

To:

Planning Policy Consultation Team
Planning Directorate – Planning Policy Division
Ministry of Housing, Communities and Local
Government
Floor 3, Fry Building
2 Marsham Street
London
SW1P 4DF

Email:

PlanningPolicyConsultation@communities.gov.uk

From:

D. C. Ritson I. Eng. M I E T.
Monks Orchard Residents'
Association (MORA)

Planning Committee Member
Shirley North Ward
London Borough of Croydon

<http://www.mo-ra.co/>

Emails:

Planning@mo-ra.co
Chairman@mo-ra.co
hello@mo-ra.co

16th September 2024

Proposed reforms to the National Planning Policy Framework and other changes to the planning system

This consultation began on **Tuesday 30 July 2024** at 2pm and will close at **11.45pm** on **Tuesday 24 September 2024**.

Please accept our response to the **NPPF Consultation** as follows:

Question 1

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

Response:

No. We believe the 2021 version of para 61 is preferable as there may be exceptional circumstances to satisfy demographic needs.

Question 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**?

Response:

No. See answer to Question 1 above.

Question 3

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

Response:

No. The uplift should be contained within the current ‘Area Type’¹ **Design Code** of the locality and within the scope of the available ‘supporting infrastructure’ for that ‘Area Type’. Therefore, in our view, **paragraph 62 of the previous NPPF (2023) version should remain** (*possible reworded*). Any uplift which would lift the whole Area Type to the next **Higher Density ‘Area Type’** should **not be allowed** without significant **Area Wide consultation or planned improvement in Infrastructure.**

Question 4

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

Response:

We do NOT agree with the deletion of para 130. Any Uplift in **Housing** or **Residential Density** should be within the constraints of the **Local Area Type Design Code**¹, and within the existing **Area Type existing supporting infrastructure**, including the local **Public Transport Accessibility Level (PTAL)**, in order to respect the **Local Character** and for **sustainability.**

To allow this uplift would completely undermine the Local Design Code and Area Type definitions of the National Model Design Code & Guidance concepts.

Authority Wide Design Codes are too broad and would limit local deviations reflecting pockets of differing **Local Character** within an authority, and within Wards. The smaller the **Area** (in hectares or sq.m.) the more accurate the **Area Type** and **Design Codes** for the locality. Without any specific local guidance, we have been using **Area Type** definitions based on the parameters of the local ‘**Post Code**’ of a proposal (i.e., Area in hectares; Number of dwellings; number of occupants), as there is no other local guidance in our **Croydon Local Plan.**

The London Borough of Croydon LPA Revised Local Plan is currently undergoing Regulation 19 Consultation, but the revised version does **NOT** refer to, or recognise, the **National Model Design Code & Guidance**, and will therefore be at least 3, possibly 4 years out-of-date **on publication** if approved and adopted by the **Planning Inspector.** And **9 years out of date** before the next formal iteration of the **Croydon Local Plan.** **This is unacceptable.**

Question 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?

¹ <https://www.gov.uk/government/publications/national-model-design-code>

Response:

Based upon the **National Model Design Code and Guidance² (2021)**, **Local Design Codes** are related to an **Area Type** (Rural, Outer Suburban, Suburban, Urban & Central), and are defined by **Housing Density** (max & min **Units/ha**). The **National Model Design Code & Guidance** provides **Housing Density ranges** in Dwellings/ha. LPAs could define their **Area Types** in different ranges if agreed by local consultation at least down to **Ward** and preferably smaller areas.

The **National Model Design Code & Guidance** provides the concept and procedures but does not indicate any Local levels for individual Planning proposals. In the absence of Local guidance, we use the **Local Post Code parameters to define a local Area Type (Units/ha)** for **Housing** and **Residential Density (Persons/ha)**, to assess the **Design Codes** for individual proposals.

The greatest opportunity for incremental increase in intensification are localities within an **Area Type** but in the **lower-density range** of that **Area Type**; also, Areas within **PTALs 3-6**, and within **800m** of a **Tram/Train Station** or **District Centre**, (See London Plan para 4.2.4 **“Incremental Intensification”**) and to be within the capacity of the existing **supporting infrastructure**.

