Report for:

Mid Devon District Council - Comparative Analysis of the Planning Service

8th October 2018

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Introduction

This report provide an analysis of Mid Devon District Council's planning service by comparing its relative costs and performance attained in 2013 with that of the current data set (2018). This report should be read in conjunction with the analytical summary attached (Appendix A).

Project Leads:

a) **CIPFA**
Vijay Pillai - Analytics Manager
James Martin - Service Lead
Alex Wilkinson - Senior Data Analyst

b) **Mid Devon Metropolitan District Council**
Jenny Clifford - Head of Planning Services
David Green - Group Manager Development Management
Ruthie Pollington - Admin Team leader

Key project timescales & milestones:

c) Data gathering questionnaire initiated on the: 22nd June 2018
d) Test run completed: 25th – 29th June 2018
e) Formal collation period:2nd July 2018 – 27th July 2018
f) Data reconciliation: 30th July 2018 – 10th August 2018 June
g) Data submitted to CIPFA: 15th August 2018
h) Data validation completed: 16th August 2018
i) Final data set received: 17th August 2018
j) Draft analysis report issued: 11th September 2018
k) Final report issued: 8th October 2018

Coding Changes

The following activity coding amendments/additions were made to ensure the Mid Devon County coding structure were reflective of current practices; 110a, 110b referring to Customer care and GDPR activities. Other codes amendments/additions were; 312 (pre-application-unpaid), 480a (Section 106 management, 212 (Neighbourhood-evidence and policy, 214 (Neighbourhoods; forums, examination and referendum, 482, 484, 485 (compliance and delivery). In addition new codes (500-599) relating to various Economic Development were also added to monitor these new activities (see appendix 5 for details).

Performance measurement range:

The performance measurement period remained the same as it was for 2013 to enable direct comparability (1st May 2017 to 30th April 2018).

Key project deliverables:

1. Provision of draft questionnaire workbook with draft changes as agreed.
2. Provision of final an Excel questionnaire workbook to be completed by planning staff to record their use of time between the periods of 2nd July 2018 – 27th July 2018.
3. Provision of an Access database to help with data collation process for performance 1 and 2.
4. Processing and analysis of the recorded data.
5. Delivery of a benchmarking report comparing Mid Devon non-metropolitan district council 2018 date set with that of 2013.
6. Provide an Excel spreadsheet to enable Mid Devon non-metropolitan district council to produce their own analysis of the data included in the final report.

Overview Analysis

In terms of costs a key point to note is the fact application handling costs remain more or less the same, albeit a 25% increase in terms of indirect planning applications received by the authority.

The number of full time equivalent (FTE) staff responsible for planning is again fairly stable although the FTE numbers for generic work has gone up from 4% in 2013 to 11% in 2018.

A key point to note is the significant (29% point) increase in income from application fees. Also of interest is the improvement in the productivity cost of the Planning Policy, which has gone down from £21 to £4 per hour, a decrease of 80% since 2013.

A detailed look of application handling costs by activity would suggest costs have increased in relation to the following categories:

a) Committee reports & decisions– by 107%
b) Running the consultation process - by 36%
c) Evaluation & negotiation – by 29%

Planning Expert Comments
This suggests potential confusion over whether to allocate time to this category or b) below where there has been a reduction in time

Conversely, there are also costs reductions in relation to:

a) Planning appeals – down 84%
b) Responding to internal consultation – down 83%
c) Decision notice, agreements – down 76%

A comparison of 2018 data with 2013 on unit costs would suggests that costs have increased, varying upwards between 9% (overheads) to 51% (other costs). However full costs have increased by 20% since 2013.

Analysis of the application costs by type would suggest overall costs have increased by 3% since 2013. However what is significant is the cost increase of Major non-residential (112%) and dwelling applications (70%) since 2013.

Cost per application for major non-residential dwellings

A more detailed look of application processing costs based on the analysis of 20 applications reveals where the cost increases have occurred. By far the biggest increase in costs is attributed to:

- Planning appeals - up by (739%)

performance in public services

- Committee reports & Decisions – up by (270%)
- Evaluations & Negotiations – up by (112%)

Planning Expert Comments

Cheaper? Or are the processes used less?

However on a positive front the delegated reports and decisions cost are much cheaper.

In terms of net income received this analysis suggests Mid Devon has made a surplus income of £146K based on 20 applications received in this category.

Planning Expert Comments

The reference to increase in income may also need to be set in the context of the 20% increase in application fees which came in for the last 3.5 months of the reporting period.

