Planning Peer Review
Wiltshire Council

Final feedback report
July 2023

Contents

1. Executive summary

1. This report summarises the findings of a Planning Service peer review of Wiltshire Council, organised by the Local Government Association (LGA) with the Planning Advisory Service (PAS) and carried out by its trained peers. Wiltshire Council was formed in 2009. It is the fourth largest unitary council in England serving a population of nearly 510,000 including around 30,000 military personnel and their families.

2. The council is clearly committed to developing its planning service. The appointment of a chief planner was welcomed by many people we met. But we feel that a more visible wider senior officer and senior councillor commitment to transformation will be needed to deliver the changes to the service that the council desires.

3. Putting in place a new Local Plan to plan future housing and economic growth in Wiltshire is a key priority for the council's senior management team and senior councillors. The council is, rightly, pressing ahead with its plans despite national uncertainty around changes to planning legislation. We think that a more systematic, project management approach to future stages of the plan would be beneficial. Historically, opportunities have been missed to involve more councillors in the development of the plan. A risk averse approach to plan development also means that a number of people who contributed to the plan were not aware of its content before it was published to the public. We also found a similar risk averse approach and a disconnect between corporate decision making around issues such as asset acquisition and disposal and a reticence to speak to planners early in the process. This results in a lack of a joined-up approach to the council's development / regeneration aspirations.

4. Immediate priorities for the service are clear but a detailed service improvement plan overseen by senior councillors and officers would be helpful to ensure these priorities are delivered. The plan should also include the actions needed for transforming the development management service and preparing for upcoming legislative changes.

5. Development management is still delivered and organised broadly in line with the four predecessor district councils, although divided into six area teams. Across the teams, we found four very distinct services with inconsistent work practices and procedures and a variety of cultures. Committee numbers, structures, cultures and working practices need reviewing to deliver one, "best in class" Wiltshire wide development management service. We believe that the existing five planning committees (one strategic and four area based) should be replaced with one or two combined committees that deal with the work of the strategic and area committees. (One or two to be determined based on an analysis of the potential volume of applications.)

6. The level of decisions delegated to officers is appropriate. But some committee decisions are being made that are not in line with good decision-making principles and are indefensible at appeal costing local tax payers money. Additional training for councillors could help to reduce this ongoing risk.

7. Senior managers and councillors value planning staff and the relationships between councillors and officers are generally / overall good, particularly at a senior level. However, planning staff don't always feel that because they feel under-resourced. We found some good practice among planning staff but this was not applied consistently across the teams and working in six separate teams limits the ability to capitalise on the levels of resilience that a planning authority of this size should be able to demonstrate. We found some low morale, scepticism and a lack of trust about the likelihood of delivery of change. We found pockets of innovation and keenness to deliver continuous improvement but this was by no means universal.

8. There is a perception that resources are stretched and there are some significant issues with the timeliness of internal consultation responses. The council has allocated significant additional resources for funding planning staff. The council's planning IT system provides good performance management data although it is not clear to what extent team leaders and officers use this data to monitor performance and manage work.

9. The council recognises that customers of the planning service do not always receive a good level of service and that customer service is not consistent. Feedback from town and parish councils was mixed. Early support for neighbourhood plans was welcomed but there were frustrations with current resource constraints in relation to supporting neighbourhood plans and lack of ability to speak to case officers in relation to planning applications. We felt that increased training and engagement for town and parish councils could benefit Wiltshire Council as well as the towns and parishes by ensuring a better shared understanding of the challenges that the respective councils face in relation to planning matters.

10. Feedback from other stakeholders, agents and developers was also mixed but with a real and genuine appetite to work with the council to deliver an improved planning service and to deliver the right outcomes for Wiltshire's communities. Some work is underway to engage with agents and developers and we think that more can be done to continue to build relationships of mutual trust.