See our answer to Question 4 above.

Question 6

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

Response:

We assume the question relates to para 11 d). and if we are correct – we have no comment to add.

Question 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?

Response:

Yes.

Question 8

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

² <https://www.gov.uk/government/publications/national-model-design-code>

Response:

Yes.

Question 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?

Response:

No Comment – do not feel qualified to comment.

Question 10

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

Response:

No Comment – do not feel qualified to comment.

Question 11

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

Response:

No Comment – do not feel qualified to comment.

Question 12

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

Response:

Yes, we agree to the proposed additions to paragraph 24, the minor deletion in 25, and new paragraphs 27 and additions to paragraph 28. Cross boundary consultation and representations should be supported, especially for infrastructure provision.

Question 13

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

Response:

Yes, but the new paragraph 36 a) to c) has not been changed.

The Test of Soundness should ensure that wherever possible , the Plans reflect the **most recent NPPF** and the most recent **Guidance from the Secretary of State**.

Question 14

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

Responses:

Our LPA (London Borough of Croydon) are offering a Revised Local Plan (2024) for Regulation 19 Consultation which is 5 years out-of-date; (Referencing the NPPF, but in requested clarification stated that the reference actually means the **2019 NPPF** which omits the need to meet the **National Model Design Code & Guidance (2021)**). It is unacceptable that a revised local plan can be **5 years out-of-date** on publication.

Question 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?

Response:

No Comment

Question 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?

Response:

No Comment

Question 17

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

Response:

More affordable housing (% of gross income) is of major importance to help more home ownership at the lower end of the market, for stable family relationships and to get a foot on the housing ladder.

Question 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?

Response:

The affordability ratio = (house price / gross annual earnings) varies across the UK and local authorities as shown by the NOS data sets. However, it can also vary dramatically across a Local Authority Area. A Local Authority could contain areas of deprivation and also areas of high earners. Should there be any adjustment for such local variations within a Local Authority Area for the local Affordability Ratio? e.g., Ward Affordability Ratio.

Question 19

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

Response:

The demographics proportions are changing which requires greater need for downsizing for elderly or smaller families.

Question 20

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

Response:

We agree with the proposed additional text to para: ~~124~~ new 122 c). as long as the proposal is within the **Local** Design Code Area Type parameters with appropriate supporting infrastructure.

Question 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?

Response:

The addition to ~~154-g~~ (new 151) the term “*substantial harm*” is too subjective and open to varying interpretations. The measure of harm should be measured with respect to the Area Type Design Code parameters of the Previously Developed Green Belt Land.

We do not disagree with the deletions.

New Para 152. What is the definition of Development not regarded as “inappropriate” for sub-para: a) as there is **no definition** for what would be “*fundamentally undermining the function of ‘Green Belt’*”.

We have no further comment on the introduction of para 155 although we prefer restrictions to release any **Green Belt Land for any proposed new build**.

Question 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?

Response:

The current definition of Previously developed land (PDL) is ‘**that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed-surface infrastructure**’. The definition covers the curtilage of the development.

We understand “Paddocks” and associated outbuildings have also been considered as PDL in Appealed proposal by the SoS. Otherwise, we believe this definition should remain.

Question 23

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

Response:

No.

We do not think the definition of 'grey belt' is specific enough.

What defines "the land that makes a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework)"? This definition is too vague and subjective.

Question 24

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

Response:

The definition of '**Grey Belt**' needs to be more specific. "limited contribution" as a criteria is inadequate.

Question 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?

Response:

Additional guidance is necessary and would be helpful within the NPPF.

Question 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?

Response:

No

Question 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?

Response:

No constructive comment

28 Question 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?

Response:

We agree to proposals to require local planning authorities to undertake a review where an authority cannot meet its identified housing, commercial or other need without altering Green Belt boundaries.

Question 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?

