

**Your Ref:**

**Our Ref:** PW 06/17  
(Please quote at all times)



Fiona McCandless  
Department for Infrastructure  
71 Ebrington Square  
Derry-Londonderry  
BELFAST BT49 6FA

Belfast Planning Service  
Cecil Ward Building  
4-10 Linenhall Street  
BELFAST  
BT2 8BP

**Tel:** 028 90 502097

**Date:** 21 June 2017

Dear Fiona,

### **Planning Performance Management Framework**

Thank you for your letter of 12 May 2017.

Belfast City Council's Planning Committee has considered the draft Planning Performance Management Framework (the Framework) and comments as follows.

The Council welcomes the introduction of a performance management framework for planning in Northern Ireland. It will help focus on performance and improve service delivery across the region, whilst providing a useful benchmark across the 11 councils.

I attach a copy of the report to the Planning Committee when the matter was discussed. The report contains a range of detailed points and forms part of the Council's formal response to the Framework in conjunction with this letter.

The Council wishes to make the following particular points about the Framework.

1. Bench-marking of performance (PI3-PI6 and PI16) – the Council strongly objects to the setting of standards around these indicators at this time. It should be for each council to decide what "good performance" looks like. A balance needs to be struck between speed of decision and the quality of service to the customer, and quality of the final decision. A complete focus on speed of decision can drive perverse behaviour which can be detrimental to quality and cause frustration to customers. This was the experience of many councils in England during the 2000s when the Government awarded Planning Delivery Grant to local planning authorities for achieving targets on the speed of decision for applications. DCLG in England has since moved away from this narrow focus and quality of customer service has become much more important. Hence the introduction of the ability to agree an extension of the determination period with the applicant. The Council supports the principle that performance indicators should be "measures" and not "targets".

Planning services in Northern Ireland are also still in transition. Councils are significantly disadvantaged by the limitations of the Northern Ireland Planning Portal which prevents the collection of detailed Key Performance Indicators which are otherwise essential for effective performance management. The Planning Portal is at least two generations behind the latest planning software used in others parts of the United Kingdom and Republic of Ireland. It is imperative that the Portal is replaced with a fit for purpose system as soon as possible. Councils are also limited by existing planning legislation such as the inability to legally invalidate an application if all the information necessary to determine an application is not provided at the beginning of the planning application process. The Department clearly recognises this as an issue through Performance Indicator 17 (Strategic Planning Division) because achievement of the 30-week target is dependent on no further environmental information being required once the application has been submitted.

2. Categorisation of planning applications – the Council recommends that applications are divided into three categories rather than the two pre-existing categories. A third category should be added to include small-scale proposals such as householder applications, Advertisement Consents, Listed Buildings and Conservation Area Consents. This will measure performance on small-scale, high volume applications which are critical to overall application performance. This also reflects the approach taken in England and Wales which have three categories of application.
3. Ability to agree an extension of time with the applicant – a complete focus on speed of decision is inappropriate and can lead to perverse behaviour. Councils should have the ability to agree an extension of time with the applicant so that issues can be worked through without the pressure to make a quick decision to meet targets. This is the approach taken in England and Wales and works very well. Councils should also be measured on the proportion (%) of applications determined within 30 and 15 weeks like in England and Wales. This helps to provide a more rounded picture of performance and links in with the ability to agree an extension of the determination period with the applicant. In measuring application performance, the Department should also exclude those applications requiring a Section 76 Planning Agreement.

In addition to these comments, a range of more detailed points are provided in the attached report, which forms part of the Council's response to the Framework.

Belfast City Council looks forward to working with the Department and the other 10 councils in further developing the Performance Management Framework so that it is fit for purpose and appropriate for planning in Northern Ireland.

Yours sincerely,

**PHIL WILLIAMS**  
Director of Planning & Place