

Planning Performance Framework

Final Draft

Published September 2012



Part 1: National Headline Indicators

	2011/2012
Development Planning:	
Age of Local/Strategic Development Plans	0 years (under a year old)
Development Plan Scheme: on track?	Now under preparation.
Effective Land Supply and Delivery of Outputs:	
Effective Housing Land Supply: 5-year supply	Yes
Effective Housing Land Supply	476 Units
Housing Approvals	55 Units
Effective Employment Land Supply	105 ha
Employment Land Take-Up	Not available.
Effective Commercial Floor Space Supply	Not available
Commercial Floor Space Delivered	0m ²
Development Management:	
<u>Project Planning:</u>	
- Percentage of applications subject to pre-application advice	32%
- Numbers of applications subject to processing agreement or other project plan	1
- Percentage planned timescales met	100%
<u>Decision-making:</u>	
- Application approval rate	96 %
- Delegation rate	93 %
<u>Decision-making timescales</u>	
Average Number of Weeks to Decision (for those not determined within 2 months)	
- Major Developments	None
- Local Developments (non-householder) (65% were decided within 2 months)	22.5 weeks
- Householder Developments (92% were decided within 2 months)	14 weeks
Enforcement:	
Time since enforcement charter published and/or reviewed	2 Years Published in February 2010 Reviewed in February 2012
Number of breaches identified	21
Number of breaches resolved (notices only)	5 Notices

Contextual Statement (Reasons/Factors which have influenced performance and any increase/decrease)

The Forward Planning team are currently in the process of updating our procedure of recording Employment land take up and Commercial floor space as part of a wider restructuring of our monitoring programme. It is hoped that this information will be freely available and accurate in the early stages of 2013.

The DM team has performed well on the non-householder casework despite some complex applications which demand significant officer time and inevitably have longer turnaround times. The small downturn in householder application performance which has been evident from Q3 2011/12 through to Q1 2012/13 actually reflects a small number of applications overall and illustrates the vulnerability of a small team to fluctuations in performance.

Numbers of applications received for the first three months of 2012 as covered by this review were significantly increased (approx 30%) on the equivalent period for 2011. This trend is being monitored. A similar proportionate increase relative to 2011 is evident for our pre-application enquiries.

Our pre-application service is operated in common with the **open, accessible approach** to all Development Management casework with an **emphasis on discussion and negotiation** to achieve a positive outcome. It is demonstrably having a positive influence on the approval rate for applications and is therefore a worthwhile shift in the deployment of our limited planning staff resource – focusing on providing constructive advice at an early stage rather than contesting appeals.

The pre –app service is a key tool to achieve the following aims:

- Better **quality of applications** at submission (with all required supporting information having been flagged early).
- Improved **certainty for applicants** on likely outcome and timescales.
- **Less refusals** – our approval rate (96% for 2011/12) was consistently above the national figure (92%).
- **Less appeals / Local Reviews** (we have handled two planning enforcement appeal cases since January this year but the last local review was July 2011).

The use of a project management approach and a processing agreement proved very effective in delivering decisions within agreed timescales on our major application to develop the Cononish Goldmine. This pilot approach is being refined for use on other significant applications.

The first review of performance against our revised Planning Service Charter (published Feb 2012) was undertaken for this first quarter period and the results are overwhelmingly positive, demonstrating in particular that our planning support team are on track to providing a responsive service at all times. It was encouraging that no target received a 'red light' status (<50 % achievement rate).

Nevertheless, some valuable feedback was provided by our Planning Committee Members toward further refining targets and adjusting thresholds for securing the 'green light' (>80% achievement rate) to ensure that we are genuinely delivering an excellent 'customer' experience.

Analysing our performance against the Service Charter is one of the ways our Planning Service is now developing systems that facilitate self-auditing and continuous improvement. It is our intention to present regular updates to Members to raise awareness of our service and to provide opportunity to input on direction for improvement - or to flag up resource issues.

It is a priority to undertake further work to develop performance indicators that record overall service quality as well as speed of response.

