# CORPORATE SERVICES DIRECTORATE

# **PLANNING DEPARTMENT**

BUSINESS PLAN 2025-2026

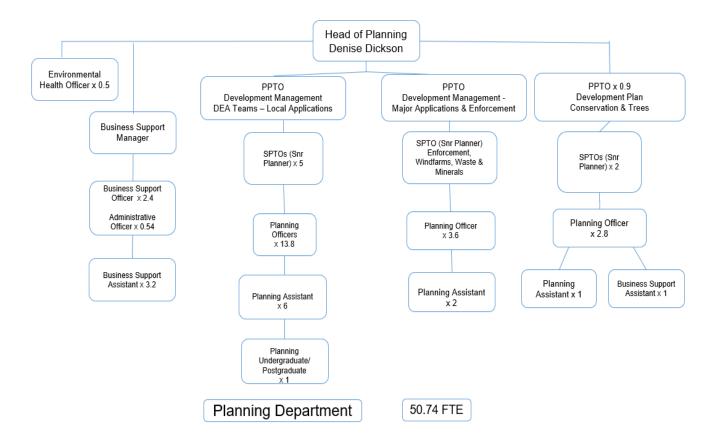
## SECTION 1: SETTING THE CONTEXT

## 1.1 FUNCTIONS OF THE PLANNING DEPARTMENT

The key functions of the Planning service area are:

- Local Development Planning creating a plan which will set out a clear vision
  of how the council area should look in the future by deciding what type and
  scale of development should be encouraged and where it should be located to
  create a sustainable environment; designation of conservation areas; issuing
  Building Preservation Notices and Tree Preservation Orders.
- Development Management determining the vast majority of planning applications and other planning consents, including waste and minerals applications, conservation area consents, advertisement consents, certificates of lawful development, non-material changes, and discharge of conditions.
- Planning Enforcement investigating alleged breaches of planning control and taking action where it is considered expedient to do so; issuing of Urgent Works Notices.

## 1.2 DEPARTMENTAL STAFFING STRUCTURE



The current staffing structure has reduced by 0.5FTE compared to the last business year due to restructuring of posts and inclusion of 0.5FTE Environmental Health Officer. In 2025/26 a new post is included for undergraduate/postgraduate work experience with successful candidates receiving maximum one year paid work experience at any time. This post will replace an existing vacant Business Support Assistant post.

## **1.3 STRATEGIC CONTEXT**

### Corporate Strategy Themes – Cohesive Leaderships, Local Economy

The Local Development Plan is a spatial landuse plan that guides the future development within our Borough. It balances competing demands for development and the protection of our built and natural environment. The LDP is prepared within the context of both the Corporate Plan and the Community Plan. The Planning Act (Northern Ireland) 2011 sets out the statutory link between the LDP and the Community Plan. The LDP must take account of regional policy and guidance issued by central government and contain policies

and proposals developed on a clear evidential basis. When adopted it will replace the Northern Area Plan 2016 and the suite of regional planning policy statements.

Until such times as Council adopts its LDP, planning decisions are made in accordance with the current Northern Area Plan 2016, the Strategic Planning Policy Statement for Northern Ireland, and the suite of regional planning policy statements. Decisions should be consistent with LDP and relevant policies. Planning decisions will be made in balancing the 3 pillars of sustainability - the social, economic and environmental needs of our society and embedding mitigation and adaptation to climate change, where relevant.

## **Corporate Strategy Theme – Improvement and Innovation**

The new Regional Planning Portal provides the technological platform to improve openness and transparency in decision-making. Increased levels of information relating to planning applications are uploaded onto the system for the public to view. Increased number of planning applications are submitted on-line reducing the need for paper files and moving towards a paperless process. Ongoing updates to the system are implemented as necessary to ensure continued improvement and experience for all users.

A new Tree Preservation Order interactive map viewer has been developed to enable the public to identify trees with preservation orders attached and those within the Borough's Conservation Areas. This makes it easier for the public to determine if an area of land is currently affected by tree protection. There are currently 80 Tree Preservation Orders in the Borough.

Annual monitoring of the Borough's Housing, Retail and Employment land is undertaken. This provides the public and key stakeholders with up-to-date information on the Borough and provides a robust evidence base that informs the preparation of the LDP.

A new interactive map viewer is being developed to enable the public to access the Council's Annual Housing Monitor information. This makes it easier for the public to identify monitor sites and land availability information.

