supporting a cleaner greener environment. The service can provide evidence of some new residential development which reflect the government's principles of urban renaissance with a balance of housing and higher densities, as at Newbury Park. The service also often asks for design statements on major applications and provides in-house design services including the production of design frameworks and conservation enhancement schemes. This work has contributed to the Council's success in securing external funding to support for example, its regeneration proposals (see also paragraph **Error! Reference source not found.**).

**A better place to live and for care**

- 68** Significant benefits are being secured for the community through planning contributions from developers. Cash payments of £5.2 million have been received by the Council over the last three years from developers for new development which has been allocated for improvements within Redbridge including the provision of improved educational facilities, affordable homes and amenities. An additional £5.6 million is scheduled to be received for similar projects. Contributions 'in kind' have also been received including the construction of the Chadwell Heath Library and Community Centre and the provision of 1,259 affordable homes. However, the basis of determining past planning contributions has in the words of one agent 'been rather hit or miss'. A SPG on Planning Contributions has been drafted which provides detailed guidance on how respective developers are expected to contribute towards future community projects in lieu of new development. The SPG is still to be adopted to provide consistent advice to developers.
- 69** The Service is unable to demonstrate the impact of policies in support of transport initiatives. The Annual Monitoring Report concludes that there is little monitoring and assessment of targeted aims to improve road safety and journey times, relieve traffic congestion and encourage cycling and walking. It is unclear therefore if residents are benefiting from new transport initiatives.
- 70** The Council is well on the way to meeting the London Plan target of producing 10,860 homes by 2016. Of new developments built in the last three years an average of 34 per cent were units of affordable homes. This exceeded the service target of 25 per cent but falls short of the London Plan of 50 per cent. A new Housing Requirements Study (2005) commissioned by the Council concludes that 'the provision of affordable housing should be recognised as a key priority and the level of affordable housing actually delivered will need to be maximised'. It is clear from the review that the Service needs to further encourage the provision of affordable homes, smaller units in new developments, conversion of apartments in larger houses and extensions to three bedroom properties.
- 71** There is no evidence to indicate whether the inequalities within the community are being reduced in support of the corporate aims of reducing poverty and social exclusion. Educational needs have been addressed and planning consent for sites for three new schools have been approved to overcome high demand and capacity levels.

### **A better place for business**

- 72 The service is encouraging business through the use of development briefs and Action Area Plans to initiate regeneration schemes. 'Progressive Ilford' for example sets out a vision for a £400 million regeneration programme for the town centre over a 30-year period to 2030. The plan suggests the creation of 5,500 residential units, 55,700 m<sup>2</sup> of retail floor space, 66,500 m<sup>2</sup> of community and leisure space and the potential increase of the population of the town centre by up to 12,000 people. A development brief for Gants Hill has also helped secure £2 million grant from the Governments Growth Fund for the revitalisation of the area. There has been a recent significant loss of business floor space through the redevelopment of the GEC site for new homes but no loss of retail space in town centres.

### **An effective and efficient service**

- 73 The service is now meeting government targets for the speed of determining planning applications and is no longer a designated Standards Authority. The reasons behind this are explained in the second judgement.
- 74 During 2005/06 the service has consistently exceeded the CPA upper threshold levels for all planning application types. Unaudited performance data reveals:
- 77.02 per cent of major applications were determined in 13 weeks (BVPI target of 60 per cent);
  - 83.87 per cent of minor applications were determined in 8 weeks (BVPI target of 65 per cent); and
  - 90.42 per cent of other applications were determined within 8 weeks (BVPI target of 80 per cent).
- 75 Within the application process:
- all applications are being registered within the target five days;
  - the number of withdrawal of applications is low so saving officer time;
  - 90 per cent of applications are now delegated to officers in accordance with national targets so encouraging speedier decisions;
  - standard land charge searches are determined with the target ten days; and
  - a proactive approach is taken to ensure that new development conforms to planning consents and that there are no breaches of conditions.
- 76 User satisfaction compares well with other London authorities and is in the mid-range banding when compared with all other authorities in England (see also paragraph 49 and paragraph 89 below).