Cost per application for all dwellings

The overall cost of handling for the category of applications 'all dwelling' appears to have decreased from £1,179 in 2013 to £359, based on the analysis of 135 applications received in 2018 (70%). Looking at specific elements with the exception of the consultations process major reduction apply to the following application stages:

- Evaluation & negotiation
- Delegated reports & decisions
- Committee reports & decisions
- Decision notice, agreements
- Planning appeals

This is clearly an area requiring further investigation given the considerable variation in cost reduction, this may however be due to data quality issues.

The total value of income generated in this category if £46K based on a total of 135 applications received during the period.

Cost per application for local non-residential dwellings

The table below shows the relative application costs of non-dwellings. Overall costs for key activities have increased by 39% (£160) since 2013.

	£/App	2013
Receipt & validation	£70	*£70*
Consultation	£72	*£43*
Evaluation & negotiation	£138	*£91*
Delegated reports & decisions	£158	*£83*
Committee reports & decisions	£117	*£33*
Decision notice, agreements	£14	*£41*
Planning appeals	£4	*£53*
Total	£573	*£413*

Planning Expert Comments

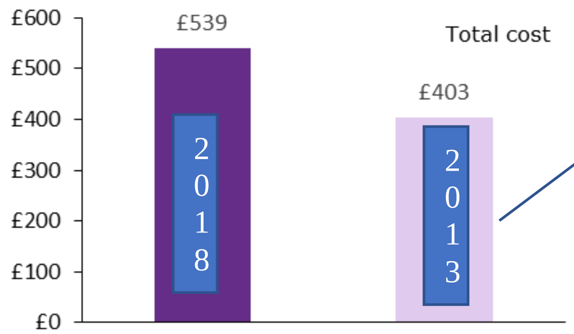
Decrease in hours spent on appeals suggests time now spent negotiating, and also show negotiating may be more expensive that refusing and appealing (although awards of costs by PINS would affect this).

With the exception of; receipt and validation, decision notices, agreements and planning appeals, all other processes are showing significant increases ranging from 52% (evaluation & negotiation) to 251% (committee reports & decisions), hence these key processes are the major contributors to the overall cost increase.

Based on 307 applications received in this category the net effect of income verses expenditure would suggest this category of applications have made a loss of £68K.

Cost per application for all other application categories

The overall costs for this category is showing an increase of 34% since 2013. However the key drivers for cost increase are processes such as; committee reports, decisions (219% increase) and consultation showing a 101% increase in cost.



Planning Expert Comments

. Difference appears to be very big and not clear what this includes. Further detailed analysis is required to understand the high costs

Three out of four of the seven key processes are however showing varying degree of decreases in costs, with planning appeals showing a decrease from £44 per application in 2013 to just £6 in 2018, representing decrease of 86%.

Based on the analysis of 612 applications received in this category the overall impact is a surplus in income of £127K. Comparing this with 2013 when income was in deficit by £287, this would suggest the overall net effect is a boost in income levels by £160K.

CIPFA performance in public services

Cost per application for householders

A total of 346 applications were received during this period, based on this with the exception of category (evaluation & negotiation) all other stages are showing cost reductions. Overall costs for householders have therefore decreased by 30% since 2013.

However, unit income levels are showing an increase from £131 in 2013 to £171 in 2018. Despite the increase in income the net effect of this is a short fall of £19K for this category of applications.

Cost per heritage applications

Overall costs for this category of applications has gone up by 4% since 2013, with the key process cost of evaluation and negotiation more than doubling in value. This has therefore contributed to an overall net loss of £72K based on the receipt of 140 applications received in period. Again there was no income recorded for this category either now or in 2013.

	£/App	2013
Receipt & validation	£53	*£73*
Consultation	£9	*£141*
Evaluation & negotiation	£372	*£153*
Delegated reports & decisions	£75	*£83*
Committee reports & decisions		*£12*
Decision notice & agreements	£4	*£30*
Planning appeals		
Total	£513	*£492*

Overall cost per hour for handling applications

During the current period (2018) the total number of productive hours were 21,476. Based on this a comparisons of costs with 2013 suggests total cost has increased from £29.9 to £35.8 and increase of nearly £6. The key driver for cost increase is other costs, although direct staffing costs is also a factor.

Further analysis of overhead charges suggests big increases in generic overhead charges (466%), although management charges have decreased by 163% since 2013. The overall net effect is a 12% decrease in charges over the last 5 years.

performance in public services

Planning Expert Comments

Could this be 20% of staff on sick leave?

