



**Cyfoeth  
Naturiol**  
Cymru  
**Natural  
Resources**  
Wales

# Natural Resources Wales' Development Planning Advice Service – Customer Survey 2016

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## 1. Introduction

Between December 2015 and February 2016, NRW carried out a study to assess how well NRW's advice on planning consultations and strategic plans is received by local planning authorities. This report summarises the main findings from this work.

The purpose of the study was two-fold. Since its initiation in 2013, NRW has regularly reported on the timeliness of its responses as part of its corporate plan report. While timeliness provides a useful measure for how well our planning service is performing, it provides limited insight into what happens to the advice once it has been received by the planning authority. This study therefore aimed to develop an additional indicator to measure the effectiveness of NRW's advice. This indicator will be used as part of NRW's reporting on progress against our corporate plan objectives.

In addition NRW was keen to get a strategic overview of which aspects of its planning service are working well and where there may be areas where there is room for improvement. As such, the findings from this study will be used to help shape future service delivery.

Respondents were asked for their views on the service they received from NRW over the previous 12 months and the findings in this report therefore relate to 2015 only. It is our intention to rerun the survey on an annual basis to ensure we continue to deliver a service that is fit for purpose.

The findings from the survey were predominantly positive, with the majority of respondents indicating that they had confidence in the advice they received from NRW and that the advice made a difference to the decisions they made. There were however also a few areas where respondents indicated that there was some room for improvement.

In the time since the survey was undertaken NRW has put a number of measures in place to improve its planning service. Where relevant, this report summarises those measures and puts forward further suggestions for improvement.

In 2016, NRW also started a joint improvement programme with Local Planning Authorities. The findings from this survey will be used as part of the evidence base to identify areas for improvement. It is anticipated that, by working closely with the LPAs, more detailed actions for improvement may be identified.

As NRW provides advice on both development management cases and strategic plans, the findings from this study have been split accordingly throughout this report, with section 2 setting out the key findings from the work. This is followed by the more detailed results from the surveys.

## 2. Summary of key findings – Development management

- In general, respondents have a high level of confidence in the advice they receive from NRW and nearly 80% of respondents indicated that NRW's advice had contributed to the determining of cases they had dealt with in the past 12 months.
- The majority of respondents agreed that NRW provides practical and clear advice that helps to avoid and/or minimise adverse effects. Over 80% of respondents indicated that they were of the view that NRW's advice adds value to the process of determining planning applications.
- Planning authorities are generally content that NRW adopts an approach that is proportionate to the risks involved, and performs well in terms of helping to reduce these risks.
- In terms of areas where there is room for improvement, only 37% of respondents felt that NRW is easy to engage in pre-application discussions
- Responses to the survey also indicated that there is some potential to improve the clarity of NRW's responses, with some Local Planning Authority staff indicating that it is not always clear how significant the issues are that were raised by NRW.
- 42% of respondents are of the view that NRW did not meet statutory and/ or agreed deadlines for consultation responses. Data that is collected separately by NRW on timeliness shows a more positive picture with over 90% of responses being provided within statutory deadlines.

### 2.1 Summary of NRW's response

- Over the past 12 months NRW has put a number of measures in place which should help to address the concerns raised as part of this survey. These include guidance for staff to improve the consistency of our advice, the introduction of response categories to improve the clarity of our advice and guidance on the process for requesting deadline extensions.
- NRW has also started a joint improvement project with Local Planning Authorities, which should help to identify any further actions for improvement that may be required.
- From April 2017 onwards, NRW will be rolling out a discretionary planning advice service. This will ensure that developers have access to a more extensive pre-application service. As such, the discretionary planning advice service should address some of the concerns raised about engaging NRW at the earlier stages of the planning process.

### 3. Summary of key findings – Strategic Planning

- The vast majority of respondents (90%) indicated that they have a high degree of confidence in the advice they receive from NRW in response to strategic planning consultations. The majority also agreed that NRW makes a positive contribution to the plan-making process and is providing local authorities with effective, well-regarded, and easy to use strategic planning advice.
- NRW are generally engaging effectively on strategic planning matters, and respondents agree that NRW has an active, positive influence on key elements of the plan-making process. Over 80% agreed that NRW adds value to the plan-making process.
- The majority of respondents also agreed that NRW's advice made it easy to understand the interaction of potential environmental effects. Respondents were also positive about the clarity and transparency of NRW's advice.
- In general, awareness of NRW's service standards was found to be low and as a result there may have been a lack of awareness amongst respondents of the level of service they can expect from NRW, or what information NRW requires from the local authority to inform this advice.
- The main concerns that were raised related to the consistency of NRW's advice across topic areas and the timeliness of that advice. Advice on protected species and habitats was also highlighted by a third of the respondents as an area where some improvements could be made.

#### 3.1 Summary of NRW's response

NRW will aim to provide greater clarity on the service it provides in relation to strategic plans by putting together a checklist for engagement on these types of plans. We will also aim to set out in more detail what our roles are in relation to SEA and HRA.

The main issue raised in the strategic planning survey relates to the timeliness of NRW's responses. However, we are not aware of missing any statutory deadlines for responding to strategic planning consultations. We intend to discuss this further with the Planning Officer Society Wales. Once we have clarified the exact nature of the issue, we will address it accordingly.

## 4. Background to the study

In 2015, NRW commissioned Land Use Consultants to carry out an assessment of the effectiveness of NRW's development planning advice. The study consisted of two parts. The first part focussed on the development of a customer satisfaction survey, which was run between December 2015 and February 2016. As part of this, all local planning authorities in Wales were asked for their views on NRW's development planning advice service.

The majority of local planning authorities (LPAs) decided to submit a single response. As a result, the strategic planning survey received a response from 15 out of Wales' 25 local planning authorities and 19 responses were received on the development planning survey. Although the total number of responses was small, the majority of Welsh LPAs provided a response.

In addition to the survey, Land Use Consultants carried out an in-depth assessment of a small sample of NRW's casework advice. The aim of this work was to assess the impact NRW's advice has had on the outcomes of the planning process. This assessment was complemented with interviews with local planning authority and NRW staff.

This report focusses on the findings from the survey, which are supplemented with quotes from the interviews with LPA staff where relevant.

### 4.1 Defining effectiveness

The aim of the work undertaken by Land Use Consultants was to develop a measure of the "effectiveness" of NRW's advice in influencing the outcomes of development management processes. For the purpose of the survey, effectiveness was defined as

"NRW's *ability* to influence the outcomes of development planning processes in line with its purpose to pursue the sustainable management of natural resources".

LPA staff were asked for their views on the level of impact NRW's advice had on their decisions. As there are a number of different factors that LPAs have to take into account when making their decisions, questions about the impact of our advice were supplemented with a range of questions about NRW's *ability* to influence.

This ability to influence will depend on a range of factors, such as the quality and clarity of our advice and the stage at which the advice is provided. NRW has identified a number of principles for effective engagement, which are set out in "Development Planning: Our Service Statement for Delivery". The customer surveys therefore also ask LPA staff for their views on the extent to which they believe we are implementing these principles in our work. The premise behind this is that applying the principles put forward in the Service Statement is a requirement for being able to influence planning outcomes.

The service standards include the following principles for NRW's engagement with development management:

- **Early engagement** – pro-actively seek opportunities to engage with developers and planning authorities at the pre-application stage to ensure that the location, layout and

design of development is informed by environmental constraints, and opportunities for environmental enhancement, thereby minimising costly delays during later stages in the planning application process;

- **Taking a risk-based approach** - focus our involvement on proposals which are likely to have significant environmental effects by taking a risk-based approach to focus our resources to those development proposals which are likely to have significant environmental effects;
- **Adopting a solutions-based approach** - identify and promote opportunities to protect and enhance the environment, including the incorporation of natural heritage features in the design of proposed development to deliver win-win outcomes for society, the economy and the environment;
- **Clear advice** – ensure that our advice is objective, consistent, evidence-based, clear, proportionate, and reflects our duties, responsibilities and purpose;
- **Transparency** – ensure transparency and accountability in the advice we provide;
- **Cross-boundary working** - work with other relevant organisations where development projects cross national boundaries;
- **Responding within deadlines** – ensure that the advice we provide is submitted within agreed or statutory deadlines.

A similar list exists for NRW's engagement with strategic planning and the results in chapter 5 and 6 have been organised around these principles, with the aim of getting a better understanding of where NRW is doing well, and where there may be room for improvement.

## 4.2 Limitations to the work

As this is the first time the survey has been run, the results presented in this summary report are intended to provide the baseline for the work. Although there has been a good response rate from local planning authorities, many decided to provide a single response per authority, which resulted in a relatively small survey group. This needs to be borne in mind when interpreting the results from this survey and particularly when making comparisons between the findings from this year's survey and those that will be undertaken in future years.

Even with a small survey group it should be possible to detect general trends, but more detailed changes (e.g. a 10% drop or increase in customers' satisfaction) may appear more significant than they are as this could be the result of only a few respondents providing a different answer.

Based on feedback received on the survey, NRW will consider if the length of the survey can be refined in future iterations of the survey. Questions that are used as the basis for the effectiveness indicators will remain unaffected.



As comment fields were only provided for a small number of questions, the survey provided limited opportunities for respondents to provide additional comments. This has made it difficult to interpret some of the responses received or to identify the best way in which to address the issues raised. We will seek to resolve this in future versions of the survey.

Finally, while the two surveys that were carried out in 2015/16 focussed on local planning authority staff, we intend to broaden this out over future years to also include feedback from developers.

## 5. Findings from NRW's Development Management Survey

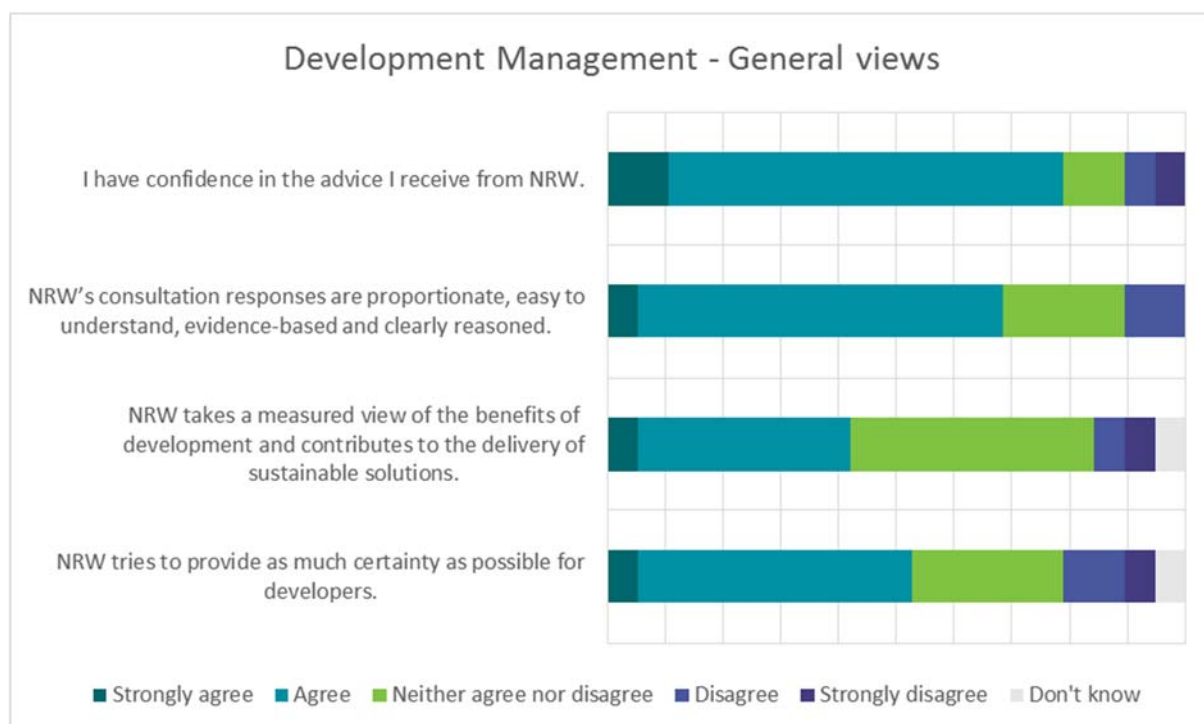
This section sets out the findings from the development management survey, which asked questions about the service NRW provides when responding to consultations on planning applications. The feedback received as part of this survey was generally positive, with most respondents indicating that they had a high level of confidence in the advice NRW provides and that this advice influenced the decisions they made.

The survey results also highlighted a number of areas where there is some room for improvement and each section below therefore also sets out how NRW intends to address the issues that were raised.

### 5.1 Development management – General views

#### 5.1.1 Survey results

The first part of the development management survey asked a number of general questions about the local authorities' perception of the service NRW provides in relation to development management.



As highlighted by the figure above, a number of positive messages emerged from this group of questions. Close to 80% of respondents, for example, indicated that they have confidence in the advice they receive from NRW. The number of negative responses to this group of questions is relatively low, with the question about the level of certainty NRW provides to developers receiving the highest level of negative feedback. At 15% this is still considered to be relatively low.

### 5.1.2 Identifying areas for improvement– General views of NRW

To identify those areas where there may be scope to improve the service, all answers to the survey were given a numerical score. These ranged from 5 for strongly agree to 1 for strongly disagree. Following on from this, an average score was calculated for each question. Questions were then put into one of the following categories based on the scores received:

- Scores of 3.5 and over – these are questions where feedback indicates that NRW’s service is rated highly by our customers. These questions are shown in green in the table below and because of the high score received, we do not consider that these are areas where there is currently a need to improve the service
- Scores below 3.5- this highlights areas that may benefit from some further attention.