- 77 Despite the introduction of enforcement improvement measures during 2005, the service is still not responding to, or resolving, complaints of potential unauthorised development within target times and a high backlog, although reducing, remains to be considered. At the time of the inspection the service had a backlog of 671 'open cases' more than one year old and still requiring to be investigated or resolved. The backlog has only fallen slightly from 741 in the past twelve months despite additional staffing resources and the setting up of a dedicated enforcement team. The team are able to deal with the same volume of cases as received but is unable to make significant in roads into the backlog. An updated enforcement action plan has recently been produced, including a system for prioritising complaints but this is yet to have a demonstrable impact. IT systems are inefficient and the service has been slow to respond to complaints. In the six-month period to the 31 December 2005:
- only 58 per cent of complaints were registered within the target three days;
  - only 55 per cent of sites were visited within the target ten days; and
  - only 23 per cent of complaints were resolved within the target eight weeks and 24 per cent within the target 24 per cent.
- 78 The quality of decisions is being reduced by lack of communication with users, the high rate of successful appeal against refusal of applications and the inconsistency in decisions. Communication with applicants is often curtailed as the 8 or 13 week, target deadline for determining applications approaches (see paragraph 51 above). Quality of decisions in such instances is being reduced. Similarly the quality of decisions is affected by the high rate of loss of appeals against refusal of applications for planning consent. The rate of loss in 2004/05 was as high as 59 per cent but has been reduced to an average of 35 per cent for the two months ending on the 31 January 2006. This is nearer the 34 per cent national average for appeals lost but is still high and reflects a lack of conformity to planning policy. Users we spoke with at Focus Groups also indicated their concern over the number of inconsistent decisions on planning applications and another example of a reduced quality. The lack of consistency in past decisions results in agents being unable to give clear guidance to clients on the outcome of any application. For 2003/04 a total of 18 per cent of officer recommendations to Planning Committees were overturned and although this rate has been reduced to 10 per cent for 2004/05 this is still high and either an indication of poor officer advice or decisions made contrary to planning policies.
- 79 The rate of refusal of planning applications has dropped, but is still too high at about 30 per cent (the national average in 2002/03 was 14 per cent). Refusal, which usually exposes a difference in interpretation of planning policy between the applicant and the Council, is partly a measure of the quality of pre-application advice and the clarity of planning guidance.

### **Is the service delivering value for money?**

- 80** We assessed planning to be providing adequate value for money in overall terms when compared to other planning authorities. An analysis has been made through a comparison of costs, efficiency of performance and measurement of service outcomes for users and the community.
- 81** The overall costs for the service are average compared to other authorities. Performance is mixed. Recent improvements have been made to address poor performance in the speed of planning decisions, but other areas such as enforcement remain a concern despite improvements made. The Council's corporate value for money approach has not yet been fully embedded, so there has been no systematic assessment of service cost relative to its efficiency and effectiveness carried out to date.
- 82** The procurement options have yet to be fully tested. The service can demonstrate examples of efficiency savings as for example through collaborative working with the London Contract Supplies framework for the provision of professional agency staff, and by switching public notice adverts to an alternative local newspaper. The Council also uses 'The Outlook' system, whereby service area bids for additional funding are risk assessed and matched to corporate priorities, and this is recognised as notable practice. The Council has approved a Procurement Strategy and set up a procurement unit to consider how efficiency savings can be made within planning but to date this has not materialised. Efficiency savings will release more financial resources to be allocated to areas in need of improvement but there is no medium-term financial plan for the service in place.
- 83** The Council has a strong culture of budgetary control, has a satisfactory General Fund Balance, and is performing within budget without significant over or under spend in planning. However, it has not robustly challenged areas of costs and income such as the potential receipts from charging for providing pre-application advice or the under performing of some aspects of the service such as enforcement although plans for the former are currently being developed.
- 84** Analysis of CIPFA statistics reveals gross expenditure of the service to be average compared to other London authorities. The Planning Policy unit costs are the fourth highest in London, but it is performing well, producing an updated UDP in 2003 and a range of LDF documents to keep the Council well on schedule for implementation of the new style plans by 2008.

