

[REDACTED]

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**From:** Smith, Steve  
**Sent:** 22 August 2023 09:21  
**To:** [REDACTED]  
**Subject:** DNS Applications

Hi both, I trust you are both well.

I write as instructed by Planning Committee to express concern and frustration over process around DNS applications and to request more flexibility and consideration to LPA's.

You will of course be aware of the capacity issues in the planning system and local authorities in general. It is impacting us all, not just LPA's and we are sure both PEDW and WG are feeling the strain. For our part, Blaenau Gwent is amongst the smallest LPA's and providing a responsive and efficient service is a daily challenge but even the larger Authorities are struggling with capacity and resilience. All in the context of facing further cuts in 2023/24 onwards.

At the moment we have 3 live DNS and at least two/three more pending at PAC or slightly earlier stage. It may just be a one off occurrence but we are being stretched to the limit trying to deal with the daily grind of applications on top of these DNS schemes which apart from other issues is affecting the wellbeing of staff.

We have recently changed our delegation and reporting process in an attempt to meet LIR timescales. We have already surrendered one LIR fee due to the unrealistic timetable of 5 week turnaround; that one was due over the Christmas shutdown, which was totally unrealistic for us to complete.

We are finding that developers are not fully engaging at pre-app stage (or at best paying lip service to it). In most cases, the 5 week period is effectively a window in which to read, consider and report on a new, largely unseen and major proposal.

Having this many DNS for wind development in such a small geographical area is raising real issues around cumulative impact e.g. noise. 5 weeks just doesn't give us time to have full regard to matters when cross boundary liaison is required and deal with specialist topics that often require us to procure expert consultancy advice. Our internal consultees are at full stretch dealing with their own service caseloads and input into planning is but one element of their role

To compound matters these schemes are landing over the summer and Christmas holiday periods when staff annual leave is further impacting on our ability to meet timescales.

There are two further causes of frustration. Firstly we had a recent case of being notified of a pending Hearing and that we would be given at least a month's notice. Without an early heads up of the actual date, we couldn't plan resources and staff couldn't book leave. We were given a potential date window but ended up (despite us chasing confirmation) being given a few weeks' notice of a date outside of the initial window after months of no contact at all. That Hearing will be held this August - peak holiday season and staff availability is now an issue. We appreciate the work plan of Inspectors will inform potential dates but liaison with applicants and LPA's over convenient dates would be most helpful and good practice.

Secondly, the request for extensions of time on LIR always results in financial penalty for LPA's yet PEDW have the ability to "stop the clock" without recourse. This appears particularly unfair and puts pressure on local planning authorities when we have had recent instances of planning appeals taking over 4 months to even be registered. The decision target date for that written reps appeal is now March next year; over 12 months after it was submitted to PEDW. We fully appreciate the workload challenges being faced but the system appears to be weighed against LPA's who are committed to providing the best advice and information to the Inspector.

We look forward to your thoughts and feedback.

Best regards

Steve (obo BGCBC)

*Steve Smith  
Service Manager Development & Estates  
Regeneration Division  
BGCBC  
Steelworks Road  
Ebbw Vale  
01495 355510*