

**CORPORATE SERVICES**  
**DIRECTORATE**

**PLANNING DEPARTMENT**

*BUSINESS PLAN*  
*2024-2025*

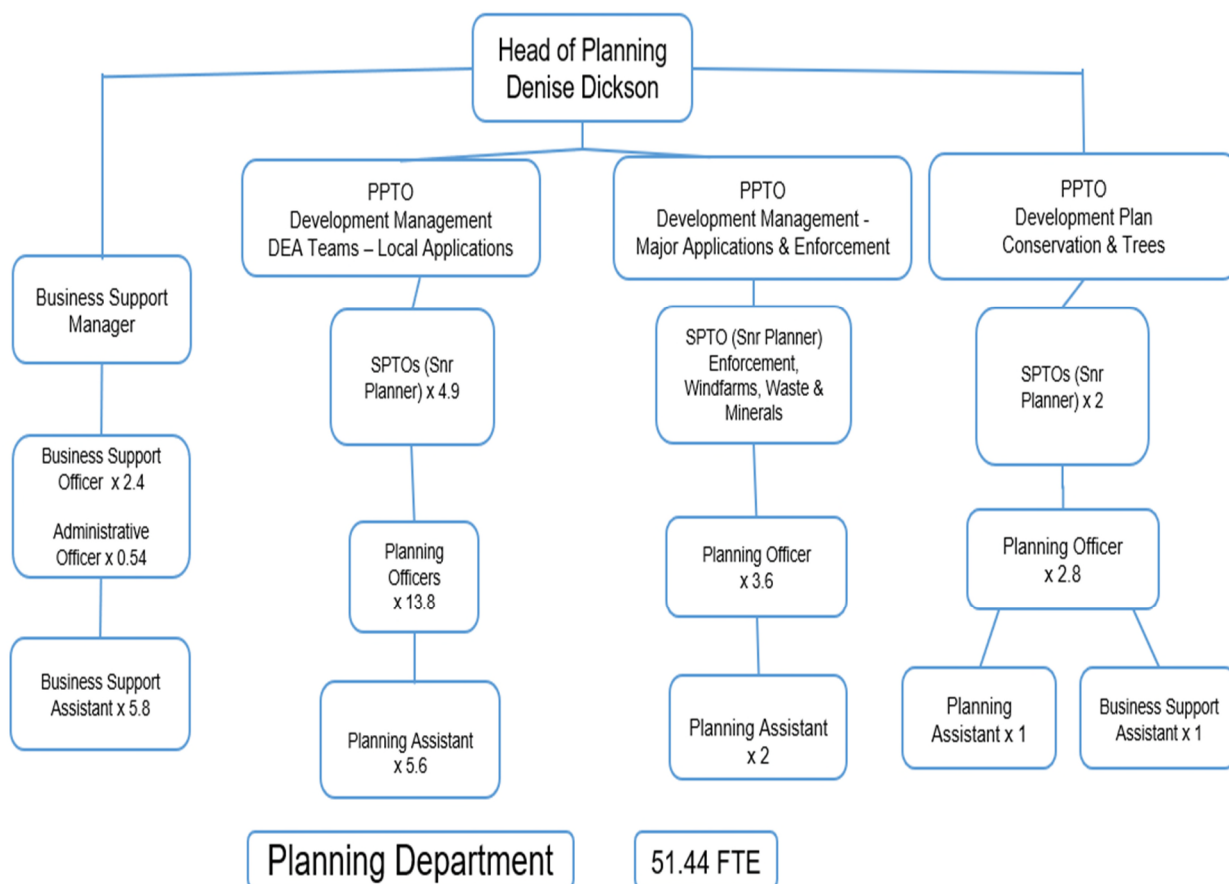
## **SECTION 1:     SETTING THE CONTEXT**

### **1.1   FUNCTIONS OF THE 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



## 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 open 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.

A new Tree Preservation Order interactive map viewer is being developed to enable the public to identify trees with preservation orders attached and those within the Borough's Conservation Areas. This will make 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.