	£'000	£/hour	2013
Direct staff	441	£20.5	*£16.6*
Other costs	58	£2.7	*£1.8*
Overhead charge:	270	£12.6	*£11.6*
Total cost	769	£35.8	*£29.9*

Overhead Charges	£'000	% staff	2013
Away from work	91	21%	*13%*
Generic overhead	304	69%	*12%*
Management	-124	-28%	*45%*
Total	270	61%	*70%*

Analysis of performance

The tables below provide a summary of key statistical outturns based on the performance figures reported. In terms of determining how efficient Mid Devon are at processing applications at a national level where applicable we have also used the CIPFA's Nearest Neighbour Model to identify the top ten nearest Non-Met District Councils to Mid Devon and compared the relative performances using the local planning authority performance Tables published by Ministry of Housing, Communities & Local Government (MHCLG) in accordance with section 62B of the Town and Country Planning Act 1990.

The CIPFA Nearest Neighbour Model is based on certain social and physical characteristics to provide a balanced scientific representation of each local authority's traits. The technique used by CIPFA follows the tradition of 'distance' approach using the Euclidean distances between all possible pairs of local authority standard characteristics. The calculation provides a final distance measure between authorities by assigning a distance of 0 to 1, with zero being the closest the 1 being the furthest. The characteristic measures used in the calculation includes factors such as; population, Area, density, space and household information etc the table below summarises the top ten Nearest Neighbour rankings:

Mid Devon

1.	Torridge	0.032
2.	West Lindsey	0.038
3.	Babergh	0.040
4.	North Dorset	0.045
5.	Mid Suffolk	0.047
6.	Melton	0.050
7.	Craven	0.050
8.	West Devon	0.052
9.	Richmondshire	0.056
10.	Hambleton	0.061

For more information on using the CIPFA Nearest Model please click on the link: CIPFA Nearest Model.

Applications valid on receipt

The proportion of valid applications received based on a total of 1,560 applications received in 2018 is 37%. Compared with 2013 the position remains the same. Looking at the different categories major non-residential and local non-residential applications had the lowest proportion of valid applications compared with other types.

Table 1

	Major non-residential	All dwellings	Local non-residential	House holder	Heritage	Waste	Minerals	Electricity	All others	Total
Applications received	20	135	307	346	140	n/a	n/a	n/a	612	1,560
Valid on receipt	3	37	78	111	40	n/a	n/a	n/a	307	576
% valid on receipt	15%	27%	25%	32%	29%	..	..	..	50%	37%
2013	*27%*	*19%*	*26%*	*33%*	*21%*	*100%*	*..*	*..*	*59%*	*37%*

Applications withdrawn

In terms of application withdrawal rates the percentage withdrawn in 2018 is 5% compared with 8% in 2013, whilst the change is relatively minor it does still represent an improvement. Factors such as better guidance and improved on-line support and assistances can influence withdrawn rates, although this can also have an impact on time spent negotiating.

Table 2

	Major non-residential	All dwellings	Local non-residential	House holder	Heritage	Waste	Minerals	Electricity	All others	Total
Applications received	20	135	307	346	140	n/a	n/a	n/a	612	1,560
Applications withdrawn		12	14	12	4	n/a	n/a	n/a	36	78
% withdrawn	na	9%	5%	3%	3%	n/a	n/a	n/a	6%	5%
2013	*11%*	*17%*	*11%*	*4%*	*7%*	*n/a*	*n/a*	*n/a*	*6%*	*8%*

Zero fee applications

Proportionally the percentage of zero fee applications have remained the same as it was in 2015, albeit there does appear to be a downward trend in terms of each category of applications and this can be influenced by local planning policies on charges that are outside the scope of the fee regulations e.g. pre-application advice.

Table 3

	Major non-residential	All dwellings	Local non-residential	House holder	Heritage	Waste	Minerals	Electricity	All others	Total
Applications received	20	135	307	346	140	n/a	n/a	n/a	612	1,560
Zero fee applications	1	10	15	30	140	n/a	n/a	n/a	238	434
% zero fee	5%	7%	5%	9%	100%	..	..	..	39%	28%
2013	*8%*	*17%*	*6%*	*13%*	*100%*	*100%*	..	..	*32%*	*28%*

Pre-application advice

This was a new category introduced in 2018, hence there are no comparable data sets with 2013. However the proportion of people seeking pre-application advice does vary significantly between major non- residential and all dwelling applications as compared with other types of applications. This may be due to the fact major non- residential and all dwelling applications being more technical than the other categories of applications.

Planning Expert Comments

If the LPA didn't offer pre-app advice in 2013 or just that it didn't charge for pre-app advice in 2013? If the former then a comparison with the levels of pre-apps would be helpful. Certainly when we introduced pre-app charges the number of pre-apps fell by approximately 50%.