- 85** The Development Control costs are average compared to other London authorities and the unit has had a variable history of performance. It has been a Standards authority for the last two years and in the last year has achieved a speed of determining planning applications that exceeds the government's targets (see also paragraph 74). Enforcement has been under resourced and is still not responding efficiently to complaints of potential unauthorised development. The quality of decisions is being reduced through high losses of appeals, inconsistency of decisions and lack of communication with users. Support service costs are relatively high compared to other outer London boroughs reflecting the fact that there are currently more support staff than Development Control staff. The service intends to carry out a further review of business processes following the local elections (see also paragraph 124).
- 86** The Planning Improvement Group has driven service development and recent efficiencies, including those detailed within paragraph 82 above. Further examples include restructuring of the service to create a single planning and regeneration service that will save the cost of a head of regeneration post from April 2006, and reduction in the number of planning committees has increased delegation levels and overall effectiveness.
- 87** Improvements in the service though have been recognised by the government through the award of Planning Delivery Grants of £350,000 for 2004/05 and £457,000 for 2005/06. These grants are above the average grant awarded to authorities of £320,000.
- 88** Service outcomes for the user and the community are mixed. The service is securing significant benefits for the community through the use of section 106 agreements and planning contributions from developers for new development. However, whilst the planning process is supporting the achievement of some corporate aims the lack of monitoring of outcomes makes measurement of the success of all policies impossible.
- 89** The service compares well with other London authorities in terms of user satisfaction and is in the mid-range banding when compared with all other authorities in England. The Mori Survey in 2003 showed a 68 per cent satisfaction rate of users with service which meets the national average satisfaction rate. More recent resident surveys indicate that the satisfaction of users has increased slightly to 75 per cent.

- 90** Analysis of the service's performance from 2003/04 to the present shows the following.
- The satisfaction with the service is within the mid-range banding compared to all other authorities in England.
  - Performance in the speed of determining applications placed the service in the worst quartile for all authorities for 'minor' and 'other' applications and in the third quarter for 'major' applications in 2004/05. There has been a dramatic improvement during 2005/06 when performance has well exceeded national targets for all application types (see also paragraph 74).
  - The service is under achieving in new build on previously developed land with a return of 86.28 per cent for 2004/05 against the government target of 100 per cent.
  - The service is in the worst quartile nationally for appeals allowed against the authority's decision to refuse planning applications which means the quality of decisions is not always consistent (see also paragraphs 78 to 79).
  - Satisfactory performance for planning searches carried out within ten working days. The service demonstrated third quartile performance for both London authorities and all authorities in England during 2004/05.
- 91** The average individual caseload per officer for 2004/05 was 267 and is well above the national target of 150 even allowing for a high proportion of householder applications. There has been a 47 per cent increase in the number of planning applications submitted over the last four years which has accentuated this situation and shows little evidence of easing.
- 92** There is also little evidence of the service learning from other authorities but there has been a significant movement to collaborative working with other agencies and departments on a wide range of planning.
- 93** Accordingly, we have assessed that on balance planning is providing adequate value for money overall.

