

Consultation reference: WG20088

## Consultation Response Form

### Positive Planning - A consultation on proposals to reform the planning system in Wales

We would like your views on our proposals to change the planning system in Wales. This requires changes to primary legislation, secondary legislation, and policy and guidance.

***Please submit your comments by 26/02/2014.***

If you have any queries on this consultation, please email:  
[planconsultations-d@wales.gsi.gov.uk](mailto:planconsultations-d@wales.gsi.gov.uk) or telephone Switchboard on 0300 0603300 or 08450103300.

#### Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tell us this in writing when you send your response or tick the box at the end of this form. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Consultation reference: WG20088

<b>Positive Planning - A consultation on proposals to reform the planning system in Wales</b>		
<b>Date of consultation period: 04/12/2013 – 26/02/2014</b>		
<b>Name</b>	Shea Jones	
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<b>Type</b> <i>(please select one from the following)</i>	Businesses/ Consultants	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, social enterprises, religious, and not for profit organisations)	<input checked="" type="checkbox"/>
	Other (other groups not listed above) or individual	<input type="checkbox"/>

Consultation reference: WG20088

**Supporting Culture Change**

<b>Q1</b>	Do you agree that the proposed remit for a Planning Advisory and Improvement Service will help local planning authorities and stakeholders to improve performance?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

CHC supports this idea. Planning applications can be extremely complex and a shift towards a culture which 'enables' development is to be applauded. It is important that this cultural shift is adopted across all LA departments who have a role in the planning process e.g. highways, environmental health, leisure, education etc. The model has potential to improve and address many of the current system's shortcomings:

- Inconsistencies across the Welsh Local Planning Authorities (LPA's) in terms of interpretation of national planning guidance e.g. Manual for Streets
- Inconsistencies in terms of the skills and 'pro' and/or 'anti' development approach.

We think that the proposed remit:

- Will help to quickly and consistently embed emerging best practice across Welsh LPA's.
- Will provide incentive for a 'performance culture' in Welsh LPA's
- Has the potential to become established and regarded as a centre of excellence in planning, with the potential to guide and drive forward better outcomes through the planning system in Wales.

<b>Q2</b>	Do you agree that existing Welsh Government support arrangements for the built environment sector in Wales should be reviewed?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

Providing support to the built environment sector in Wales is very important and increasing efficiency, reducing costs and expediting the process are critical factors to this. More co-operative working is required and as Welsh Government has a policy commitment to the pursuit of sustainable development, joined up working across multiple sectors is required to deliver this whilst a better integration of services is required in order to bring it to fruition. CHC supports the continuation of the Design Commission for Wales with regard to this much needed pursuit of design quality and DCFW's role in encouraging its delivery is important. CHC also particularly supports the role of Constructing Excellence Wales (CEW) and CREW Regeneration Wales (who are part of the CHC group structure) in supporting the built environment.

Consultation reference: WG20088

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Q3	Do you agree that competency frameworks should be prepared for planning practitioners and elected representatives to describe the skills, knowledge and behaviours necessary to deliver planning reform?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

The introduction of competency frameworks should improve decision making within the planning system and increase the consistency of decisions across LA areas in Wales. Any proposal would need to be complementary to existing frameworks and initiatives and not create unnecessary duplication. It is imperative that elected members with decision making powers on planning applications are well trained on the skills, knowledge and behaviours necessary to deliver planning reform.

CHC notes the Royal Town Planning Institute Cymru commissioned Study into the Operation of Planning Committees in Wales in 2013, which recognised that planning committees, committee members and chairs were all “influenced by a range of factors including corporate culture”. The Report made a number of recommendations which included a national programme of member training including the provision of an efficient and effective programme of ongoing member training, as well as mandatory. CHC members have expressed in the past that there is a wide variety of practice in the operation of planning committees and that there is a lack of consistency across Wales. Planning officers are being asked too much of and do not always have the appropriate skills to adequately deal with the changing face of planning whether it be in respect of Affordable housing or sustainable development. When it comes to Affordable housing the definition is interpreted differently across the principality. CHC would therefore welcome proposals for member training and that compulsory training be established which should focus on the role of members in needing to understand the planning system and their democratic role within the process.