### **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. Meetings are held on a regular basis with members of the RSUA and RTPI to increase engagement and improve performance.

### **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 DfI'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

<b>Strengths</b>	<b>Weaknesses</b>
<ul style="list-style-type: none"><li>• 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.</li><li>• Greater engagement with Elected Members in the decision-making process for planning applications.</li><li>• Agreed Protocol and Scheme of Delegation with Planning Committee in place and regularly reviewed.</li><li>• Positive engagement with internal and external stakeholders.</li><li>• Teams established to deal with specific application types provides consistency and efficiency to development management process.</li><li>• Ongoing training of staff assists in developing their skills and knowledge</li><li>• Staff have developed detailed local knowledge of the areas within which they work resulting in greater consistency and efficiency in decision-making.</li><li>• Flexibility and commitment of staff to adapt to change and continue to deliver services in challenging circumstances.</li><li>• Experienced and resilient staff employed on permanent basis with wide range of knowledge and skills.</li><li>• Positive attitude throughout the office.</li><li>• Clear assigned roles in relation to Development Management, Development Plan and Enforcement.</li></ul>	<ul style="list-style-type: none"><li>• Difficulty recruiting experienced staff to cover temporary posts.</li><li>• Loss of experienced staff and knowledge through sickness and resignation.</li><li>• Increased caseloads reduce performance</li><li>• Increasing complexity of legislation and environmental areas/issues.</li><li>• Detailed policies within SPPS constrain Council's ability to develop policies specific to needs of Borough within its new Local Development Plan (LDP).</li><li>• 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.</li><li>• Delays to processing of planning applications due to delays in consultation responses outside of control of Council.</li><li>• Operational issues arising from the implementation of the new Regional Planning IT System</li><li>• Inability to make changes to planning legislation to improve processes in LDP and development management processes.</li></ul>

<b>Opportunities</b>	<b>Threats</b>
<ul style="list-style-type: none"> <li>• Further develop better partnership working between internal and external stakeholders to improve working relationships and service improvements.</li> <li>• Improve performance by reviewing procedures for processing planning applications.</li> <li>• Continue to input into amendments to planning legislation to bring about improvements to the planning function.</li> <li>• Refinement of local plan policies to reflect local circumstances.</li> <li>• Improvements to the new Planning Portal IT System ensuring up-to-date stable system with improved customer interface.</li> <li>• Delivery of topic specific training.</li> <li>• Improved openness and transparency of Tree Preservation Orders (TPOs) through the introduction of online GIS facility.</li> <li>• Filling of vacant posts provides opportunities for career development and helps to motivate staff.</li> <li>• Publish information leaflets to develop greater understanding of the development management process.</li> <li>• Collaboration with stakeholders to develop standing advice to streamline the planning process.</li> </ul>	<ul style="list-style-type: none"> <li>• Infrastructure constraints and material costs resulting in decrease in planning applications submitted and associated income.</li> <li>• Loss of experienced staff resulting in increased pressures on remaining staff and delays to delivering the planning function.</li> <li>• Greater risk of challenge through Judicial Reviews/Ombudsman on planning decisions and impact on staff resources and budget costs.</li> <li>• Risk to breaches of confidentiality/data protection due to high volumes of correspondence received and uploaded onto the Planning Portal.</li> <li>• Impact of Planning Appeals Commission (PAC) Resource issue/timetable on LDP Independent Examinations.</li> <li>• Delay to Council agreement on publication of draft Plan Strategy due to continual input from elected members.</li> <li>• 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</li> <li>• Potential for fraudulent information to be submitted in support/objection to a planning application.</li> </ul>

## PESTEL ANALYSIS

<b>Political</b>	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.
<b>Economic</b>	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 applications over this business year.
<b>Social</b>	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.
<b>Technological</b>	Implementation of the new Planning Portal contributes to improvement in customer accessibility and engagement in the planning functions and open and transparent decision-making. Remote meetings provide an opportunity to continue engagement in a hybrid format with potential for greater attendance at meetings and workshops. Introduction of the online GIS facility for TPOs will contribute to improved accessibility to this information, improving openness and transparency.
<b>Environmental</b>	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.
<b>Legal</b>	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. The carrying of vacant posts has significantly increased caseloads for staff impacting on staff morale, customer service and performance against statutory targets.