## What are the prospects for improvement to the service?

### What is the service track record in delivering improvement?

- 94 The service has experienced fluctuating performance in the speed of decisions over the last three years.<sup>3</sup> This has been due to a combination of factors including revised democratic structures (the area committee system), problems with implementation and functionality of the new IT system (APAS), and a huge increase in workload, all of which contributed to the service being designated a standards authority in 2004/05. However, the service has maintained an improved track record for all application types over the last 12 months. This has been brought about by adoption of a service improvement plan and implementation of a package of measures agreed by the Scrutiny committee. The plan has been subsequently revised to incorporate the findings of a review by external consultants to look at both the reasons for poor performance, and business processes.
- 95 The improvement measures have included the establishment of three regional planning committees (in May 2005) to focus solely on planning applications, increased levels of delegation to officers (to approximately 90 per cent of cases), a duty planner being made available at the One Stop Shop, streamlining of the role of the Conservation Advisory Panel, and use of Grampian conditions<sup>4</sup> to streamline the decision-making process and increase efficiency. As a result, the service is now achieving in excess of the CPA upper threshold levels for all planning application types. The improvement plan has also addressed ways to improve performance information, people development, and information retrieval.
- 96 Improvement measures have not only increased the speed of decisions but have also increased overall accessibility to the service and brought about a small recent improvement in user satisfaction. The new regional committee structure, availability of a duty planner, development of planning pages on the Council's web site, and on-line tracking of applications and decisions are all user-focused improvements that are appreciated by user and stakeholder groups engaged as part of the inspection.
- 97 As detailed in paragraph 62, the service has made improvements and achieved outcomes that have contributed to the achievement of some but not all of the corporate aims. For example, the service can demonstrate that policies have generally ensured no loss of green belt or metropolitan open space, contributed to preservation of the built heritage, and ensuring that new developments are safe.

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<sup>3</sup> See Exhibit 1 – pages 29 to 30

<sup>4</sup> Grampian conditions – The determination of major planning applications can be delayed by the requirement for the applicant to enter into a section 106 obligation. In a limited range of appropriate circumstances it is possible to use Grampian conditions as a prelude to obligations being entered into, so as to enable the application to be determined, but preventing implementation of the permission until such time that alternative arrangements, ie s106 obligation has been put in place.

### **34 Environment Planning | What are the prospects for improvement to the service?**

- 98** Planning policy has also made a key contribution to the Council's rate of progress in meeting London Plan new housing targets, although affordable housing policy is not currently sufficient to meet needs. Lack of monitoring and assessment of policies supporting transport and sustainability objectives means that their contribution to meeting corporate aims has been difficult to measure.
- 99** Enforcement remains an issue despite measures put in place during the last year including the creation of a separate planning enforcement team. The backlog and current level of planning enforcement complaints remain high, the backlog not having reduced significantly over the last six months (from 741 cases to 671 cases). An updated action plan proposing diversion of proactive resources to deal with reactive complaints for six months as well as a range of other measures has only recently been drafted and is yet to demonstrate a positive impact. In addition, although stopping action on anonymous complaints may improve the overall figures, it could also hide the facts. The service will still need to ensure that there are robust protocols for investigating alleged serious breaches.
- 100** The Council's corporate value for money approach has not yet been fully embedded, so there has been no assessment of service cost relative to its efficiency and effectiveness carried out to date. There is a requirement for all service plans to incorporate the corporate framework from 2006/07 onwards ensuring that value for money and procurement principles are embedded within core service aims and objectives, and clearly articulated. Value for money is also now a key consideration in all committee reports.

### **How well does the service manage performance?**

- 101** The Council is clear about what it wants to achieve for the area, its aims and new planning policies are based upon up-to-date assessments of need (see paragraph 61), and the planning service has been placed at the heart of delivery. The new vision and the role of planning in contributing to corporate and community priorities is clearly set out in the draft Local Development Framework Core Strategy Preferred Options Report which integrates national, regional and local policy and sets a clear strategic framework for future development.
- 102** The draft Local Development Framework is progressing to target and the strategic approach has been clearly driven by the Leader of the Council, cabinet portfolio holders, the Executive Director of Environment and senior officers within the planning Service.
- 103** The service is actively reviewing Local Development Framework plans with regard to social exclusion and equalities. As a result, three policy areas have been prioritised for Equalities Impact Assessments in 2006/07 starting with Housing.