In the current system, which varies considerably across Wales, the potential exists for untrained elected members to make planning decisions or to overturn professional recommendations according to local political considerations. This has for many years stifled the delivery of housing in particular and many other important forms of development in Wales.

CHC has received feedback that a planning issue which is causing major difficulties for RSLs is that Local Planning Authorities may seem to have little understanding of their lack of cooperation/resourcing with regard to the discharging of planning conditions

Consultation reference: WG20088

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Consultation reference: WG20088

## Active Stewardship

Q4	Do you agree that the National Development Framework will provide a robust framework for setting national priorities and aid delivery?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

It is vital that a national development framework would help to improve consistency in decision making although it must provide scope for adopting some level of local guidance where appropriate. The delivery of key strategic infrastructure projects is critical to the future economic success of Wales and this in turn will have a direct impact on all new major investment and development within the Principality. Integration with the Wales Infrastructure Investment Plan (WIIP) could be important.

It is imperative that the National Development Framework (NDF) is well prepared and relevant. Lessons learnt from the recently adopted National Planning Policy Framework (NPPF) in England may be of use during the preparation, such as the effectiveness of the 'presumption in favour of sustainable development', underpinning the whole policy.

In preparing the NDF, it may well be important to take into account developments with the Future Generations Bill and the National sustainable development goals and outcomes, as well as the proposed Natural Resources Policy (NRP).

Q5	Do you agree that Planning Policy Wales and Minerals Planning Policy Wales should be integrated to form a single document?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

CHC supports this proposal-simplifying planning policies wherever possible should always be WG's de-fault position.

Q6	Do you agree that a core set of development management policies should be prepared for consistent application by all local planning authorities?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

CHC feels that there are advantages to this in helping to standardise the approach taken by LPA's in setting out their policies, as creating a consistent approach across Wales will be advantageous to organisations who work across different LA areas and should lead to fewer appeals against planning decisions.

Consultation reference: WG20088

**In the current system, there is a tendency for each LPA to 'reinvent the wheel' whenever they are required to prepare new development plans. Consequently the target dates for adopting plans are rarely met and in many cases take many more years than anticipated. The effect of this on the development sector is obviously negative. This measure will, therefore, improve efficiency and reduce costs and promote development without necessarily diluting the quality of the policies.**

<b>Q7</b>	Do you agree that the proposed development hierarchy will help to ensure that planning applications are dealt with in a proportionate way dependent on their likely benefits and impacts?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>CHC supports a clear planning hierarchy. Nationally important applications span numerous local authority areas and affect large numbers of the population so it is wholly appropriate to introduce a hierarchical approach to decision making.</b></p> <p><b>However, by introducing a lower threshold of 10 houses for the definition 'Major Development' this in itself will slow down the delivery of housing projects in Wales. We do not agree that the figure should be this low as it over emphasises the impact of small to medium size housing developments without necessary justification.</b></p>			

<b>Q8</b>	Do you agree with the proposed categories and thresholds for Developments of National Significance set out in Annex B?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p>			

<b>Q9</b>	Do you agree with the proposed categories and thresholds for Major Developments set out in Annex B?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>

Consultation reference: WG20088

<p>Comments:</p> <p><b>By introducing a lower threshold of 10 houses for the definition 'Major Development' this in itself will slow down the delivery of housing projects in Wales. We do not agree that the figure should be this low as it over emphasises the impact of small to medium size housing developments without necessary justification.</b></p>
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Q10	Do you agree Developments of National Significance applications should be subject to mandatory pre-application notification, and consultation?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>Pre-application advice is critical to the majority of applications let alone those of National Significance.</b></p>			

Q11	Do you agree that a fee should be charged for pre-application advice for prospective Developments of National Significance applications?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>CHC feels that more information is required on fee levels.</b></p>			