A new non-statutory Validation Checklist was implemented on 01 September 2024. The new procedures were developed in discussion with Planning Agents who submit applications in the Borough. The benefits of validation checklists are generally set out as follows:

- they set out the scope of information required at the outset to ensure a 'fit for purpose' submission;
- they enable the planning authority to have all the necessary information to determine the application.
- they minimise the need for further submission of additional information during the life of the application which avoids unnecessary delay in the determination of applications and reduces costs to councils through reduction in readvertisements and re-neighbour notification.
- they provide applicants with certainty as to the level of information required and the likely overall investment needed prior to the application submission.
- they ensure that the appropriate information is provided with an application to assist interested parties, including consultees, in their consideration of development proposals.

A statutory Validation Checklist went out for a 12 week public consultation on 27 January 2024 and will be implemented following consideration of responses and agreement with the Planning Committee.

## **Corporate Strategy Theme – Healthy and Engaged Communities**

Planning decisions will be made balancing the 3 pillars of sustainability - the social, economic and environmental needs of our society and embedding mitigation and adaptation to climate change, where relevant. The Statement of Community Involvement sets out how the Planning Department intends to engage with the public, stakeholders and Government Departments in exercising its planning functions.

The Statement of Community Involvement was updated in February 2025 and subsequent to agreement received from Dfl on 07 March 2025 it was published on the Planning Section of Council's website and advertised in local newspapers.

Meetings continue to be held on a regular basis with members of the RSUA and RTPI to increase engagement and seek input into service improvements.

## **Corporate Strategy Theme – Climate Change and our Environment**

Planning decisions will be made balancing the 3 pillars of sustainability - the social, economic and environmental needs of our society and embedding mitigation and adaptation to climate change, where relevant. The Council is preparing its own Local Development Plan (LDP) that will take account of regional legislation, policy and guidance relating to mitigation and adaptation to climate change. When adopted, all planning decisions must have regard to the policies contained therein, guiding development proposals across the Borough in a sustainable manner.

A senior officer within the Planning Department sits on Council's Climate Action Team and contributes to Council's input into Dfl's Annual Reporting on its 'Sustainable Water: A Long-Term Water Strategy for Northern Ireland (2015-2040)" Implementation Plan'.

## 1.4. SWOT ANALYSIS AND PESTLE ANALYSIS

### Strengths

- Greater engagement with Elected Members in the Local Development Plan process bringing greater awareness for staff of local needs pertaining to the Borough through the LDP process.
- Greater engagement with Elected Members in the decision-making process for planning applications.
- Agreed Protocol and Scheme of Delegation with Planning Committee in place and regularly reviewed.
- Positive engagement with internal and external stakeholders.
- Teams established to deal with specific application types provides consistency and efficiency to development management process.
- Ongoing training of staff assists in developing their skills and knowledge
- Staff have developed detailed local knowledge of the areas within which they work resulting in greater consistency and efficiency in decisionmaking.
- Flexibility and commitment of staff to adapt to change and continue to deliver services in challenging circumstances.
- Experienced and resilient staff employed on permanent basis with wide range of knowledge and skills.
- Positive attitude throughout the office.
- Clear assigned roles in relation to Development Management, Development Plan and Enforcement.

#### Weaknesses

- Loss of experienced staff and knowledge through sickness and resignation.
- Excessive caseloads reduce performance.
- Increasing complexity of legislation and environmental areas/issues.
- Detailed policies within SPPS constrain Council's ability to develop policies specific to needs of Borough within its new Local Development Plan (LDP).
- Application processing constraints due to delays resulting from late submission of information and representations, and external discussions with stakeholders not agreed prior to submission of application.
- Delays to processing of planning applications due to delays in consultation responses outside of control of Council.
- Inability to make changes to planning legislation to improve processes in LDP and development management processes.

## Opportunities

- Further develop better partnership working between internal and external stakeholders to improve working relationships and service improvements.
- Improve performance by reviewing procedures for processing planning applications.
- Continue to input into amendments to planning legislation to bring about improvements to the planning function.
- Refinement of local plan policies to reflect local circumstances.
- Improvements to the new Planning Portal IT System ensuring up-to-date stable system with improved customer interface.
- Delivery of topic specific training.
- Improved openness and transparency of Tree Preservation Orders (TPOs) through the introduction of online GIS facility.
- Filling of vacant posts provides opportunities for career development and helps to motivate staff.
- Publish information leaflets to develop greater understanding of the development management process.
- Collaboration with stakeholders to develop standing advice to streamline the planning process.
- Implementation of new mandatory Planning Application Validation Checklist to front load planning applications to improve performance.

