

WG50622

**Promoting a resilient and high performing planning service
Consultation response form**

Your name: Mark Harris

Organisation Name (if applicable): Home Builders Federation

Organisation type:

- Business/Consultant ☐
- Local Planning Authority ☐
- Government Agency/Other Public Sector ☐
- Professional Bodies/Interest Groups ☒
- Voluntary Sector/Community Groups ☐
- Other Group or Individual (not listed above) ☐

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Your address:

Responses should be returned by **17 January** to:

planconsultations-a@gov.wales

Or sent by post to:

Welsh Government
Planning Directorate
Cathays Park
Cardiff
CF10 3NQ

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to be anonymous, please tick here ☐

Question 1: Do you agree with our proposals to change planning applications fees from a percentage uplift approach to FCR?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF members support increasing planning fees subject to the services provided by local planning authorities (LPAs) being improved as a result. The principle of FCR appears the best way to ensure an improvement in the service provided, but only if the money raised by planning applications is ringfenced to the planning department [see later questions and answers]. Regarding the use of the additional funding, our understanding is that planning departments are currently part funded from central funding. An increase in fees should not result in this central funding being reduced otherwise there will be no additional funding available to the LPA.

Question 2: Do you agree that the 'FCR Pathway', ensuring most applications reach FCR in 3 to 5 years, is an appropriate approach?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

Due to the significant increase in fees needed to reach FCR from the current fee level, the staggered approach is supported in principle. It is however noted that housing developments over 25 units are only given one year of transition compared to between 3-5 for other fee increases. These categories will also see significant fee increases. Taking the Outline Application (more than 1.2 ha) category as an example, the proposal will see a 21% increase in the fixed fee element and a 47% increase in the max fee, with this being introduced over only two years. A shorter lead in time for all applications would help to provide extra money sooner.

Question 3: Do you agree that for those fee categories not considered by the ARUP Study, they should be increased to the 2024 baseline only and uplifted for inflation annually?

- Yes ☐
- No ☐
- Don't know ☐

Please give your reasons

N/A

Question 4: Do you agree with our proposals to increase fees for Pre-Application Services to the 2024 baseline, taking account of inflation only?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF believes that a well-resourced and effective pre-application services is critical to improving the performance of LPAs and the time taken to determine planning applications. However, members report there is currently a big difference between the service provided by each LPA, in terms of both the quality and time it takes to receive advice. As such, this is an area of performance that needs to be monitored closely, accordingly monitoring of the pre-app service should be included in the new updated monitoring performance framework.

Question 5: Do you agree with the proposals for planning fees to be adjusted annually in line with inflation?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

Although this would seem necessary to ensure that planning fees continue to provide FCR into the future, it does create a level of uncertainty. To help counter this it is suggested that the inflation rise could have a maximum annual cap based on an average figure over the last five years. It is also noted that fees will only be increased under this mechanism, whereas inflation can fluctuate up or down. The HBF notes that the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023, which introduced the automatic annual increase starting on 1 April 2025. However, the increase is capped at 10% even if the inflation rate of the Bank of England CPI is higher.

Furthermore, larger housing applications are often in the planning system for several years [pre app, outline, phased reserved matters, discharge of conditions], this means that the fee could increase considerably over the life of the application and at a level which would be unknown. Accordingly, HBF suggest that the application fee for any subsequent submission related to that application should be fixed at the rate which applies when the outline application is made.

Question 6: Do you agree that the Bank of England CPI is the most appropriate index measure to use?

- Yes ☒
- No ☐

- Don't know ☐

Please give your reasons

The HBF notes that the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023, which introduced the automatic annual increase starting on 1 April 2025. However, the increase is capped at 10% even if the inflation rate of the Bank of England CPI is higher.

Question 7: Do you agree that publishing fees three months in advance of any fee increase coming into force is enough time for notification and publication arrangements by LPAs?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF considers that a three-month lead in period is acceptable and should help to reduce the potential for increased workload associated with rushing applications in to avoid extra costs.

