Appendix A:

Summary Report from Officers to the Steering Group

Recommendation

It is recommended to note the work that has been carried out in accordance with the tasks listed in the Action Plan and highlighted in this report. The actions have been implemented, with the exception of a handful of longer term elements.

The Planning Services Improvement Action Plan

The independent review into the Castle Mill Student Accommodation development by Vincent Goodstadt confirmed that the City Council met its statutory obligations in handling the planning application. The report did outline however, six principal areas of recommendations for adopting best practice. These related to planning procedures, consultation, design, committee reporting, conditions/ enforcement and wider strategic issues. They are set out in the Planning Service Improvement Action Plan (Appendix A).

This report outlines what the service has done to implement and embed the recommendations of the Action Plan. A number of new processes have been introduced and documents written. A list of the new documents is set out in Appendix B. Some of the actions cross-over different recommendations. For completeness, please refer to the Action Plan (Appendix A), which provides a response to each action derived from the recommendations.

1. Planning Procedures

Standard Operating Procedures (SOPs):

All of the existing Standard Operating Procedures (SOPs) have been reviewed and updated. Various new SOPs have been created as a result and the new additions are listed in Appendix B. The service has commenced a project to obtain ISO 9001 accreditation. As part of this the SOPs will be rationalised as appropriate, with the remaining information kept as guidance, in accordance with best practice.

Pre-application Process:

The review identified areas for improvement in the pre-application process generally and in how this service is provided to the University, with particular reference to improving the clarity of the informal and formal liaison arrangements and documentation of pre-application process. The pre-application Standard Operating Procedure (SOP), was reviewed and updated to include best practice. New templates were created for letter writing, structuring meetings and recording minutes and notes, improving quality and consistency and providing greater clarity in terms of auditing of the process. This more structured approach has proven helpful to less experienced Planners.

All requests for formal pre-application advice are now subject to a documented triaging process, by senior officers, who allocate cases, carry out an early cursory check of the proposal, identifying main policies and potential planning considerations, resource implications and appropriate engagement with applicants and others. At this point, the Triage Officer will also provide some initial advice to the case officer, about whether the case should go to the Oxford Design Review Panel (ODRP) and whether a Planning Performance Agreement (PPA) would be appropriate and whether (and why) to seek additional specialist policy advice.

Applicants are actively encouraged to 'front load' information during the pre-application stage, so as to add value to the process at an early stage, improve the quality and clarity of application documentation for all concerned and the efficiency of the process by reducing the need for approving details at pre-commencement stage, while providing increased certainty as to the quality of the built scheme.

Pre-application process with Oxford University

The three-weekly pre-application advice meetings held with the University are documented via circulated agendas and agreed recorded notes. The Council and the University have also had discussions with representatives of the Colleges as to developing a protocol of contact about future developments. This matter is outstanding and it is envisaged that the eventual agreed position will be documented in a published "handbook", to be created by the end of 2015.

Oxford Design Review Panel (ODRP)

Case officers discuss with developers the benefits of design review and referrals to the ODRP early in the pre-application stage. A promotional leaflet explaining the review process and its benefits to applicants has been published and is available on our website, while a guide for officers has also been produced to assist them with this task. There have been many positive examples of where the panel has added value to proposals and where applicants have been very satisfied with the service they have received. In a number of cases, this has resulted in repeat reviews.

Environmental Impact Assessment (EIA)

The EIA regulations and the best practice for interpretation and implementation have been reviewed by the Council's Planning Lawyer. A comprehensive guidance document outlining the key requirements for dealing with EIA developments was been prepared and is available to all Planning Officers. In-house training was provided to Officers in October 2014 and one-to-one guidance and advice is available on a case-by- case basis from the Council's legal team. Further refresher training is scheduled every 6 months to help maintain awareness of the requirements in the legislation and the implementation of best practice.