It could be argued that scores between 3 and 3.5 still reflect an overall positive view of NRW’s service, as this relatively high average can only be achieved if the majority of responses are either positive or equivocal. The numerical analysis, and the threshold of 3.5, are therefore used here as a starting point for identifying areas for improvement. Other factors, such as more detailed feedback received as part of the survey and the total number of dissatisfied responses have been used to narrow this down further and identify the main areas where there may be room for improvement.

Scores of 3.5 and above have been highlighted in green in the table below. Where an area for improvement has been identified this is highlighted in orange.

<b>Development management - general views on NRW’s service</b>	
1: I have confidence in the advice I receive from NRW	3.68
2: NRW’s consultation responses are proportionate, easy to understand, evidence based and clearly reasoned	3.63
3: NRW takes a measured view of the benefits of development and contributes to the delivery of sustainable solutions	3.33
4: NRW tries to provide as much certainty as possible for developers	3.38

The numerical analysis on the first set of questions in the development management survey indicates that questions 3 and 4 may benefit from further attention. Although question 3 (NRW takes a measured view on the benefits of development and contributes to the delivery of sustainable solutions) received the lowest overall score in this set of questions, this is partially the result of the larger number of neutral responses. Considering the respective roles of NRW and the LPAs in the planning process, where NRW provides advice on environmental impacts and the LPA considers this alongside a range of other factors, this relatively large number of neutral responses is not considered to be problematic.

### 5.1.3 NRW's Response - Actions for Improvement

The main issue raised in this part of the survey relates to the level of certainty NRW's advice provides for developers. As NRW is an advisor in the planning application process and not a decision maker the level of certainty we are able to provide for developers is limited. While the decision maker will take account of all material considerations relating to a scheme, our expertise relates to environmental interests and natural resources.

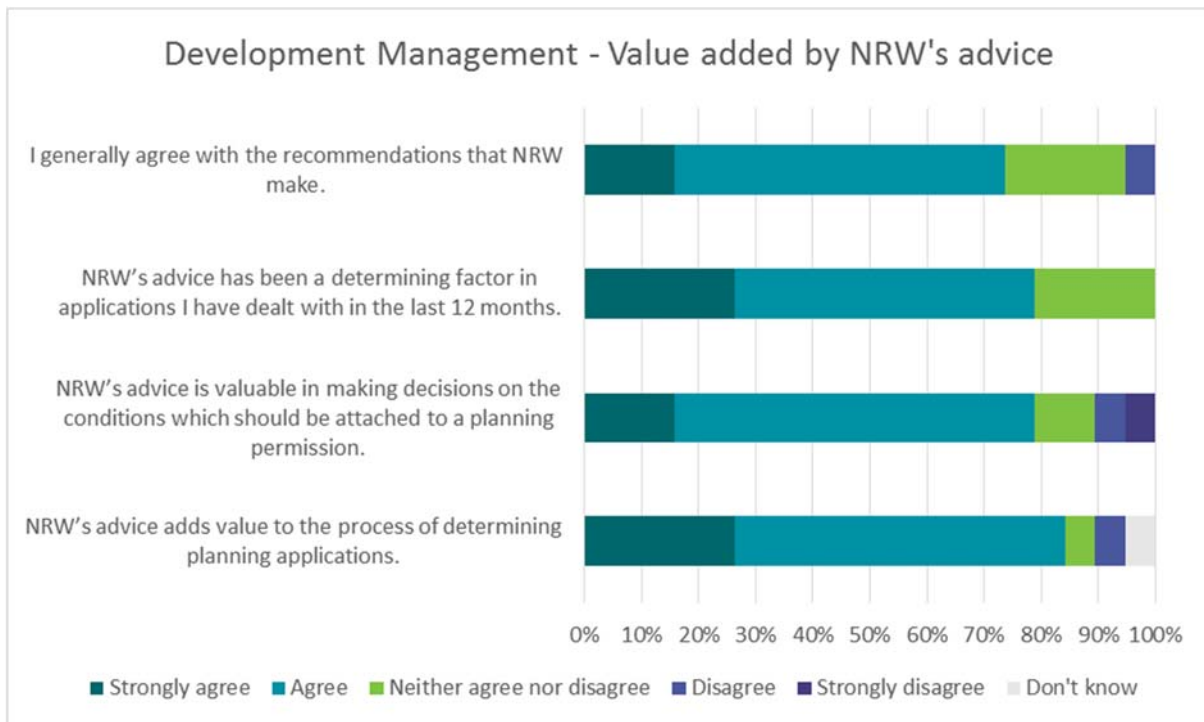
We recognise, however, that there are benefits associated with providing advice to developers at an early stage in the planning process. For this reason we have started work to extend the pre-application service that is currently available to developers, through the introduction of a formalised discretionary planning advice service. As part of this service we intend to provide developers with a free initial opinion on their development. In addition there will other services that can be requested by developers for a fee. It is our intention to start implementing this service from April 2017 onwards.

As part of this service, we intend to publish a new service statement which will provide greater clarity to developers about the level of discretionary service that will be provided by NRW.

## 5.2 Development management – value added by NRW's advice

### 5.2.1 Survey results

Respondents were asked for their views on whether they think that NRW adds value to the planning process. Responses to this set of questions were particularly positive, with over 80% of respondents either agreeing or strongly agreeing that NRW's advice adds value to the process of determining planning applications. In general, the number of negative responses to this set of questions is relatively low, as are the number of neutral responses, which could be seen as an indication that in general respondents valued NRW's contributions.



## 5.2.2 Identifying areas for improvement – value added by NRW’s advice

The numerical analysis set out below highlights the predominantly positive feedback received on this set of questions. The answers to questions 6 and 8 received the highest scores in the development planning survey. As this set of questions is aimed at identifying if NRW’s advice makes a difference, these positive results are particularly encouraging. Based on these findings there do not appear to be any obvious areas within this set of questions, where improvement is required in the short term.

Development management – views on value added	
5: I generally agree with the recommendations that NRW makes	3.78
6: NRW’s advice has been a determining factor in applications I have dealt with in the last 12 months	4.05
7: NRW’s advice is valuable in making decisions on the conditions which should be attached to a planning permission	3.79
8: NRW’s advice adds value to the process of determining planning applications	4.11

## 5.2.3 NRW’s Response - Actions for Improvement

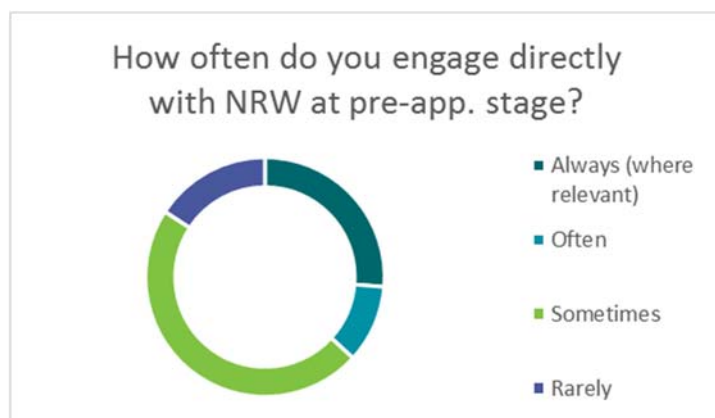
NRW welcomes the positive feedback it has received on this set of questions. In future iterations of the survey we intend to add a few additional questions to this part of the survey, with the aim of gaining a better understanding of where our customers think we add most value. This type of more detailed information is currently missing from the survey and, if provided, could help inform where NRW focusses its efforts in the future.

## 5.3 Development management – early engagement

### 5.3.1 Survey results

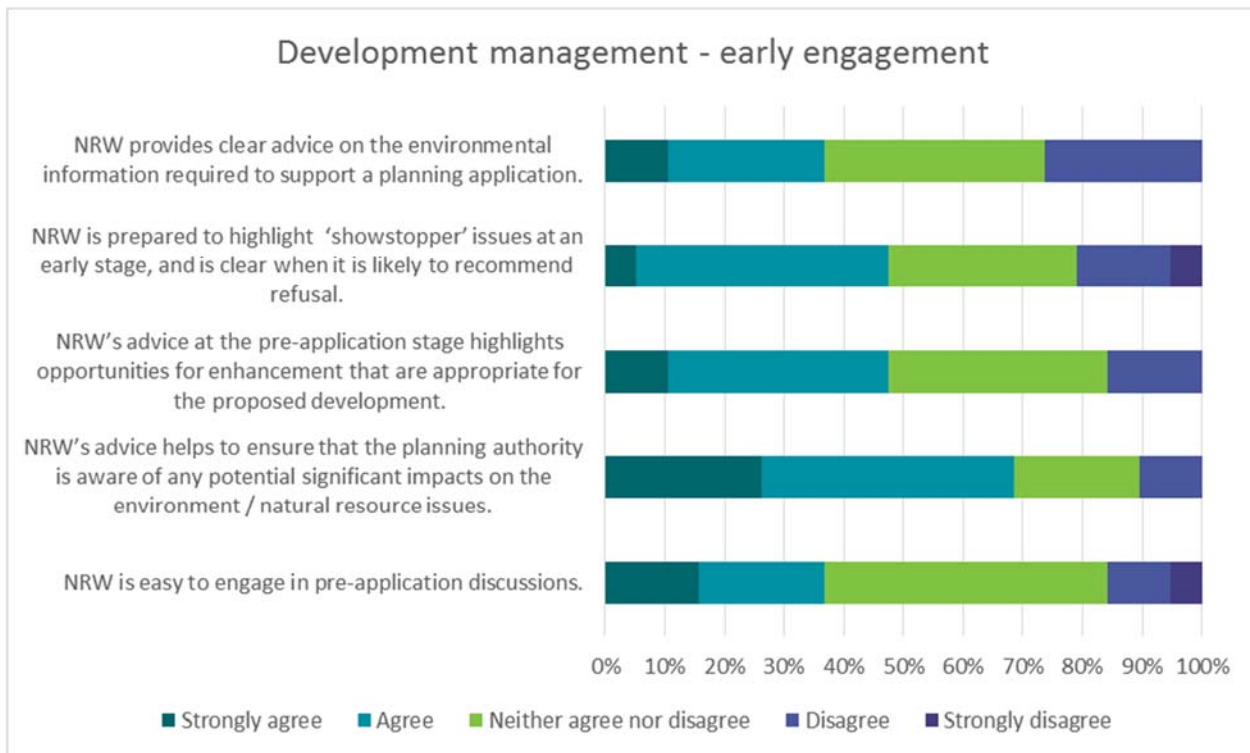
In its service statement NRW sets out that it will “pro-actively seek opportunities to engage with developers and planning authorities at the pre-application stage to ensure that the location, layout and design of development is informed by environmental constraints, and opportunities for environmental enhancement”

In the early engagement section of the survey, respondents were asked for their views on both how easy it is to engage NRW at an early stage in the planning process and how helpful NRW’s advice is at this stage. When interpreting these results it should be noted that only a relatively small number of respondents indicated that they regularly engage with NRW at the pre-application stage, which is shown in the diagram below. This may provide a partial explanation for the relatively high number of neutral responses to this question.



The feedback received did, however, also indicate that while some respondents were happy with the service provided at this stage and others were neutral, that a number of respondents indicated that they were dissatisfied with this aspect of NRW’s service.

Fifteen percent of respondents indicated that did not think that NRW is easy to engage at the pre-application stage and 25 %of respondents were of the view that NRW’s advice on the information required to support a planning application was not always clear. While these figures are still relatively low, this indicates that there is some room for improvement in this area.



### 5.3.2 Identifying areas for improvement – Early engagement

The numerical analysis highlighted that the average score for all questions, but one, is below the 3.5 threshold. It is possible that the higher score given to question 12, is the result of way the question was worded. As no mention was made of this question being specifically about early engagement, respondents may have answered this question for NRW's overall service, rather than the pre-application stage. In future iterations of the survey NRW will therefore reword this question to avoid this risk of misunderstanding.

<b>Early engagement</b>	
9: NRW provides clear advice on the environmental information required to support a planning application	3.21
10: NRW is prepared to highlight "showstopper" issues at an early stage, and is clear when it is likely to recommend refusal	3.26
11: NRW's advice at the pre-application stage highlights opportunities for enhancement that are appropriate for the proposed development	3.42
12: NRW's advice helps to ensure that the planning authority is aware of any potential significant impacts on the environment/ natural resource issues	4.05
13: NRW is easy to engage in pre-application discussions	3.32

### 5.3.3 NRW's response - Actions for Improvement

As mentioned in the general views- section, NRW has identified a need to improve its input at the pre-application stage. NRW therefore intends to roll out a formalised discretionary planning advice service, which will give developers access to a free initial opinion on their development, as well as additional (charged) services. We will also develop a Service

Statement for the charged service, which will provide greater clarity for both developers and LPAs on what level of pre-application service can be expected of NRW.