Part 2 - Defining and Measuring a High-Quality Planning Service

<p>OUR DELIVERY</p>
<p>Open for Business</p> <p>We are Open for Business because we:</p> <ul style="list-style-type: none"> - Take pride in our open accessible approach to all development enquiries/proposals with an emphasis on negotiation and discussions to achieve a positive outcome. - Provide access to our Director or Head of Planning on significant investment cases where early consideration is required of the principle of development. - Use a project support manager on all major applications (and our development plan delivery) to assist our planners. - Provide consistent pre-application advice using a set response template that highlights the policies, the considerations for the application and information that should be submitted with an application. We undertake site meetings, consultees and request further information where needed to progress a pre-application. - Ensure applicants have direct access to case officers by phone or email during the application process and case officers meet with agents and applicants, when required, on site or at the offices to negotiate improvements and resolve issues. - Carefully balance the natural heritage sensitivities in our National park area and request proportionate information to assist in determining an application. Our website provides clear information on what level of information is expected of the applicant - and at pre-application. - Have identified sites ready for development in our Local Plan and are actively encouraging engagement with land owners to progress the development proposals.
<p>High Quality Development on the Ground</p> <p>We deliver High Quality Development on the Ground because we:</p> <ul style="list-style-type: none"> - Have an adopted Local Plan with a design policy that is informed by our detailed Sustainable Design Guide to ensure that we deliver high quality development within a sustainability framework. This is applied and used to negotiate design improvements. - We actively promote our allocated development plan sites with a focus on securing “Water Based Tourism and Sustainable Tourism Products” that meet the aims of the National Park Partnership Plan. - Worked with partners using the (SG sponsored and grant funded) Charrette process to produce a ‘Design and Public Realm Guide’ for the National Park’s largest settlement – Callander and support delivery of the National Park Local Plan. - Work with our communities’ team to help communities produce Community Action Plans to assist them in taking forward projects on their own. - Provided grant assistance for the past 5 years through our Conservation Area Regeneration Scheme with the main aim to restore important and historic parts of Conservation Areas – spend is up to £125,000. - Use press releases to highlight the added value of the planning service to the National Park in specific high profile planning approvals such as the Cononish Gold Mine - Recognise the need to establish a design award scheme to recognise and celebrate high quality development within the Park. - Learn from good completed developments such as our run-of-river hydro schemes which have been show cased on many different study days for internal and external groups – publically sharing best practice; ie presentation at conference.
<p>Certainty</p> <p>We ensure consistency of advice, process and decision-making to applicants by:</p> <ul style="list-style-type: none"> - Having an up-to-date Development Plan (Adopted Dec 2011) - Actively engaging with a wide range of stakeholders – community and business representatives, other agencies and interest groups as well as planning agents - in the ongoing evolution of Supplementary Planning Guidance and the next steps as we move toward preparing a next Local Development Plan. - Using project management approach and processing agreements for dealing with our Major Applications, specifically on Cononish gold mine at Tyndrum and the Redevelopment of the Torpedo Range Site at Arrochar. We also used this approach in our recent local plan

adoption process. It involves using the authority's separate project management support, setting out a project plan including budget management, communications plan, risk register, and a clear and realistic timetable for determining the application.

- Developing **protocols with our underlying Local Authorities** as the relevant Housing Authorities to specifically address the efficient handling of legal agreements connected to developer contributions in the form of commuted sums toward Affordable Housing delivery.
- Operating a more 'formal' system of **pre-application advice** with case logging to enable us to:
 - Achieve reliable cross referencing of advice issued for any specific site (through our mapped records data base)
 - Ensure consistency of approach by officers – adopting a template based response letter with attachments / links to relevant guidance notes as appropriate (ie; bat surveys / working near trees).

Some of the highlights of this year include:

- No (0%) applications have been approved that are contrary to development plan demonstrating the robustness of our development plan and reliability of officer advice.
- We have been working hard toward improving our rate of applications 'valid on receipt'. For the year 2010/2011 we only had 52% of applications valid on receipt. Our accessible pre-app service together with our 'Making a Valid Planning Application' advice leaflet has improved this figure for 2011/2012 seeing an increase to **65% of applications now valid on receipt**.

