

## Response ID ANON-SNQ4-RJ6F-X

Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system  
Submitted on 2024-09-23 17:15:02

### Scope of consultation

#### Respondent details

a What is your name?

Name:  
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c What is your organisation?

Organisation:  
Urban Transport Group

d What type of organisation are you representing?

Other (please specify)

If you answered "other", please provide further details:  
Membership body representing the UK's largest city region transport authorities

#### 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?

Not Answered

Please explain your answer:

No view

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?

Not Answered

Please explain your answer:

No view

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

Yes

Please explain your answer:

Strategic planning across local authority boundaries is critical for delivering housing that is integrated with sustainable transport provision. Working at the city region level can help to deliver coordinated planning across a wider area.

We support the principle of housing growth focused around existing, well-connected urban conurbations.

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

Yes

Please explain your answer:

We agree that local planning authorities are well placed to identify opportunities for maximising the efficient use of land, especially those sites well served by existing transport and other infrastructure.

We would add that locations well served by public transport, walking and cycling should be prioritised. These transport choices should be present, or planned for, from the very earliest stage of development.

Without a high-quality public transport network, even a small increase in development, housing or economic activity will lead to a more than proportional increase in congestion, particularly in urban areas, which can quickly escalate, capping economic growth and agglomeration potential.

Peak time congestion in the UK is more severe than in any other European country, largely due to an under-provision of public transport, which in turn is connected to low residential densities, particularly on the outskirts of cities (making public transport provision less viable).

Just 40% of residents surrounding Britain's largest cities are able to travel into city centres using public transport in 30 minutes. This compares to almost 70% of residents surrounding similar-sized European cities. This lack of connectivity costs the UK economy more than £23.1bn per year.

The National Infrastructure Commission warns that economic growth in some of England's largest cities is likely to be constrained over the next 20 to 30 years unless they can increase capacity on their public transport networks and reduce car journeys into city centres.

The NPPF should make it clear that higher densities play a huge part in reducing car dependency and supporting a vision-led approach to planning, starting with the outcomes we want to see, rather than a predict and provide approach.

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:

Increasing densities are key to ensuring people can choose to use public transport, walking and cycling. The less densely populated a place is, the more likely someone is to drive, whereas sustainable transport use goes up as population density rises.

This is a reflection of the fact that traditional forms of public transport are less viable at the lower densities often found in many British suburbs surrounding cities. Lower densities also mean that key services are more spread out, meaning walking and cycling are often not seen as practical for everyday journeys.

The routine use of the car for short, everyday trips, such as the school run, generates congestion and road danger and – in a vicious circle – makes walking and cycling still less attractive.

However, whilst low density, low-rise is the form suburbs tend to take in the UK, this is not necessarily a defining characteristic of suburbs in comparable Western European cities, where mid-rise developments, close to city centres and connected to public transport networks are more common.

The NPPF should make it clear that higher densities play a huge part in reducing car dependency and supporting a vision-led approach to planning, starting with the outcomes we want to see, rather than a predict and provide approach.

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

Not Answered

Please explain your answer:

No view

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?

Yes

Please explain your answer:

We agree that planning authorities should have an up-to-date pipeline of deliverable sites. This helps to build investor confidence, support the supply chain and ensure that plans for transport can be informed by those for housing and vice versa.

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:

No view

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?

Not Answered

Please explain your answer:

No view

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

Not Answered

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

No view

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

Not Answered

Please explain your answer:

No view

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:

Yes, Strategic planning across local authority boundaries is critical for delivering housing that is integrated with sustainable transport provision.

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

Not Answered

Please explain your answer:

No view

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. :

#### 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?

Not Answered

Please explain your answer:

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?

Not Answered

Please explain your answer:

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

Not Answered

Please explain your answer:

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?

Not Answered

Please explain your answer:

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.:

We support the better alignment of the formula with the ambitions and geographies of Mayoral Combined Authorities and agree that urban cores must not be treated in isolation from their surrounding areas.

## 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:

We would like to emphasise the importance of transit orientated development (TOD). In prioritising development sites the NPPF should ensure these are favoured over car-based, low density sprawl.

'Brownfield first' proposals are helpful, given that these are often have existing transport links or are located on rail corridors or former rail industry sites making them easy to serve through new stations.

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?

Not Answered

Please explain your answer:

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:

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

Not Answered

Please explain your answer:

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

Not Answered

Please explain your answer:

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?

Not Answered

Please explain your answer:

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?

Not Answered

Please explain your answer:

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?

Not Answered

Please explain your answer:

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?

Not Answered

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?