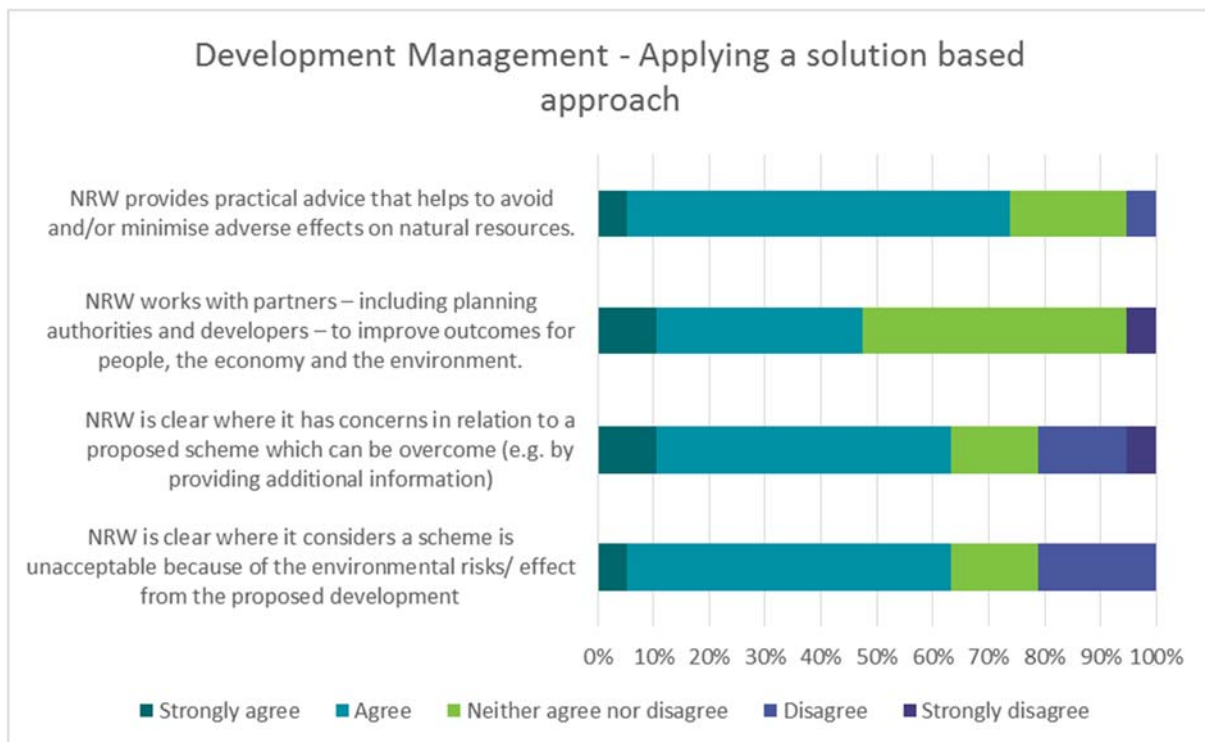
## 5.4 Development management – Solution based approach

### 5.4.1 Survey results

In its service statement, NRW set out that it would seek to “identify and promote opportunities to protect and enhance the environment, including the incorporation of natural heritage features in the design of proposed development to deliver win-win outcomes for society, the economy and the environment”

Respondents were asked a number of questions to establish if respondents felt that NRW generally takes a solutions based approach and how useful this advice is. Over 60% agreed that NRW is clear where it has concerns about a particular planning proposal and over 70% that NRW will provide practical advice to help avoid or minimise negative impacts.

There was also a small number of respondents (20%) that disagreed with the statement that NRW is always clear when it has concerns about a development proposal. This indicates that there may be some room for improvement to ensure that NRW is always clear in the way it communicates concerns.



### 5.4.2 Identifying areas for improvement – Applying a solutions based approach

The numerical analysis set out below demonstrates that NRW’s advice on avoiding and minimising adverse effects on natural resources is generally well received. Although the question about working in partnership received a score below 3.5, the more detailed information above shows that this score is the result of the relatively large number of neutral answers, rather than negative feedback. The remaining two questions, relating to

the way in which NRW communicates its concerns, have been highlighted as potentially benefitting from further work.

More detailed feedback provided as part of this question indicated that at times, it was unclear to respondents what level of significance should be attached to the issues that NRW raised.

<b>Solutions based approach</b>	
14: NRW provides practical advice that helps to avoid and/ or minimise adverse effects on natural resources	3.74
15: NRW works with partners – including planning authorities and developers- to improve outcomes for people, the environment and the economy.	3.47
16: NRW is clear where it has concerns in relation to a proposed scheme which can be overcome (e.g. by providing additional information)	3.42
17: NRW is clear where it considers a scheme is acceptable because of the environmental risks/ effects from the proposed development	3.47

### 5.4.3 NRW's response - Actions for Improvement

Since carrying out the survey, NRW has revised its response categories. It is anticipated that this will address most of the concerns raised in relation to questions 16 and 17 above. In particular, the revised response categories will clearly indicate where concerns can be addressed by; the provision of amendments to the scheme, by attaching appropriate conditions to a planning permission, or by the provision of additional information that demonstrates any effects are acceptable. In future iterations of the survey, NRW will monitor if introducing the revised response categories has had the intended effect.

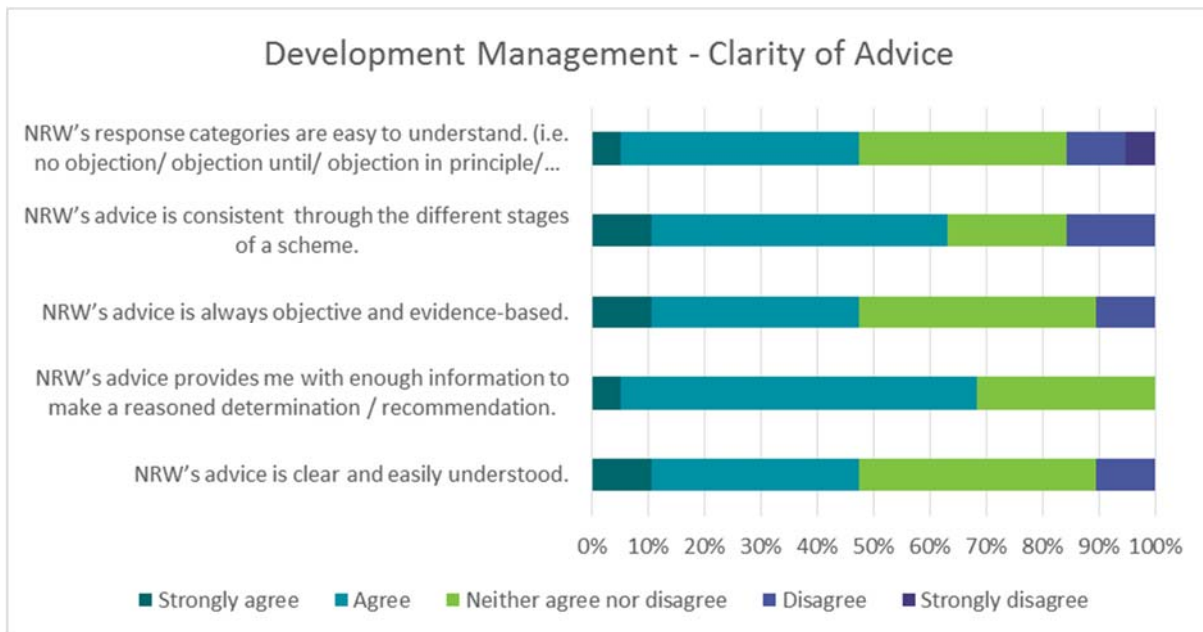
## 5.5 Development management – clarity of advice

### 5.5.1 Survey results

In its service statement NRW set out that it will aim to ensure that its advice is “objective, consistent, evidence-based, clear, proportionate, and reflects our duties, responsibilities and purpose”

Clarity of advice plays an important role in ensuring that NRW is able to influence outcomes. Respondents were asked a number of questions about this subject, in particular about how easy the advice is to understand and if it is considered to be objective.





The responses to the survey highlight a number of positive messages in relation to the clarity of NRW's advice. The number of respondents that disagreed with the statements in this section were generally low, with none of the questions getting more than 15% of these types of responses. Close to 70% of respondents indicated that NRW provides them with sufficient information to make a reasoned determination and over 60% indicated that they think NRW's advice is consistent across different stages of a scheme.

### 5.5.2 Identifying areas for improvement – Clarity of advice

While the detailed results were generally positive, the outcomes of the numerical analysis highlight a few areas where there may be scope for improvement. Although there was little negative feedback on this set of questions overall, some of the scores are relatively low because of the large number of neutral responses received.

Even though neutral responses do not necessarily indicate that there is an issue, it could be argued that for NRW to be effective, the clarity of NRW's response is particularly important. Neutral answers to these questions may provide an indication that NRW's advice is occasionally less clear.

<b>Development management - Clarity of advice</b>	
18: NRW's response categories are easy to understand	3.26
19: NRW's advice is consistent through the different stages of the scheme*	3.58
20: NRW's advice is always objective and evidence based	3.47
21: NRW's advice provides me with enough information to make a reasoned determination/ recommendation	3.73
22: NRW's advice is clear and easily understood	3.05

### 5.5.3 NRW's response - Actions for Improvement

Since running the survey, NRW has put significant effort into improving the clarity of its advice. NRW has introduced response categories, which should help to minimise any

ambiguity in how NRW's advice should be interpreted. In addition, we are also developing a series of Operational Guidance Notes to ensure that our advice is consistent and transparent.

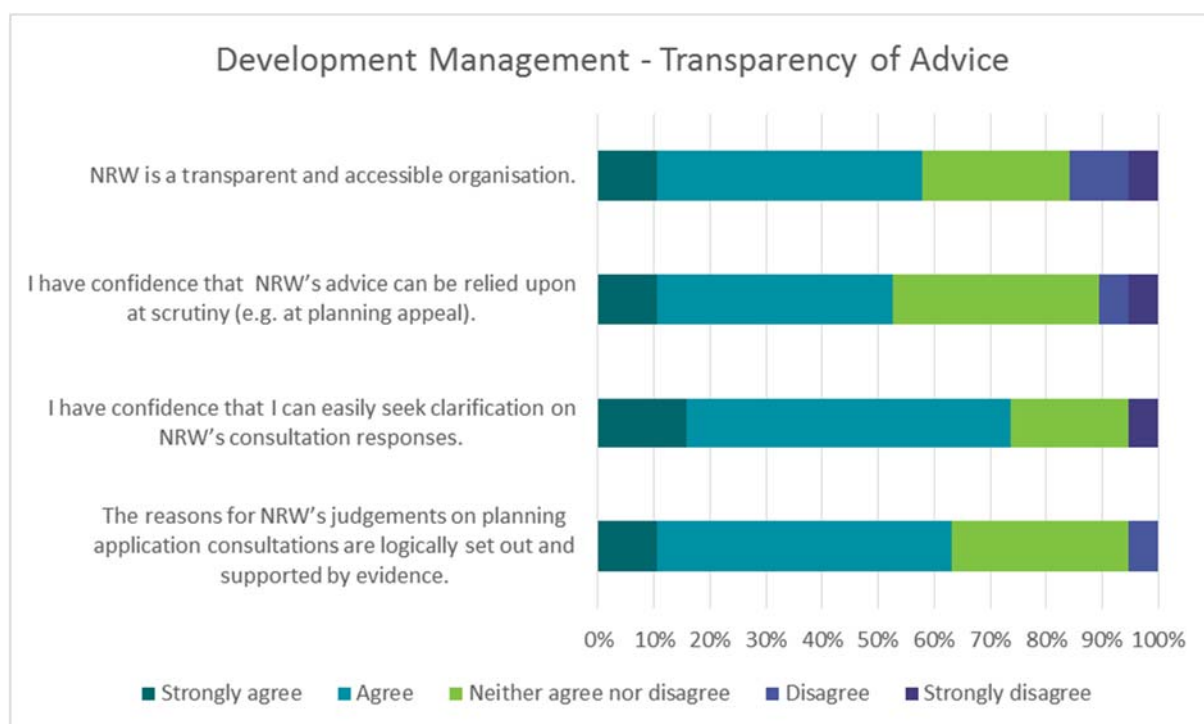
NRW has also started a joint improvement project with Local Planning Authorities, which amongst other things, will consider the clarity and transparency of NRW's advice. Further actions for improvement may be identified as part of this work.

## 5.6 Development management – Transparency

### 5.6.1 Survey results

In its service statement NRW set out that it will “ensure transparency and accountability in the advice we provide”. In the survey, questions were asked about different aspects of transparency, including if respondents thought the advice would stand up to scrutiny and if they thought it was evidence-based.

Overall feedback on the transparency of NRW's advice was positive, with over 60% of respondents indicating that they agree or strongly agree that reasons for NRW's judgements are logically set out. Over 70% of respondents were also confident that they could seek further clarification from NRW, if required.



### 5.6.2 Identifying areas for improvement – Transparency of Advice

The numerical analysis below shows that NRW scored well on two of the questions, but two of the questions were scored just below the 3.5 threshold. As the score on question 25 was the result of a relatively high number of neutral answers rather than negative feedback and no further feedback was received on how the score to

this question could be improved, this question has not been highlighted as needing further work at this stage.

While close to 60% of respondents indicated that they agreed that NRW was a transparent and accessible organisation, there was also some disagreement with this statement, which resulted in a lower overall score.