11. The council's self-assessment clearly sets out how the planning service priorities align with corporate priorities. We found senior managers are clear about the outcomes that they want from the planning service. But that doesn't necessarily result in the required outcomes happening, for example the council cannot demonstrate that it has enough housing in the pipeline to meet needs for the next five years which is a major issue for the council. It has led to a lot of speculative applications for development, resulting in housing development where the council would not necessarily want it and there are no immediate plans to address the situation, other than progressing the local plan as quickly as possible.

12. Despite not having a five-year land supply, delivery levels are good and the council has met the housing delivery test for the past three years but performance has been slipping year on year in terms of the speed of determining planning applications and planning income is also in decline compared with previous years.

13. Whilst the current focus on housing numbers is totally understandable, the council is not currently monitoring other outcomes from the local plan related to other policies and we heard about examples where outcomes are not being delivered because of delays in the planning function including major housing sites which could help alleviate the five year land supply issue.

2. Recommendations

14. The following table summarises the key recommendations from the peer review team:

1	Demonstrate clear senior political and officer leadership for achieving planning improvement priorities and ensuring that planning is better engaged in place shaping and the council's development and regeneration aspirations by: • using the current restructure plans to review links between key services such as planning, urban design and economic development • developing an implementation plan to deliver service priorities (including putting planning front and centre in the council's asset / regeneration / economic development aspirations); merging and transforming the six current development management teams; and plans for addressing potential upcoming changes in legislation; • setting up an implementation board made up of senior councillors and officers to oversee the delivery of the implementation plan; and • creating a developer forum with the cabinet member for economy and growth to support the delivery of strategic sites and articulate the vision for place.
2	Develop a project plan approach to the next stages of the Local Plan, the Minerals and Waste Plan, Gypsy and Traveller Plan and other planning documents to prioritise resources and including improving cross party, senior officer, stakeholder and resident engagement in the plan making process.
3	Review the scheme of delegation and numbers of committees to: • combine the functions of the area committees and strategic committee and reduce the total number of committees to one or two (depending on an analysis of the volumes of applications); • review the effectiveness of the call-in procedure to ensure it is not used simply to disagree with an officer recommendation; and • introduce measures to reduce the length of planning committees including (but not limited to) removal of the ability of unlimited speaking time at planning committee for divisional councillors; shorter officer presentations and a potential 'call over' for items where at the start of committee, councillors are asked to call items for presentation, debate and determination. This would enable those not called to be automatically determined in line with the recommendation. • review speaking arrangements to ensure a fairer balance between support and objection – for example by possibly limiting the number of speakers and / or reviewing the amount of time allocated to applicants if there are a lot of objectors.
4	Transform the development management service to become one Wiltshire planning service with a shared culture (in line with Wiltshire Council's "Identity") and consistent processes, practices and decision making. Ensure staff involvement in working up the actions needed to achieve this and include them in the implementation plan referred to in recommendation 1.
5	Consider providing some dedicated transformation resource to kick start the necessary change programme including organisational development.
6	Consider taking a proactive and targeted project management approach to granting permission for key housing sites and facilitating delivery of housing sites granted planning permission to assist with meeting five-year housing land supply prior to adoption of the Local Plan. The use of planning performance agreements (PPAs) would be part of this. PPAs (with associated charge for officer time) are an incredibly useful tool to improve project management of the full process, from pre-

