

Response by St Albans Civic Society to the National Planning Policy Framework Consultation

We welcome the opportunity to comment on the proposals for reform and recognise that there is an urgent need both to build more homes and to increase the amount of affordable and social housing.

Our main disagreement with the proposals is the insistence on the new “standard method” of calculating housing targets for the highly variable environments of councils throughout the country. St Albans is probably at the extreme of variability as over 81% of the District is Green Belt and it is a commuter town where the majority of residents do not work there. The city itself has about 25% Conservation Area.

Our responses to the detailed questions are below.

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<p><u>Chapter 3 – Planning for homes</u></p>	<p>St Albans Civic Society Response</p>
<p><u>Housing need</u></p>	
<p>Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61? [This question is about making the standard method for assessing housing needs mandatory, not advisory.]</p>	<p>No, There needs to be some scope for Councils to make the case for a lower target, taking account of their ability to meet targets without unacceptable incursion into high-quality Green Belt and existing infrastructure limitations.</p>
<p>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?</p>	<p>No, for the reasons set out in Question 1</p>
<p>Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?</p>	<p>No. The original rationale for this uplift remains the same – cities have better infrastructure as well as transport links and it is entirely reasonable to focus more housing in these areas, where there is generally the highest demand. There is already scope in the guidance for cross boundary strategic planning where this is desirable</p>
<p>Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?</p>	<p>No. It is very important to recognise that the character of existing areas should be taken into account and this may well mean that significant uplifts in the average density of housing would be totally out of character with the existing areas, especially those with heritage significance. Heritage cities such as St Albans which has major Conservation Areas are an example of where increased density would be inappropriate. It would also conflict with national Design Guidelines.</p>
<p><u>Character and density</u></p>	
<p>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?</p>	<p>No. We are unclear on what spatial visions mean but local plans should take account of the character of the surrounding area. High density housing in the Green Belt is clearly unacceptable.</p>
<p><u>'the presumption'</u></p>	
<p>Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?</p>	<p>Yes but sustainability must include good design and infrastructure provision should be an NPPF requirement.</p>

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<p><u>Housing land supply</u></p>	
<p>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?</p>	<p>No. If there is an up to date Local Plan then there seems no reason to impose additional resource requirements on Local Authorities</p>
<p>Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF? [This is about adjusting treatment of past shortfalls and oversupply in calculating the housing supply requirement.]</p>	<p>No. It is illogical to effectively penalise a council that is able to over-deliver housing in one year. Surely, councils should be incentivised to deliver the new housing as quickly as possible so credit should be given if it is possible to, say, deliver a large project early.</p>
<p>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?</p>	<p>Yes/No This seems reasonable as a contingency but may not be deliverable (see Questions 1 & 2)</p>
<p>Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?</p>	<p>Yes 5% would be reasonable</p>
<p>Question 11: Do you agree with the removal of policy on Annual Position Statements?</p>	<p>No. This gives authorities the flexibility to deal with local decision making and should be retained.</p>
<p><u>Co-operation and strategic planning</u></p>	
<p>Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?</p>	<p>Yes</p>
<p><u>Other</u></p>	
<p>Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?</p>	<p>We agree that there is a need to assess the soundness of strategic plans by considering the reality and deliverability at a local level by Local Authorities in consultation</p>
<p>Question 14: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>See Q19</p>