<b>Transparency</b>	
23: NRW is a transparent and accessible organisation	3.47
24: I have confidence that NRW's advice can be relied upon at scrutiny	3.47
25: I have confidence that I can easily seek clarification on NRW's consultation responses	3.79
26: The reasons for NRW's judgements on planning applications are logically set out and supported by evidence	3.68

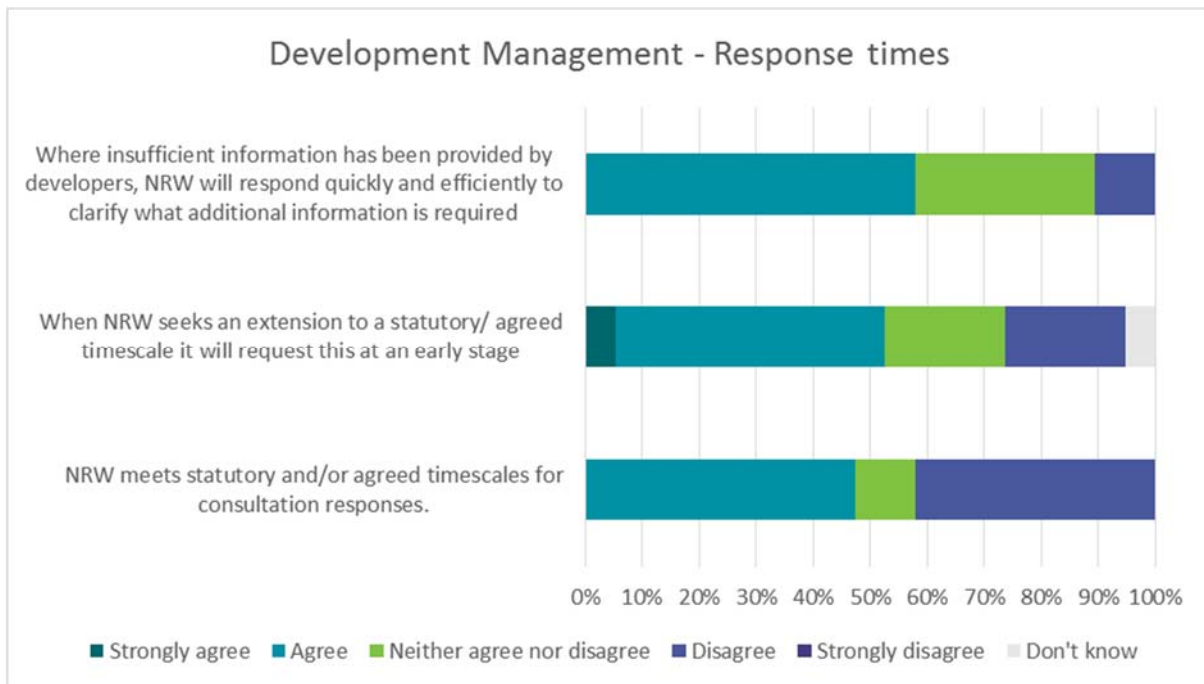
### 5.6.3 NRW's response - Actions for Improvement

Feedback received as part of the survey indicated that at least some of the issues reported in relation to the accessibility of the organisation took place shortly after NRW came into existence. Since then, NRW has put case managers in place which can be contacted directly by the LPAs. A number of respondents indicated that they had found this new arrangement to be working well.

## 5.7 Development management – Response times

### 5.7.1 Survey results

NRW already reports on the timeliness of its responses on a regular basis and the questions in this survey were therefore focussed on perceived timeliness, i.e. do respondents think that NRW responds fast enough. While over 50% of respondents agreed that in cases where insufficient information had been provided or where an extension was required, NRW will respond quickly, only 45% are of the view that NRW responds within statutory and/or agreed timescales.



### 5.7.2 Identifying areas for improvement

The numerical analysis carried out on the results indicated that there are two potential areas for improvement in relation to timeliness. The issues reported as part of the survey were mainly in relation to NRW's requests for extension deadlines. Some of this feedback indicated that some requests for extensions came in at a relatively late stage and that, at times, there has been some miscommunication about whether an extension was agreed.

<b>(Perceived) timeliness</b>	
27: Where insufficient information has been provided by developers, NRW will respond quickly and efficiently to clarify what additional information is required	3.68
28: When NRW seeks an extension to a statutory/ agreed timescale it will request this at an early stage	3.38
29: NRW meets statutory and/ or agreed timescales for consultation responses	3.05

### 5.7.3 NRW's Response - Actions for Improvement

NRW keeps separate records about the timeliness of its responses, which show that over 90% of responses are provided within statutory or agreed deadlines and that extensions to timescales are often limited to a few days only. There therefore appears to be a mismatch between our customers' perception of the timeliness of our responses and the data we hold.

This may be partially the result of our customers having higher expectations of our turn-around times than we can realistically deliver. Requests for re-consultations in particular often come with challenging timescales.

To address the issue of the lack of clarity about whether an extension has been agreed, NRW has put guidance in place for staff on the process of requesting extensions. This includes requiring any extensions sought to be agreed in writing with the relevant planning

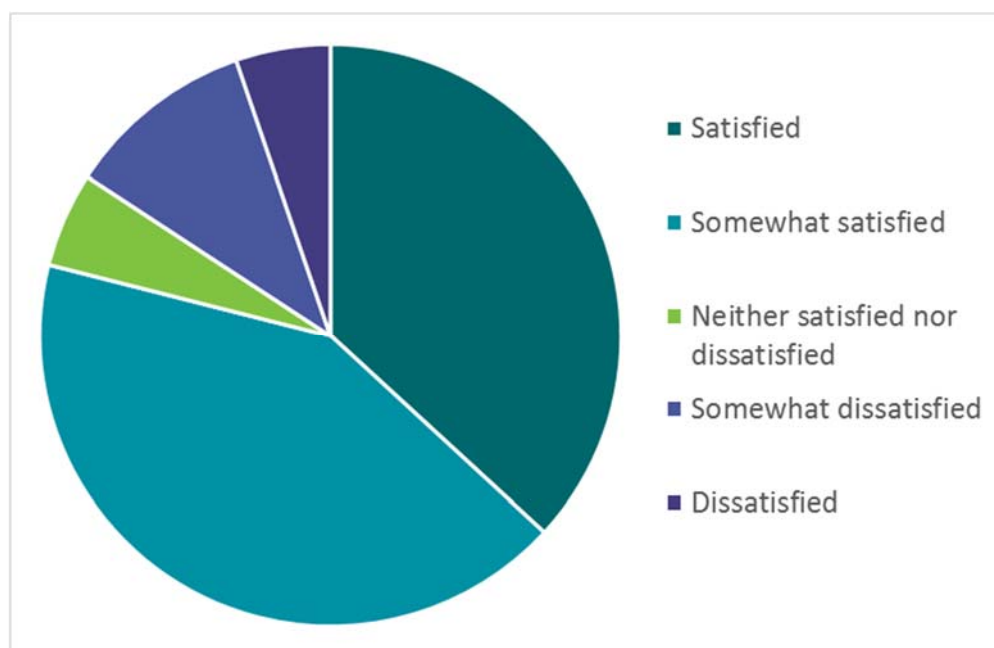
authority, which should help to minimise the risk of miscommunication between NRW and the LPAs.

In 2016, NRW also started a joint improvement project with Local Planning Authorities. Part of the aim of this project is to improve the efficiency of the service that is being provided by NRW.

## 5.8 Customer satisfaction – overall satisfaction

### 5.8.1 Survey results

Respondents were asked to provide an overall assessment of their satisfaction with the service they received on development proposals. Feedback received indicates that a significant majority are either satisfied (37%) or somewhat satisfied (42%) with the service NRW provides.



Where respondents were less content, this was strongly related to the timings of responses. These answers were provided in response to a question about where respondents felt there was room for improvement:

#### Key interview quotes:

*“Different sections of NRW appear to respond to planning application consultations within different timescales. On occasions this holds up a response being sent out from NRW.”*

*“Faster responses. Clear and unambiguous advice Consistency between different consenting regimes within NRW”*

*“A lot of emphasis appears to be placed on “agreed timescales” and therefore when deadlines are tight (such as Scoping Opinions), we often receive a request for an extension of time early on in the process - rather than providing a quicker turnaround depending on timescale priorities.”*

*“Stop focussing on speed and start focussing on quality of response instead. I would rather have a quality response late than a fast response that doesn't help anyone except tick a box. Some joined up thinking would be good so that NRW doesn't express concerns about schemes that another part of NRW has been involved in designing. Access to officers would be brilliant - call centres are in my opinion useless for planning professionals. More collaborative working.”*

When asked for specific examples of where NRW is working well, the quality of advice was the overwhelming theme.

**Key interview quotes:**

*“very good detailed responses with thorough justifications.”*

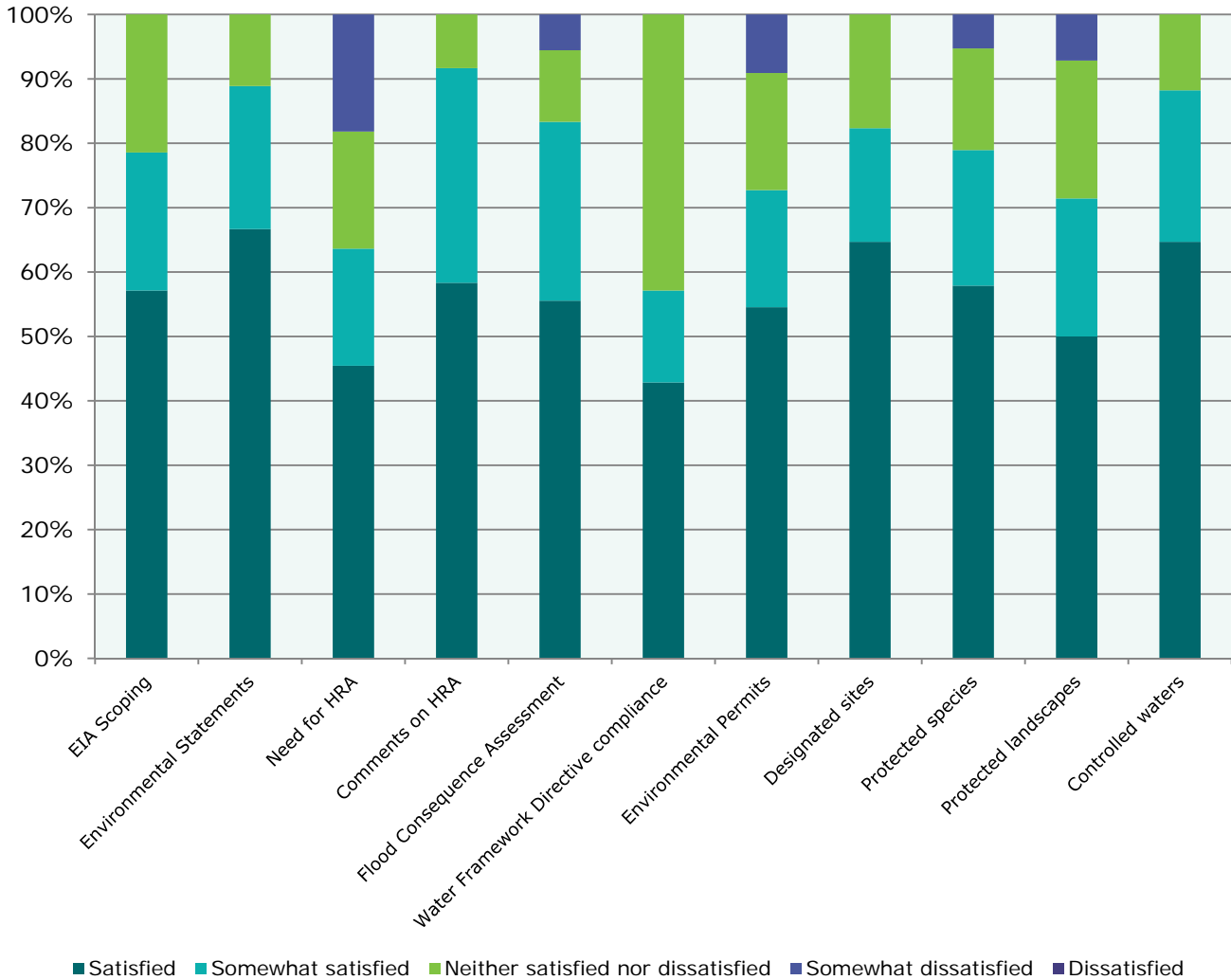
*“In general, responses are generally received in a timely manner providing consistent advice. Responses cover most issues in detail which is important. NRW have recently acted on our behalf at a recent Inquiry regarding flooding issues [redacted] and Officers have been very quick to respond, happy to meet and discuss issues and have explained them clearly. I have been very impressed with the support that NRW have provided in this respect and the willingness to review information at short notice to try and resolve issues.”*

*“Advice is mostly objective, fact based, clear and well structured -NRW are accountable and approachable. -We feel that we have a very good working relationship with NRW. Good example [redacted]. NRW were helpful in providing very detailed responses.”*

*“Will always respond and are open to discussion/debate.”*

### 5.9 Satisfaction with key subject-based services

In addition to general questions about people’s satisfaction with NRW’s service, respondents were asked for their views on particular services. Feedback indicates that levels of satisfaction are generally high, and account for more than 70% for



all but two metrics. (Need for HRA and Water Framework Directive). When viewed in parallel with the number of respondents describing themselves as either “satisfied” or “somewhat satisfied” with NRW’s overall service, this provides a positive overall picture of the way NRW’s service performs in relation to development management advice.