Response:

We agree to the proposed changes to paragraph 147 of the NPPF that the release of land should not be supported where doing so would fundamentally undermine the function of the Green Belt across the area of the plan as a whole.

Question 30:

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

Response:

Decision making to be as a result of consultation with **all** stakeholders and locally affected residents.

Question 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?

Response:

Decision making to be as a result of consultation with **all** stakeholders and local affected residents.

Question 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?

Response:

We do not appreciate any reason why any Travellers should be allowed to assemble on Green Belt Land. Any Green Belt Land currently occupied by Travellers should remain Green Belt Land after Travellers have left.

Any decision making to be as a result of consultation with all stakeholders and locally affected residents.

Question 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?

Response:

Decision making to be as a result of consultation with all stakeholders and locally affected residents.

Question 34:

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

Response:

We agree that the tenure split across affordable housing be delivered under the golden rules should be for local authorities to decide.

Question 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?

Response:

Local Planning Authorities should be allowed to set lower targets in low land value areas, if they are meeting Housing Targets elsewhere within the Borough.

Question 36:

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

Response:

Yes, to apply the rules which include delivering access to good quality green spaces and nature.

Question 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?

Response:

Yes; for new residents to be able to access good quality green spaces within a short walk of their homes.

Question 38:

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

Response:

No comment, as not sure how to assess.

Question 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?

Response:

No comment, as not sure how to assess.

Question 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?

Response:

No comment, as not sure how to assess.

Question 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?

Response:

No comment, as not sure how to assess.

Question 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?

Response:

No comment, as not sure how to assess.

Question 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?

Response:

No comment, as not sure how to assess.

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

Response:

No comment, as not sure how to assess the question and do not fully appreciate nor understand the terminology.

Question 45:

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

Response:

All revised Local Plans should take into account any recent published guidance from the Secretary of State, or if insufficient lead time, should make reference to such guidance for the Regulation 19 consultation.

Question 46:

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

Response:

No.

Question 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?

Response:

Yes.

Question 48:

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

Response:

Yes, we agree that the 10% target be replaced by identified local needs.

Question 49:

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

Response:

We could not find the 25% First Homes requirement in the 2023 NPPF.

b) **First Homes:** is as set out in the 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021. First Homes come forward through the First Homes exception sites and through developer contributions.

Thus, No Comment.

Question 50:

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

Response:

No.

Question 51:

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

Response:

We agree with the proposed new Para 69.

Question 52:

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

Response:

Local Authorities should set targets for Council owned properties for social rental in proportion to their population. Any right to buy funds should be re-invested to build more homes.

Question 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?

Response:

No Comment – have no suggestions.

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

Response:

Use grey Brownfield, Grey belt land only. Do not encroach on natural woodland.

Question 55:

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

Response:

The number of Dwellings converted for “looked after children” or new builds for “looked after children” should have a limited accommodation reflecting the Residential Density of the Area Type Design Code of the local community Area. Also, these types of resident conversions should be separated over an area and not confined to a close knit group of dwellings.

Question 56:

Do you agree with these changes?

Response:

Yes

Question 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?

Response:

No suggested changes.

Question 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?

Response:

No suggested changes.

Question 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?

Response:

We agree. There seems to be a reluctance by LPAs to adopt the **National Model Design Code & Guidance** and policies, which should be reflected in their **Local Plans** as early as possible. LPAs should define the parameters of their various **Area Types**.

Question 60:

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



Response:

Any upward extension or provision of accommodation in roof space should reflect the roof forms of the local Area Type design code.

Question 61:

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

Response:

More emphasis on the adoption of the National Model Design Code & Guidance in para 224.

Question 62:

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

Response:

We agree.

Question 63:

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

Response:

No comment

Question 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?

Response:

NSIP ? (Not defined in the NPPF). It depends upon where these gigafactories are proposed to be located. Requires local consultation

Question 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?

Response:

No comment – not qualified to respond to this question.

Question 66:

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

Response:

No comment

Question 67:

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

Response:

Yes.