Planning Expert Comments

It is important to analyse time spent on this to see if it is cost effective to consider whether the service is worthwhile and/or needs to change

Table 4

	Major non-residential	All dwellings	Local non-residential	House holder	Heritage	Waste	Minerals	Electricity	All others	Total
Applications received	20	135	307	346	140	n/a	n/a	n/a	612	1,560
Pre-application advice	12	85	9	2	4	n/a	n/a	n/a	73	185
% receiving	60%	63%	3%	1%	3%	..	..	..	12%	12%
2013	..	..	..	..	..	..	..	..	..	*n/a*

Delegation

The rates remain consistent compared with 2013. Although major non-residential dwelling delegation rates appears to show an increase of 24% for 2018.

Table 5

	Major non-residential	All dwellings	Local non-residential	House holder	Heritage	Waste	Minerals	Electricity	All others	Total
Delegated decisions	12	106	278	324	133				526	1,379
Committee decisions	8	17	15	9	3				31	83
Delegation rate	60%	86%	95%	97%	98%	..	..	..	94%	94%
2013	*48%*	*83%*	*95%*	*97%*	*96%*	*100%*	..	..	*96%*	*94%*

Permissions

The comparative permission rates remains fairly consistent with 2013, above the 90% range.

Table 6

	Major non-residential	All dwellings	Local non-residential	House holder	Heritage	Waste	Minerals	Electricity	All others	Total
Total decisions	20	123	293	333	136	n/a	n/a	n/a	557	1,462
Permissions granted	20	102	281	328	127	n/a	n/a	n/a	513	1,371
% Granted	100%	83%	96%	98%	93%	..	..	..	92%	94%
2013	*86%*	*77%*	*97%*	*95%*	*95%*	*100%*	*..*	*..*	*85%*	*91%*

Overturns

Application overturn rates runs at a ratio of 3:1 compared with 2013.

Table 7

	Major non-residential	All dwellings	Local non-residential	House holder	Heritage	Waste	Minerals	Electricity	All others	Total
Total decisions	20	123	293	333	136	n/a	n/a	n/a	557	1,462
Overturns	4	10	11	1	6	n/a	n/a	n/a	12	44
Overturn rate	20%	8%	4%	0%	4%	n/a	n/a	n/a	2%	3%
2013	*10%*	*4%*	*0%*	*0%*	*1%*	*n/a*	*n/a*	*n/a*	*1%*	*1%*

Based on the Local planning authority performance Table P152a (percentage of applications overturned at appeal on major development July 2015- June 2017), which measures the quality of decisions made by Mid Devon compared with its nearest neighbours, this shows that Mid Devon is ranked third in comparison with its nearest 10 peers and is performing well above the upper quartile position (see table P152a below).

The second table P154 provides data on district planning matters performance for quality of non-major decisions (July 2015 to June 2017). The performance here is somewhat better with Mid Devon being ranked second and well above the upper quartile range.

Planning Expert Comments

It might be helpful to identify whether any service improvements have been implemented over the last 5 years that might have resulted in some of the differences - e.g. greater focus on electronic working, new IT systems/process, amendments to the constitution to allow for more delegation or variation to the call in to committee procedures, etc.

P152a: Planning Authority	Performance in %
Richmondshire	0.00
Babergh	0.68
Mid Devon	2.08
North Dorset	2.22
Hambleton	2.63
West Lindsey	2.70
Mid Suffolk	3.13
Torridge	3.45
Melton	3.92
Craven	4.84
West Devon	12.50

Quartile & Rankings	
Upper Quartile	2.15
Median Quartile	2.70
Lower Quartile	3.68
Group Avg	3.47
Mid Devon Rank	3

P154: Planning Authority	Performance in %
Richmondshire	0.26
Mid Devon	0.33
Hambleton	0.71
West Dorset	0.83
Babergh	0.89
Melton	0.93
Craven	0.99
North Dorset	1.28
West Lindsey	1.36
Mid Suffolk	1.39
Torridge	1.62

Quartile & Rankings	
Upper Quartile	0.77
Median Quartile	0.93
Lower Quartile	1.32
Group Avg	0.96
Mid Devon Rank	2

Appeals and Local Reviews (Performance)

This table provides the ratio of decisions made and the number of appeals against it. Again this remains fairly consistent at 2% compared with 2013.