## 6. Findings from NRW's Strategic Planning Survey

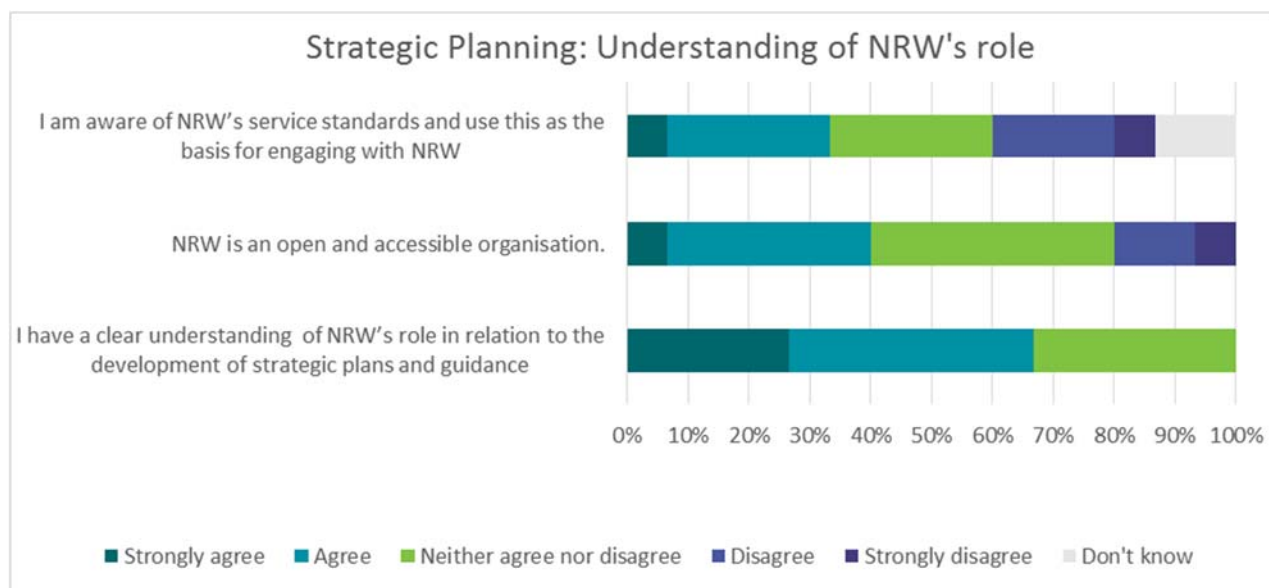
This section sets out the findings from the strategic planning survey, which asked questions about the service NRW provides to local planning authorities on strategic plans, such as local development plans. The feedback received as part of this survey was generally positive, and only a few issues emerged from the findings. Where relevant, NRW has set out its response to these issues in this chapter.

### 6.1 Development Planning – Understanding of NRW's role and responsibilities

#### 6.1.1 Survey results

At the start of the survey, respondents were asked a number of general questions about their understanding of NRW's role in the planning system. This set of questions was intended to provide NRW with some context for interpreting the results to other questions.

The findings from this set of questions indicates that the majority of respondents are clear on NRW's role in the planning system. Awareness of NRW's service standards however is significantly lower, with fewer than 35% of respondents providing a strong indication that they used the Service Standards as the basis for engaging with NRW



#### 6.1.2 Identifying areas for improvement – Understanding of NRW's role

In addition to a low level of awareness of NRW's service standards, the results from the numerical analysis below indicates that NRW received a comparatively low score in relation to people's perception of the openness and accessibility of the organisation. A relatively high number of respondents (40%) indicated that they neither agreed, nor disagreed with this statement, but there was also a small percentage of respondents who disagreed or strongly disagreed (20%).

<b>Strategic Planning – Understanding of NRW's role</b>	
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1: I have a clear understanding of NRW's role in relation to the development of strategic plans and guidance	3.93
2: NRW is an open and accessible organisation	3.2
3: I am aware of NRW's service standards and use this as the basis for engaging with NRW	3.08

### 6.1.3 NRW's response – Actions for improvement

Although this set of questions was used predominantly as a control against subsequent answers, it does highlight that awareness of NRW's service standards is generally low.

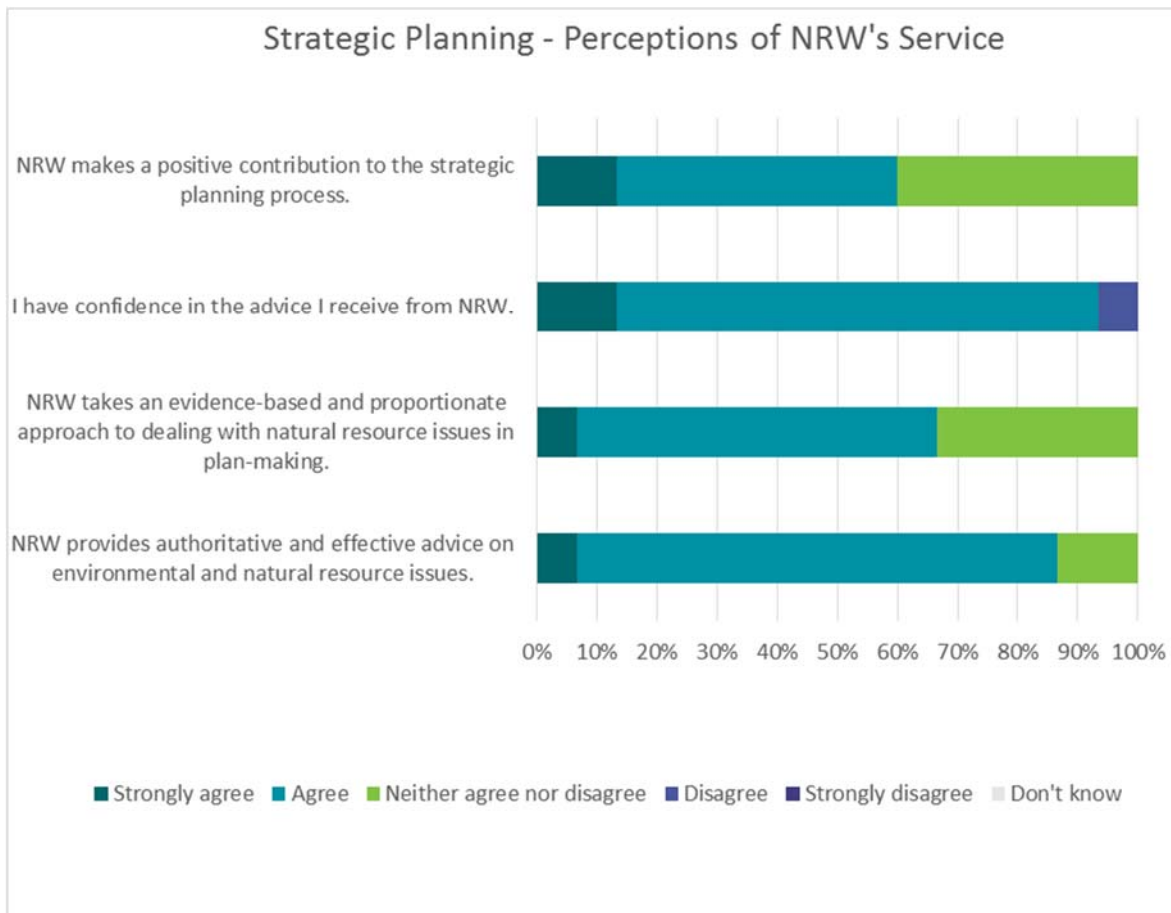
Based on the findings from the survey, NRW has identified a need to provide greater clarity for LPAs on the service they can expect from NRW on Strategic Plans. For development management, NRW uses a checklist which can also be used by LPAs to help decide if NRW should be consulted. We intend to put a similar checklist in place for strategic plans so that there is greater clarity on what service NRW is able to deliver.

In addition, we will update our web content to reflect these changes.

## 6.2 Strategic Planning – Perceptions of NRW's Service

### 6.2.1 Survey results

Respondents were asked a number of general questions about the service they had received from NRW over the previous 12 months.



The responses to this set of question were predominantly positive. Over 85% of respondents agreed, or agreed strongly that NRW provides authoritative and effective advice on environmental issues. Over 90% indicated that they had confidence in the advice they received. Only one negative answer was provided in this complete set of questions, whereas two questions (Q 4 and 6) received a relatively high number of neutral responses.

### 6.2.2 Identifying areas for improvement – Perceptions of NRW’s service

The analysis set out below highlights that in general NRW’s service is well received, with people’s confidence in NRW’s advice being particularly high. As only one negative response was received to this complete set of questions and all questions received a higher average score than 3.5, this analysis did not highlight any obvious areas that need to be addressed in the short term.

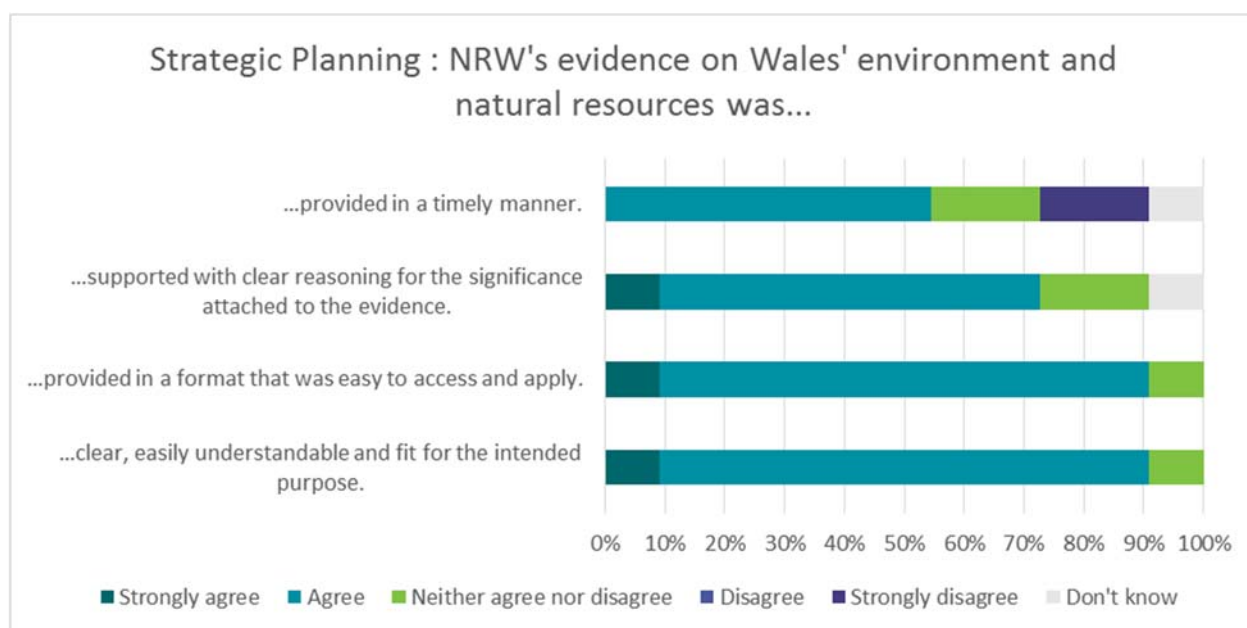
<b>Strategic planning – Perceptions of NRW’s service</b>	
4: NRW’s makes a positive contribution to the strategic planning process	3.73
5: NRW provides authoritative and effective advice on environmental and natural resource issues	3.93
6: NRW takes an evidence-based and proportionate approach to dealing with natural resources issues in plan-making	3.73
7: I have confidence in the advice I receive from NRW	4

## Strategic Planning –

### 6.3 Quality of NRW's evidence

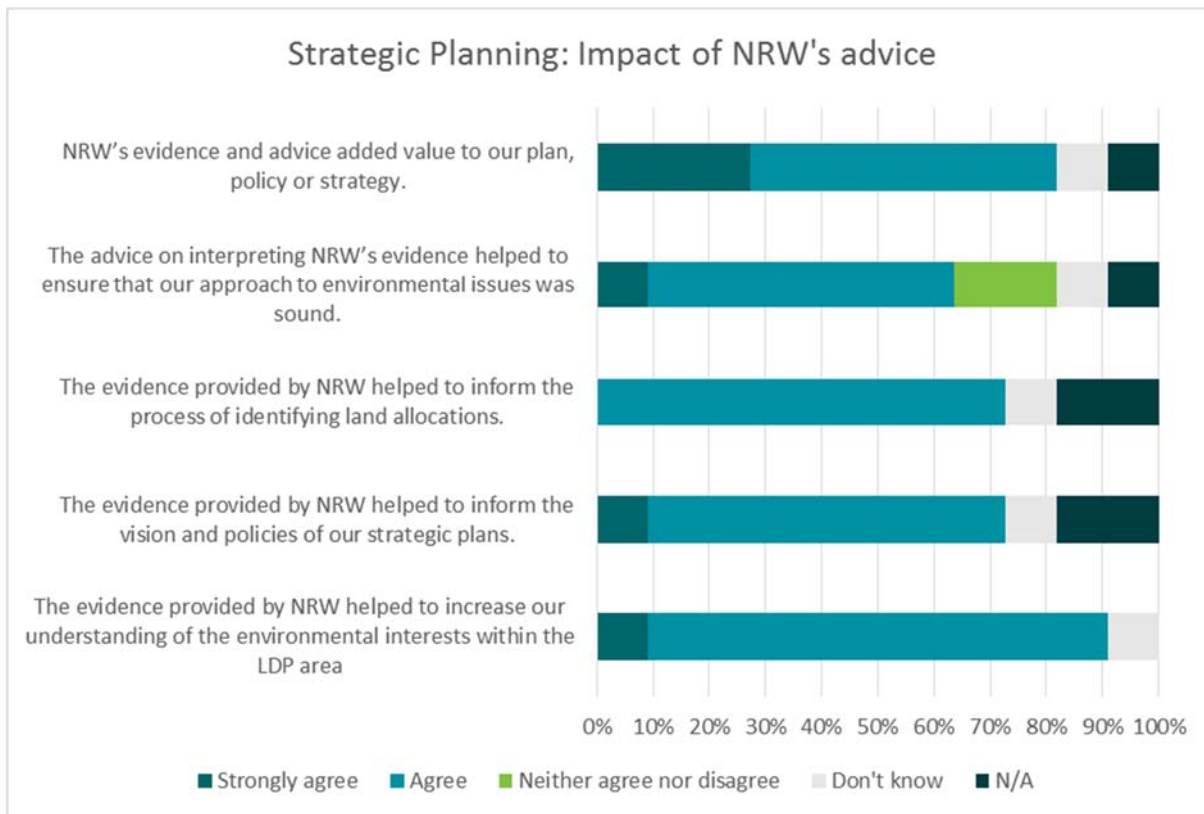
#### 6.3.1 Survey results

In its Service Statement, NRW sets out a commitment to providing local authorities with the evidence required to inform their plans. Respondents were asked a range of questions about NRW's evidence. For the purpose of this report, these have been split into two separate groups: questions relating to the quality and timeliness of NRW's evidence and questions about the impact of NRW's evidence.