	app through the discharge of conditions, and to facilitate early engagement with key stakeholders including key internal stakeholders
7	Ensure the proposed officer restructure provides sufficient management resource to support and prioritise service transformation.
8	Develop succession plans and career progression for the planning service.
9	Introduce a triage approach to determining planning applications and investigating enforcement complaints. Not all enforcement complaints need to be investigated and it should be possible to implement check lists and shorter reports for low-risk planning applications.
10	Set up an officer working group between Development Management and the Technical Support Team to assist with the effective use of the new IT system by case officers and managers.
11	Ensure that planning decisions are always signed off by a different officer to the one who carried out the assessment.
12	Improve training for councillors and for town and parish councils including regular planning updates, lessons learnt, site visits and webinars.
13	Better use existing mechanisms for communicating with town and parish councils about planning matters – area boards, town centre partnership boards, monthly town and parish council meetings.
14	Consider how to allocate enough space to facilitate teams working together as well as effective cross team working in an office environment regularly.
15	Consider implementing team site visits (including tech support) for lessons learnt etc.
16	Review existing neighbourhood plan resourcing and consider how to prioritise neighbourhood plan resource.
17	Improve focus on customer service by introducing a formal feedback loop from complaints to help shape service improvements and consider setting up a Planning Agents' Forum to provide information and seek views on improving customer service. This could include a regular newsletter to share information.
18	Review current approach to monitoring and consider allocation of resources to enable monitoring of a broader range of local plan objectives and policies.

3. Background and scope of the peer review

15. Peer challenges are managed and delivered by the sector for the sector. They are tailored to meet the individual council's needs and designed to complement and add value to a council's own performance and improvement focus. They help planning services review what they are trying to achieve; how they are going about it; what they are achieving; and what they need to improve.

16. Wiltshire Council was formed in 2009. It is the fourth largest unitary council in England serving a population of nearly 510,000 including around 30,000 military personnel and their families.

17. The over-arching objective for this review was to help the council create a more unified and resilient planning service. As one of the largest and most diverse planning authorities in the Country, Wiltshire has the potential to be at the leading of edge of planning practice nationally and an exemplar for other areas. The review explored whether the structure and resources of the planning service are appropriate for a planning authority of this size, focusing on core roles in terms of development management, local plan making, management and monitoring as well as the planning committees and decision making.

18. The peer challenge involved an assessment of the council's planning function against a framework which explores five main themes. These are:

- **Vision and leadership:** the council's leadership and corporate engagement of the planning service in this.
- **Performance management:** effective use of skills and resources to achieve value for money and continuous improvement of the planning service, including in decision making on proposals, and whether the service is adequately resourced.
- **Community engagement:** how the authority understands its community leadership role, especially in terms of the accessibility, customer focus and transparency of the planning process
- **Partnership engagement:** how the service works in partnership with other stakeholders to balance priorities and resources, address differing views and deliver shared ambitions.
- **Achieving outcomes:** the achievements of the planning service within the available resources and the planning services role as a facilitator to change in the area.

19. Peer challenges are delivered by experienced elected councillor and officer peers. The make-up of the peer team reflected the focus of the peer challenge and peers were selected based on their relevant expertise. The peers were:

- **Peer councillor:** Linda Haysey (Leader East Hertfordshire Council) linda.haysey@yahoo.co.uk.
- **Peer councillor:** Daniel Fitzhenry (Southampton City Council) Councillor.D.Fitzhenry@southampton.gov.uk
- **Lead officer:** Liz Hobden (Brighton & Hove) Liz.Hobden@brighton-hove.gov.uk
- **Senior Officer:** Anna Lee (Dorset) anna.lee@dorsetcouncil.gov.uk
- **Peer review manager:** Bridget Downton downtonbridget@outlook.com

4. Vision and leadership

20. Wiltshire Council is clearly committed to developing its planning service. We found an openness and a good level of self-awareness about the need for improvement. The appointment of a chief planner was welcomed by many people we met, both within the council and among its stakeholders. We heard that he is making good progress and is visible and accessible within the council and with external stakeholders. But we feel that a more visible senior officer and senior councillor commitment to the transformation needed would be a valuable next step in delivering the changes to the service that the council desires. We heard about the excellent way that the council has dealt with changes needed in other service areas, such as children's services, with a high profile, with corporate support for those issues. We feel that planning would benefit from a similar approach. This would be beneficial for securing the necessary changes to the planning service as well as demonstrating to developers and colleagues that the council is committed to delivering a "best in class" planning service. This is important because planning is key to delivering on the council's corporate aspirations including place shaping; regeneration; economic development; high quality customer service etc.