Communication, engagement and customer service

Our communications strategy and Planning Service Charter involves:

- **Maximising the potential for e-planning** - proactively encouraging applicants and agents to use the eplanning portal to submit **online applications**. Our efforts resulted in 48% of applications being received electronically for 2011 (average for year). However this percentage increased to 75 % online submission for the final quarter 2011/12 (Source: OAA site usage Jan – March 2012 figs). Case Study example in Audit Scotland.
- Meeting our **customer service standards** set in our Planning Service Charter which has a commitment to providing the highest possible service for our customers. Over the period we:
 - acknowledged 95 % of all applications within 3 working days of receipt
 - validated 99% applications within 7 working days of receipt . Previous years this task took on average 10 working days and we have now reduced this target to 5 working days in the new service charter. This shows our focus on getting the application to the officer as soon as possible. In some instances we have seen applications received and validated on the same day.
 - Undertook 73% of application site visits within 20 working days of receipt.
 - Responded to 62% of pre-application enquiries within 20 working days of receipt.
- Having an **up-to-date website** and range of Planning Advice Leaflets that are user friendly to help the public view applications and applicants submit applications, pre-applications, and appeals.
- Having a **Planning Information Officer** who is the first point of contact for phone calls and reception enquiries. For any telephone calls not answered we endeavour to respond to messages left by the end of the working day.
- Following our **complaints procedure** and requesting feedback from our customers on our performance.
- Hosting **agent's forum and planning forum** ensures user engagement and **constructive feedback** of our service. Further initiatives are under development to create a quality assurance strategy to ensure that the planning service remains fit for purpose.
- Undertaking a **Customer Feedback Survey** from our consultation of the Local Plan. It showed that overall people were satisfied with the way in which the Local Plan was consulted upon. They were asked to comment on each method which was used from newspaper articles to drop in event. The key findings from the survey include:
 - 70% of respondents were satisfied with the way the plan was consulted
 - 66% of respondents found the planning staff helpful

Efficient and Effective Decision-Making

We ensure our structures and processes are proportionate by having:

- An **effective Scheme of Delegation** which involves electronic signing of reports of handling and final decision notices checked by officers to reduce delays. This year only 7.5 % of all applications were decided at committee which reduces delays.
- Regular monthly scheduled committee meetings.
- A **Development Management Procedure Manual** that covers everything from an application, to non-material amendments, EIAs and pre-applications. The team work hard to ensure processes and procedures are efficient and effective, all suggestions for changes or concerns from customers and colleagues are assessed and appropriate action is taken to streamline the process.
- Quarterly **Procedure meeting** to review and improve procedures continually.
- **Close working relationship** with partners (SEPA, SNH) – for example in our recent experience of processing a number of applications for ‘run of river’ hydro schemes we have encouraged applicant’s to apply for their water use licence (CAR licence) and Planning Permission in parallel so that any obstacles can be overcome simultaneously.
- **Service agreements** and protocols with our statutory consultees –SNH, SEPA. Also, in 2011 we had a SEPA planner based one day a week in our planning team to provide support and advice when issues arose (Case Study example in Audit Scotland).

Effective Management Structures

We ensure we have effective management and team structures by:

- Working within a clearly defined **corporate management structure** within which the planning service fits.
- Preparing and taking leadership of the **National Park Partnership Plan** which ensures joint objectives with all the other public bodies* operating in the National Park Area.
- Having strong relationship with our **close working with our colleagues** in conservation team who regularly give advice and support on biodiversity, landscape, trees and built heritage.
- Having **regular team meetings** within Development Management and Forward Planning held together by Rural Development managers meetings where projects and service priorities are discussed and agreed. Also, resources are regularly reviewed to ensure delivery of agreed service plan and corporate priorities.
- Giving **staff opportunities** to move between development management and local plan team to cover workload pressure when either we have a local plan deadline to meet or a large volume of planning applications.
- Ensuring we have staff with a **range of skills and expertise** who are capable of working on a variety of projects.
- Helping the whole organisation develop a Performance Management Framework.

*Key Public Sector Partners include – West Dunbartonshire Council, Argyll and Bute Council, Stirling Council, Perth & Kinross Council, Forestry Commission, SNH, Police, Transport Scotland, Sport Scotland, Scottish Enterprise, Historic Scotland, SEPA and Visit Scotland.

Note: The structure of the National Park Authority is unique. We have three main teams – Conservation, Visitor Experience and Rural Development supported by Business Services. The Planning Service sits alongside community development and tourism within Rural Development. A link to the organisational chart is found in the Supporting Evidence.