The first set of questions, set out above, demonstrates that in general people are happy with the evidence that is being provided by NRW. Over 90% of respondents indicated that they either agreed or strongly agreed that NRW's evidence is clear, easily understandable and fit for its intended purpose. While there was little negative feedback on this set of questions, a small number of respondents strongly disagreed that NRW's advice was provided in a timely manner. This mirrors the concerns raised about the perceived timeliness of NRW's responses in the development management survey.

The responses to the questions relating to the impact of NRW's evidence (see diagram below) also reveal a predominantly positive picture. Over 80% of respondents indicated that they were of the view that NRW's advice added value to their plan or policy. The remaining 20% indicated that this question was either not applicable or that they did not know. An equally positive response was provided to a statement about NRW's evidence increasing the understanding of environmental interests in the area, which 90% of respondents agreed with. No negative responses were provided to any of the questions in this section. Combined with the responses to the previous set of questions this appears to indicate that NRW's evidence is generally well regarded and makes a difference in the planning process.



### 6.3.2 Identifying areas for improvement – Quality and impact of NRW's evidence

The numerical analysis set out below highlights that satisfaction with this aspect of NRW's service is high. In fact, it was in this area of the survey that some of the highest scores were recorded. The only area where concerns were raised was in relation to the timeliness of NRW's responses.

<b>Strategic Planning– quality of NRW's evidence</b>	
8: The evidence provided by NRW is clear, easily understandable and fit for the intended purpose	4
9: The evidence provided by NRW is provided in a format that was easy to access and apply	4
10: The evidence provided by NRW is supported with clear reasoning for the significance attached to the evidence	3.9
11: The evidence provided by NRW is provided in a timely manner	3.2
<b>Strategic Planning – Impact of NRW's evidence</b>	
12: NRW's evidence and advice added value to our plan, policy or strategy	4.3
13: The advice on interpreting NRW's evidence helped to ensure that our approach to environmental issues was sound	3.9
14: The evidence provided by NRW helped to inform the process of identifying land allocations	4
15: The evidence provided by NRW helped to inform the vision and policies in our strategic plans	4.1
16: The evidence provided by NRW helped to increase our understanding of the environmental interest within the LDP area	4.1

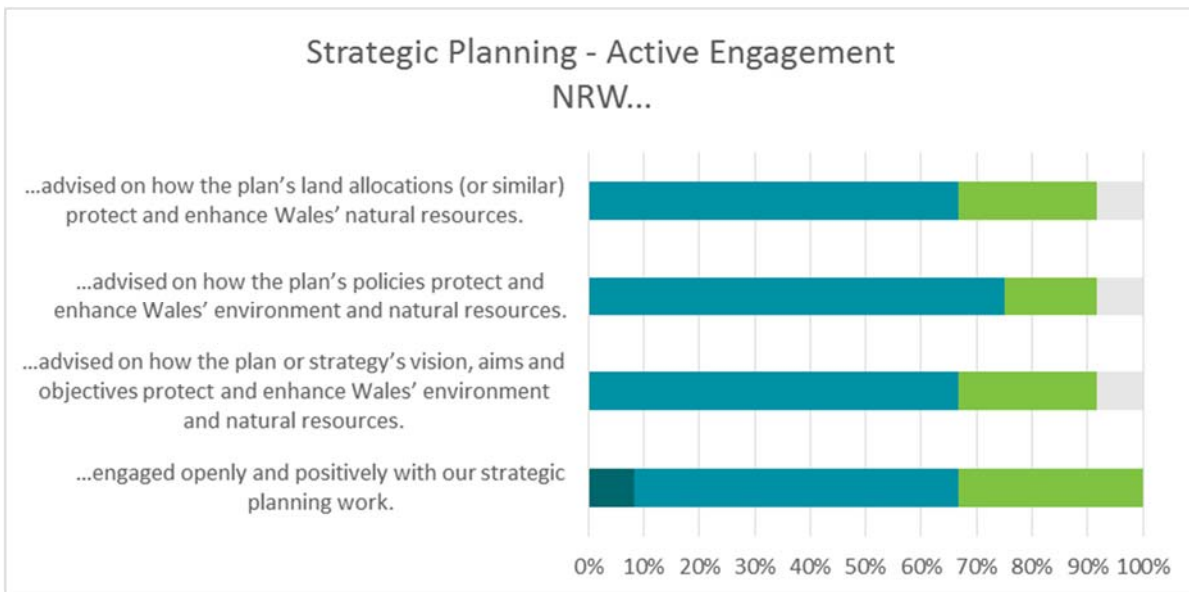
### 6.3.3 NRW's response – Actions for improvement

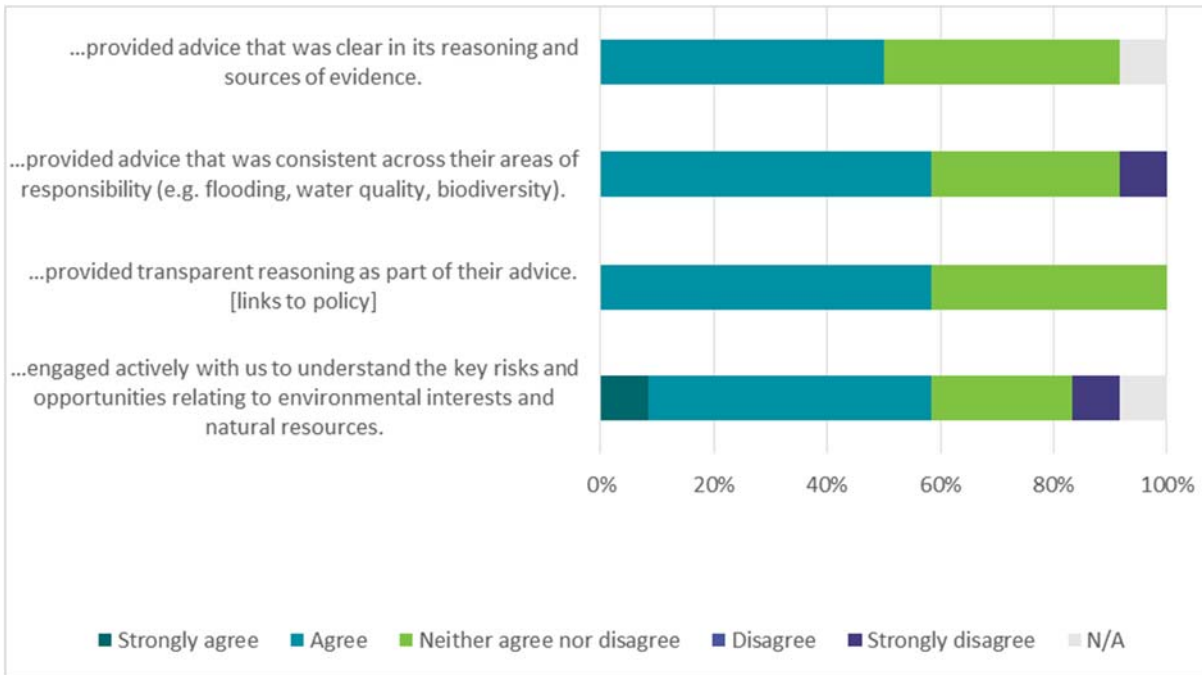
NRW does not monitor the timeliness of its responses to LDP consultations, but we are not aware of missing any statutory deadlines for responding. As no further information has been provided about the stages of the planning process during which deadlines are not considered to be met, it is difficult to address this issue. We intend to explore the reasons behind these responses further through our work with the Planning Officers Society Wales.

## 6.4 Strategic planning – Active engagement

### 6.4.1 Survey results

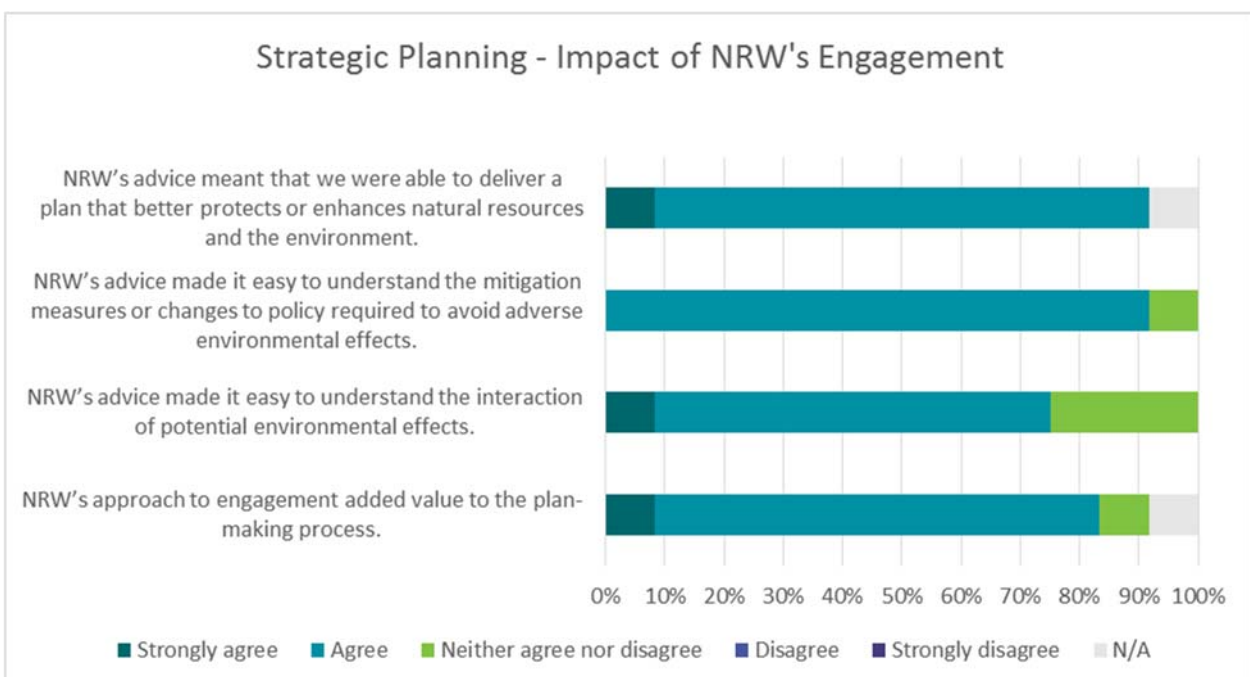
NRW's Service Statement sets out that NRW will “seek opportunities to maximise benefits from the sustainable management of natural resources and the environment, provide consistent and evidence based advice at each stage of the plan-making process, and provide additional advice during non-statutory stages where resources allow”. The respondents were asked two sets of questions on this topic, the first of which related to how NRW has engaged local planning authorities while the second set of questions focussed on the impact this has made.





In general this set of questions received a positive response, with close to 70% of respondents indicating that they felt NRW engaged openly and positively with their work on strategic plans. There were very few negative responses to this set of questions, but there were some questions where a relatively large number of respondents provided a neutral answer. For example, over 40% indicated that they were equivocal about whether NRW provided transparent reasoning as part of its advice. Although general feedback was positive, there may therefore still be some areas where the service can be improved further.

Following on from the questions about NRW's engagement, respondents were asked about the impact NRW's advice had made on the development of their plans.



The picture that emerged from this set of questions is encouraging, with over 90% of respondents indicating that they agreed, or strongly agreed, that NRW's advice meant that they were able to deliver a plan that better protects or enhances the environment. There were no negative responses to this set of questions and the number of neutral responses was also limited, which strengthens the overall impression from this set of questions that NRW's advice and evidence is generally well received and makes a difference.

#### 6.4.2 Identifying areas for improvement – Active engagement

The analysis results confirm that NRW has received high scores against the majority of questions in this section. A number of the questions relating to the impact of NRW's advice have been rated particularly high.

The only question where NRW's services was rated somewhat lower, relates to the consistency of NRW's advice across different areas of its responsibility.

<b>Development planning – Active engagement</b>	
17: NRW advised on how the plan's land allocations protect and enhance Wales' environment and natural resources	3.73
18: NRW advised on how the plan's policies protect and enhance Wales' environment and natural resources	3.82
19: NRW advised on how the plan or strategy's vision, aims and objectives protect and enhance Wales' environment and natural resources	3.73
20: NRW engaged openly and positively with our strategic planning work	3.75
21: NRW provided advice that was clear in its reasoning and sources of evidence	3.55
22: NRW provided advice that was consistent across their areas of responsibility	3.42
23: NRW provided transparent reasoning as part of their advice	3.58
24: NRW engaged actively with us to understand the key risks and opportunities relating to environmental interests and natural resources	3.55
<b>Development planning – Active engagement impact</b>	
25: NRW's advice meant that we were able to deliver a plan that better protects or enhances natural resources and the environment	4.1
26: NRW's advice made it easy to understand the mitigation measures or changes to policy required to avoid adverse environmental effects	3.9
27: NRW's advice made it easy to understand the interaction of potential environmental effects	3.8
28: NRW's approach to engagement added value to the plan-making process	4

#### 6.4.3 NRW's response – Areas for improvement

The detailed feedback provided as part of the survey indicated that at least some of the issues relating to the consistency of NRW's advice emerged at an early stage in NRW's existence and that respondents are of the view that the service has improved since then.