## Threats

- Infrastructure constraints and material costs resulting in decrease in planning applications submitted and associated income.
- Loss of experienced staff resulting in increased pressures on remaining staff and delays to delivering the planning function.
- Greater risk of challenge through Judicial Reviews/Ombudsman on planning decisions and impact on staff resources and budget costs.
- Risk to breaches of confidentiality/data protection due to high volumes of correspondence received and uploaded onto the Planning Portal.
- Impact of Planning Appeals Commission (PAC) Resource issue/timetable on LDP Independent Examinations.
- Delay to Council agreement on publication of draft Plan Strategy due to continual input from elected members.
- Having to take account of new Plans and Policies (e.g NI Marine Plan and updated SPPS policies) due to the delay in publication of the draft Plan Strategy
- Potential for fraudulent information to be submitted in support/objection to a planning application.
- Period of heightened sensitivity due to local Council elections in May 2026 impact on publication of draft Plan Strategy.

## **PESTEL ANALYSIS**

Political	Local accountability as Elected Members have responsibility for decision making for those non-delegated decisions and for agreeing the new LDP. The ability to influence Dfl to make legislative changes will impact on delivery of amendments to legislation required to improve the planning function and reduce costs to Council in delivering the service. Receipts are closely related to general economic activity in the Borough. Planning can be an enabler of development and can be viewed as an income generator to the overall benefit of the Council. The impact of infrastructure constraints, the increased costs of materials, and the lack of availability of trades people may have had an impact on the income generated by planning
Social	applications over this business year. Opportunity to improve the wellbeing of citizens of the Borough through the linkage with the Community Plan and greater community involvement in the development plan process. Continue to implement the agreed Statement of Community Involvement. Continued engagement with internal and external stakeholders will assist in improving service delivery.
Technological	Implementation of the new Planning Portal contributes to improvement in customer accessibility and engagement in the planning functions and open and transparent decision-making. Hybrid meetings provide an opportunity to continue engagement in with remote access and potential for greater attendance at meetings and workshops. Introduction of the online GIS facility for TPOs contributes to improved accessibility to this information, improving openness and transparency.
Environmental	Ability to protect the environment and encourage economic development through a balanced delivery of the planning function. The new development plan process will provide the opportunity to encourage greater political and community involvement in the process with each option appraised through the Sustainability Appraisal and other Assessments. Continuation of the collaboration with other council staff will improve knowledge and evidence to produce sound planning policies to promote sustainable development.
Legal	Working in a complex legal environment increases the risk of challenge through Judicial Reviews/Ombudsman cases. Large number of European designated sites in the Borough and increased scrutiny through The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 and the Council Directive 92/43/EEC raising complex issues.

## 1.5. PRE-REQUISITES AND EXTERNAL DEPENDENCIES

Planning is a demand-led service and we are affected by the wider economic factors which determine the level of applications received. Enforcement is a similarly reactive process as the majority of complaints are received from the public.

Planning cannot control the number of planning applications or enforcement cases opened as this is driven by the needs of the wider public and strength of the economy.

Planning is largely constrained by complex legislation, policies and guidance published by central government. The risks involved in failing to comply with these can result in a significant financial cost, delay and reputational damage to Council. It is therefore important to ensure that Planning has sufficient staff resources with the necessary skills and knowledge to make sound planning decisions thereby reducing the risks of administrative errors.

The significant challenge ahead for Planning is maintaining a stable workforce and reducing challenges to decision-making. The carrying of vacant posts significantly increases caseloads for staff and impacts on staff morale, customer service and performance against statutory targets. It is important that when vacant posts arise that they are filled as expeditiously as possible to reduce caseloads and ensure efficient processing of planning applications.

The ability to influence central government to make legislative changes continues to impact on the delivery of improvements to the efficient delivery of the Planning function. Collaborative working between Councils and Department of Infrastructure through the Performance Improvement Plan (Phase 2), are other stakeholders through quarterly meetings is important to ensure key issues impacting on the Planning function are addressed in a collaborative manner with those who have the ability to influence changes to legislation and working practices outside of Council.

Council is responsible for the publication of a new Local Development Plan that will, when adopted, form the basis of planning decision making within the Borough. The draft Plan Strategy was presented to full Council for ratification at the meeting held on 01 November 2022. At that time Members resolved to defer ratification in order for further workshops to be held to discuss specific areas of concern. Workshops were held in August, September and December 2023 and in January 2024. A LDP Working Group was held in March 2024.

Over the last year an amended LDP timetable and an updated Statement of Community Involvement have been published. At the request of Members, Independent Research has been commissioned to undertake research into housing provision and allocation to inform the draft Plan Strategy. This research is scheduled for completion in September 2025. An updated Retail and Commercial Leisure Capacity Study has been commissioned to inform both decision making on relevant planning applications and the draft Plan Strategy. This is due for completion with this business year.