Financial Management and Local Governance

Our planning service:

- Operate within strictly defined levels of financial delegated authority for signing off the purchase of goods and services within a **robust corporate procurement strategy**.
- Have **staff training** in place to ensure a high level of understanding and access to the finance system to monitor expenditure.
- Use regular **financial and business planning reports** to ensure effective management checks are in place and these are provided to staff, management, the Board and Scottish Government.
- Use a **balanced scorecard approach** within the business plan to facilitate risk management and highlight whether resources have been effectively allocated to the delivery of projects and services to agreed deadlines and action is taken where necessary.
- Sit on **project working groups** to monitor resources.
- Follow **internal policies, processes and procedures** to ensure best practice and statutory guidelines are considered and followed.

Culture of Continuous Improvement

We have delivered **five improvement plans** since 2007 with key achievements and benefits being:

- A **Development Management Procedure Manual** that ensures that we are always improving our efficient handling of applications and other enquiries, appeals, consultations and amendments.
- **Agents and Planning Forum** resulting in a better relationship with our agents and other stakeholders.
- Adopted **Planning Service Charter** resulting in improved customer care and performance targets.
- Range of **Planning Advice Notes** resulting in less phone calls and quick response times for small pre-application enquiries.
- Improved **Pre-application** Procedure resulting in certainty in outcomes.
- Improved **Telephone Handling** Procedure resulting in better customer care.
- **Delivering Online Planning Information** and streamlined electronic procedures resulting in less telephone calls, saving time and money all processes from consultations to writing reports. We now issue **electronic Decision Notices**.
- **Members Study Days** – viewing case studies, resulting in better informed planning outcomes from our Members.

Part 3 - Supporting Evidence

In order to compile the above table that sets out the reasons why we are a High-Quality Planning Service we have drawn on the following documents:

- National Park Planning Pages – see Local Plan, Supplementary Planning Guidance, Scheme of Delegation, Pre-Application Procedure, Planning Service Charter, Planning Advice Leaflets
<http://www.lochlomond-trossachs.org/planning/>
- Planning Service Charter Review and Update 2011
<http://www.lochlomond-trossachs.org/looking-after/planning-access-committee-meeting-13/06/2011/menu-id-503.html>
- LLNTPA Organisational Chart –
http://www.lochlomond-trossachs.org/images/stories/Looking%20After/PDF/Organisation_Chart_June_2011.pdf
- National Park Partnership Plan (2012-2017) –
<http://www.lochlomond-trossachs.org/nationalparkplan/>
- National Park Corporate Plan (2011 -2012)
<http://www.lochlomond-trossachs.org/images/stories/Looking%20After/PDF/publication%20pdfs/Corporate%20Plan%202012.pdf>
- Annual Report (2010-2011) – Rural Development Section pg 33 – Local Plan, Conservation Area Regeneration Schemes, Rural Housing Enabler, Development Management
<http://www.lochlomond-trossachs.org/images/stories/Looking%20After/PDF/publication%20pdfs/AR201011.pdf>
- Callander Charrette Design and Public Realm Guide – published as an SPG
<http://www.lochlomond-trossachs.org/images/stories/Callander%20Design%20and%20Public%20Realm%20Guide.pdf>
- Community Action Plans 2007 – 2011
<http://www.lochlomond-trossachs.org/living/our-communities/menu-id-202.html>
- Modernising the Planning System (Audit Scotland, Sept 2011) – See Case Study 3 & 4
http://www.audit-scotland.gov.uk/docs/central/2011/nr_110915_modernising_planning.pdf

Part 4 – Service Improvements

Key Commitments for 2012 - 2013

In the coming year we will:

Key Commitment 1 – Continued growth in sustainable development benefitting the Park’s communities and the wider Scottish economy

1. Update and Publish a New Development Plan Scheme by December 2012
2. Commence Local Development Plan process.
3. Adopt Supplementary Planning Guidance (SPG) for flooding (Callander), design (Callander) and housing development by March 2013.
4. Issue a revised draft SPG for Renewable Energy by March 2013.
5. Monitoring of Local Plan Policies using Uniform Database (started Dec 2011, ongoing)
6. Support delivery of the Callander Charrette Early Actions and design SPG.
7. Support Rural Housing Enabler and other enabling initiatives with housing partners

Key Commitment 2 - A higher quality of built environment in our communities, including well managed historic townscapes and landscapes which benefit the resident and visitor experience of the Park

8. Increase coverage of Adopted Conservation Area Appraisals
9. Seek to fund, through small grants, further projects in the Callander Conservation Area Regeneration Scheme – all funding fully committed by March 2013.
10. Deliver small grants scheme for Callander Shopfronts.
11. Increase the number of redundant buildings brought back into use
12. Support Argyll Mausoleum Project Improvement
13. Develop the Project Plan for the unauthorised Advertisement Project (to de-clutter the landscapes of the National Park).