Question 8: Do you agree with our proposals to reduce the variable fee thresholds for residential outline, full and change of use planning applications?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF is concerned as to the impact this proposal might have on SME developers who are already struggling with a number of challenges. This upfront cost is usually not fundable as part of any borrowing, with development funding only becoming available once planning permission is obtained.

Question 9: Do you agree with our proposals to increase householder application fees to meet cost recovery?

- Yes ☐
- No ☐
- Don't know ☐

Please give your reasons

N/A

Question 10: Do you agree with our proposals to introduce a lower fee of £85 for those householder application types covered by Part 2 (Schedule 1) Paragraph 7a.

- Yes ☐
- No ☐
- Don't know ☐

Please give your reasons

N/A

Question 11: Do you think householders will be encouraged to build habitable garden rooms rather than build an extension to their homes because of the lower fee?

- Yes ☐
- No ☐
- Don't know ☐

Please give your reasons

N/A

Question 12: Do you agree with our proposals to double the fee for retrospective planning applications?

- Yes ☐
- No ☐
- Don't know ☐

Please give your reasons

N/A

Question 13: Do you consider that our proposed fees for reserved matters applications is an appropriate reflection of the resources/costs of processing these applications? If not, what fee structure should be used instead?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF supports the proposed reserved matters fee.

HBF does not agree that reserved matters should be treated as an application for full planning permission. Reserved matters are in practice a discharge of a condition of the specific details relating to the reserved matter, the wider planning considerations will have formed part of the outline application, with them also having been considered when allocating the site [applies to LDP allocated site].

Question 14: Do you consider that our proposed fee for Renewal Applications in Annex A is a robust reflection of the costs of processing these applications?

- Yes ☒
- No ☐
- Don't know ☐

Please provide evidence

HBF considers that the review of the application required to determine an extension of time is limited to a check of whether any relevant policies have significantly changed. Therefore, the work required to determine the application is limited and therefore the fee proposed is appropriate.

Question 15: Would it be more appropriate for a renewal application to have the same fee as the original application for planning permission being renewed (either the full or outline permission fee)?

- Yes ☐
- No ☒
- Don't know ☐

Please provide evidence

In most cases, even an extension of time application will not require the full consideration of all matters so paying a full fee again is considered unreasonable and would not reflect FCR.

Question 16: Do you consider that a fee should be charged for applications relating to LBCs or CACs?

- Yes ☐
- No ☐
- Don't know ☐

Please give your reasons and submit data/evidence

N/A

Question 17: Do you consider that a fee should be charged for applications relating to TPOs?

- Yes ☐
- No ☐
- Don't know ☐

Please give your reasons and submit data/evidence

N/A

Question 18: Are there any application types for which fees are not currently charged but which should require a fee?

- Yes ☐
- No ☐
- Don't know ☐

Please give your reasons and submit data/evidence

N/A

Question 19: Do you consider that the additional income arising from proposed fee increases should be ringfenced for spending within LPA planning departments?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF considers this one of the critical issues which needs to be resolved as part of the proposed changes being consulted on and prior to the proposed fee increases. The reason for the fee increases is to ensure that the LPA have the resources to be able to offer an efficient and effective service. As the consultation states at the start '*A resilient and high performing planning service is essential for a successful and inclusive country. It is fundamental to the delivery of national and local priorities providing certainty to business and communities about how places will grow and change.*' If the additional fees proposed are not ringfenced then there is no justification for the increase, as it is not the role of applicants to fund other areas of the Council, many of which are also funded by S106 agreements attached to larger planning permissions.

With regard to the use of the additional funding our understanding is that Planning departments are currently part funded from central funding. An increase in fees and associated

ringfencing should not result in this central funding being reduced otherwise there will be no additional funding available to the LPA.

Question 20: What are the current challenges/barriers to the ringfencing of planning fees in planning departments?

Please explain and give your reasons

There is a risk that ringfencing planning fee income could result in Councils reducing the planning function's future budget, meaning that after the fee increases there is in fact very little extra money available to improve the service.