Q12	Do you agree that the Planning Inspectorate Wales is the most appropriate body to undertake the processing of a Development of National Significance application?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>Although CHC feels PINS is the most appropriate body, it is important that it is given sufficient resource and specialist skills advice and a skills base when necessary. If PINS were to undertake this role, it should in no way detract from their capacity to process planning appeals in a timely and high quality fashion.</b></p> <p><b>Although the following point may not be relevant to this question in particular, CHC wanted to raise it-providing flexibility in respect of change within the use classes is significant with regard to facilitating a spatial re-arrangement of land and building uses, which is frequently a fundamental tenant to achieving regeneration. This change has a particular significance at present given WG's VVP initiative and a current UK wide interest in town and city centre residentialisation projects to service regeneration initiatives.</b></p>			



Consultation reference: WG20088

**CREW Regeneration Wales, which is part of the CHC group, is committed to undertaking research work during 2014 on the potential opportunity to re-introduce more residential use in town centres, and it will be focused on the linked social, economic and environmental implications ( i.e to secure sustainable development ) this will have on a location. CREW Regeneration Wales would welcome an opportunity to engage with colleagues in the Planning Division on this particular area of work.**

<b>Q13</b>	Do you agree that only one round of amendments to an application for Developments of National Significance should be permitted after it has been formally registered?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Comments:</p> <p><b>All types of proposals requiring planning approval are potentially subject to external forces that lead to amendments, therefore, to restrict the number of amendments in the way proposed would be unreasonable. However, the additional cost of administration that result from repeated amendments to applications for Developments of National Significance should be borne by the applicant.</b></p> <p><b>It is beneficial that Welsh Ministers have the discretion to require additional consultation on those amendments they consider necessary rather than an application being refused on a technicality.</b></p>			

<b>Q14</b>	Do you agree with the proposals for handling connected consents?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>Would an issue with a connected consent have a detrimental effect on the primary consent?</b></p>			

<b>Q15</b>	Do you agree that examination should follow a similar procedure to the proposed call-ins and appeals?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>An examination would demonstrate transparency. We see no need to invent an alternative system for determining DNS call-ins and appeals.</b></p>			

Consultation reference: WG20088

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<b>Q16</b>	Do you agree with the proposed division of responsibilities between the Welsh Ministers and the local planning authority at the post-determination stage?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: <b>Subject to the LPA having the required skills and resources.</b>			

<b>Q17</b>	Do you agree that the statement of case and draft statement of common ground should be produced when submitting an appeal?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: <b>This would offer advantages of time saving. However, the length of time in which to make an appeal post-refusal should not be curtailed.</b>			

<b>Q18</b>	Do you agree that the Planning Inspectorate should decide how to handle the examination of an appeal?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
Comments: <b>There should be agreed criteria and a set process for considering this to ensure full consideration and ensure transparency and trust in the process. It should be subject to clear and transparent reasoning being provided for the course of action chosen. We recognise and endorse the ability for PINS to decide whether a planning appeal should be conducted through an 'Informal Hearing' or 'Public Inquiry', since these methods are often inappropriate and time and resource consuming for all involved.</b>  <b>CHC has received feedback stating "As an affordable housing developer we rarely, if ever, choose these methods, preferring to opt for the 'written representations' route. This is because we recognise its advantages in terms of</b>			

Consultation reference: WG20088

**time and cost. This also avoids some negative publicity of the more public methods without losing the essential quality of decision making.**

**We would therefore suggest that appellants should be able to choose the written representations option, but that only PINS are able to choose the 'Informal Hearing' or 'Public Inquiry' routes as being more appropriate".**

<b>Q19</b>	Do you agree no changes should be made to the content of an application post appeal submission?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Comments:</p> <p><b>Subject to mutual agreement between appellant and LPA, it should be possible to amend the content of an application post appeal submission.</b></p>			