21. Since the appointment of the Director of Planning, cross-council working has improved. The relationship between planning and other council services is developing. We found a real appetite for change which is a refreshing contrast to a history of a lack of joint working and understanding for each other's perspectives.

22. Putting in place a new Local Plan to plan future housing and economic growth in Wiltshire is a key priority for the council's senior management team and senior councillors. The council's cabinet member for planning chairs a monthly Local Plan Programme Board to discuss progress and to hear about proposed policies, site allocations and evidence that will inform the new plan. The Leader of the Council and officers from the council's extended leadership team attend the Board.

23. The council's spatial planning team, supported by colleagues from other teams in the council, have been working extremely hard to get the Local Plan to its current stage. Historically there have been a number of delays to the plan preparation. Despite national uncertainty around pending changes to the National Planning Policy Framework, the council, sensibly, is keen to press ahead with its Local Plan. We think that a more systematic, project management approach to future stages of the plan would be beneficial. This also needs to be applied to the production of plans that are currently missing or out of date, such as the minerals and waste plan and a plan to deliver the housing needs of the Gypsy and Traveller communities.

24. Some policies in local plans can be contentious and meet with resistance from the community. Despite the very clear need for housing, many communities are resistant to these being built near them. So, councils often find it difficult to secure support for local plans and get them through the democratic process. Historically, there has been limited engagement of councillors from across the council in developing Wiltshire's Local Plan. This means that many councillors that we met were not clear about the content of the emerging plan and that council-wide buy in for it has not yet been secured. There is, of course, still time to engage councillors as the plan proceeds, which should now be addressed.

25. We also found that a number of managers across the council who had fed into the plan policies were not clear whether their comments had been addressed or not. The council, rightly, has put in place mechanisms to ensure a clear distinction between its role as local planning authority and its role as a landowner with an interest in developing its own land. It is important that there is a very clear separation with checks and balances in place to maintain this. But we found such a risk averse approach that there was a disconnect between corporate decision making around issues such as asset acquisition and disposal and a reticence to speak to planners early in the process. This results in a lack of a joined-up

approach to the council's development / regeneration aspirations. We also found evidence that this approach had been extended to a range of non-contentious policies that had nothing to do with land holdings. This meant that the process didn't feel open to colleagues who had contributed and so we couldn't be clear to what extent the Local Plan will be delivering the council's priorities.

26. The council's self-assessment clearly sets out the following five immediate priorities for the planning service:

- Secure an up-to-date Local Plan
- Regain a five-year housing land supply
- Deliver excellent customer service in line with the council's 'our identity'
- Complete the restructure of the planning service and fill vacant posts
- Improve morale across the service and reduce staff turnover.

27. We found that some planning staff were aware of these priorities but there is not currently a plan that sets out the detailed actions and timeline needed to deliver the priorities. We think that a detailed transformation plan, overseen by a board made up of senior officers and councillors would be helpful to ensure that the necessary transformation is delivered. This plan could also include the actions necessary to integrate the existing development management service which is still organised around the predecessor council arrangements. It would be beneficial if the plan also included the actions that the council needs to take in readiness for the significant national changes that are coming in relation to planning services.

5. Performance management

28. Historically there has not been the resource, the management capacity or the will to deliver the transformation needed to combine the six development management services into one Wiltshire Council development management service that meets the needs of local people and reflects the culture of Wiltshire Council. We found very distinct services in the six teams with inconsistent work practices and procedures and a variety of cultures. We think that some dedicated transformation resource would help to give this work the kick start that it needs. We understand why this work wasn't tackled as part of local government reorganisation back in 2009, but a significant amount of transformation is now needed to deliver one Wiltshire development management service. All of the managers in the development management service currently carry their own significant caseload which limits their capacity to focus on the changes needed to deliver a high quality, consistent Wiltshire wide service. We also found that some managers and councillors are not embracing Wiltshire Council with a significant allegiance to predecessor councils, processes and practices, particularly in relation to development management. This needs to change. It is 14 years since Wiltshire Council replaced the district councils.