Table 8

	Major non-residential	All dwellings	Local non-residential	House holder	Heritage	Waste	Minerals	Electricity	All others	Total
Total decisions	20	123	293	333	136	n/a	n/a	n/a	557	1,462
Application appeals	3	14	6	1	1	n/a	n/a	n/a	n/a	25
Appeal rate	15%	11%	2%	0%	1%	..	..	..	n/a	2%
2013		*9%*	*2%*	*1%*	*1%*	*n/a*	*..*	*..*	*3%*	*2%*

Appeals allowed and Local Reviews

Based on the total appeals made (table 8 above) table 9 provides the total appeals allowed and its running rate. There are no major differences compared with 2013, with appeals running at a rate of between 36% and 38% over the 5 year period.

Table 9

	Major non-residential	All dwellings	Local non-residential	House holder	Heritage	Waste	Minerals	Electricity	All others	Total
Appeals allowed	2	1	6	n/a	n/a	n/a	n/a	n/a	n/a	9
Appeal allowed rate	67%	7%	100%	n/a	n/a	..	..	..	..	36%
2013	*..*	*38%*	*67%*	*50%*	*50%*	*..*	*..*	*..*	*18%*	*38%*

Speed of Processing

During the period analysed Mid Devon made a total of 1,462 planning decisions. From end to end the average number of weeks taken to make a decision was 0.6 weeks compared with 1 week in 2013. This represents and overall improvement of 34% over the five year period.

Table 10

	Major non-residential	All dwellings	Local non-residential	Householder	Heritage	Waste	Minerals	Electricity	All others	Total
Total decisions	20	123	293	333	136	na	n/a	n/a	557	1,462
Av end-to-end weeks	17.6	12.6	9.8	9.2	10.6	na	na	na	7.7	0.6
2013	12.5	14.3	9.7	8.6	9.7	7.9	na	na	7.5	1.0

Table P151a (speed of decisions on applications for major development at district level - July 2016 to June 2018) provides a summary of the key performance stats for the percentage of applications processed within 13 weeks or within agreed time without penalty for missing data. This analysis would suggest Mid Devon's performance is ranked sixth against its nearest neighbouring non-metropolitan district councils using the CIPFA Nearest Neighbour model and in terms of quartile rankings Mid Devon's performance of 86.8% of applications processed on time is above the median quartile.

Similarly, for Table 153 performance non-major development the percentage of applications completed within 8 weeks or within agreed time without penalty for missing data decisions, suggests Mid Devon is ranked in the same sixth positon at the median quartile. Therefore in both of these categories Mid Devon's' standing is good and well above the group average. However in terms of future targets the aim here should be to reach the upper quartile position.

P151a: Planning Authority	Performance in %	Quartile & Rankings	
Richmondshire	100		
Hambleton	91.4		
Melton	91.2	Upper Quartile	90.8
Babergh	90.4	Median Quartile	85.45
West Devon	88.9	Lower Quartile	83.9
Mid Devon	86.8	Group Avg	85
West Lindsey	84.1		
Mid Suffolk	83.9	Mid Devon Rank	6
North Dorset	82.4		
Craven	68.3		
Torridge	67.6		

P153: Planning Authority	Performance in %	Quartile & Rankings	
Richmondshire	96.00		
Hambleton	89.50		
West Lindsey	89.50	Upper Quartile	88.05
North Dorset	86.60	Median Quartile	85.70
West Dorset	86.40	Lower Quartile	80.65
Mid Devon	85.70	Group Avg	83.95
Babergh	82.60		
Torridge	81.50	Mid Devon Rank	6
Melton	79.80		
Mid Suffolk	76.60		
Craven	69.30		

Enforcement

Enforcement allegation investigations	410

	N	%	*2013*
Enforcement actions	320	78%	*95%*
Notices served	34	11%	*8%*
Enforcement prosecutions		n/a	*16%*
Enforcement appeals	2	..	*100%*
Appeals upheld	1	50%	*14%*

As shown above the total volume of planning enforcement investigations for 2018 is 410. In terms of enforcement activity, actions have reduced by 18% since 2013 although the number of notices issued has increased by 28%. Interestingly though the number of appeals upheld has increased by as much as 250% compared with 2013.

Enforcement- Costs

The above table provides a summary of enforcement costs. Cost of investigations have nearly doubled since 2013 with costs rising from £178 to £303 per allegation. Unfortunately there were no comparable data for 2018 in relation to prosecutions and appeals.

Cost of allegation investigation	£124k	Cost of prosecutions	£14k	Cost of enforcement appeals	n/a
Cost per allegation received	£303	Cost per prosecution	..	Cost per appeal	n/a
2013	*£178*	*2013*	*£6,371*	*2013*	*£263*

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