Management of the electronic planning file:

The system used to manage the electronic case file is IDOX. The planners have attended training workshops with IDOX experts to explore the functionality of the system and to upskill them about uploading documents. Options were explored

with IT colleagues about organising the electronic file, but the functionality of IDOX is limited, although this was greatly improved by the latest system upgrade. This has improved the way members of the public can view documents on Public Access. We still want to have a well organised set of documents that are easily retrievable and aspire to enhance this area of our service through pursuing potential developments in our IT system At the moment, all documents relating to each stage of the planning process (pre-app, application, conditions, NMAs etc.) are stored in separate electronic folders under different reference numbers, although these are linked under the planning history of the site and thus easy to refer to. If in the future, it is possible to create one electronic file with sub folders, this may be a further enhancement to the accessibility and ease of viewing each case and related cases.

2. Consultation Procedures

This part of the report focused on the best practice methods of consulting third parties about major planning proposals before a formal planning application is submitted. The Council has recently drafted the Statement of Community Involvement (SCI) which was reported to CEB on 19th November 2014 and went out to public consultation on 6th January 2015 for six weeks. The SCI provides a range of options for consultation. For large major proposals, decisions for public consultation will be taken on a case by case basis and a bespoke approach may be considered appropriate.

It is acknowledged that to achieve meaningful feedback to help inform a proposal, public engagement should be carried out early on in the process. Officers encourage applicants to ideally adopt a two stage approach, whereby they public are consulted to help inform the proposal and then they are reconsulted prior to submitting the planning application. The applicants can then show how the feedback may have influenced their proposal. The Council however cannot formally require such an iterative approach. Normally details of this would be documented with the application submission as part of the applicant's statement of community involvement as well as the design and access statement.

An advice note will be prepared to explain to members of the public our practice. A guidance note on best practice public consultation for major pre-application proposals is now available for applicants and forms the basis for such discussions between applicants and Officers at pre-application meetings and in response letters. The option for pre-application briefings with Officers and Members to present information about Major schemes is always available and taken up on a case by case basis. Recent briefings including Barton Park have proved to be helpful and this option is raised at an early stage for all appropriate Major applications.

Consultation once the planning application has been submitted:

The report makes a number of suggestions for improvements in how third parties are notified that a planning application has been submitted, particularly in reference to Major applications. These are highlighted within the weekly lists. A number of the suggested improvements on consultation have been incorporated into updated SOPs and Guidance Notes including, the Site Notice SOP, Amended Plans SOP

and guidance for the best practice on communicating the scale and massing of new developments.

3. Visual Impacts & Quality of Design

<u>Design training for staff</u>

The report recognised the efforts that had been made in establishing initiatives to improve design capacity within the Council and recommended that these be complemented by action to enhance the use of in-house expertise and to provide members with greater support in their considerations of design issues and visual impacts. A whole range of actions to this effect are set out in Note 3 in Appendix C which outlines how we have been doing this and how we continue to build on the work already carried out presently and in the future.

In August 2014, a Design Skills Audit was carried out in the service, identifying the design related qualifications and experience that various officers have and could be built upon further. The majority of the officers are enthusiastic about design and keen to develop their skills further. The skills audit assisted in the development of a training programme in the form of design workshops and group case conferencing sessions, upskilling all Officers and ensuring consistency in design quality and approach across the group. Two design training sessions were also provided by CABE, who facilitate the Oxford Design Review Panel, focusing on appraising developments and identifying and articulating design issues. Officers have also received extensive training about the process of taking applications to the ODRP through internal seminars, while they have also been improving their skills by attending review panel meetings, as participants or observers.

<u>Design training: Members</u>

In October 2014 CABE provided a training workshop on design skills and review for the first cohort of members. A second one is to take place in February 2015, with more to follow. In January 2015, a training session for members was provided on design in Oxford and a review of the Blavatnik building. A walking tour review of completed developments is also currently being organised for July 2015.

