

**COMMENTS FROM REDROW HOMES to ES.Comm@wales.gov.uk –  
General principles of Planning (Wales) Bill Consultation**

| Topic                                              | Page in Ex. Mem | Redrow's Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.National Development Framework (NDF)             | 13              | <p>Redrow supports the introduction of the NDF. Sitting at the top of the development plan hierarchy it should provide clarity and appropriate support to deliver major infrastructure projects. This is something that the Wales Spatial Plan did not achieve.</p> <p>Redrow recommends that the NDF undergoes a process of genuine public engagement and scrutiny in its preparation and then it is reviewed every three years to ensure it remains robust and is achieving the objectives it sets out.</p> <p>While the NDF is unlikely to include housing schemes (as most are not large enough to justify inclusion), it is considered that strategic housing issues will play a significant role in Plan. As such, it is considered appropriate that the Plan should include a National Housing Target to instill a pro-growth agenda in all Welsh LPAs to achieve these aims.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2.Strategic Planning (Strategic Development Plans) | 15              | <p>The implementation of Strategic Development Plans is considered to be long overdue and is supported by Redrow. It is considered important to develop and agree the strategic boundaries, based on Market Areas (e.g. housing, employment etc) that often cross local authority boundaries, and not follow existing administrative boundaries.</p> <p>With regard to housing provision, is it proposed that an overall housing demand figure is set across the SDP "area" and a full breakdown as to how it is to be divided between the constituent LPAs will be provided and open to scrutiny. The housing figures imposed upon then LPA must then be used as agreed.</p> <p>Redrow believes that the Panel must have an economic partner of standing; Perhaps even both a commercial development specialist and a housing specialist.</p> <p>Consideration must be given to the housing demand within the JHLAS study, for any LPA covered by an SDP, and where a land supply is below the 5 year minimum the policies on housing land supply within the development plan should be given an out of date status until the land supply is improved meet to the required identified need.</p> <p>Clarification is required over the status of existing LDPs upon adoption of a SDP. Will LPAs be forced to review their LDPs and then forced to review upon any review/revision of the SDP?</p> |
| 3.Local Development Plans                          | 19              | Redrow will comment, by January 2015, under the LDP review consultation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4.Notification of LDP withdrawal                   | 19              | Redrow supports this as it should speed up development plan production. It will ensure that LPAs look beyond the fixed end date of a Plan period and to gain understanding of the steer and focus for the successor Plan and not effectively start from the beginning once a certain date in time is reached. It will seek to encourage continued development plan production and review.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 5.Joint Local Development Plans                    | 20              | Redrow sees the merits of directing LPAs to prepare joint LDPs where LPAs do not elect to do so themselves. However, WG must be prepared to use such power and step in when LDP progress is slow, especially if poor progress is seen with neighbouring authorities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|                                                |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.Period for which development plan has effect | 20 | Redrow supports this change – too often plans can be adopted without giving clear indication of the expiration date of the Plan. As with point 4 above this should focus the minds of LPAs in looking beyond the end date of a Development Plan and working to adopt a new Plan before expiry of the current Plan. It is often the case that LPAs are using out of date development plans to guide development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 7.Pre-application Consultation                 | 23 | <p>Redrow agrees that pre-application consultation should be set for major development only and that the thresholds should be altered. Redrow would suggest 50 dwellings or 2.5ha as a threshold for a mandatory pre-application consultation but note that a lower threshold(s) would be appropriate in rural locations.</p> <p>It is also considered that a pre-consultation event is not a requirement for an allocated site whereby the Development Plan is less than 4 years old or within 4 years of a review (unless the developer wishes to hold such an event) given the level of consultation and scrutiny the development Plan process would have already been through.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 8.Pre-application services                     | 24 | <p>Redrow supports this in general. There is concern that there would be a requirement to publicise pre-application advice as it is often undertaken on a confidential basis. Some enquiries with LPAs do not result in proposals being taken further forward. As such, local residents could be made aware of speculative proposals that do not materialise and cause potential unnecessary concern within the local community. Confidentiality of development proposals must be respected.</p> <p>Consistency across all LPAs is important. Redrow welcomes that statutory consultees will be required to provide pre-application advice. A question is raised as to how this would work when many of the statutory consultees individually already charge for pre-application advice.</p> <p>Redrow suggests that the pre-application charge should be deductible from the cost of the application fee on the submission of a formal application. The pre-application charges should therefore be reflective of this.</p> <p>While Redrow appreciates that the pre-application advice cannot be binding on an LPA it is considered that a nationally published pre-application guidance document should outline that the advice provided at a pre-application should remain the opinion of the Council following the submission of a formal application unless new matters become apparent following the pre-application enquiry or from consultation with other bodies. If a statutory consultee does not respond within a specific timescale (four weeks for example) then that should be treated as them having no objection.</p> |
| 9.Developments of National Significance        | 26 | No comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10.Applications to the Welsh Ministers         | 27 | <p>While there appears some logic to this alternative route Redrow would need to be confident that the Welsh Ministers would be able to deal with the application in a more efficient and timely manner. There is often frustration when applications or appeals are dealt with by Welsh Ministers as they are seen as 'non-contactable' and applicants gain less contact than with the LPA. Also, no timescales are given for determination by the Welsh Ministers currently. Paragraph 3.67 of the explanatory memorandum states that 4 applications were called in in 2013. It would be interesting to look at the nature of these applications and the timescales for determination.</p> <p>Redrow also have concern over whether the WG have the resources to deal with applications submitted directly to them. Will the Welsh Ministers be monitored and the performance reviewed in the same way as LPAs?</p> <p>Redrow would also like clarification as to whether applying to Ministers under this route would result in any applicant losing the right of appeal as the Planning Inspectorate Wales are a function of the Welsh Government and appellant would be appealing to the Welsh Government against their own decision?</p>                                                                                                                                                                                                                                                                                                                                                                                          |
| 11.Planning Committees and Delegation          | 29 | Redrow would welcome the increased consistency of approach across all LPAs. Redrow will provide comment on the current consultation on this topic by January 2015.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12.Decision Notices                            | 31 | Redrow support this concept in principle. There is considered clear merit in having a single decision notice that one can look at to see the current stage of that application (i.e. which reserved matters have been agreed, conditions agreed etc). It                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