<b>Q20</b>	Do you agree with the proposal for the Welsh Ministers to be able to initiate awards of costs?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>Again, this should be subject to clear reasoning being provided and there should be input from both parties prior to reaching a decision on an award of costs to ensure that all background information has been presented.</b></p> <p><b>This would go some way to addressing the reasons why a disproportionate number of appellants choose the 'Informal Hearing' or 'Public Inquiry' routes.</b></p>			

Consultation reference: WG20088

Q21	Should fees be introduced to cover the costs of the Welsh Ministers resulting from an appeal?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: <b>Subject to a clear cost structure being provided?</b>			

Q22	Do you agree that a Commercial Appeals Service (CAS) should be introduced?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments: <b>As above.</b>			

Consultation reference: WG20088

## Improving Collaboration

Q23	Do you agree that local planning authorities should be merged to create larger units?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p>If this was to happen, its vital that the establishment of significantly larger LPAs doesn't give rise to concerns regarding the ability to connect with local communities. Hopefully this will improve consistency, help distribute resources and increase the level of expertise within individual LPA's, although whilst we recognise the advantages of certain geographically linked LPA's merging their resources to deliver more efficiently, LDP's, Minerals and other strategic plans, we do not think this should be extended to Development Control.</p> <p>It may well be important to consider the the Williams Commission Report which has been published since the Positive Planning consultation was published.</p>			

Q24	Do you think that a national park authority should continue to have responsibility for planning in their area?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Comments:</p> <p>Having to deal with 2 LPA's on a single application is extremely difficult-in a scenario where a single National Park is split between two or more LPAs, issues could arise as the opportunity for a different interpretation of policy within a single Park could lead to inconsistency. There are three examples in Wales where LPA's and NPA's determine applications within their own boundaries. In these areas, there is potential for the bodies to disagree on the approach to development: the LPA's being more pro-development, whereas the NPA's taking a more cautious approach to the impact of development. This can lead to an inbuilt conflict on major development issues to the detriment of the local economy. It is also inherently wasteful in terms of resources (planning officers, conservation officers).</p> <p>CHC does however support the consultation document's theme that there should be more and better collaboration between NPAs and other LAs.</p>			

Q25	Do you agree that strategic development plans should only be prepared in the identified areas?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p>More detail is needed in regards to the extent that the Cardiff and Swansea areas would cover and there is no mention of Newport, which should be</p>			

Consultation reference: WG20088

**considered with Cardiff, along with a wider defined area in south east Wales. Current proposals for SDP's i.e. Cardiff, Swansea and the A55 Corridor feels too restrictive. SE Wales, SW Wales, the M4 Corridor etc would be more strategic.**

<b>Q26</b>	Do you agree that the scope of Strategic Development Plans should be limited to the key issues identified in paragraph 5.29?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>WG needs to ensure clarity for the wider public in respect of what is included within the NDF, SDP and LDP.</b></p>			

<b>Q27</b>	Do you agree that a partnership between local planning authorities and social, economic and environmental stakeholders should oversee preparation of Strategic Development Plans?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>Subject to more clarity on who the stakeholders are. The SDP's should be developed with the full engagement of:</b></p> <p><b>Universities, Schools and Higher Education Centres</b>  <b>Health Boards</b>  <b>The Private Sector</b>  <b>Voluntary / Third Sector</b>  <b>Statutory Authorities e.g. NRW, WWDC etc.</b>  <b>Emergency Services</b></p> <p><b>Involvement from those outside Local Government will bring other issues to the forefront of discussions and make the plans more inclusive. This would echo the approach taken at LA levels to produce their 'Community Plans'.</b></p>			

Consultation reference: WG20088

Q28	Do you agree that a light touch Local Development Plan should be prepared in areas where there is a Strategic Development Plan?	Yes	No
		<input checked="checked" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>Planning committees must have sufficient training to ensure they fully understand any new system and their role and responsibilities within it. Light touch' must not be misconstrued for a lesser importance of planning policies.</b></p>			

Consultation reference: WG20088

## Improving Local Delivery

Q29	Do you agree with the essential elements of a good planning service identified in Annex A?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

CHC has received feedback that the the following criteria should be added-  
""Percentage of applications recommended for approval overturned (refused) by elected members." Several LPA's that we regularly engage with, overturn applications recommended for approval especially where local objections to social housing are prevalent.