- 104** There are clear links between Community strategy priorities, corporate strategies and plans, and Local Development Framework policies. The Council's detailed plans for social and infrastructure improvements, regeneration and investment initiatives are becoming more clearly articulated within the draft Regeneration and Investment Strategy 2006/16. However, this has not yet been formally adopted and outcome and output targets detailed within it are not yet formally reflected within the community strategy as explicit targets.
- 105** Planning guidance has been produced to facilitate for example, the need for local housing growth, including the Ilford Town Centre Area Action Plan, Gants Hill draft Area Action Plan, South Woodford Master Plan and development briefs for both major and minor sites.
- 106** Outcome-based targets and measures are not yet fully developed to allow the service to demonstrate both its contribution to achieving community priorities and the overall success of planning policies. Although the 2005/06 service plan aligns service activities with the six corporate aims of the Council which in turn reflect the key ambitions detailed within the community strategy it does not include a full suite of outcome measures. These are being developed as part of the new corporate 2006/07 service planning process which is intended to integrate all processes, outputs and outcomes, including the Planning Improvement Plan and progress on the sustainability agenda.
- 107** Improved performance management arrangements have been integral to the service's recent achievements. Recent improvements have been driven by the Director through the Planning Improvement Group which has been used primarily to drive improved Development Control performance. A variety of mechanisms are now used by the service to monitor performance. These include:
- daily and weekly reports to monitor the status of all BVPI109 figures showing forthcoming application deadlines;
  - weekly management meetings;
  - fortnightly reporting of BVPI performance to the Director;
  - monthly monitoring of unit work programmes;
  - a bi-monthly progress report by each functional manager which is discussed collectively by senior managers to monitor performance and deal with emerging issues;
  - corporate performance reporting using the Council's corporate performance tool, PBViews, by way of a simple 'traffic light' system; and
  - an annual report providing an overview of the previous year's performance and highlighting future pressures.

## 36 Environment Planning | What are the prospects for improvement to the service?

- 108 In addition to the above, the Annual Monitoring Report is produced in line with Local Development requirements, and provides a sound basis for recording use and effectiveness of planning policies, although as detailed in paragraph 43, the conclusions need to be more developed and concise to demonstrate how successful these policies have been.
- 109 Ownership of service performance at political and senior management level is demonstrated through the monthly review of cabinet portfolios by the Leader of the Council, following formal review of performance by portfolio holders in conjunction with the Director and Head of service. Portfolio holders also keep abreast of service developments through daily contact with senior officers of the service.
- 110 The service has not made full use of user engagement to inform service standards and service planning. Planned actions to address this include setting up a user/agents forum in summer 2006. This forum will also be used to increase awareness of the on-line application facility.
- 111 Weaknesses in systems for measuring performance against customer service standards are being addressed. For example, measures are being put in place so that telephone answering/response times can be measured from June 2006, and difficulties in assessing the robustness of performance data due to the dynamic nature of the APAS system are being overcome through engagement with the supplier with a view to locking down the system for performance reporting purposes.
- 112 A letter monitoring system has recently been purchased from LB Islington which will allow monitoring of correspondence on a similar basis to the system operated to flag up planning applications reaching their deadline in order to create greater urgency and accountability for providing written responses to both customers and members. However, this will require careful balancing of performance in this respect against actions relating to speed of decision-making, and may require a review of service standards.
- 113 The service has actively responded to external challenge. The Planning Improvement Plan was updated following an inspection by government inspectors in March 2005 as part of Standards Authority procedures. Actions were put in place to reduce the case loads of officers, increase delegation of decisions to officers, streamline processes, adopt planning contribution guidance and improve efficiency of IT. The service also openly commissioned a peer review by the IDeA and Planning Advisory Service in November 2005 to 'critically evaluate its performance and keep it on track with its improvement journey' particularly in meeting the challenges of the Planning and Compulsory Purchase Act 2004 and the Sustainable Communities agenda. The results of this review are currently being incorporated into the new service plan.