Question 21: Do you consider that to support LPAs in ringfencing planning fees, Welsh Government should only implement fee increases where there has been a written commitment from an LPA to do so?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF fully supports this approach, as already outlined in our response to question 19. However, based on the wording of the question, we are concerned that this might be considered on a single Authority basis which could result in different planning fees in different LPAs. HBF opposes the introduction of local variations in planning fees, as this would unnecessarily complicate the planning system in Wales.

Question 22: Do you agree that appellants should pay a fee to submit an appeal?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF notes that the appeal process in Wales has also suffered from reduced performance in terms of speed since its creation. Since PEDW took over dealing with appeals in Wales the time scales associated with appeals has increased significantly. It currently takes 12 weeks to register an appeal and although this time has halved from last year it is still well above the stated target of 10 working days.

If the introduction of a fee can help improve this service, then it would be supported. We would however suggest that any fee should not apply where the appeal is as a result of a refusal contrary to officer recommendation or non-determination of the application and neither of these situations are the applicants fault.

Question 23: Do you agree that the 'costs' system provides a suitable mechanism to recover costs, which may include the appeal fee, following unreasonable behaviour by any party?

- Yes ☐
- No ☒
- Don't know ☐

Please give your reasons

The cost system is currently difficult system to use and is a route often not chosen by developers due to the complexities, the time and the perceived impact it might have on the relationship between a developer and the LPA in the future.

Question 24: Do you agree that a percentage of the planning application fee is the best way to set fees for planning appeals?

- Yes ☐
- No ☐
- Don't know ☒

Please give your reasons

Although this does appear to be the simplest and clearest way to calculate a fee, it is not clear why 50% has been chosen. HBF suggests that the work involved in determining an appeal is very different to that of a planning application, with the bulk of the work having already been carried out by the planning officer. It appears from the information provided in the consultation on current operational costs (Para.69) that the fees proposed to be raised are unlikely to have very little impact on the performance of PEDW, therefore HBF questions the benefit of introducing a new charge.

Question 25: Do you agree that 50% of the original planning application fee is fair and proportionate charge for planning appeals?

- Yes ☐
- No ☐
- Don't know ☒

Please give your reasons

See answer to Qu.24 there appears to be no justification for the choice of 50%.

Question 26: Do you agree with the proposed exceptions to a Planning Appeal fee? Are there any other appeal types that could be included as exceptions?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

An appeal which results from a refusal against officer recommendation should also be exempt from a fee.

Question 27: Do you have any other comments in relation to Planning Appeal Fees?

Please give your reasons

HBF does not support a fee for non-determination applications. Subject to all the information requested by the applicant having been provided then an appeal against non-determination is usually triggered by the poor performance of the LPA. This being the case it seems unreasonable for the applicant to have to pay for this appeal to be determined.

Question 28: Do you agree that fee categories should be simplified in the future?

- Yes ☐
- No ☐
- Don't know ☒

Please give your reasons

HBF notes that any future changes will be subject to separate consultation which is an approach we would support.

Question 29: What are your views on the options proposed?

Please give your reasons

HBF reserves its position until a separate consultation is launched. HBF notes that it is suggested that the current definition of major application (10 or more units) is too low and should be raised to 25. Such a rise would help SME developers.

Question 30: What is the current 'gap' in monetary/percentage terms between revenue received from current fee levels to the costs of running the development management service in your LPA area?

Please provide data

N/A

Question 31: What impact, positive or negative, will our proposals have on the income received in monetary and percentage terms, and the relationship to the costs of running a development management service both now and in the next 3-5 years until FCR is achieved?

Please provide data and explain your reasons.

N/A

Question 32: In relation to householder applications, what are the current costs associated with a “typical” householder application vs fee income (including officer time, admin time (registration, validation, comms), statutory notices etc)?

Please provide data

N/A

Question 33: For applicants using planning services, do you consider that our proposals will improve service delivery?