<u>Oxford Design Review Panel (See entries above)</u>

<u>Design Supplementary Planning Guidance (SPD)</u>

Work on a Design SPD is in progress with a view to complete it in 2015. This will be an excellent tool for Officers to use in assessing the quality of design and in negotiating schemes with applicants, developing their skills. It will also raise the profile and importance of high standards of design in Oxford.

<u>Visualisation methods</u>

The quality and clarity of the material presenting the design of developments is fundamental to the understanding and assessment of what the final building will look like by all concerned, including officers, members and residents. This

important point is emphasised at the pre-application stage whereby applicants are now asked to consider the range of best practice methods of representing this information clearly, before and during the planning application so that all interested parties can properly assess the proposal. A guide on the best practice for visualisations has been produced and will be available to applicants and on our website by 31st March 2015. This guide appears to be one of the first of its kind produced by Local Planning Authorities and it will be a useful tool to encourage applicants to raise the standard of their submissions. A positive example of this was the production of a 3D scale model during pre-application discussions for a new building adjacent to Seville House on Mansfield Road, which helped inform the final detailing of the proposed building on a sensitive site.

A trial using the Swiss Poles method of representing the proposed height of buildings was carried out at Elsfield Hall. This was a useful exercise, although it has however a number of practical drawbacks. Nevertheless it has helped to refine the Council's approach to encouraging applicants to consider using a wide range of best practice visualisation methods.

The use of electronic 3D models is becoming increasingly common and the Council are encouraging applicants to provide visual 'fly throughs' of their models which show the proposal in its context and from different viewpoints, allowing those viewing it to experience the proposed development in a more realistic format. A recent, positive example of this was the 'fly through' of the Primary Street and Squares of Barton Park presented to Members of the East Area Planning Committee on 11.02.15.

On 9th March 2015, three officers received training in the use of Sketchup, a 3D electronic modelling tool for designing new developments. This has helped ensure that the service is fully up to date with the latest developments in technology and able to understand and make the best use of it. The Officers now have individual Licences to use Sketchup and act as the Champions for exploring the benefits of this system and rolling out the training for using it to the rest of the service over the next year.

A conscious, structured effort has been made to raise the profile of the Council's expectation for high quality design and we now have a dedicated set of related web pages which are reviewed and added to when necessary. We are keen to establish our reputation as a Council that pushes for design excellence, supporting our vision to build a world class city for everyone.

4. Committee reporting

The report recommended that improvements be made to the way planning issues are presented in committee reports, with particular reference to creating a systematic documentation of the policy evaluation that has been undertaken and clarification about the extent and nature of any departure (non-compliance) from policy.

Weekly policy surgeries were introducedwith planning policy officers, to discuss and clarify the policy context, and to help case officers incorporate policy comments into

reports. The policy surgeries were promoted at a group meeting where officers agreed best practice for addressing policy issues in committee reports. A guidance note on policy issues has been preparedto assist case officers. Policy support is also provided on a case by case basis whereby Lead Policy Officers are identified for Major developments or complex minor developments to assist the Case Officer on principle policy matters. At the pre-application stage, this has been useful in identifying whether a proposal would be a departure or not. The Planning Policy team also check each weekly list for any applications that may need to be identified as departures, as well as checking the Chief Principal Planner's list of forthcoming Major cases which are usually at the pre-application stage to ensure that the early consideration of these is also captured.

Following a review of existing best practice, informed by internal and external examples, two options for a typical report layout (to reflect individual Case Officers' report writing styles) have been suggested, which help record the case officers' policy assessment and provide an appropriate audit trail of the thought process undertaken by the Case Officer. The structure of the report will also make it easier to distinguish between those policies that Members need to be aware of because they may influence some particular aspect of the proposals and those policies that are central to the outcome of the application. To assist Members with understanding the details of the proposal, officers will seek to provide them at committee with all relevant visualisation material available, such as physical models, presentation boards, samples of materials, 3D fly through videos.

5. *Planning conditions and enforcement*

The report recommended that enforcement procedures and co-ordination (on conditions) should be strengthened through a greater auditing regime on decisions whether to take enforcement action or not. In response to this, pro-formas have been created to record the reasons for taking appropriate action as well as to close down enforcement investigations without further action.