Question 68:

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

Response:

Yes.

Question 69:

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

Response:

Yes.

Question 70:

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

Response:

- a) Define the relationship between **Area Type** population density and **Area of recreational space** afforded to that population.
- b) not a function of planning – this is a function of the NHS. (Other than limiting 'Fast Food' Outlets).

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

Response:

Ensure that developments have supporting accessibility to **Public Transport** in relation to the **Residential Density** of the **Area Type** setting.

Question 72:

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

Response:

NSIP ? (Not defined in the NPPF). It depends upon where these 'on shore' wind projects are proposed to be located. Requires local consultation.

Question 73:

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

Response:

We need more locally produced energy. To keep tariffs low we need more locally produced energy instead of relying on foreign imported fuel so we do need to innovate a bit more and encourage investment through green tech by supporting renewable and low carbon energy. Imported fuel is contributing to CO2 emissions including transport emissions and as such is not globally efficient.

Question 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?

Response:

Yes

Question 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?

Response:

Not qualified to answer

Question 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?

Response:

Not qualified to answer

Question 77:

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

Response:

Not qualified to answer

Question 78:

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

Response:

Not qualified to answer.

Question 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?

Response:

Not qualified to answer

Question 80:

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

Response:

The Environmental Agency should provide guidance for local flood risks, especially below ground water courses.

Question 81:

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

Response:

Not qualified to answer, but probably the Environment Agency should be more involved in local Planning decisions.

Question 82:

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

Response:

What footnote? Confused question.

Question 83:

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

Response:

Not qualified to answer

Question 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?

Response:

Not qualified to answer, but Water Utilities should be enforced to meet stringent standards of water purification, and the management of sewage clean up and protection. Stringent monitoring by the Environment Agency and enforcement by OFWAT.

Question 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?

Response:

Not qualified to answer

Question 86:

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

Response:

No.

Question 87:

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

Response:

Not qualified to answer

Question 88:

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

Response:

Not qualified to answer

Question 89:

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

Response:

LPAs should undertake staff productivity and efficiency analysis and to determine why costs have risen out of proportion to the rate of inflation. The answer is NOT to increase costs but Increase productivity and efficiency.

Question 90:

If no, 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.

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

Response:

[See Answer to Question 89](#)

Question 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?

Yes

No – it should be higher than £528

No – it should be lower than £528

no - there should be no fee increase

Don't know

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

Response:

[No - See Answer to Question 89](#)

Question 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.

Response:

[No - See Answer to Question 89](#)

Question 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.

Response:

[No - See Answer to Question 89](#)

Question 94:

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

Please give your reasons in the text box below.

Response:

The proposal for LPAs to set their own fees provides opportunities for competition between adjacent Local Authorities and a mechanism for minimising fees. Although likely to be small differences, it could be a method of reducing fees to attract developments into a location if the LPA are having difficulty meeting their targets.

Probably advisable to have a set maximum fee formula by government.

Question 95:

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

Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.

Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.

Neither

Don't Know

Please give your reasons in the text box below.

Response:

See Answer to Question 94 - prefer Local Variation – Maintain a nationally-set default fee and give local planning authorities the option to set all or some fees locally.

Question 96:

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

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?

Response:

No - subsidising other services is totally inappropriate.

Question 97:

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

Response:

None – subsidising by other services is totally inappropriate.

Question 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?

Response:

No, as once such allowances are authorised, there is no limit to what an LPA could set fees for.

Question 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.

Response:

Not applicable

Question 100:

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

Response:

Not qualified to define limitations but should not be set to make a profit on the activity.

Question 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.

Response:

Not qualified to define limitations

Question 102:

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

Response:

No.

Question 103:

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

Response:

LPAs use 'transitional arrangements' to avoid providing up-to-date National guidance. We are not aware of any alternatives to transitional arrangements.

Question 104:

Do you agree with the proposed transitional arrangements?

Response:

We agree to the removal of para 226

Question 105:

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

Response:

No.

Question 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?

Response:

No.

-----End of Consultation-----