- Yes ☐
- No ☐
- Don't know X

Please give your reasons

It is difficult to answer this question in advance of the changes being implemented, also not knowing which changes will be made and when. An increase in revenue can only help if its ringfenced and current funding is not reduced as a result. How the additional funding is spent will impact on the actual outcomes in terms of LPA performance. However, it would seem reasonable to presume that if fees increase to FCA levels and are ringfenced then an improvement in the service offered by the LPA should be expected.

Question 34: For applicants using planning services, what are your general views on the impacts, either positive or negative, of our proposals?

Please give your reasons

It is difficult to answer this question in advance of the changes being implemented and also not knowing which changes will be made and when. However, we consider that there are no obvious proposals which appear likely to have a negative impact, other than the ones identified in earlier answers.

Question 35: Do you agree with that the Planning Performance Framework should be re-introduced?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

On the basis that a significant increase in planning fees is being proposed to reach FCR and this is being justified by the need to improve a service which has been identified by several recent reports as performing poorly, then monitoring progress is critical. However, we are not convinced that the previous PPF is the appropriate tool. A monitoring tool which contains no penalties and/or incentives would seem flawed and far less likely to drive change. We also note that any monitoring will require resources, so in view of the current lack of resources monitoring should be kept to a minimum and focus on indicators which directly relate to improvements in the service.

HBF agrees with a monitoring framework being introduced, however, we do not agree with just simply reinstating the previous PPF.

Question 36: Do you think that future planning application fee increases should be specifically linked to performance?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF considers this is critical as already discussed in answers to earlier questions. The performance of the planning department and in particular the time it takes to deliver an implementable planning permission [this includes planning permission, signed S106 agreement and discharge of a planning conditions as a minimum] is a major factor in the speed with which new homes are delivered as well as other types of development. Although the HBF accepts that speed is not the only factor to consider when looking at planning performance it is still very important.

Members report that the whole planning process is taking considerably longer than it used to. Starting with the time it takes to adopt/review LDPs to the time it takes to determine planning applications and discharge conditions. This is in part due to the additional legislative and policy requirements and other factors required to be considered when determining applications; however, we believe that the lack of resources, both in terms of the number of people and the level of experience also significantly contribute to this increased delay.

Question 37: Do you have any comments on the proposed content of APRs?

- Yes ☐
- No ☐
- Don't know ☐

Please give your reasons

The following amendments to the PPF are suggested:

INDICATOR 06. The local planning authority's current housing land supply in years. HBF notes that this question will need to be amended as there is no longer a requirement for a five-year land supply calculation. HBF suggests that instead a table should be provided showing the annual level of new homes delivery against the annual level of delivery required by the plan.

INDICATOR 07. Percentage of "major" applications determined within time periods required.

On the basis that a 'major' application in Wales is 10 units or more means that this category includes a large size range of applications. HBF requests that this question should be split into further sub sections looking at housing applications with larger numbers.

Also, the time taken to sign the S106 should be monitored as the application is not actually granted until the S106 is signed.

INDICATOR 12. Percentage of Member made decisions against officer advice.

HBF suggest that this should record the number rather than the percentage.

INDICATOR 13. Percentage of appeals dismissed.

HBF suggest that this should record the number rather than the percentage.

INDICATOR 16. Does the local planning authority have an officer on duty to provide advice to members of the public?

HBF notes that the way LPA planning departments operate has changed significantly with officers often working from home. Members report that it has become very difficult to contact an officer other than by email. HBF considers that the ability to contact planning officers face to face is a critical part of the need to improve the service. Accordingly, this question needs to be reconsidered.

Furthermore, there are currently no incentives/ penalties associated with the PPF; therefore, it lacks teeth and is unlikely to help drive an improvement in performance. If these aren't introduced it does raise the question as to why the data would be collected, particularly as having to collect the data is a draw on resources.

Question 38: What are the key indicators which you think the performance of authorities should be measured against?

Please explain and give your reasons

Please see answer to previous question.

Time taken to achieve an 'implementable' planning condition.

