

Response ID ANON-SNQ4-RTM5-E

Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system
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Scope of consultation

Respondent details

a What is your name?

Name:
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b What is your email address?

Email:
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c What is your organisation?

Organisation:
Woodford Neighbourhood Forum

d What type of organisation are you representing?

Neighbourhood planning body, parish or town council

If you answered "other", please provide further details:

Chapter 1 – Introduction

Chapter 2 – Policy objectives

Chapter 3 – Planning for the homes we need

1 Do you agree that we should reverse the December 2023 changes made to paragraph 61?

No

Please explain your answer:

We welcomed the December 2023 changes.

We believe that the results of the Standard Method should be advisory and not mandatory because each local authority has unique characteristics and circumstances, including topography, types of economic activity, importance of agriculture, amount of land with Green Belt status, historical and cultural background and demographics. Local authorities are better placed than central government to assess the needs of their area. Therefore, the quantum as well as the location of development that is appropriate should be a local decision. Targets set by central government can lead to development in unsuitable locations, which risks causing harm to current residents, the agricultural economy, the environment and the climate.

In our own borough, Stockport Council had prepared a plan, which proposed no changes in Green Belt boundaries because it was clear from feedback that was what many residents wanted. The council has paused consultation because of the proposed changes in planning guidelines and housing targets, so progress here has been impeded.

Setting housing targets for LPAs to achieve will not necessarily do anything to ease the problems perceived in housing. It is a very complex area influenced by a large number of interlinked factors.

It seems that changes in society have changed the structure and reduced the size of households, creating a greater demand for low-priced market housing. There is a difference between "demand" and "need". It seems that there is insufficient low-priced market housing to meet the new demand, while there is insufficient social housing to meet needs, which a caring society should meet. Meeting demand has to be balanced against the other harms it may cause, but a caring society should aim to meet the need for social housing.

The house building sector is understandably concerned primarily with profit. It can and does manipulate the planning system to maintain high profit margins, which is counter to satisfying the demand for low-priced housing, or the need for more social housing.

There is substantial evidence that housing does not respond to the usual effects of supply and demand on price for many complex reasons, including mortgage interest rates, the impact of the cost of living on ability to save for deposit, the use of housing as an investment and the impact of wealthy investors, as well as manipulation of supply by the housing development sector to maintain high prices. Increasing supply is unlikely to achieve significant reduction in market prices in the timescale of this Government, if at all. Ref:

<http://woodfordnf.co.uk/wp-content/uploads/2024/09/Housing-shortage-What-the-experts-say.pdf>

Changes in planning guidelines aimed to make it easier for the housing sector to increase supply are not likely to achieve your objective. The system needs to be changed to provide incentives for development of low-priced market housing and to close the loopholes that provide escape routes.

Heavy reliance on developer contributions to achieve social housing seems to have failed and will continue to fail because developers are adept at finding loopholes to preserve their profit margins. Sufficient social housing will only be achieved with input of Government funding.

2 Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

No

Please explain your answer:

It is important for a local authority to be able to take alternative approaches because each local authority has unique circumstances, including topography, types of economic activity, importance of agriculture, amount of land with Green Belt status, historical and cultural background, and demographics. A local authority, in consultation with local residents, is better placed than central government to work out solutions to its housing needs.

3 Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

No

Please explain your answer:

The idea to increase density in already built up areas was good, but it may need some fine tuning. The % uplift could be reduced to avoid sacrificing quality for quantity.

4 Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

No

Please explain your answer:

The paragraph should be modified rather than deleted to ensure that sound evidence is provided to justify increasing density and to avoid sacrificing quality for quantity.

5 Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes

Please explain your answer:

The aim should be to achieve high density development in specific suitable locations without loss of character, creating sustainable communities with local infrastructure within walking distance.
An important aim should be to take the pressure off the countryside and green spaces which residents treasure and have been shown to be important for mental and physical health, as well as for local food production and the national economy.

6 Do you agree that the presumption in favour of sustainable development should be amended as proposed?

No

Please explain your answer:

We have seen evidence here in Stockport, where the local plan is out of date and a 5-year housing supply cannot be demonstrated, that the presumption in favour of sustainable development and the "tilted balance" can lead to permission for development in unsustainable locations. For example, the accessibility score is no longer a consideration in determining a planning application. This can be exploited by housing developers. Surely accessibility should always be a very important consideration.