- 114** There has been active involvement of Scrutiny in the service both in terms of the programme of improvement measures, and the working party for the UDP review and preparation of the Local Development Framework. This has been a positive measure to encourage ownership and accountability by members but has also added to the time taken to complete the exercise due to entrenched views of some members to maintain the status quo.
- 115** The service has undertaken an analysis of the high number of refusals, appeals and appeals allowed against the Council and responded to the findings by introducing supplementary planning guidance for amenity space to try and counter the high number of refusals and ensure greater consistency on interpretation of planning policy. As detailed in paragraph 54, although there has been a slight reduction in the loss of appeals there has been no further systematic analysis of decisions to establish the cause of the reduction.
- 116** There is a link between the service plan and individual performance and development plans and targets. Staff are committed to the service and are positive about training and development opportunities. Performance management of staff follows the corporate approach and the service has IIP accreditation.
- 117** The service is not yet systematic in its drive to achieve value for money. There is limited management information available within the service on costs and outcomes in comparison with others. There has some analysis of the Audit Commission's Value For Money profiles and levels of planning delivery grant, but there is little to suggest a more in depth analysis to inform the decision-making process.

### **Does the service have the capacity to improve?**

- 118** Despite good progress on LDF preparation and difficult decisions already having been made on key development sites in support of delivery of community priorities, the effectiveness of measures to ensure consistent good quality decision-making in line with current and developing planning policy cannot yet be fully demonstrated. The Council cannot yet demonstrate that the planning service has the human resource and financial capacity needed to deliver its ambitions. Although it has added to strategic leadership, middle management, and business support capacity, plans for increased efficiency to both reduce reliance on planning delivery grant and allow redirection of resources to front line delivery are in the early stages of development. Collaborative working across the Council and with partners is developing and the service has been instrumental in the Council securing growth area funding to support regeneration initiatives in Ilford and Gants Hill.

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- 119** Not all councillors are fully equipped to make planning decisions. Training on planning-related issues is not compulsory, and there has been poor attendance by members at sessions provided. As a result, due regard is not always given to officers' professional advice and UDP policies when councillors are involved in planning decision-making. This has resulted in some tension in the relationships between officers and councillors, inconsistent decision-making and some inefficient use of officers' time. Earlier member involvement in the planning process is planned to commence in June 2006 through establishment of the Design Advice Service that will consider medium to large scale developments. A key aim of this service will be to make the likely conditions that will lead to a successful application clearer to developers. In addition, training for new members on planning matters has been fixed for June 2006 with special briefings for those who may be on the first planning committee at the end of May 2006. This will be supported by joint member and officer lunchtime seminars.
- 120** The recent local elections have provided continuity and stability in terms of overall political leadership and of the regeneration and planning portfolio to ensure that focus and good progress is maintained on the Local Development Framework. Difficult decisions have already been made on key development sites to support delivery of community priorities, for example the approval to construct tower blocks at Pioneer Point and to construct a new school and leisure facility on the former PLA site. However, the new vision for the Local Development Framework is challenging and creates tension between local wants, for example, protection of green space/amenity land (more in line with current UDP policies), and both regional and national needs for growth, for example in affordable housing provision and increased density of development, and also for sustainable development. Members' understanding of, and commitment to the wider needs is variable across political groups with some members still focussing on maintaining the status quo to satisfy the demands of their local communities. Measures put in place to change the mindset of members and ensure they make good quality decisions in line with both existing and emerging policy and needs, such as the proposed 12-point action plan (that includes new member training and creation of the Design Advice Service as detailed above), are very recent, and cannot yet be tested for effectiveness.
- 121** A merger of the service with the Council's Regeneration team under a new joint chief officer will provide enhanced strategic leadership capacity, particularly in helping the service focus on its objectives for sustainable local development, with a greater emphasis on social, environmental and economic issues in addition to regeneration of the physical infrastructure.