Key Commitment 3 – A customer focused and efficient planning service that performs in the top 10 in Scotland

14. Ensure that the planning service is responsive to customer satisfaction feedback which includes running the Planning and Agents Forums (Corporate Plan Objective RD04)
15. To further improve procedures and Planning Advice Leaflets – areas of work for this year include Planning Obligations and EIA.
16. To increase achievement level of planning service standards to all over 80%. Review the service charter quarterly and report to committee. Review the standards at the end of 2012/2013.
17. Refining our Model Conditions through an internal focus group.

Key Commitment 4 – Delivery of high quality decisions and built developments

18. To gather and respond to feedback from customers on the quality of built development.
19. To monitor the quality of developments approved by recording the added value for each case.
20. To develop a mechanism to monitor the effectiveness of our Sustainability Checklist in influencing the quality of development on the ground.
21. To undertake the preparatory work towards ensuring a design award is in place by 2014.
22. To review and respond to SG consultations on Fees, Permitted Development, Development Delivery, Development Plan Examinations.

23. Ongoing Member training and development of a Handbook for Members.

Delivery of our service improvement actions in 2011 - 2012

Committed Improvements and Actions		Yes/No	Evidence or Reason
1.	Local Plan Examination – Review Reporters Recommendations and issue Local Plan for Adoption.	Yes	Local Plan - http://www.lochlomond-trossachs.org/planning/adopted-local-plan/menu-id-904.html
2.	Issue and consult on Supplementary Planning Guidance on key topics to support the Local Plan. We published the following this year: <ul style="list-style-type: none"> • Sustainable Design Guide • Sustainability Checklist • Advertisement Control • Conservation Area Appraisals 	Yes	http://www.lochlomond-trossachs.org/planning/supplementary-planning-guidance/menu-id-903.html
3.	Issue Action Programme	No	
4.	Update Development Plan Scheme	No	Progressing final Adoption of Local Plan over this period
5.	Establish effective monitoring and review mechanisms of adopted local plan in conjunction with D.M	No	Reason - Not completed as plan was not adopted until December 2011 so action moved to next year.
6.	National Park Plan – working with partners.	Yes	National Park Partnership Plan - http://www.lochlomond-trossachs.org/nationalparkplan/
7.	Rural Housing Enabler – support Rural Housing Service to deliver affordable housing on the ground.	Yes	Rural Housing Enabler appointed and working in the Park.
8.	Internal housing working group to progress housing guidance, toolkits, protocols with partners and monitoring of affordable delivery.	Yes	Draft protocols written and housing stakeholder workshops programmed.
9.	Ensuring delivery on key planning applications relating to our Strategic objectives of Water Based Tourism and Sustainable Tourism Products – piers, accommodation, visitor facilities etc.	Yes	Approvals include: <ul style="list-style-type: none"> • Approximately 40 new self-catering holiday units/chalets. • Small-scale new camping facilities and toilets on Loch Lomond. • Redevelopment of boat yard in Balloch that supports the Water Bus Service on Loch Lomond. • Redevelopment of Luss Toilets
10.	Unauthorised advertisement project. Planning enforcement project to de-clutter the National Park (to operate in conjunction with Tourism 'business toolkit' project which promotes the value of running a tourism business in the National Park).	No	Reason – no staff resources to take forward.
11.	Finalise a set of Model Planning Conditions	No	Work has started on this but