Positive engagement with stakeholders to the planning function provides the opportunity to collaborate on driving forward improvements to customer service. A review of the planning process for pre-application discussions was agreed and implemented on 01 September 2024. Likewise, collaborative working with stakeholders on a non-statutory validation checklist has resulted in the implementation of the Planning Application Validation Checklist on 01 September 2024. With the commencement of legislation to place Planning Application Validation Checklists on a statutory basis, a public consultation was launched on 14 January 2025 for 12 weeks. This public consultation has now closed and responses are being considered prior to publishing the new statutory Planning Application Validation Checklist.

Discussions are ongoing with statutory consultees to continue to develop Standing Advice to streamline the planning process. Standing Advice has been agreed with Dfl Roads and with NI Water.

The Council has implemented the new Northern Ireland Planning Portal with 9 other Councils and Dfl. This shared system went live on 05 December 2022 and provides Council with a stable, up-to-date system with an improved customer interface. Initial issues with the new Portal are largely resolved and the system is now operating effectively for development management; continual improvements are being implemented through agreement with the Project Board.

The Planning Portal provides greater access to information on planning applications by the general public. This improves open and transparent decision-making with more information available digitally to the general public on how decisions are reached on planning applications. This increased publication of information also increases the risk of data protection due to large volumes of data being uploaded for public viewing. The increased scrutiny of decision-making also increases the risk of challenges to decisions. The risks involved in failing to comply with the complex legislation, policy and guidance can result in a significant financial cost, delay and reputational damage to Council. Training of Members and staff is important to ensure timely, quality and consistent decision-making to reduce the risks of challenge. Mandatory training is carried out with Planning Committee Members annually and other training provided as identified throughout the year to improve decision making. External bodies such as NILGA have been engaged to deliver training to Members in the forthcoming year.

A planning award has been included within the Causeway Chamber of Commerce annual awards which promotes the image of planning and the excellent schemes approved through the planning system.

## 1.6. FINANCIAL BUDGET

The Planning Department financial budget for 2025/26 has been agreed at  $\pm 1.96$ m supported by predicted income of  $\pm 1.21$ m bringing the total expenditure to  $\pm 3.16$ m. The majority of the budget expenditure is payment of staff wages accounting for 90.3% of overall expenditure.

Directorate	Corporate Services	
Service Area	Planning	
Reporting Year	2025/26	
Business Plan Objec	tive 1	
Improve performan	ice in relation to the processing of planning app	lications and enforcement cases
Lead Officer(s):		
Denise Dickson, Shan	e Mathers and Jennifer Lundy	
Link to Corporate Str	ategy:	
Cohesive Leadership;	Improvement and Innovation	
Link to Community P	Ylan:	
A Sustainable Accessi	ble Environment; A Thriving Economy	

Link to Performance Improvement Plan:

Council will improve its overall performance by delivering a comprehensive corporate Transformation Action Plan

Work Stream	Actions	Financial Information/ Budget £	Timescale	Performance Indicator(s) APSE Benchmarking Indicators	Progress	RAG Status
Improve processes	Implement statutory planning application validation checklist	Reduction in deferred income	Q3	Validation checklist implemented		
	Implement Standing Advice from NI Water	No impact on budget	Q1	Standing advice implemented		
Reduce processing times for local and major category of planning applications	Develop an action plan to manage and reduce the number of over 24 month applications in the system	No impact on budget	Q2 Q4	Action Plan developed and implemented Reduction in number of over 24 month applications (both local and major category of applications) by 10% by end of Q4 Reduction in number of over 12 month applications (both local and major category of applications) by 10% by end of Q4		

	Monthly report from Principal Planning Officers to Senior Planning Officers meeting analysing the performance in processing both local and major category of planning applications	No impact on budget	Q4 Q4	Average processing times for major         category of applications meeting         statutory target of 30 weeks.         Average processing times for local         category of applications:         Q1: 25 weeks         Q2: 21 weeks         Q3: 17 weeks         Q4: 15 weeks
Reduce processing times to bring enforcement cases to conclusion	Monthly report to Planning Senior Officers meeting analysing the performance in processing enforcement cases	No impact on budget	Q4	Average processing times for case conclusion for 70% concluded within 39 weeksQ1: 60% concluded within 39 weeks Q2: 65% concluded within 39 weeks Q3: 70% concluded within 39 weeks Q4: 70% concluded within 39 weeks

#### **Risk Management** Identify Risks and any Mitigating Actions Required:

Risk 1: Impact of staff vacancies and increased caseloads will negatively impact on the ability to improve performance.