The ability to influence central government to make legislative changes continues to impact on the delivery of legislative changes to improve the efficient delivery of the planning function.

The 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. The focus for the year ahead for the LDP is further research on issues raised by elected members and to publish an amended LDP Timetable to reflect the resultant delay to publication.

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 has reached advanced stages and new procedures are drafted for agreement. Discussion on validation checklist is ongoing and new procedures are to be drafted for agreement to implement from the Planning Committee. Discussions are ongoing with statutory consultees to develop Standing Advice to streamline the planning process.



The Council has implemented the new Northern Ireland Planning Portal with 9 other Councils and DfI. 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; issues are currently under resolution for the TPO and enforcement modules.

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.

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 2024/25 has been agreed at £1.87m supported by predicted income of £1.36m bringing the total expenditure to £3.23m. The majority of the budget expenditure is payment of staff wages accounting for 93% of overall expenditure.

<b>Directorate</b>	Corporate Services
<b>Service Area</b>	Planning
<b>Reporting Year</b>	2024/25

<b>Business Plan Objective 1</b>
<b>Improve performance in relation to the processing of planning applications and enforcement cases</b>
<b>Lead Officer(s):</b>
Denise Dickson, Shane Mathers and Jennifer Lundy
<b>Link to Corporate Strategy:</b>
Cohesive Leadership; Improvement and Innovation
<b>Link to Community Plan:</b>
A Sustainable Accessible Environment; A Thriving Economy
<b>Link to Performance Improvement Plan:</b>
Council will improve its overall performance by delivering a comprehensive corporate Transformation Action Plan

<b>Work Stream</b>	<b>Actions</b>	<b>Financial Information/ Budget £</b>	<b>Timescale</b>	<b>Performance Indicator(s)</b>	<b>Progress</b>	<b>RAG Status</b>
<b>Streamline the planning application process</b>	Implement a new Pre-Application Discussion process	Increase in income	Q2 Q4	New PADs process implemented  Time frame for processing PADs reduced		
	Implement a validation checklist	Reduction in deferred income	Q2 Q4	Validation checklist implemented  Timeframe for processing local planning applications reduced		
	Implement Standing Advice from NI Water	No impact on budget	Q3 Q4	Standing advice agreed with NI Water  Standing advice implemented		
<b>Reduce processing times for local and major</b>	Develop an action plan to manage and reduce the number of over 12 month applications in the system	No impact on budget	Q2 Q4	Action Plan developed and implemented Reduction in number of over 12 month applications (both local and major		

category of planning applications			Q4	category of applications) by 10% by end of Q4 Reduction in number of over 24 month applications (both local and major category of applications) by 10% by end of Q4		
	Monthly report to Planning Senior Officers meeting analysing the performance in processing both local and major category of planning applications	No impact on budget	Q4 Q4	Processing times for major category of applications reduced to 40 weeks by end of Q4 Processing times for local category of applications: Q1: 28 weeks Q2: 26 weeks Q3: 23 weeks Q4: 19 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	Processing times for case conclusion meeting statutory target of 70% concluded within 39 weeks Q1: 55% within 39 weeks Q2: 60% within 39 weeks Q3: 65% within 39 weeks Q4: 70% within 39 weeks		