			due to staff resources it has not been completed.
12.	Work with our 4 partnership local authorities to develop protocols to agree respective roles, improved service levels and working arrangements, to assist in expectations.	No	Work has started on the Housing Protocol with the other local authorities but has not been completed.
13.	Take on board feedback from customer survey (online service) .	Yes	Specifically on e-planning.
14.	Review performance against Service Charter targets and review service / adjust targets as appropriate.	Yes	This has been reviewed and taken to our Planning and Access Committee on 13th June 2011 .
15.	Continue joint working with Cairngorms National Park to evolve online systems and share procedures.	Yes	Our support team have provided a service to assist Cairngorms to get their planning application database online – see http://www.cairngorms.co.uk/park-authority/planning/new-planning-applications/
16.	Review and respond to SG consultations on review of non-domestic permitted development.	Yes	Response provided on March 2011 (first consultation)
17.	Review planning Agents Forum to gain feedback of our service and to raise design awareness.	No	Agents Forum did not take place as no interest from agents to attend forum.
18.	Continue to run our Planning Forum	No	Planning Forum did not take place as no resources due to pressures of dealing with the Local Plan Examination.
19.	Prepare new Planning Advice Leaflets on landscaping developer's advice on trees, biodiversity, design and access statements, understanding EIA, 'beginners' guide to planning.	Yes	Leaflets on website: http://www.lochlomond-trossachs.org/planning/planning-advice-leaflets/menu-id-594.html
20.	Continue to improve our website and publishing new guidance notes and local plan and supplementary guidance as and when ready.	Yes	http://www.lochlomond-trossachs.org/planning/
21.	Issue a customer feedback survey to all participants in the Local Plan preparation process.	Yes	
22.	Consultation on new Supplementary Planning Guidance to include online submission of representations. This will include a new interactive online version.	Yes	Consultation took place with use of online survey monkey: See current consultation: https://www.surveymonkey.com/s/SPG_Consultation
23.	Bid for charrette to explore the future development of Callander. If successful, has the potential to empower and engage stakeholders and to guide decisions which reflect local needs and priorities.	Yes	Submitted April 2011 and run over last year. Publication of Callander Charrette Design and Public Realm Guide in November 2011. http://www.lochlomond-trossachs.org/planning/callander-design-and-public-realm-guide.html

24.	Record the ' Added Value ' against each decision made and review this information in order to make improvements to the quality of decisions	No	Reason – no staff resources to take forward.
25.	Prepare and publish a Handbook for Members of the Planning and Access Committee	No	Reason – no staff resources to take forward.
26.	Review the procedures for the planning and Access Committee meetings – focus on effective and transparent hearings.	Yes	Improved Hearings Procedure
27.	Further training for Planning Committee Members with visits to development projects on site.	Yes	Training run in September 2011 for new Members.

Appendix 1 – Official Statistics April 2011 to March 2012

Decision Making: Timescales			
Category	Total Number of decisions	Proportion of decisions	Average timescale (weeks)
All Major Developments¹	0		0.0
All Local Developments²	208		10.9
All Local developments (non-householder)			
Local: less than 2 months	80	64.5%	
Local: more than 2 months	44	35.5%	22.5
Householder developments			
Local: less than 2 months	77	91.7%	
Local: more than 2 months	7	8.3%	14.0
Housing Developments			
Major	0		0.0
Local: less than 2 months	19	48.7%	
Local: more than 2 months	21	51.3%	30.9
Business & Industry			
Major	0		-
Local: less than 2 months	5	83.3%	
Local: more than 2 months	1	16.7%	32.9
EIA Developments	2		36.8
Other Consents *	60		9.6
Applications subject to³			
Planning/legal agreements **	3		98.0
Local reviews	2		58.0

*Consents and certificates: Listed Building and Conservation area consents, Control of Advertisement Consents, Hazardous Substances consents, Established Use Certificates, Certificates of Lawfulness of Existing Use or Development, Notification on Overhead Lines, Notifications and Directions under GDPO Parts 6 & relating to agricultural and forestry development and applications for prior approval by Coal Authority or licensed operator under Classes 60 & 62 of the GDPO.

** Legal obligations associated with a planning permission; concluded under Section 75 of the Town and Country Planning (Scotland) Act 1997 or Section 69 of the Local Government (Scotland) Act 1973

Decision Making: Local Reviews and Appeals		
	Total number of decisions	Original decision upheld (%)
Local reviews	2	100.0%
Appeals to Scottish Ministers	1	100.0%

Enforcement Activity	
	Number
Cases taken Up	21
Notices Served ***	5
Reports to Procurator Fiscal	0
Prosecutions	0

*** Enforcement notices; breach of condition notices; planning contravention notices,; stop notices; temporary stop notices; fixed penalty notices and Section 33 notices.