29. The council operates four area-based committees (mirroring the predecessor district council boundaries) and one strategic committee. These area-based committees are frequently cancelled and most determine very few planning applications. Most significant planning applications are determined by the strategic committee with the local area planning committees only considering planning applications that have been called in by councillors. It is not clear why the strategic planning committee couldn't consider those applications that are called in by councillors. We understand that these arrangements were put in place as part of local government reorganisation to bring members of the predecessor councils along the unitary journey. The time is right now to review committee arrangements. The council should merge the functions of the area committees and the strategic committee. It would be sensible to carry out an analysis of the likely volumes of planning applications that this would result in to determine how many planning committees are necessary which we would estimate to be either 1 or 2. Obviously, the council will need to consider how local members, community groups and other stakeholders fully engage with the 1 or 2 planning committees but the benefits of reforming the current structure could also enable new methods to be introduced – possibly using technology or varying the locations that committees are held in from time to time.

30. We were concerned with some of the practices that we heard about in relation to planning committees. We heard a lot about the need for "local democracy" in relation to planning committees. Planning decisions are not a way of exercising local democracy. Planning decisions should be made with regard to the national and local policy context and material planning considerations. We have seen decisions made at planning committee that clearly demonstrate that committee members do not always understand their responsibility for taking appropriate policy-based decisions, for example in relation to 5-year land supply. We understand the frustration that some councillors feel in relation to speculative applications but this frustration should not play out in poor decision making that ends up costing the local tax payer money; and taking up a lot of time dealing with appeals that the council has limited chance of winning. At the same time as reducing the number of planning committees, the council should consider ways of reducing the length of committee including eliminating the unlimited time allowance for divisional members to address the planning committees. This is really poor practice. The council's speaking arrangements are also potentially biased towards objectors because of the unlimited number of speakers and lack of additional time given to developers to respond.

31. We also found a lack of understanding among some councillors about the roles of planning committees. We think that this is partly a training issue. The council provides clear guidance

and training for councillors involved in determining planning applications setting out the importance of open and transparent decision making. But this is only done after elections and there is no ongoing training or briefing in relation to planning for Wiltshire councillors. Useful appeal updates are provided to committees which is a good way of learning but we think that the committee members would benefit from a regular training programme to keep abreast of changes in planning and to be clearer about what good and bad decisions look like.

32. The council has high, appropriate levels of delegated decision making which is good. However, we did find that some senior officers sign off planning applications from their own caseload, which is poor practice that can be easily addressed. Using senior officers to sign off applications is a good idea and spreads the load of this part of the planning application processing, but senior officers should not sign off applications in their own case load.

33. Senior managers and councillors value planning staff and recognise them as being dedicated and committed. We found some officers demonstrating initiative to develop new ways of working and some good team rapport and support for one another. We heard about some positive support through buddying and mentoring. We found some cross-team working, such as sharing green belt experience and some good learning initiatives such as "case busters" and "show and tell". We think that the managers in the service need to capitalise on this. We also found some innovation and a real desire to deliver continuous improvement, for example in the technical support team.

34. However, the good practice that we saw is not being consistently applied across the different teams. And within the existing structures, there is limited sharing of work between teams which means workloads are not balanced and importantly, this impacts negatively on the resilience of the service to deal with the inevitable staff turnover that a planning authority of this size experiences. We also met with some officers who were resistant to change and didn't really recognise the need for it. Work will be needed to help shift this mind set. We recognise that there are plans to work with organisational development colleagues to develop the teams, cultures and behaviours that will be needed to successfully deliver the change needed.