The quality of online planning application databases is variable with some LPA's offering a very limited and non 'user-friendly' service. We would suggest that the best practice is emulated with a standard approach for all LPA's.

We note that in the section on Engagement, in the consultation document, there is no reference to a coordinated 'Development Team Approach' in relation to pre-application (and post-application) services. We have found that those authorities which coordinate the input of all technical disciplines (e.g highways, drainage, conservation) provide applicants with a better and more efficient service. Conversely, poorly performing LPA's tend to provide a very disjointed service where consultation responses from internal consultees are rarely considered jointly and are usually passed on to applicants in a haphazard fashion."

Q30	Do you agree that each local planning authority should produce and publish an annual performance report to agreed standards?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

CHC supports this requirement and feels that it is essential to ensure each LPA is functioning efficiently and within statutory periods.

Q31	Do you agree that where a local planning authority is designated as poorly performing there should be an option to submit planning applications for major development only to Welsh Ministers?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

CHC would agree with the basic premise that there should be an alternative process for applications to be determined in relation to poorly performing LPA's.



Consultation reference: WG20088

**However, the downside of this would be the potential for the Welsh Ministers to become swamped with applications for major development.**

**This should be subject to ongoing involvement with the LPA. The areas of poor performance and the root causes of the poor performance need to be established where an authority is poorly performing and then an appropriate response should be developed and implemented.**

<b>Q32</b>	Do you agree that Welsh Ministers should be able to direct preparation of a joint Local Development Plan?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Comments:</b>  <b>Where it is strategically beneficial to do so. However, in reality the LDP process is already somewhat cumbersome and ineffective in relation to timescales, therefore, if the Welsh Ministers intercede there should be a strict timetable for the joint plan to be prepared.</b></p> <p><b>Our members that are housing developers would not support measures which would lengthen or over complicate the LPD process in relation to housing provision over and above the current system.</b></p>			

<b>Q33</b>	Do you agree that Local Development Plans should plan for at least 15 years ahead and have a set end date beyond which they cease to be the development plan?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Comments:</b>  <b>CHC supports the idea of planning for a number of years although 15 years does seem like a significant time for a LDP to remain relevant as evidence bases can become out of date. WG would need to closely monitor the situation to maintain its relevance and take steps to implement change if required. In the event that a LPA has not adopted a LDP for over 15 years, there will be uncertainty about which policies do apply which will lead to a greater potential for problems to occur at planning stage.</b></p>			

Consultation reference: WG20088

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Q34	Do you agree that local planning authorities should work with town and community councils to produce place plans which can be adopted as supplementary planning guidance?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p>If this was introduced it would need to be very closely monitored by WG and may lead to some inconsistent decision making both within LA's and across LA areas.</p>			

Q35	Do you agree that where a development proposal accords with an allocation in an adopted development plan a new planning application process should be introduced, to ensure that only matters of detail such as design and layout are considered?	Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p>Simplifying the planning process where there has already been a high level of scrutiny would be welcomed. We agree with the basic premise that local communities should have a greater say in proactive plans for their area. However, we foresee that in practice, this approach would require considerable input from LPA's. Furthermore, there is a potential for significant variety in the quality of such 'Place Plans' as some communities may be far more inclined or well resourced to engage with this process. There is also the danger of an 'anti-development' mindset influencing the content of the 'Place Plans'.</p> <p>The provision of social and affordable housing and other forms of supported housing can often be very unpopular at Community Council level.</p>			

Q36	Do you support the proposal to allow a right of appeal against a local planning authority not registering a planning application?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p>Submitting a planning application and all of the supporting documentation is a very expensive exercise and there should be a duty on the LPA to register the application in a timely manner. There can also be time and cost implications for the applicant if an application is not processed within a reasonable timescale which could result in a particular development not going ahead e.g. grant funding being available in a particular financial year. We support the right of appeal as otherwise, this would leave developers powerless against scenarios</p>			

Consultation reference: WG20088

where LPA's deliberately hold back registration of applications.