- 122** Restructuring of the service during 2005/06 has also provided additional middle management capacity, particularly in the area of business support. However, the capacity to bring about further improvements to front line service delivery is currently stretched. Very high Development Control caseloads continue, and, although there is a very high proportion of householder applications received by the service, the caseload per officer is still nearly twice the recommended national average of 150 per annum. Officers have managed to sustain the workload over the last year but are concerned as to whether this can be continued indefinitely and say that there is a limit as to how far their 'good will can be stretched.'
- 123** As detailed in paragraph 99, enforcement capacity also remains stretched and an action plan to address the backlog in reactive complaints has yet to be formally agreed.
- 124** Councillors and officers are clear that planning delivery grant (PDG) is ring fenced to the service budget and that there will be no growth in the service budget for 2006/07 due to the grant being secure for this period. There is no medium-term financial plan for the service. Initiatives to reduce the reliance on Planning Delivery Grant and release additional resources for front line service delivery, such as business process re-engineering and charging for pre-application advice, are in the early stages of development and/or implementation. It will therefore be some time before there is likely to be any relief in the pressure on front line staff.
- 125** Additional resources are being invested in e-planning but are currently insufficient to meet needs. An e-planning investment strategy has been prepared with a view that its delivery will help manage the workload better, and staff will be supported with more training. However, the staff to take IT initiatives forward are yet to be recruited, so any potential benefits that can be gained from this, for example, increased service efficiency and redirection of resources to priority areas, will take time to come to fruition. In addition, the service proposes to use unallocated Planning Delivery Grant to support the e-planning initiatives with a return on the investment expected in 2008/9. However, this funding is insufficient to meet the entire costs and will require corporate funding support of some £150,000 to £200,000. No provision for this has yet been made.
- 126** There is strong financial control by the Director of Environment. The current recruitment freeze has heightened staff concerns on workload following recent departures, and the granting of time off in lieu rather than payment of overtime is putting further pressure on them. However, the director has put these measures in place to be certain about the service cost and income bases, and to be in a position to enable the management team to assess where the priority areas are so that if a vacancy comes up it can be used in the area where it is most needed. This situation will be reversed when he knows exactly what the service can afford.

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- 127** Staff are strongly committed to improvement but morale is poor. Although staff feel able to learn and develop their skills, they are concerned about sustainability of their caseloads, cramped working conditions and the décor of the planning offices they have to work in. To try and address this issue the service has begun a programme of redecoration works and is shortly to introduce a pilot home working exercise using six volunteers. This pilot scheme will need to run and be formally evaluated before any decision can be made that could impact on working conditions for the whole service.
- 128** The Environment directorate has recognised weaknesses in its approach to equality and diversity issues and a new officer is about to be appointed to take this forward. This person will support preparation of formal equalities impact assessments in Planning ensuring that there is integration of service-based issues with those arising from policy sustainability appraisals. However, this work is only in the early stages of development and a service equalities improvement plan is currently in draft form.
- 129** Recruitment and retention problems were reviewed in June 2004 and resulted in the introduction of market-factor increments to retain more experienced staff. Although this has helped the situation at senior levels, there is still high turnover of staff at more junior levels and we were not made aware of any measures, such as career progression schemes, to address this. In addition, there are currently no succession planning arrangements in place or proposed to address the fact that a number of key staff will be retiring in the next four to five years.
- 130** The service has demonstrated that it can be effective at working in partnership with other Council services and the police, for example, by using the development team approach for major developments such as Repton Park and the proposed development at Five Oaks Lane. Outcomes jointly secured to date have been detailed earlier in this report. This approach ensures integrated 'council service' delivery to the developer.
- 131** The service is working jointly with other councils on a number of issues though this has not yet led to tangible outcomes. For example, officers have worked alongside those from Barking and Dagenham, Bexley, Greenwich, Newham and Transport for London on the Thames Gateway Bridge development. Mitigation measures have been secured through constitution of the Borough Consultative Group and the section 106 agreement provides a mechanism to allow the Council's involvement in for example, the setting of the toll boundary, and allocation of the £14.5 million mitigation fund.
- 132** The benefits of collaborative working will shortly be seen by way of efficiency savings gained through the Council joining the London Contract Supplies framework for the provision of professional agency staff. However, this is an area that could be developed further.

- 133** The Council's strategy to promote population growth and create additional demand in the area to make it more attractive to investors is delivering results. The Planning Service has been instrumental in helping to secure inward investment. For example, £2 million has been secured from the ODPM for the Unity Square development in Ilford with an additional £1.1 million secured from the same source for the regeneration of Gants Hill. The service has also been closely involved in the successful £3 million lottery bid for the first phase of conservation and enhancement works in Valentine's Park around Valentine's Mansion, and the current bid to finance refurbishment of the building.