35. Whilst senior managers and councillors value planning staff, we found that some staff do not feel confident of this. We found some low morale, scepticism and a lack of trust about the likelihood of delivery of change. People feel under enormous pressure and teams told us that they are frustrated because they find it difficult to deliver good outcomes. The level of committee overturns and hostile applications are getting some people down, with one team member telling us that they feel "outgunned and massively overworked". We found a lack of shared culture across planning and relationships between development management and technical support are not as strong as in some other councils. It doesn't feel like one team. We also heard that it is hard for new team members to learn the job because of virtual / hybrid working and no specific office space to meet in.

36. The relationships between councillors and officers are good. Senior level relationships are strong and respectful. Some of the committee practices referred to above and some of the inappropriate decision making can cause tension at times, but generally relationships between case officers and committee members are good.

37. In recognition of the importance of planning, the council has allocated significant additional resources for staffing of £668,000 to support the upcoming restructure as well as a budget for appeals. There is a current perception from some staff that the department is under-resourced and not paying competitive salaries. Recruitment and retention are an issue across the service, as they are nationally but there are some examples of good practice including employment of graduates, apprentices and "growing your own".

38. We heard from internal and external stakeholders that there are significant issues with internal consultation responses on planning applications not being provided in a timely way. This needs addressing. Some additional resource has been secured to increase ecology resources which was one of the areas of concern, but there are others including highways and flooding. We also heard about the large number of neighbourhood plans already adopted or in train / approaching review. The council would benefit from reviewing its approach to prioritising which neighbourhood plans it allocates resource to and reviewing resource levels accordingly.

39. The council's planning IT system provides good performance management data although it is not clear to what extent team leaders and officers use this data to monitor performance and manage work. And we also heard some concerns from staff about how to use IT system and clear differences in approach across the teams. This needs to be addressed so that the whole service can utilise performance management information effectively.

6. Community, stakeholder and partner engagement

40. The council recognises that customers of the planning service do not always receive a good level of service and that customer service is not consistent. There is also currently no structured mechanism for receiving and learning from customer feedback. Work is underway to address this.

41. Wiltshire has 253 parish or town councils with 51 neighbourhood development plans. Some of these councils gave us mixed feedback. They acknowledged that Wiltshire Council had been proactive in promoting and supporting neighbourhood planning. But we heard that resources are now too limited to meet the demand of the many town and parish councils that want to develop or renew their plans. We heard about some good examples of dealing with individual officers that was positive for town and parish councils. But we also heard about the frustrations of not being able to contact case officers in relation to their neighbourhood plans and planning applications.

42. Some of the feedback that we received from town and parish councils demonstrated their frustrations. Whilst there were clearly some legitimate issues that have not been adequately addressed or learnt from, some of the frustrations that we heard stemmed from issues outside the council's control, for example in relation to national planning policy and legislation that requires the council to act, or not, in a particular way. We feel that Wiltshire Council and the town and parish councils would benefit from more training, awareness raising and engagement, particularly for everyone to better understand "the art of the possible" in relation to some planning and enforcement issues. We absolutely recognise that there are a significant number of town and parish councils, but the council has a range of mechanisms already in place that it could build on to facilitate this including a monthly meeting that town and parish councils are invited to and the existing 18 area boards. Using technology to deliver webinars is also a good way of reaching larger audiences and post COVID is something that we are all more used to doing.

43. Some town and parish councils and some other stakeholders found the website difficult to use, particularly searching for and filtering on planning applications.

44. Feedback from other stakeholders was mixed but with a real and genuine appetite to work with the council to deliver an improved planning service and to deliver the right outcomes for Wiltshire's communities. We heard that communication has improved since the appointment of the Director of Planning. Agents, developers and stakeholders welcome this and are keen for the dialogue with the council to continue. Natural England were positive about their relationship with the council, as were stakeholders with an interest in heritage assets. Although those involved with heritage assets did have some concerns about resource levels and the appetite for enforcement in relation to heritage assets.