7 Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

No

Please explain your answer:

It can result in unsustainable development in unsuitable locations.
Developers can control delivery of housing by claiming lack of viability of sites to meet their high profit margins and by delaying build out (land banking) on sites with planning permission.
The Financial Times 24 September 2024 quoted the leader of Wiltshire Council as saying that "it has become impossible to maintain a five-year housing supply because developers play the system and hold back development".
Imposing the 5-year land supply rule punishes the LPA and existing residents who can lose precious green spaces, but does not always result in sustainable development.

8 Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Not Answered

Please explain your answer:

9 Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

No

Please explain your answer:

This is an arbitrary number and nationally imposed housing targets are not likely to solve the problems in housing anyway, as outlined in answer to question 1.

10 If Yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

No (It should be a different figure)

Please explain your answer if you believe a different % buffer should be used:

The buffer should be zero, as outlined in answer to question 9.

11 Do you agree with the removal of policy on Annual Position Statements?

Yes

Please explain your answer:

Monitoring of the implementation of the Local Plan would be more useful.

12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Yes

Please explain your answer:

Cross boundary co-operation is in theory a good idea, but it doesn't currently seem to be a very effective tool in the planning system. It is easily worked around by authorities exchanging a Memorandum of Understanding.

We have mixed feelings about "elected Mayors in overseeing the development and agreement of Spatial Development Strategies (SDSs) for their areas" because the Greater Manchester Spatial Framework for the 10 authorities in Greater Manchester proposed loss of large areas of Green Belt in Greater Manchester. It was deeply unpopular and resulted in 27,000 objections during public consultation. In response, the quantity of Green Belt loss was reduced, but this was not enough for Stockport Council which withdrew from the plan in 2020. The remaining 9 authorities went on to produce the Places for Everyone Plan, which is still proposes Green Belt loss and is currently the subject of a JR challenge by a group representing residents.

13 Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

No

Please explain your answer:

They seem good tests when applied correctly.

14 Do you have any other suggestions relating to the proposals in this chapter?

Please provide any other suggestions relating to the proposals in this chapter. :

1. Separate "need" from "demand".
2. Accept that the need for social housing can only be met by input of government funding.
3. Accept that it may never be possible to satisfy the high demand for low-priced market housing.
4. Manage the perception that everyone has "a right to own a home", which may not be a realistic ambition in the modern world.
6. Ensure that renting a home is a reasonable option. It is very acceptable and common in many countries in Europe.
5. De-stigmatise young people living with parents. This was very acceptable one or two generations ago. It reduces the need for housing and is more sustainable.
6. Acknowledge that larger household sizes can be helpful because the environment, climate, landscape and agricultural economy will suffer further if developed countries aim to build sufficient homes to accommodate very small household sizes.
7. Either scrap the "right to buy" because it removes social housing from the system, or ensure immediate replacement.
8. Provide incentives for developers to achieve low priced-housing and meet section 106 agreements e.g. tax breaks.
9. Include penalties for reneging on section 106 agreements and conditions e.g. no planning permission for future proposals
10. Reduce the profit margins expected by large house builders to be more in line with the rest of the economy, which will improve site viability equations.
11. Include disincentives for land banking. The Financial Times 24 September 2024 reported that analysis by the Local Government Association reveals that more than a million homes given planning permission in England and Wales since 2010 have not been built.

Chapter 4 – A new Standard Method for assessing housing needs

15 Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No

Please explain your answer:

Existing housing stock will not necessarily produce an accurate assessment of demand or need. Recent projections seem likely to be a more accurate method, provided that they are recent.

As outlined in answer to previous questions the concept of a standard method is too simplistic for a very complex scenario. There is substantial evidence that housing does not respond to the usual effects of supply and demand on price for many complex reasons, including mortgage interest rates, the impact of the cost of living on ability to save for deposit, the use of housing as an investment and the impact of wealthy investors, as well as manipulation of supply by the housing development sector to maintain high prices.

16 Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

No

Please explain your answer:

This may be part of the equation but as outlined in answer to question 15 there are many other factors to consider.

17 Do you agree that affordability is given an appropriate weighting within the proposed standard method?

No

Please explain your answer:

The concept of a standard method is over simplistic. The approach needs to be much more flexible and capable of fine tuning by local authorities to meet their unique circumstances.