Q37	Should the requirement for mandatory design and access statements be removed?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p>Clarity is required on what alternative methods would be adopted to achieve good design. A blanket requirement for Design &amp; Access Statement's (DAS's), such as has existed for the past 7 years is not justified. A DAS should not be necessary in respect of minor householder development, minor amendments to a consented scheme and numerous other forms of development where design and access are not primary considerations. However, for major developments, housing developments and other sensitive forms of development, a DAS is an effective way for application to summarise their approach to a number of design issues and enables planning officers to efficiently appraise the design and access issues of proposals.</p>			

Q38	Should the requirement to advertise planning applications for certain developments in a local newspaper be removed?	Yes	No
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Comments:</p> <p>Consideration should be given to using web/social media-based platforms as the use of traditional based platforms will reach fewer and fewer people over time. When LPAs can demonstrate that they have effective systems in place (particularly for hard to reach groups and individuals) this should be supported. Alternatives which do not purely rely on electronic communications should also be included as the internet is not available to all and is therefore not ready to take on this role. We would recommend that there should be a transitional period where both forms of advertisements are used.</p>			

Q39	Should there be any local variation within a national	Yes	No
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Consultation reference: WG20088

	scheme of delegation for decision making on applications?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Comments:</p> <p><b>Consistency is critical to organisations working across LA areas. There should be a single National format for delegation and decision making on applications.</b></p> <p><b>Allowing variation, would open up the potential for the level of inconsistency that is currently experienced. This currently leads to the politicisation of the development process, which frustrates the delivery of development and the social and economic benefits which it can bring.</b></p> <p><b>We support the Consultation Proposals in 'Positive Planning' in relation to a single scheme of delegation, targets for the percentage of schemes delegated and the size limits on planning committees. We would also recommend that all members assigned to planning committees are subject to mandatory training in planning and design.</b></p>			

Q40	Do you agree that a minor material change should be restricted to "one whose scale and nature results in a development which is not substantially different from that which has been approved"?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>Anything other than this restriction could lead to some applicants abusing the system. We think that Welsh Ministers should produce guidance on what constitutes a 'minor material amendment' as the potential exists for considerable confusion and disagreement over this definition.</b></p>			

Q41	Do you agree that the proposals strike a balance between the need to preserve land used as Town and Village Greens and providing greater certainty for developers?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>This situation will need to be monitored closely by WG to ensure that the changes are having the desired effect and there must be a willingness on the part of WG to take further action if required.</b></p>			

Consultation reference: WG20088

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<b>Q42</b>	Do you agree that the proposals will reduce delay in the planning enforcement system?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>Subject to LPA's having sufficient resources allocated to enforcement measures. We would be in favour of a more effective, clear cut enforcement sytem.</b></p>			

<b>Q43</b>	Do you agree with the introduction of temporary stop notices to the planning enforcement system in Wales?	Yes	No
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p> <p><b>This will act as a more effective deterrent than currently exists to unauthroised development.</b></p>			

I do not want my name/or address published with my response (please tick) <input type="checkbox"/>
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Consultation reference: WG20088

## **How to Respond**

**Please submit your comments in any of the following ways:**

<b>Email</b>
Please complete the consultation response form and send it to: <a href="mailto:planconsultations-d@wales.gsi.gov.uk">planconsultations-d@wales.gsi.gov.uk</a>  (Please include 'Positive Planning – WG20088' in the subject line).
<b>Post</b>
Please complete the consultation form and send it to: <b>Planning Bill Team</b> <b>Planning Division</b> <b>Welsh Assembly Government</b> <b>Cathays Park</b> <b>Cardiff</b> <b>CF10 3NQ</b>
<b>Additional information</b>
If you have any queries on this consultation, please email: <a href="mailto:planconsultations-d@wales.gsi.gov.uk">planconsultations-d@wales.gsi.gov.uk</a> or  telephone: 0300 0603300 or 08450103300