Time taken to provide pre-application advice, the time from when developer request advice to the issuing of the advice.

Time to discharge planning conditions, most LPAs register these as applications, but they need to be recorded separately.

HBF suggests that a full timescale [submission to implementable consent] should be recorded for all housing applications over 100 units.

Question 39: What are your views on the current performance bands - Improve (red), Fair (yellow) and Good (green)? Do you think they should be changed?

- Yes ☐
- No ☐
- Don't know ☐

If yes, please give your reasons

HBF doesn't have any strong views on the colours, although we consider the word 'fair' is very open to interpretation.

Question 40: Are there any quantitative metrics not included which should be?

- Yes ☒
- No ☐
- Don't know ☐

Please indicate what additional quantitative metrics you consider should be included and explain why

- Response speed of statutory consultees
- Time to respond to requests for pre-application advice
- Details of award of costs made against LPAs at appeal
- Costs incurred defending all appeals that were allowed
- Planning Permissions and Reserved matters refused contrary to officer recommendations
- Referrals/Refusals on allocated sites
- Time between resolution at committee to signing Section 106 Agreements
- The length of time taken for a decision on a called-in application

Question 41: Are there any qualitative metrics not included which should be?

- Yes ☐
- No ☐
- Don't know ☐

Please indicate what additional quantitative metrics you consider should be included and explain why.

Question 42: Do you think the current targets and indicators are the correct ones in relation to the performance of the development management service?

- Yes ☐
- No ☒
- Don't know ☐

Please give your reasons

HBF suggests that there needs to be a measure of how long it takes to deliver an 'implementable' planning permission rather than just a measure against the statutory time frame. Current targets do not provide the full picture as an application could fall into poor for being just one day over target whilst others could take significantly longer.

Question 43: Do you think the current targets and indicators are the correct ones in relation to the performance of the development plan service?

- Yes ☐
- No ☒
- Don't know ☐

Please give your reasons

INDICATOR 03. Annual Monitoring Reports (AMRs) produced following LDP adoption

HBF questions what purpose this serves as most LPAs do not consult on their AMRs and as far as we are aware nothing happens following their submission. From the ones we have seen it appears a very resource heavy document, with little or no purpose.

INDICATOR 06. The local planning authority's current housing land supply in years

The five-year land requirement no longer applies in Wales although we would fully support its reintroduction.

HBF would suggest a new measure based around the number of homes delivered annually broken down by type [allocated site, windfall, brownfield] and tenure against those predicted by the plan.

Question 44: Do you agree that the performance of local planning authorities for speed of decision-making should be assessed on the percentage of applications that are determined within the statutory determination period i.e. excluding extension of times and Planning Performance Agreements?

- Yes ☐
- No ☒

- Don't know ☐

Please give your reasons

HBF considers all applications should be included in the monitoring, the use of PPAs has increased and are often used by members. One option would be to record them separately.

Question 45: Do you think that introducing resilience measures into APRs is a useful addition to performance reporting?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

HBF consider the suggested measures will provide a valuable picture of how the LPA is functioning over and above the PPF targets.

Question 46: Do you agree with the broad measures proposed? If not, why and what others should be included?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

Question 47: What do you consider to be the greatest skills and expertise gaps in local planning authorities and what impact is this currently having on service delivery?

Please provide examples/evidence

HBF members consider that being unable to meet LPA planners face to face is detrimental to the planning process.

Members also report that planning officers are not empowered to make decisions. Planning decisions will always be a balance of competing factors, but we believe it's the planning officer's job to consider these and come to an 'on balance decision', rather than just report all the various comments received from consultees.

Question 48: What do you consider to be the main barriers faced by LPAs in recruiting and retaining staff?

Please provide examples/evidence

A HBF member has provided the following comments:

Speed of decision making, bureaucratic processes will slow things down, might favour more standardised or traditional approaches – less creativity

Decision-making may need to align with political directives

Resource / IT constraints may prevent authorisation of fast pc (needed for graphics), specialist software – limiting ability to do job professionally.