|                                            |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                            |     | is considered that a generic template for this should be produced that all LPAs will have to follow.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 13.Notification of Development             | 32  | With large sites and strategic sites notices are often updated on a weekly basis and the concept of a live notice will result in a large document. Redrow would recommend that a single site display should consist of an overview of information such as the developer, the application description, the application reference and information on where the plans/documents can be viewed (i.e. the web or at Council offices). Redrow would also encourage that any standalone related permissions (e.g. a replan of plots) would be incorporated by a single site display.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 14.Statutory Consultees                    | 33  | <p>Redrow welcomes a requirement for statutory consultees to respond within a specified timescale and welcome that this is proposed for pre-application enquiries also. Redrow suggests that this could be applied to development plan production work also.</p> <p>Redrow suggest that Welsh Water Dwr Cymru becomes a statutory consultee as they are a key 'player' in the development process and need to engage more deliberately in the decision making process and contribute in a timely manner.</p> <p>There is no mention over what happens when the statutory consultee does not respond within the specified timescale or the extent of response. For example, can the statutory consultee respond by saying that they require a further two weeks to comment or is it that once the timescale for response is reached and no response is made then it is taken that the statutory consultee has no objection? Redrow recommends that non-response of a statutory consultee within a set time-period, i.e. four weeks, will result in deemed no objection.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 15.Removal of Design and Access Statements | 35  | Redrow welcome this removal. Redrow also appreciates that there is a place for providing a design document within larger planning application. Redrow will provide comment on the current Design in the Planning Process consultation by January 2015.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 16.Town and Village Greens                 | 36  | Redrow fully support this approach. This change should be robustly defended against by any third party objections to the changes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 17.Enforcement                             | 38  | No comment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 18.Planning Appeals                        | 41  | Redrow strongly oppose the proposal not to accept further changes to appeal proposals. In the spirit of positive planning and enabling development, these proposals are considered counterproductive. In Redrow's experience, and it is expected that the Planning Inspectorate would feel the same, post appeal negotiations with LPAs often result in matters being agreed and thus less matters for the Inspector to resolve on and ultimately a better more sustainable scheme to which all parties can benefit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Pre-consultation costs to developers       | 127 | <p>Paragraph 7.196 states that the total minimum cost to a developer to undertake a pre-application consultation event would be between £360 and £1,320 per site. It then goes on to suggest that the cost to the development industry would be an additional £367,000 per year. Crucially it also states that the proposed pre-consultation event would have no savings to anyone else. The Council will still have to undertake the same level of consultation that they currently do and Redrow believe that the same residents would raise concern/objection in the same way following receipt of the planning application, regardless of the pre-consultation event.</p> <p>The cost of the consultation event is considered to be grossly underestimated. Paragraph 7.195 solely looks at the cost of writing up on the responses from the consultation event and concludes that they would be between £360 and £1,320. From recent experience in England Redrow's costs have been substantially higher for such consultation events. Costs associated with setting up a consultancy team, that team having meetings to discuss the pre-consultation event, the team preparing the material for the event, advertising the event, a consultancy team presence (e.g. planning consultants, highway consultant, drainage consultant etc) at the event, venue hire and then the cost of producing the pre-consultation event documents has cost from £6000 for a 43 unit scheme to over £10,000 for a 360 unit scheme, excluding Redrow's internal costs.</p> |

DRAFT