45. The council has set up a Wiltshire Development Forum to support the planning needs of local businesses and provide guidance and support to key local businesses to navigate through the planning system. The council also has plans to set up regular meetings for agents and this will help to improve communications with key developers. The council has provided some clear communications for agents about things like amendments which are helpful in managing expectations and balancing the need to negotiate good proposals but also in a timely fashion.

46. We heard about some good working relationships, particularly from agents on smaller schemes. But this wasn't universal. We heard that developers have faith in the skills and abilities of some planning officers but some concerns about inconsistencies. Some felt that it was difficult to get hold of case officers. We also heard frustrations about the pre-application service in terms of timeliness and indeed its lack of availability for smaller schemes. One developer had been told to seek pre-application advice only to be told that it wasn't available. Developers and agents told us that Wiltshire is in the "middle of the pack" in terms of their

dealings with planning authorities – Wiltshire is not as good as the best and not as bad as the worst. To improve communication, planning agents were keen to see a regular newsletter to share information and/or a planning agents forum.

47. Developers perceive a lack of a joined-up project management approach on strategic applications and would value a dedicated team and better relationships with those dealing with their applications – case officers and consultees. And some developers expressed concern about the confidence of some officers in resolving competing issues and the challenges of coming to a balanced planning view in the face of those competing issues. This is a key role of the case officer but we heard that sometimes conflicting consultation responses were simply shared with the developer without any conclusion about the implications of those conflicting views. We feel that a more joined up "team" approach to some of the more significant and strategic sites would benefit both developers and the various officers who need to input into determining large, complex schemes.

48. As well as improving the one team approach for dealing with significant and strategic sites, we also think that the council might want to consider setting up a forum to include senior politicians and officers to engage with strategic developers – not in relation to specific planning applications, but rather to discuss broader development opportunities and barriers in Wiltshire from the perspective of both the council and developers. This could also help inform some of the actions that the council might want to consider as part of its service transformation work.

7. Achieving outcomes

49. The council's self-assessment clearly sets out how the planning service priorities align with corporate priorities. And senior managers are clear about the outcomes that they want from the planning service:

- Place shaping and design
- Improve quality of development
- Attract investment
- Support rural economy
- Enable planning service to deliver net zero
- Increase affordable housing in rural areas

50. The council cannot demonstrate that it has enough housing in the pipeline to meet needs for the next five years. The lack of a five-year housing supply, in part caused by some stalled sites that would deliver significant numbers of homes, is a major issue for the council. It is resulting in a number of speculative applications for development resulting in housing development where the council would not necessarily want it and not in line with the concept of plan led development. This situation frustrates Wiltshire Council councillors as well as town and parish councils and local communities. Without a five-year land supply, councils have a lot less ability to refuse planning applications. The council is putting a lot of effort into getting an adopted local plan in place to tackle this but doesn't have a plan for how to try and regain a five-year land supply in the meantime. By understanding how many houses it needs to grant planning permission for and focussing efforts on some key applications to deliver this, it could reduce some of the pressure ahead of the local plan adoption. The plan will gain some more weight at the beginning of 2024 if the current proposed timescale for submission for independent inquiry is met. But more could be done ahead of that, and the council cannot be certain of the timescale for achieving a sound adopted plan, at which time it will be best protected from speculative development applications.

51. Despite not having a five-year land supply, delivery levels are good and the council has met the housing delivery test for the past three years, but performance has been slipping year on year in terms of the speed of determining planning applications and the council is also heavily reliant on extension of time agreements. This is a particular risk as the government may be introducing a wider range of performance measures. For major applications, quarter one of this year has shown a small improvement and for non-major applications, there has been a further small deterioration in the first quarter of this year:

	2019/20	2020/21	2021/22	2022/23	Q1 2023/24
% major applications determined within 13 weeks or a time agreed with applicant	94%	94%	67%	66%	71%
% non major applications determined within 8 weeks or a time agreed with applicant	94%	92%	77%	75%	71%
% appeals resulting in decisions being overturned where committee decision has gone against officer recommendation	20%	75%	43%	56%	