LPA's pay less than private consultancy - when in middle of career a jump from Consultancy to LPA unlikely to be financially viable.

Job Security – limited term posts often posted – concern over long term job security.

Pay structures within LPA's make it difficult to reward good performance/improvement.

Question 49: Are current salaries and career structures sufficient to retain planning staff?

- Yes ☐
- No ☒
- Don't know ☐

Please provides examples/evidence.

Based on recent job applications it appears that many LPA job applications are offering a lower wage than an equivalent private sector role. It appears that there can often be a difference of between £5-10K.

Question 50: Does your LPA currently offer opportunities for early career planners? Have you had success in retaining staff?

Please provide examples/evidence

N/A

Question 51: In addition to increasing planning fees, in what other ways could Welsh Government support greater capacity and capability within local planning departments and pathways into the profession?

Please provide examples of existing good practice or initiatives if possible

HBF suggests it would help if clearer guidance and training is provided whenever new legislative requirements are made particularly when they apply immediately and retrospectively as happen with recent amendments to Chapter 6 PPW12. Such training should, be made available to all sides involved in planning, public and private.

Question 52: Do you have any other ideas to help resource the planning system?

Please explain how you think the proposal could help resources

HBF considers that currently none of the measures proposed in this consultation will result in improvements in the planning service for at least 2 – 3 years. WE consider that unless some short terms options are considered an implemented then during this 2-3 year period we will continue to see a delay in the adoption of updated replacement LDP's and an associated continued decline in the number of new homes delivered across Wales.

HBF suggests that a short-term fix could include Welsh Government producing guidance and advice on the use of PPAs and the use of the private sector to help deal with planning application backlogs. They are both solutions that happen already but as I understand it many LPAs are nervous about them.

Question 53: Is there demand for undergraduate/post graduate bursary schemes in Wales? If responding on behalf of an LPA how many individuals would you wish to put forward and how often?

- Yes ☐
- No ☐
- Don't know x

Please gives your reasons

HBF is aware that bursary schemes currently run in England and Scotland, and we can see no reason why Wales shouldn't have a similar scheme. Many planners who start their career stay in Wales and often planners who start their career outside of Wales do not chose to move to roles in Wales. Wales does have a university offering a planning course it would seem sensible to encourage students to tend this course as there is a reasonable chance they will stay and work in Wales.

Question 54: Is there demand for undergraduate/post graduate apprenticeship schemes in Wales? If responding on behalf of an LPA how many individuals would you wish to put forward and how often?

- Yes ☐
- No ☐
- Don't know x

Please gives your reasons

Although the HBF has no evidence available to support such schemes, it is often difficult to judge demand for something before it is available. There clearly is however a need for more planners so we would support any scheme which will encourage more people into the

profession. University education is not for everyone, and we consider planning is the type of profession which can be learnt on the job.

Question 55: Where do you consider additional staffing resources secured via bursary/apprenticeship schemes should be directed to have the most impact? For example, within LPA planning services and or the delivery of CJC strategic and specialist planning functions.

Please provide evidence and explain your reasons

Planners who come through bursary/apprenticeship schemes are more likely to be inexperienced planners. Therefore, their job role is as important as which organisation. HBF considers that they are likely to be more productive with the LPA where they can help deal with the smaller less complex applications, helping to free up time for more experienced officers to deal with the more complex applications.

Question 56: What are your views on merits and challenges of establishing regional/larger than local shared services?

Please provide evidence and give your reasons

HBF questions how they would be resourced without losing staff from existing services. We are also unsure how they will help determine larger housing applications. There will also need to be a clear set of roles as it's not just about dealing with the application, there is likely to be a pre-app, S106 and discharge of conditions linked to the application.

Question 57: Do you agree that planning skills hubs should be located within CJsCs

- Yes ☐
- No ☐
- Don't know ☒

Please give your reasons

Although in principle this would seem a sensible suggestion there are currently two unknowns, firstly the exact role of the hub and the fact that the CJsCs have not yet been operating long enough to fully understand how they work or where they work from.