Mitigation 1: Ensure Authorisation to Recruit is actioned prior to post becoming vacant to ensure vacancy is filled as expeditiously as possible.

**Risk 2:** Planning Committee do not agree to the implementation of the new statutory Planning Application Validation Checklist **Mitigation 2:** Continue engagement with key stakeholders at RSUA/RTPI meeting to improve front-loading of planning applications with necessary information

**Risk 3:** Fraudulent information submitted in support/objection to a planning application may impact on performance due to verification of information/investigation **Mitigation 3:** Ensure procedures are in place for staff to raise concerns regarding potential fraudulent information.

Directorate	Corporate Services
Service Area	Planning Department
Reporting Year	2025/26

Business Plan Objective 2:

Preparation of Council's draft Plan Strategy

Lead Officer(s):

Denise Dickson, Sharon Mulhern

Link to Corporate Strategy:

Cohesive Leadership; Local Economy; Improvement and Innovation; Climate Change and our Environment

#### Link to Community Plan:

A Sustainable Accessible Environment; A thriving Economy

#### Link to Performance Improvement Plan:

Council will improve its overall performance by delivering a comprehensive corporate Transformation Action Plan

Work Stream	Actions	Financial Information/ Budget £	Timescale	Performance Indicator(s) APSE Benchmarking Indicators	Progress	RAG Status
Research on Housing need in the Borough	Receipt of independent research to establish the most up to date housing requirement for the Borough	£40k	Q4	Completion of research to inform LDP by Ulster University by Q3		
Updated Retail and Commercial Leisure	Award contract for Retail and Commercial Leisure Capacity Study	£40k	Q1	Signed contact between Council and successful candidate by end Q1		
Capacity Study	Receive complete Retail and Commercial Leisure Capacity Study		Q3	Receipt of finalized Retail and Commercial Leisure Capacity Study by end Q3		
	Consider impact on planning policies of Retail and Commercial Leisure Capacity Study		Q4	Agreement through Planning Committee to accept findings and recommendations from Retail and Commercial Leisure Capacity Study.		

Housing Monitor Interactive Map	A new interactive map viewer is being developed to enable the public to access the Council's annual Housing Monitor information. This makes it easier for the public to identify monitor sites and land availability information.	Within budget		Completion and publication of the map viewer on the Council's website.				
Identify Risks	Risk Management         Identify Risks and any Mitigating Actions Required:         Risk 1: Members disagree with evidence base provided from Independent Researchers.							
Mitigation 1: S	Mitigation 1: SMT kept up-to-date with progress at key stages and workshop held to agree way forward.							

Directorate	Corporate Services
Service Area	Planning Department
Reporting Year	2025/26

Business Plan Objective 3:
To manage finance, staff, information and other resources effectively and efficiently within corporate governance framework
Lead Officer(s):
Denise Dickson
Link to Corporate Strategy:
Cohesive Leadership
Link to Community Plan:
A sustainable accessible environment; a thriving economy
Link to Performance Improvement Plan:
Council will improve its overall performance by delivering a comprehensive corporate Transformation Action Plan

Work Stream	Actions	Financial Information/ Budget £	Timescale	Performance Indicator(s) APSE Benchmarking Indicators	Progress	RAG Status
Ensure all Audit/Ombudsman	Review Planning Fraud Risk Self Assessment Checklist	No impact on budget	Q2	Checklist completed		
recommendations are implemented	Monitor and implement Ombudsman recommendations	No impact on budget	Q4 Q4	Number of cases where Ombudsman determines maladministration is less than 0.4% of all decisions made Implement recommendations within 6 months of receipt of final report.		
Manage staff recruitment to ensure vacant permanent posts filled within 3 months	Ensure Authorisation to Recruit form completed and sent for agreement to SLT	Posts already accounted for within budget and structure	Q2	Long term vacant permanent posts filled or determined no longer necessary within 3 months of post becoming vacant		

#### **Risk Management** Identify Risks and any Mitigating Actions Required:

**Risk 1:** Overturns at Planning Committee are contrary to LDP and planning policy increasing risk of challenge through the High Court and Ombudsman **Mitigation 1:** Planning Committee Members undertake mandatory training on code of conduct, decision making and audit recommendations prior to sitting on the Planning Committee.

**Risk 2**: Decisions made by Planning Committee Members impact on resources not previously accounted for i.e. budget/staffing.

Mitigation 2: Members reminded of budget/resource implications of decisions before final decision taken.

Risk 3: Turnover of staff due to sickness/resignation impacts on workload of remaining staff impacting on performance.

Mitigation 3: Ensure Authorisation to Recruit is completed and sent to Senior Leaders Team within 2 weeks of post becoming vacant.