52. Planning income is also in decline compared with previous years:

Development Management Income
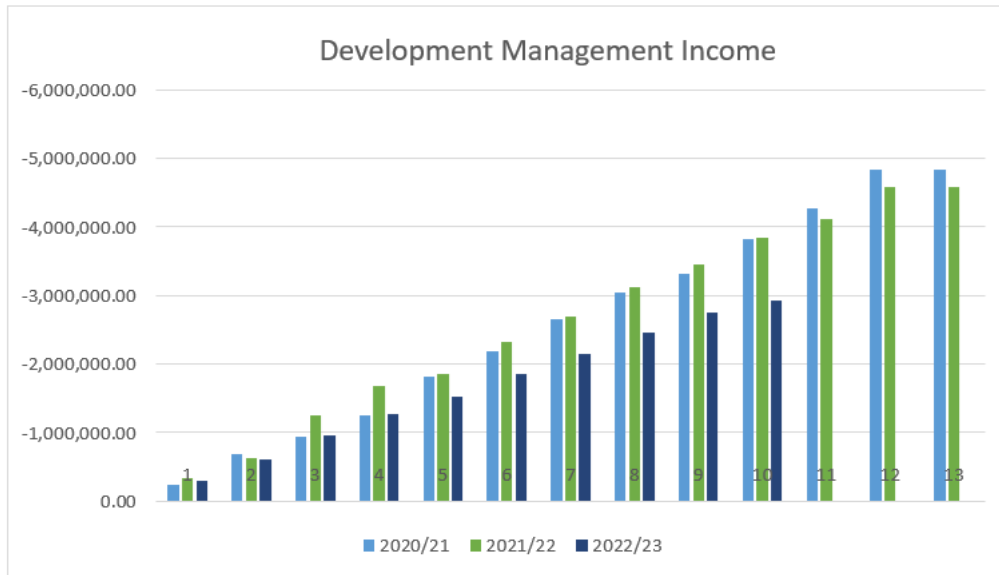
53. Whilst the current focus on housing numbers in totally understandable, the council is not currently monitoring other outcomes in relation to other policies from the local plan and local plan delivery is about more than just housing numbers. The council is also not currently learning from outcomes on the ground and would benefit from using site visits as a training tool for teams and councillors to look at the impacts of good and bad decisions.

54. We heard about examples where outcomes are not being delivered because of delays in the planning function. For example, investment for a warehouse was lost because of delays with pre-application advice and delays on highways consultation responses have had a major impact on a significant development site near the railway station.

8. Implementation, next steps and further support

55. We recognise that senior political and managerial leadership will want to consider and reflect on these findings.

56. To support openness and transparency, we recommend that the council share this report with officers and that they publish it for information for wider stakeholders. There is also an expectation that the council will develop an action plan to be published alongside the report.

57. Both the peer team, PAS and the LGA are keen to build on the relationships and the peer challenge process includes a six-month check-in meeting to take place in January 2024 This will be a facilitated session which creates space for the council's senior leadership to update peers on its progress against the action plan and discuss next steps and any further support required.

58. A range of support from the LGA and PAS is available on their websites. This includes:

    • local plan project management

    • helping with options for planning committee changes

    • pre-app and PPAs

    • training and development for members, town and parish councils and officers

    • more detailed work around enforcement

    • advice and support around approach to developer contributions (S106 and CIL)

59. For more information about planning advice and support, please contact garreth.bruff@local.gov.uk

60. The LGA has a range of practical support available. The range of tools and support available have been shaped by what councils have told LGA that they need and would be most helpful to them. This includes support of a corporate nature such as political leadership programmes, peer challenge, LG Inform (our benchmarking service) and more tailored bespoke programmes.

61. Emily McGuinness, Senior Adviser is the LGA's focal point for discussion about your improvement needs and ongoing support and can be contacted at emily.mcguinness@local.gov.uk