Not Answered

Please explain your answer:

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

Not Answered

Please explain your answer:

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?

Yes

Please explain your answer:

We welcome the inclusion of 'necessary improvements to local or national infrastructure, including delivery of new schools, GP surgeries, transport links, care homes and nursery places, to deliver well-designed, connected places, recognising that local leaders are best placed to identify the infrastructure that their communities need' as a Golden Rule, but feel that there could be greater clarity in specifying what kinds of transport links should be designed in to schemes from the outset.

These should aim to ensure good access by public transport, walking and cycling. These help to ensure that new developments do not contribute to car dependency and congestion. Furthermore, some 22% of households in England do not have access to a car, rising to 40% of households in the lowest income quintile. It is important to ensure that these households can access the opportunities that new developments provide.

Prioritising developments around existing public transport infrastructure supports this, as does joining up work across land-use and transport planning. There are multiple examples of where new light rail lines, for example, have acted as catalysts for developments, unlocking housing and commercial developments and building in sustainable transport choices from the outset.

## 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?

Not Answered

If Yes, what changes would you recommend?:

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?

Not Answered

Please explain your answer:

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?

Yes

Please explain your answer:

'Well-designed places' should support social interaction, be safe and welcome everyone. UTG recently submitted evidence to the parliamentary inquiry into children, young people and the built environment. The inquiry was unfortunately halted by the change of government - the Department should review the evidence that was submitted to ensure it is taken into account in reforms to the NPPF. An edited extract from our evidence is reproduced below.

Children and young people's needs are not prioritised in the current planning process. Children receive just one mention in the NPPF and no national guidance on child-friendly design and planning exists. Children are not defined as a statutory equalities group in terms of considering their needs or ensuring they are involved in decision making. Transport policy frameworks have a similar deficit.

There would, however, be huge benefits in putting children at the heart of spatial and transport planning - places that work for children tend to work for everyone, including bringing wider benefits to public health and the environment.

Children should be considered a statutory equalities group in the planning process and should be meaningfully involved in local planning decisions. Child Impact Assessments could also become a standard part of the planning process. Similar provisions should also be extended to transport planning, using a 'child lens' to ensure streets promote the safety of the youngest and most vulnerable users.

As well as producing national guidance on child friendly planning for the built environment and for transport, Government should explore cost-effective, equitable ways to enhance the capacity and expertise of local authorities in this area and to secure additional capital and revenue funding to support high quality delivery (including through developer contributions).

Opportunities for everyday outdoor play and mobility are critical to children's physical and mental health and wellbeing. Children and young people need a variety of safe, accessible, welcoming and stimulating spaces within easy walking distance. If key local services – schools, shops, clubs, leisure centres – are not within walking distance, children cannot reach them independently, limiting their ability to be active.

In England, only one-fifth of children aged 5-15 meet official physical activity targets. Walking, cycling and outdoor play are the easiest ways for children to be physically active every day. Almost a quarter of children would like to cycle or scoot to school, but only 4% actually do, with traffic danger the primary barrier. To address this, planning policy must encourage spaces and places that put people first, rather than allow vehicles to dominate.

A coordinated, cross-departmental approach is needed, with children at its heart, recognising the connections between planning, housing, economic growth, public health, transport, decarbonisation and clean air. This joint work should recognise that children have the right to independent mobility, to access outdoor space and play and to be a visible and valued part of public life.

## 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?

Yes

Please explain your answer:

We welcome moves to provide particular support for these industries. From a transport perspective, we particularly welcome support for gigafactories and for freight and logistics.

Gigafactories

The UK has not yet entered the battery production market in a significant way. The UK's approach to developing its battery industry has had negative consequences for the sector, driving original equipment manufacturers to look abroad for opportunities to produce batteries, impacting the confidence of the private sector and investors in the UK industry's future. The UK has one factory producing batteries at "giga" scale: a site run by the Chinese-owned AESC in Sunderland, which is capable of producing 2 gigawatt hours (GWh) of battery capacity a year, far short of what will ultimately be needed to meet demand.

The demand in the UK to satisfy the need for batteries for private cars, commercial vehicles, heavy goods vehicles, buses, micromobility and grid storage is equivalent to five gigafactories with demand rising to ten gigafactories by 2040. This could see 35,000 people employed in gigafactories and 65,000 people in the battery supply chain if these were to be located in the UK (Source: The Faraday Institute (2022) UK Electric Vehicle and Battery Production



Potential to 2040).

Grasping the opportunity to grow domestic battery industry could not only boost the supply chain for electric vehicles, but crucially also create jobs, grow the economy and increase resilience against geopolitical shocks to the supply chain.

