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Katrina Godfrey  
Permanent Secretary  
Department for Infrastructure  
Clarence Court  
10-18 Adelaide Street  
Belfast  
BT2 8GB

11 September 2020

Dear Katrina

### **NI Audit Office: Planning in Northern Ireland**

You will be aware that the Comptroller and Auditor General and Local Government Auditor have indicated that they wish to undertake a review of the Planning System. In recent weeks my audit team has been undertaking preliminary work, and has been in contact from officials within the Department and some councils. This work has now been completed and the C&AG and LGA have decided that a full study review should now be undertaken. An outline of our proposed approach is attached at Annex 1.

It is our intention to publish this report in Spring/Summer 2021. I would welcome the opportunity to meet to discuss our approach to this audit. In particular, it would be useful to agree the arrangements to manage our requests for information covering the large number of organisations who deliver the planning system. I would also be grateful if you could appoint a Senior Responsible Officer within the Department who could facilitate our audit work. At Annex 2 I have attached a preliminary specification of the audit evidence we will require during our audit.

Yours sincerely



**Colette Kane**  
**Director**

## Audit Approach

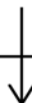
**The policy objective of the planning system is to secure the orderly and consistent development of land whilst furthering sustainable development and improving well-being.**

Achieving this depends upon the system offering service users certainty: both in terms of the timescales for processing applications and in terms of the policy context within which applications are submitted to allow stakeholders to know what is likely to be acceptable or not.



**Our study will examine the extent to which the system as it currently operates meets these objectives**

We will identify key performance issues and make recommendations as to how these could be addressed.



### **Council performance**

We will review how effectively councils are delivering those parts of the planning system for which they are responsible (LDPs, Decision Making and Enforcement)



#### **Evidence Base**

Extensive analysis of published and internal management information

Review a sample of planning case files from different councils

Review of counter-fraud and ethics policies against Departmental guidance and best practice

Interviews with key stakeholders

### **Departmental performance**

We will review how effectively the Department has provided guidance and intervention to ensure the system operates effectively



#### **Evidence Base**

Review of minutes from key leadership groups

Review progress made to date in response to Irvine Report recommendations

Interviews with key stakeholders

### **Underlying constraints and structural issues**

We will review the key issues and constraints, potentially outside the control of councils or the Department, that have a negative impact on performance



#### **Evidence Base**

Detailed analysis of evolving costs and staffing levels across the different parts of the planning system

Interviews with key stakeholders, including developer representatives

## Annex 2 – Preliminary Audit Evidence Requirements

Theme	Sub-issue	Audit Evidence	Information Source
Key Facts	Cost of planning-system pre-2015	Annual income and expenditure analysis for Planning Service function within Department of Environment: 2011-12 to 2014-15	Department for Infrastructure
		Detailed analysis of staffing levels of Planning Service function within Department of Environment between 2011-12 and 2014-15	Department for Infrastructure
	Allocation of staff to Councils in 2015	Detailed breakdown of the staff resource identified as being required by each council at 1 <sup>st</sup> April 2015	Central point of contact / Individual councils
		Detailed analysis of any changes in the staff resource identified as being required by each council since 2015	
		Detailed analysis of staff transfers from Department of Environment to local Councils at 1 <sup>st</sup> April 2015	Department for Infrastructure / Local councils
	Costs since 2015	Detailed analysis of total costs incurred by councils to provide planning functions since 2015 – should include breakdown of costs between three key functions (plan making, decision making, and enforcement)	Central point of contact / Individual councils
		Analysis of total costs incurred by key statutory consultees since 2015	Statutory Consultees
		Analysis of changes in staffing levels identified as being required and actual staff in post at councils since 2015	
		Analysis of number of staff dedicated to planning applications identified as being required and actual staff in post at key statutory consultees since 2015	Statutory Consultees
Council performance	Plan making	Update from each council on current status of LDPs and estimate of completion date	Central point of contact / Individual councils
		Report/Estimate of the costs incurred to date on development of LDP and future costs to completion	Central point of contact / Individual councils
	Decision making - timeliness	Detailed analysis of timeliness of decision making	Publicly available information
		Comparison of decision making timeliness to GB/Rol	Publicly available information
		Review of a sample of cases which have taken in excess of statutory	Central point of contact / Individual councils

		target to identify commonly occurring issues.	
	Decision making - quality	Confirmation from each council of: <ul style="list-style-type: none"> <li>• Total number of decisions made by Planning Committee</li> <li>• The total number of these decisions that had been specifically “called-in” by a Planning Committee member</li> <li>• where Planning Committee made a decision against the advice/recommendation of a statutory consultee</li> <li>• The total number of cases for both files called-in and not-called in by members where the Planning Committee overruled the recommendation of Planning Officers</li> </ul>	Central point of contact / Individual councils
		Review of documentation to confirm the rationale for a sample of cases where Planning Committee overturned Planning Officer decision/recommendation	Central point of contact / Individual councils
		Confirmation of the total number of appeals made and the number which were successful	Publicly available information
		The total value of costs associated with appeals	Central point of contact / Individual councils
		Confirmation of all training offered and completed over last five years to Planning Committee members.	Central point of contact / Individual councils
		Comparison of ethical/conflict of interest guidance within councils to Departmental Guidance/Best Practice	Central point of contact / Individual councils
Departmental Oversight		Minutes from meetings of three key leadership groups	Department for Infrastructure
		Update on progress made to date on implementing the recommendations made in the Irvine Report	Department for Infrastructure
		Planning Applications to Committee Database (Council overturns of Planning Officer recommendations)	Department for Infrastructure