The list of standard planning conditions have been reviewed and updated to improve their relevance and conformity with the latest best practice. The conditions have been coded into four broad categories to assist with future compliance. These are as follows: P – pre-commencement, C – during construction, O – pre-occupation, F – forever. ICT improvements are currently being carried out.to list conditions into these categories.

6. *Wider Planning Issues*

The final set of recommendations in the report related to broad questions to inform wider planning strategy issues, such as capacity and pressure for development and impact. The Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA) and its review provide clarity on the capacity of the city to absorb growth and the pressures on building densities. They will help to inform decisions on the timing of any review of our own Core Strategy.

Actions embedded into the service

Throughout the year-long implementation of the Action Plan, the Officers responsible for this worked closely with Vincent Goodstadt, the author of the original report for the investigation. A number of workshops were held with Vincent Goodstadt and Officers from the Development Control and Planning Policy teams and then the conclusions of those discussions were shared with the relevant teams for consultation, agreement and then implementation. This was important to make sure there was clarity and agreement about the interpretation of the recommendations to ensure the actions implemented were relevant and purposeful.

Some of the actions such as the creation of a new system for allocating and triaging all pre-application enquiries were relatively straight forward to embed and the team are now used to this process. Others such as establishing a Handbook with the University and Colleges will require further work. The Action Plan is a record of the completion of tasks required to help implement the recommendations from the original review report, but it is appropriate to recognise that a number of actions will extend beyond the life time of the Action Plan because they are, in themselves longer-term projects and aspirations requiring additional time and resources, so that they too, are properly developed and embedded into the service.

Conclusion

The work on the action plan has been carried out over the last year with a wide range of actions, grouped under six broad categories, developed and implemented. These have improved the quality, standard and consistency of service provided and they have addressed a number of issues raised in the Vincent Goodstadt report. The majority of the actions have now been embedded into the service but they too, will require on-going monitoring and review to ensure they continue to be relevant and embedded into the service.

The table at Appendix D (and at the end of the original Action Plan) outlines the actions which are still to be implemented, many of which have become projects in their own right and independent of the original Action Plan. Their completion requires additional resources over and above that provided within the remit and timescale of that Action Plan.

There are a number of tasks within the Action Plan that have been started and indeed resulted in a change of working practices. However, to fully embed them into the service, additional time is required which takes us beyond the lifetime of the Action Plan. This is not unusual however and the progress of fully embedding these actions will be subject to future reviews indicated below:

Actions in the process of being embedded:

Action	Progress and Plans	Review
Effective interaction between Development Control and Planning Policy.	Policy input is identified at the pre-application stage through Triaging. Case Officers make an early assessment of their cases to establish	On-going.

DC Planners approach to understanding the policy context.	what policy implications there may be and then proactively seek input from the Policy team. Weekly, Policy Surgeries are held which help DC Officers get clarification on issues of non-compliance, interpretation and implementation of policies. The Policy team review the weekly list of planning applications to help capture any potential departures from policy. Major Planning applications are assessed for non-compliance and departure at the validation stage.	
Improved auditing process and case management of all applications.	All Standard Operating Procedures (SOPs) have been reviewed and updated in preparation for the application for ISO 9001. The new SOPs created from this Action Plan have already assisted with this process and building on this, the requirements and importance of a more systematic approach to auditing has been embedded into the 2015 appraisal targets for staff.	Check case management of the file at the end of the life time of the planning application file – usually when the decision is signed off. Discuss issues with staff as and when they arise, at 1:1s and at bi-monthly appraisal meetings.
Organisation of the electronic file.	Develop a 'house style' for indexing documents on the electronic file which makes it clear what each document is. Training and an agreement of the most appropriate standard to be provided by DC to the Technical Services team.	Internal audit carried out by DC Team Leaders by the end of June 2015. On-going training for new staff will be required.