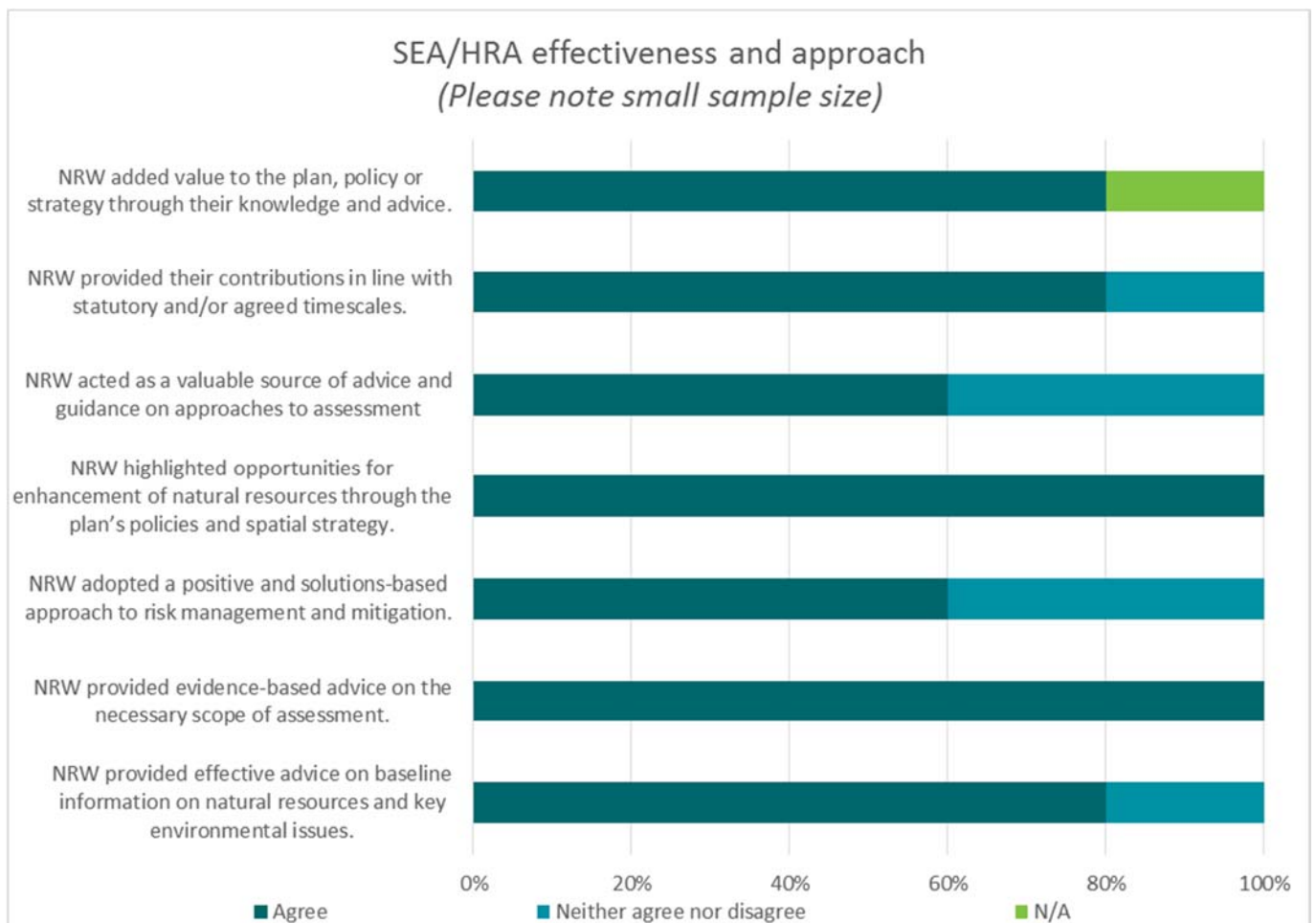
NRW is nevertheless of the view that introducing a checklist for engagement in strategic plans would help to ensure that LPAs get a more consistent service. We are also of the view that clarifying our role in SEA and HRA as part of NRW's Service Statement for Delivery would be helpful in this respect.

## 6.5 NRW's input on specific planning processes

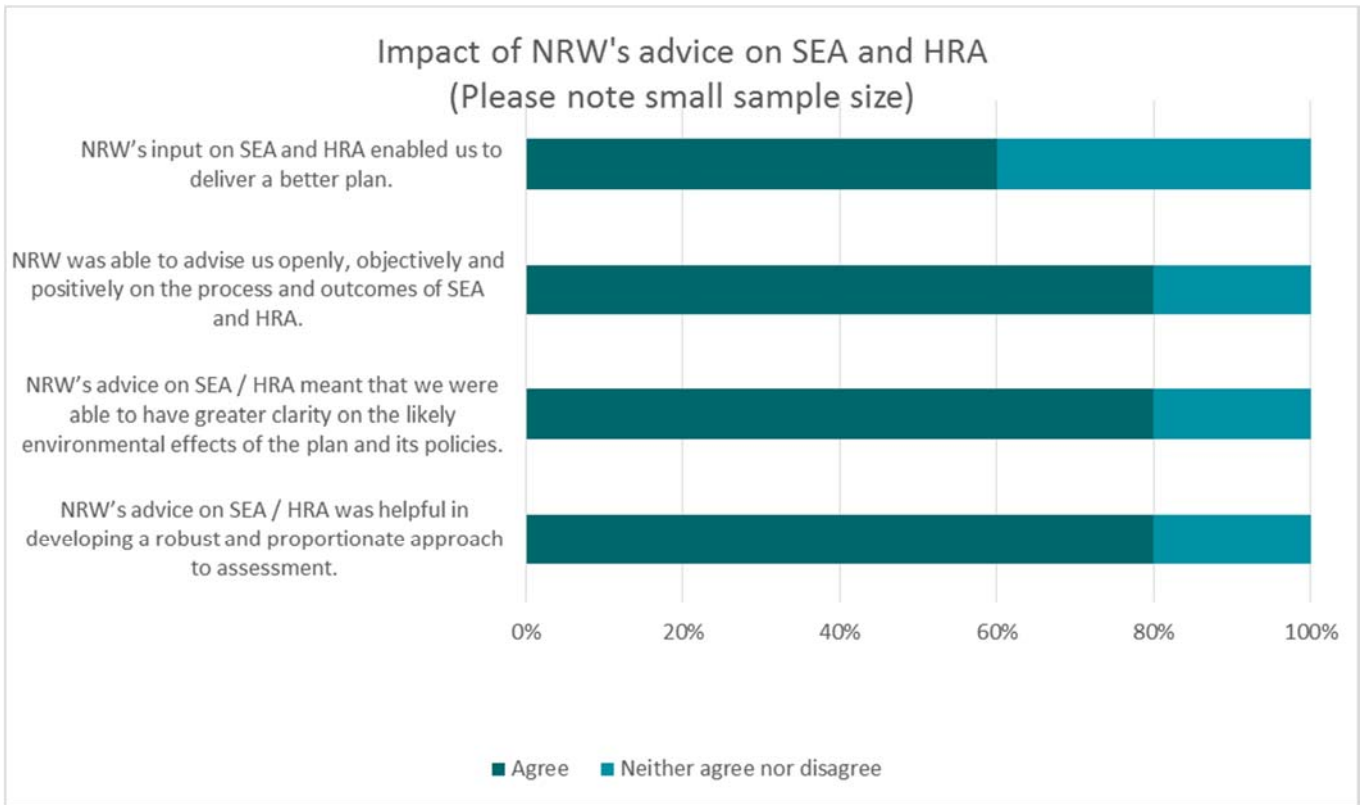
### 6.5.1 SEA and HRA

Respondents were asked a range of questions about NRW's input on Strategic Environmental Impact Assessment, Habitat Regulation Assessments and Strategic Flood Risk Assessments. Only a small number of respondents provided an answer to these questions, with the majority indicating that they did not have direct experience in liaising with NRW on these questions. Given the low number of respondents, NRW did not carry out a further numerical analysis on this data and the graphs are presented here for information only.

The first set of questions focussed on NRW's contribution to SEA/HRA. The responses to these questions highlight a positive picture, with most respondents agreeing with the statements about NRW's advice. The majority of respondents with relevant experience agreed that NRW takes a positive, solutions-based approach to managing risk and mitigation, provide advice on time, and add value to the plan/ strategy being assessed. Respondents found the baseline information and advice on environmental issues supplied to authorities for SEA and HRA to be particularly effective.

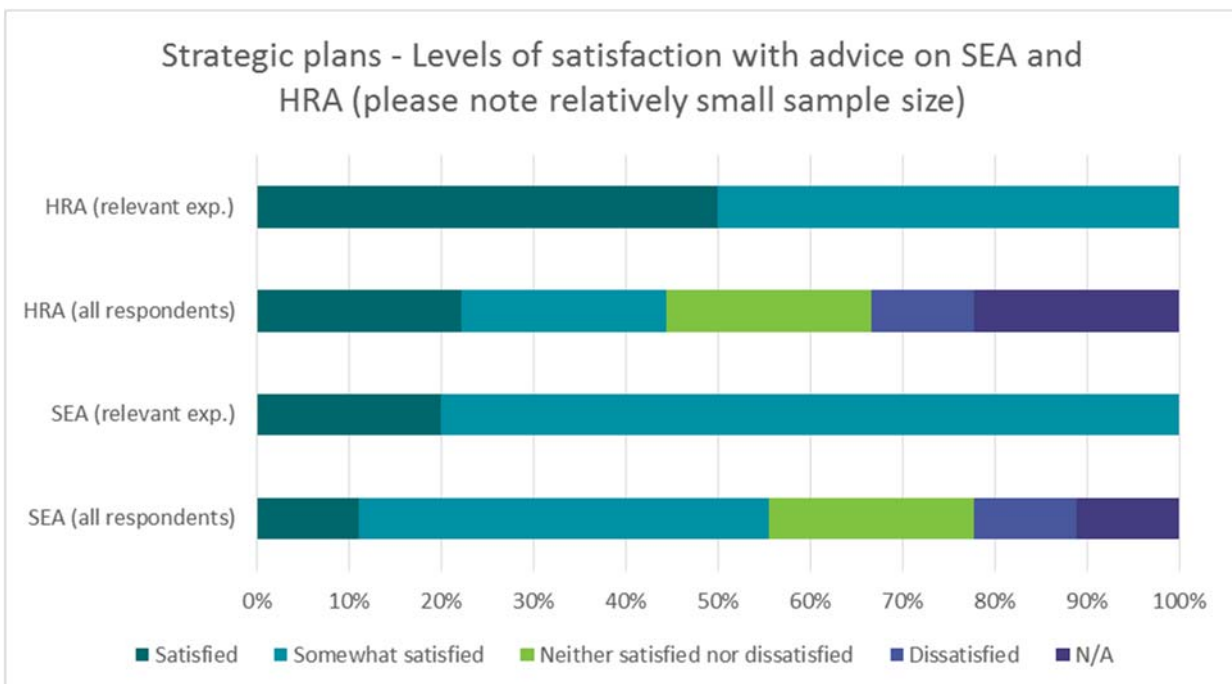






Respondents were also asked a number of questions about the impact of NRW's advice on SEA and HRAs (diagram above). Responses to this set of questions indicated that the majority of respondents agreed that NRW's advice on SEA and HRA meant that the authority had greater clarity on the likely environmental effects of the plan and its policies.

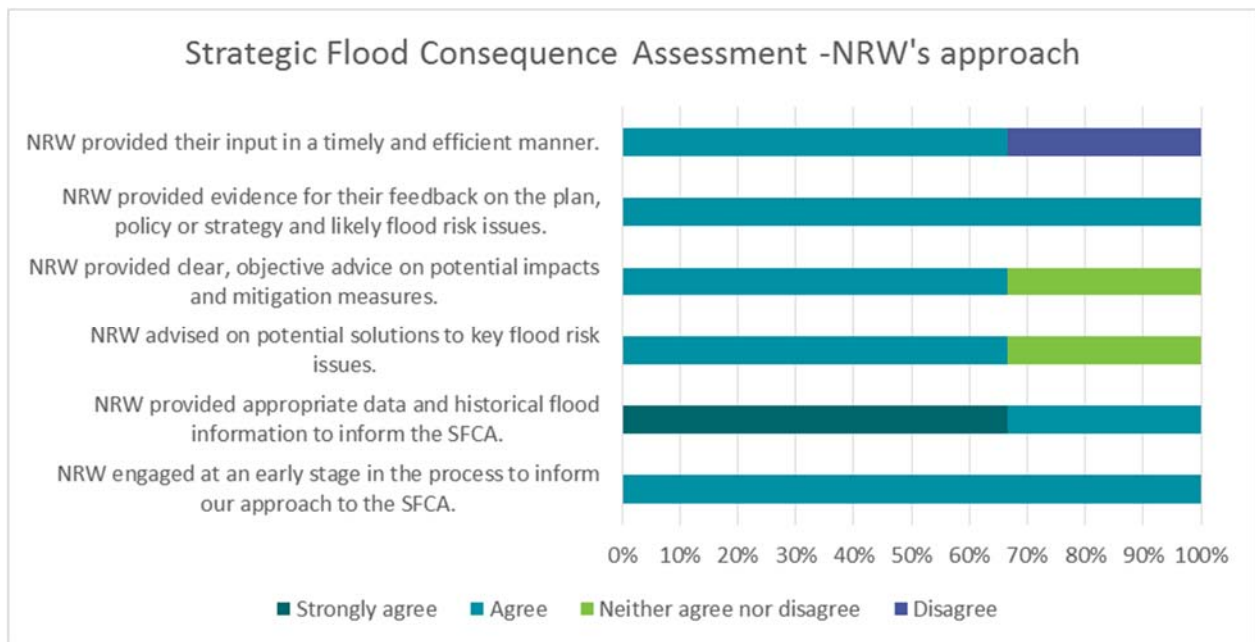
All respondents, with relevant experience, indicated that they were either satisfied or somewhat satisfied with the service they received from NRW on HRA and SEA.