18 Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

No

Please explain your answer:

The standard method is over simplistic. The approach needs to be much more flexible and capable of fine tuning by local authorities to meet their unique circumstances.

19 Do you have any additional comments on the proposed method for assessing housing needs?

Please provide any additional comments on the proposed method for assessing housing needs.:

The so called "housing crisis" is a crisis of affordability, which is a complex social and economic phenomenon, as explained in answer to question 1. Ref: <http://woodfordnf.co.uk/wp-content/uploads/2024/09/Housing-shortage-What-the-experts-say.pdf>

Supply of social housing should not be solely linked to supply of market-priced housing. In a free market economy this will not meet needs. Government imposed targets for social housing may be part of the solution, but government funding will also be essential.

Chapter 5 – Brownfield, grey belt and the Green Belt

20 Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes

Please explain your answer:

Brownfield first is the way to go. The only exceptions to this rule would be where previously developed land has become an important ecological niche. The priority should be rigorously set out in the planning guidelines.

However, the concept in this sentence could be a problem: "This makes clear that the default answer to brownfield development should be yes." There should always be the proviso that it is sustainable development in an accessible location.

21 Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

No

Please explain your answer:

It is not clear why this section has been deleted from paragraph 154 when there is a push for more affordable housing: "and contribute to meeting an identified affordable housing need within the area of the local planning authority."

22 Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Please provide any further views:

Glasshouses and horticultural land are important for local food production and an important part of our economy. They could be protected with a specific clause in the guidance placing restrictions on change of use.

23 Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

No

Please explain your answer:

We agree in principle that some sites that have Green Belt designation do not perform all the functions of Green Belt set out in the NPPF. Protection of these sites from development is inappropriate in some cases. Rather than seek a new classification of grey belt, which may be subjective and confusing, would it be better to remove the sites from Green Belt during the preparation of a Local Plan and, where they include hard standing or built structures, reclassify them as PDL?

24 Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Yes

Please explain your answer:

Changes could be monitored and penalties imposed for degradation.

25 Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

No

Please explain your answer:

An additional designation of Grey Belt adds complexity. Land that is not performing the purposes of Green Belt should have Green Belt status removed at Local Plan preparation stage.

26 Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Not Answered

Please explain your answer:

27 Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Yes

Please explain your answer:

Allowing nature to recover and thrive is very important to protect our own ecological niche on the planet. LNRSs, urban green spaces and undesignated rural countryside should be vigorously protected by the NPPF, as well as Green Belt.

28 Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

No

Please explain your answer:

Paragraph 144 sets it out clearly for Local Plan preparation. However, we can't find text that sets sequential land use priority in planning decisions once a Local Plan is made.

29 Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes

Please explain your answer:

30 Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

Not Answered

If not, what changes would you recommend?:

31 Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Not Answered

Please explain your answer:

32 Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

Not Answered

Please explain your answer:

33 Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

Not Answered

Please explain your answer:

34 Do you agree with our proposed approach to the affordable housing tenure mix?

Not Answered

Please explain your answer:

35 Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

The Government or local planning authorities should be able to set lower targets in low land value areas

Please explain your answer:

Many Green Belt sites are not accessible and require trips by car to reach works, shops, schools and leisure facilities. These are not suitable locations for affordable housing whose occupants may not be able to afford to own a car.

36 Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Yes

Please explain your answer:

Please also note that some forms of nature take hundreds, and in some cases thousands, of years to establish and cannot be quickly replaced once destroyed, so protection of existing natural features is important as well as securing new benefits for nature and public access.

This applies equally to green field sites and Green Belt sites.

37 Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

Not Answered

Please explain your answer:

38 How and at what level should Government set benchmark land values?

Please explain your answer:

39 To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

Not Answered

Please explain your answer:

40 It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Please explain your views on this approach:

41 Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

Not Answered

Please explain your answer, including what support you consider local authorities would require to use late-stage viability reviews effectively:

42 Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

Not Answered

Please explain your answer:

43 Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

Not Answered

Please explain your answer:

44 Do you have any comments on the proposed wording for the NPPF (Annex 4)?

Not Answered

Please explain your answer:

45 Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

Not Answered

Please explain your answer:

46 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 6 – Delivering affordable, well-designed homes and places

47 Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Not Answered

Please explain your answer:

48 Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Not Answered

Please explain your answer:

49 Do you agree with removing the minimum 25% First Homes requirement?

Not Answered

Please explain your answer:

50 Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

Not Answered

Please provide any further comments:

51 Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Not Answered

Please explain your answer:

52 What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Please explain your answer:

53 What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Please explain your answer:

54 What measures should we consider to better support and increase rural affordable housing?

Please explain your answer:

55 Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Not Answered

Please explain your answer:

56 Do you agree with these changes?

Not Answered

Please explain your answer:

57 Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

Yes

If Yes, what changes would you recommend?:

The term "Affordable Housing" with its numerous subdivisions has confused the public. Social housing needs to be under a separate umbrella. To ensure that they are more attainable, purchase and rental prices could be a percentage of income rather than linked to market prices, which are influenced by many factors as outlined in answer to question 1.

58 Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Not Answered

Please explain your answer :

59 Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

Yes

Please explain your answer:

Beauty and beautiful are very subjective terms which are not helpful in guidelines. In monitoring implementation of our neighbourhood plan, we have noted that well-designed is also subjective. Design codes may help to set criteria.

60 Do you agree with proposed changes to policy for upwards extensions?

Not Answered

Please explain your answer:

61 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 7 – Building infrastructure to grow the economy

62 Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Not Answered

Please explain your answer:

63 Are there other sectors you think need particular support via these changes? What are they and why?

Not Answered

Please explain your answer:

64 Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

Not Answered

Please explain your answer:

65 If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

Not Answered

If Yes, what would be an appropriate scale? :

66 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 8 – Delivering community needs

67 Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Not Answered

Please explain your answer:

68 Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Not Answered

Please explain your answer:

69 Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Not Answered

Please explain your answer:

70 How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Please explain your answer:

71 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 9 – Supporting green energy and the environment

72 Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Not Answered

Please explain your answer:

73 Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Not Answered

Please explain your answer:

74 Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Not Answered

Please explain your answer:

75 Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Not Answered

Please explain your answer:

76 Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Not Answered

Please explain your answer:

77 If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Please explain your answer:

78 In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Please explain your answer:

79 What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Please explain your answer:

80 Are any changes needed to policy for managing flood risk to improve its effectiveness?

Not Answered

Please explain your answer:

81 Do you have any other comments on actions that can be taken through planning to address climate change?

Not Answered

Please explain your answer:

82 Do you agree with removal of this text from the footnote?

No

Please explain your answer:

Food security is increasingly important due to the impact of climate change and international conflicts. The footnote needs to be in the main text.

83 Are there other ways in which we can ensure that development supports and does not compromise food production?

Yes

Please explain your answer:

Food security is increasingly important due to the impact of climate change and international conflicts.

The importance of agricultural land warrants further research and expansion in the main text of the NPPF. We suggest you liaise with Defra, the NFU and other representatives of the farming community to get this right. Even low grade agricultural land can play an important role in food production, for example on hill farms unsuitable for other crops sheep are a very efficient way to convert grass, which humans cannot digest, into high quality food for humans.

Solar farms should not be located on agricultural land for food security and aesthetic reasons. They should be sited on roof tops.

84 Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Not Answered

Please explain your answer:

85 Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Not Answered

Please explain your answer:

86 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 10 – Changes to local plan intervention criteria

87 Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Not Answered

Please explain your answer:

88 Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Not Answered

Please explain your answer:

Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

89 Do you agree with the proposal to increase householder application fees to meet cost recovery?

Not Answered

Please explain your answer:

90 If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

Not Answered

If Yes, please explain in the text box what you consider an appropriate fee increase would be. :

91 If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Not Answered

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.:

92 Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your answer:

93 Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your reasons and provide evidence on what you consider the correct fee should be:

94 Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

Not Answered

Please explain your answer:

95 What would be your preferred model for localisation of planning fees?

Not Answered

Please give your reasons in the text box below:

96 Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

Not Answered

If Yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development? :

97 What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

Please explain your answer:

98 Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Not Answered

99 If Yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Please explain your answer:

100 What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Please explain your answer:

101 Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

Please explain your answer :

102 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer.:

Chapter 12 – The future of planning policy and plan making

103 Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

Not Answered

Please explain your answer:

104 Do you agree with the proposed transitional arrangements?

Not Answered

Please explain your answer:

105 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 13 – Public Sector Equality Duty

106 Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

Please explain your answer:

Chapter 14 – Table of questions

Chapter 15 – About this consultation