Question 58: How do you think a planning skills hub(s) could be resourced considering governance, financial and staffing requirements?

Please provide evidence and give your reasons

HBF suggests that due to the current lack of resources and the resultant delay in housing delivery, due to both the time it takes to determine planning applications but also the updating of LDPs, resources should be concentrated on the LPA planning services initially. As the CJsCs

start to progress their SDPs then decisions can be made for the need for extra resources which may be needed to avoid resources being taken from LDP teams at critical times in the plan making process. There are a number of plans in review across Wales which are likely to be at inquiry stage over the next 2-3 years. We'd also suggest that in terms of strategic and specialist roles these are likely to be more suited to planners with several years' experience rather than those newly qualified.

Question 59: Do you agree that planning skills hubs could potentially be funded by a proportion of fee income from each LPA be used to resource the hub?

- Yes ☒
- No ☐
- Don't know ☐

Please give your reasons

Yes, in principle but it will in part depend on who works within the planning hub and what type of applications they work on. For example, if the Hub were set up to deal with green energy related applications only, then it would seem reasonable that this should be funded in part by only these type of planning applications.

Question 60: Do you agree with our proposal to change the statutory review period for LDPs from 4 to 6 years?

- Yes ☐
- No ☒
- Don't know ☐

Please give your reasons

HBF strongly objects to this proposal as we consider it will lead to a further reduction in the number of homes delivered. Welsh Planning Policy requires us to work within a plan led system and for this to operate effectively then the plans need to be as up to date as possible. Although, there have been a number of unexpected reasons why the current round of plan reviews is significantly behind schedule, with many plans likely to take well over four years to review. The current minimum time period for a plan to have on adoption is 10 years so if you take the proposed 6 years and add four years to carry out the review this will result in plans becoming out of date making it even harder to operate within a plan led system. There is currently no guarantee of when SDPs will be adopted and therefore no guarantee of when the new LDP light system will start to operate. Even with LDP lights as they have not been prepared before in Wales there is no guarantee that they will result in a faster review period as suggested. HBF suggests that any change to the review period should at minimum wait until there is certainty of the time scales for the adoption of SDPs and the resultant ability to move

from the current LDP to the LDP light system. We would suggest that such certainty will only be available at the point all SDPs in Wales have reached Deposit stage.

Question 61: Do you think that a shorter or longer review period would be more appropriate?

- Yes ☐
- No ☒
- Don't know ☐

Please give your reasons

HBF considers that the current review period is appropriate and necessary to ensure plans are kept up to date and that enough land is allocated and available for the construction of new homes.

Question 62: What would be the resource implications, both staffing and financial, if the statutory review period was changed to 6-year review period?

Please provide data and evidence

HBF considers that the length of the review period should not make a difference to resources, certainly not to staffing, as the staff are already employed to work as planners and often specifically to work on the LDP as their main role.

Question 63: To what extent would a six-year review period assist LPAs in moving towards the regional delivery agenda?

Please give your reasons

N/A

Question 64: What, in your opinion, would the likely effects of our proposals have on the Welsh Language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English?

Do you think there are opportunities to promote any positive effects?

Do you think there are opportunities to mitigate any adverse effects?

Please explain and give your reasons

N/A

Question 65: In your opinion, could any of our proposals be formulated or changed so as to:

- have positive effects of more positive effects on using the Welsh language and not on treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Please explain and give your reasons

N/A

Question 66: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

HBF would also suggest there is potential for short term action around providing guidance and advice on the use of PPAs and the use of the private sector to help deal with planning application backlogs. They are both things that happen already but there is some nervousness among some LPAs.

This is what's available in England <https://www.local.gov.uk/pas/development-mgmt/pre-application-advice-and-planning-performance-agreements-ppas/planning>

HBF would suggest that the performance of WG regarding decisions being considered by the Welsh Ministers / 'called in' applications should be monitored and timescales set in which decisions should be made.