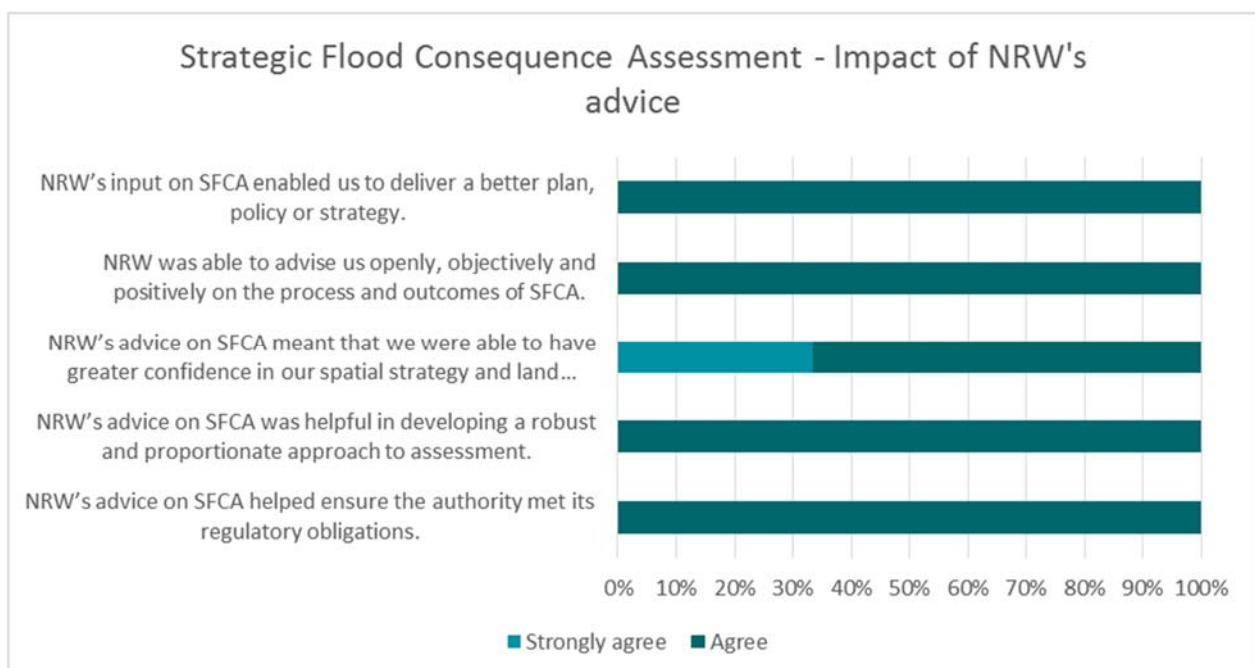
## 6.5.2 Strategic Flood Consequence Assessment

Respondents were asked for their views on the service received in relation to Strategic Flood Consequence Assessment. The number of respondents that indicated to have direct experience was very small and results should therefore be used with caution.

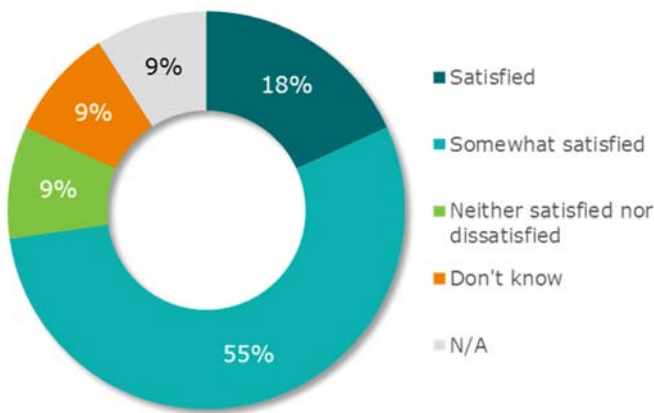
The first set of questions focussed on the service provided by NRW, which shows that NRW's data provision is rated particularly highly. The only respondent to register any measure of discontent did so in relation to the timing of NRW's inputs.



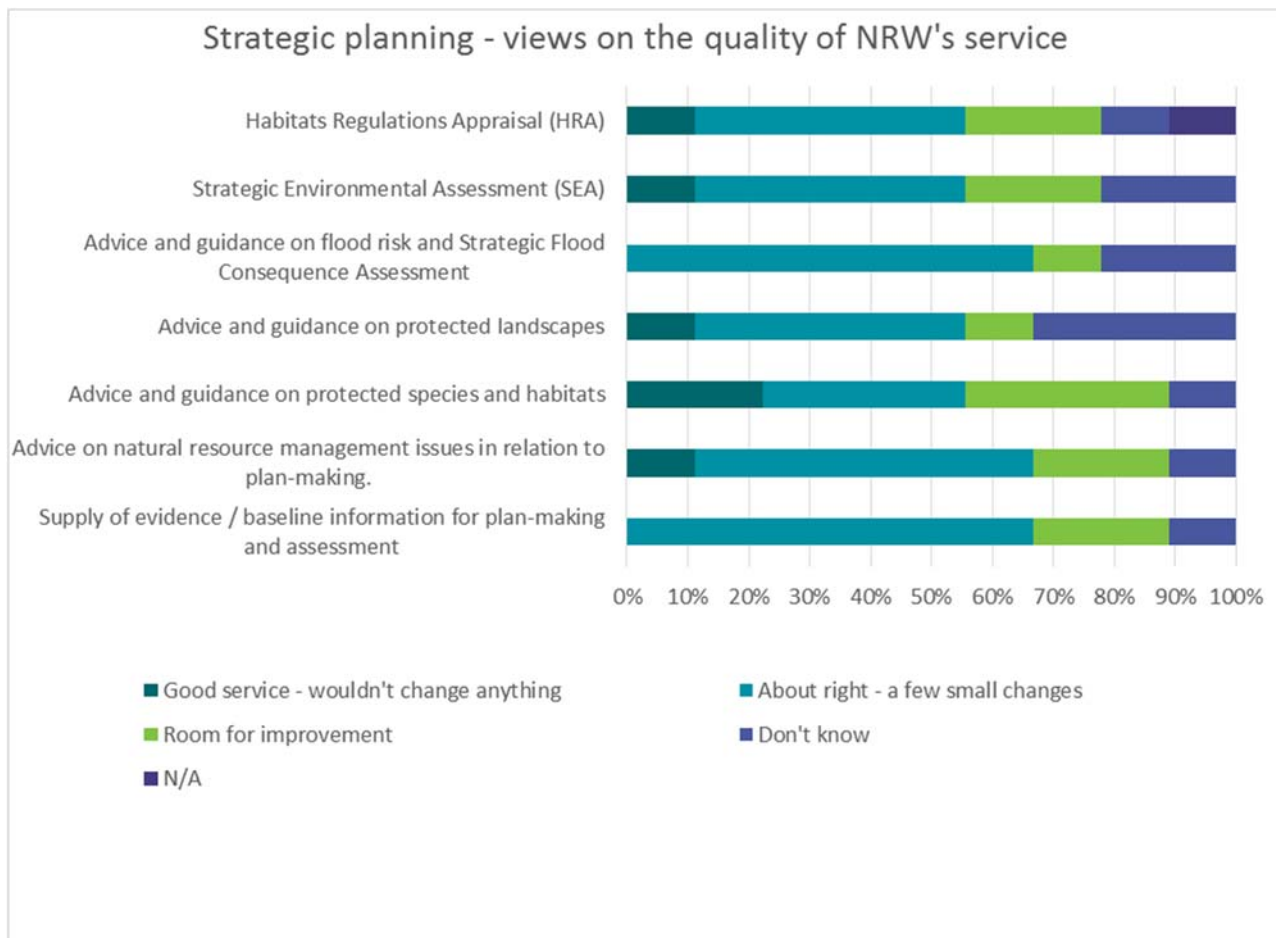
Respondents were also asked for their view of the impact of NRW's advice, which returned a positive result with all respondents either agreeing, or strongly agreeing with all statements about the impact of NRW's advice.



## 6.6 Conclusion: Overall satisfaction with NRW's advice on strategic plans



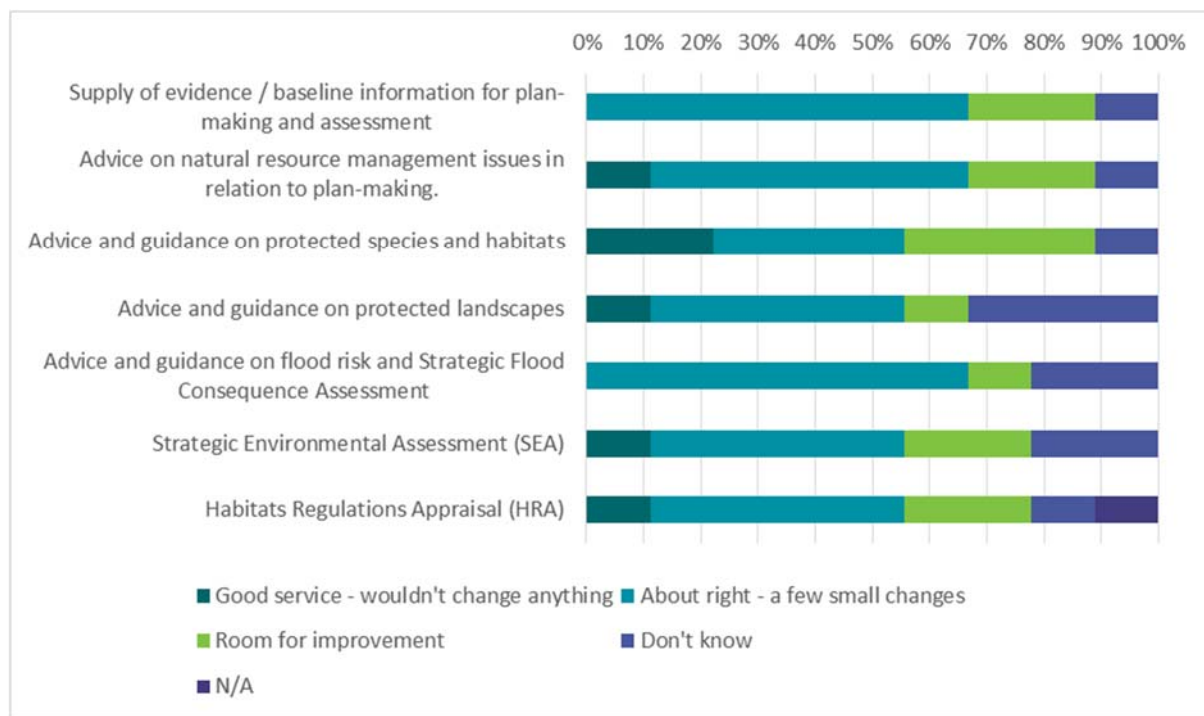
At the end of the survey respondents were asked to rate their overall satisfaction with NRW's service. Responses to this question indicate that the majority of respondents were either satisfied or somewhat satisfied (73%). None of the respondents indicated that they were dissatisfied, which combined with the results of the rest of the survey demonstrates that, in general, NRW's advice is well received.



Respondents were also asked to indicate if they were broadly happy with the service provided by NRW on different types of plans, or whether they felt there was room for

improvement. This highlights again that satisfaction with NRW's general input on the plan making process is high, with only a small proportion of the respondents indicating that they felt that there was room for improvement.

Areas where some respondents indicated that there is some room for improvement include on NRW's advice and guidance on protected species and habitats (30%) and the advice on SEA and HRA (20%).



## Conclusion

The two surveys undertaken by NRW have allowed NRW to identify areas where its planning advice service is currently performing well. The main messages are:

- Feedback is generally positive, with NRW's contribution to strategic planning being particularly well regarded
- Feedback suggests that there is some room for improvement in terms of early engagement and the clarity of NRW's responses. Customers' perception of the timeliness of NRW's response is also less positive than NRW's statistics on response times.
- Awareness of NRW's Service Statement and guidance documents is relatively low and there is scope for improving this.

NRW has already started work to address the main issues raised and this includes:

- The development of a discretionary planning advice service. This will give developers better access to advice during the early stages of the planning process

- The publication of a new service statement for the discretionary planning advice service, which will provide developers with greater clarity about the level of discretionary advice NRW is able to provide
- The introduction of response categories to improve the clarity of NRW's responses (completed)
- The development of a series of Operational Guidance Notes to improve the consistency of NRW's advice
- The introduction of guidance for staff on the process of requesting an extension to a deadline
- Increase awareness of NRW's service standards (ongoing)
- The development of a checklist for engagement on strategic plans, with the aim of providing greater clarity to LPAs on the service NRW is able to offer (ongoing)
- Review of NRW's Service Statement, including clarifying the role of NRW in HRA and SEA (ongoing)

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