<b>Risk Management</b>						
<b>Identify Risks and any Mitigating Actions Required:</b>						
<b>Risk 1:</b> Impact of staff vacancies and increased caseloads will negatively impact on the ability to improve performance.						
<b>Mitigation 1:</b> Maintain reserve list of candidates for Planning Officer and Planning Assistant roles to ensure permanent vacant posts can be filled immediately.						
<b>Risk 2:</b> Planning Committee do not agree to the implementation of the new PADs process and the Validation Checklist						
<b>Mitigation 2:</b> Continue engagement with key stakeholders at RSUA/RTPI meeting to improve front-loading of planning applications with necessary information						
<b>Risk 3:</b> NI Water does not agree to develop Standing Advice						
<b>Mitigation 3:</b> Continue to raise issue through Planning Statutory Consultee Forum						
<b>Risk 4:</b> Fraudulent information submitted in support/objection to a planning application may impact on performance due to verification of information/investigation						
<b>Mitigation 4:</b> Random verification of information submitted on letter headed paper or photographs						

<b>Directorate</b>	Corporate Services
<b>Service Area</b>	Planning Department
<b>Reporting Year</b>	2024/25

<b>Business Plan Objective 2:</b>
<b>Preparation of Council's draft Plan Strategy</b>
<b>Lead Officer(s):</b>
Denise Dickson, Sharon Mulhern
<b>Link to Corporate Strategy:</b>
Cohesive Leadership; Local Economy; Improvement and Innovation; Climate Change and our Environment
<b>Link to Community Plan:</b>
A Sustainable Accessible Environment; A thriving Economy
<b>Link to Performance Improvement Plan:</b>
Council will improve its overall performance by delivering a comprehensive corporate Transformation Action Plan

Work Stream	Actions	Financial Information/ Budget £	Timescale	Performance Indicator(s)	Progress	RAG Status
				<b>APSE Benchmarking Indicators</b>		
<b>Research on Housing need in the Borough</b>	Carry out research to establish the most up to date housing requirement for the Borough	No impact on budget	Q3	Completion of research to inform LDP preparation in line with published timetable		
<b>Tree Preservation Orders Interactive Map Viewer</b>	Develop Tree Preservation Order interactive map viewer to enable the public to identify trees with preservation orders attached and those within the Borough's Conservation Areas	No impact on budget	Q3	Tree Preservation Order interactive map viewer operational and accessible by the public		
<b>Risk Management</b>						
<b>Identify Risks and any Mitigating Actions Required:</b>						
<b>Risk 1:</b> Members disagree with evidence base provided from published data. <b>Mitigation 2:</b> SMT kept up-to-date with progress at key stages and workshop held to agree way forward.						

<b>Directorate</b>	Corporate Services
<b>Service Area</b>	Planning Department
<b>Reporting Year</b>	2024/25

<b>Business Plan Objective 3:</b>
<b>To manage finance, staff, information and other resources effectively and efficiently within corporate governance framework</b>
<b>Lead Officer(s):</b>
Denise Dickson
<b>Link to Corporate Strategy:</b>
Cohesive Leadership
<b>Link to Community Plan:</b>
A sustainable accessible environment; a thriving economy
<b>Link to Performance Improvement Plan:</b>
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
<b>Ensure all Audit/Ombudsman recommendations are implemented</b>	Review Planning Fraud Risk Self Assessment Checklist	No impact on budget	Q2	Checklist completed		
	Review outstanding audit/Ombudsman recommendations and allocate timeframe for implementation	No impact on budget	Q3 Q4	Implementation timeframe agreed  Recommendations implemented within timeframes  Number of cases where Ombudsman determines maladministration is less than 0.4% of all decisions made		
<b>Manage staff recruitment to ensure vacant permanent posts filled within 2 months</b>	Undertake recruitment process for staff at the following grades: Principal Planning Officer Senior Planning Officer Planning Officer Planning Assistant	Posts already accounted for within budget and structure	Q2 Q2	Long term vacant permanent posts filled  Reserved list held for future vacancies for next 12 months at the grades listed		

## **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

**Mitigation 1:** Planning Committee Members undertake mandatory training on code of conduct, decision making and audit recommendations prior to sitting on 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:** Maintain reserve list of successful candidates at Senior Planning Officer, Planning Officer and Planning Assistant grades.