#### Freight and logistics

We welcome support for the decarbonisation of the freight and logistics industry. To support capacity enhancements, a more extensive network of rail and water-connected distribution sites is required. Greater use of city centre opportunities – such as making more use of city railway stations as freight hubs – should be explored and, beyond this, the largest distribution parks serving urban areas should be rail and/or water connected.

Alongside rail and water-connected sites, other distribution hub formats should be explored and prioritised within the NPPF with a view to minimising the volume and impact of road freight movements in urban areas. Backed by the right incentives and policies to make them economically viable, Urban Consolidation Centres could substantially reduce the volume and impact of deliveries by road in urban centres.

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?

No

Please explain your answer:

#### Chapter 8 – Delivering community needs

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

Yes

Please explain your answer:

Yes, although we would sound a degree of caution around delivering infrastructure 'faster' - processes must allow time to ensure that new developments are planned around existing or new public transport, walking and cycling infrastructure from the outset. In this way we can ensure that people and businesses can choose to use these modes from the day they move in, embedding sustainable travel habits and accessibility.

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?

Yes

Please explain your answer:

We wholeheartedly support a shift away from 'predict and provide' towards a vision-led approach. Our members have ambitious visions for economic growth in their areas, creating vibrant, attractive places that people want to live, work and invest in, that support access to opportunity and that help to deliver Net Zero.

It makes sense to plan around the outcomes we want, rather than planning for more traffic which will usually expand to fill any space afforded to it. In contrast, public transport, walking and cycling offer a means to decouple growth from congestion, allowing more people to travel using less space. It

supports the creation of more liveable and investible places designed around people.

The changes to the text of the NPPF could make it clearer what is meant by a 'vision-led' approach and how this differs from predict and provide. The text as it stands is perhaps too open to interpretation. In addition, there must be accompanying training and guidance for highways and planning authorities.

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

Please explain your answer:

Planning and design of the built environment is fundamentally linked to the ability to promote healthy communities and tackle childhood obesity.

The way the built environment is planned and designed affects the extent to which people can choose to travel in a way that is safe, healthy and green, including the extent to which they can choose to walk, scoot, cycle or wheel.

More walking, cycling and public transport use means cleaner air and safer, more liveable streets.

Safer, more liveable streets promote social interaction and enable children to play outside more often as well as to travel independently on foot or by bike or scooter, helping to tackle childhood obesity and sedentary lifestyles.

Opportunities for everyday outdoor play and mobility are critical to children's physical and mental health and wellbeing. Children and young people need a variety of safe, accessible, welcoming and stimulating spaces within easy walking distance. If key local services are not within walking distance, children cannot reach them independently. Instead, they must rely on lifts from parents and carers (if available) or upon public transport (if available or permitted). Both options limit children's opportunities to be physically active and disadvantage those living in households without a car in terms of what activities they can access.

In England, only one-fifth of children aged 5-15 meet official physical activity targets. Walking, cycling and outdoor play are the easiest ways for children to be physically active every day. Almost a quarter of children would like to cycle or scoot to school, but only 4% actually do, with traffic danger the primary barrier.

To address this, planning policy must encourage spaces and places that put people first, rather than allow vehicles to dominate. This would benefit the whole community as well as the public purse.

Research on behalf of DfT found that each £1 invested in walking and cycling delivers an average of £5.60 of benefits, mostly from the health benefits and associated lower costs to the NHS.

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:

Resilience to climate change must be considered from the outset when developing new schemes. Actions to deliver, upgrade or maintain infrastructure (including transport) as part of new developments offer opportunities to put in place climate change adaptation measures at the same time, for example, sustainable urban drainage systems.

To address climate change mitigation and adaptation more effectively, there is a significant need for capacity building in the skills required, including for suppliers and contractors who will deliver adaptations on the ground.

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?

Yes

Please explain your answer:

At 26% of greenhouse gas emissions, transport remains the largest emitting sector in the UK. Within that, cars and taxis are the largest contributor to domestic emissions, at 57%.

Net zero cannot be achieved without the urgent decarbonisation of transport and ensuring that travel by public transport, walking, cycling and wheeling is the desirable first choice for most everyday journeys.

Some 71% of all trips are under five miles and 46% of trips are under two miles. People should have attractive options to complete these short, everyday journeys using the greenest, most efficient modes. The planning system has a key role in ensuring that the option to use these modes is designed into developments from the outset.

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

Not Answered

Please explain your answer:

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

Not Answered

Please explain your answer:

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