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<p>Chapter 4 – A new Standard Method</p>	
<p>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?</p>	<p>Yes – a better measure</p>
<p>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?</p>	<p>No. This does not make sense for a District like St Albans which is a commuter town and where the median earnings of the residents is much higher (about 1.6 times more) than the median earnings of those working in the city (many of whom live elsewhere). Use of the earnings measure produces a totally unrealistic figure to feed into the affordability calculation. Median earnings of those who live in the district would produce a more realistic figure. For non-commuter places the difference between the work place and resident measure may be small.</p> <p>Use of a standard formula does not take account of particular circumstances and there should be some consideration of making adjustments where the standard formula produces an indicated target which is on its face excessive – an increase of more than 50% over the current standard formula, for example. Use of this formula for St Albans produces an increase of 75% in the target and this is clearly excessive bearing in mind that the Green Belt accounts for over 81% of the district. Is it not possible to apply a sanity check to the figures produced by the standard formula and maybe even out the increase over the surrounding districts, most of which in St Albans case have indicative target reductions.</p>
<p>Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?</p> <p>[The proposed changes involve applying a higher affordability multiplier.]</p>	<p>No. We disagree with the blanket application of the weighting algorithm as it takes no account of the variety of reasons why house prices are high (e.g., a quality Green Belt setting)</p>
<p>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?</p>	<p>No. This is not practical and the impact is likely to be broadly the same as house pricing. In this case, if used it should be based on earnings of those who work in the area rather than those who already live there (in contrast to our comment on Q16).</p>
<p>Question 19: Do you have any additional comments on the proposed method for assessing housing needs?</p>	<p>The use of a standard formula is flawed as it does not take account of individual circumstances (e.g., shortage of Brownfield and Grey Belt land for development).</p> <p>Solving the issue of affordability requires a strategic plan for the whole country with regional plans supporting that. Provision of</p>

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	<p>affordable sustainable housing should be heavily prioritised over current developer preferences, but loading the major responsibility for this on districts for which the Green Belt was devised would be damaging.</p>
<p><u>Chapter 5 – Brownfield, grey belt and the Green Belt</u></p>	
<p>Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?</p>	<p>Yes in principle, but development that might be allowed must respect local environment (e.g., Conservation Areas) and should be under local control unrestricted by target numbers.</p>
<p>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?</p>	<p>Yes</p>
<p>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?</p>	<p>We consider that the definition should be unchanged</p>
<p>Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</p>	<p>Yes, but the definition of 'limited contribution' is crucial and that should be subject to local consultation and decision. Primary requirement is that green belt land should not be built on – it doesn't have to be attractive, although fully enclosed open spaces can be made attractive by local community involvement.</p>
<p>Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?</p>	<p>Yes, by not allowing it to be built on.</p>
<p>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?</p>	<p>Yes we agree that additional guidance is required and this should be in planning practice guidance.</p>
<p>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</p>	

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<p>purposes?</p>	
<p>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?</p>	<p>Yes we would support the involvement of Local Nature Recovery Strategies in such identification.</p>
<p>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?</p>	<p>Yes, with land values being determined locally</p>
<p>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?</p>	<p>Yes</p>
<p>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?</p>	<p>Yes – it is difficult to conceive of what other method apart from decision making could be appropriate</p>
<p>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?</p>	<p>The priority for Grey Belt should be use for housing or essential common infrastructure</p>
<p>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?</p>	<p>No</p>
<p>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?</p>	<p>No</p>

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<p>Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?</p>	<p>It is a laudable ambition but putting all affordable housing in Green Belt is difficult – providing sufficient infrastructure and good public transport links is challenging. It is not likely to be feasible if the mix is solely reliant on private developers. New towns or independent (sustainable) development areas would be the best approach.</p>
<p>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?</p>	<p>It should be left to local decision making to decide what is both appropriate and practicable</p>
<p><u>Benchmark land values</u></p>	
<p>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?</p>	<p>Yes</p>
<p>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?</p>	<p>Yes and include a betterment levy and a higher proportion of social housing on any sale above BV</p>
<p>Question 38: How and at what level should Government set benchmark land values?</p>	
<p>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?</p>	<p>This is a complex issue as operation of the new NPPF may of itself affect land values.</p>
<p>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?</p>	
<p>Question 41: Do you agree that where viability negotiations do occur, and contributions below the level set</p>	

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<p>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?</p>	
<p>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?</p>	<p>Restrict non commercial development, etc within the London metropolitan area by designating grey belt/green belt where this would apply</p>
<p>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?</p>	<p>No</p>
<p>Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?</p>	<p>No</p>
<p>Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?</p>	<p>No</p>
<p>Question 46: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No</p>
<p>Chapter 6 – Delivering affordable, well-designed homes and places</p>	
<p>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?</p>	<p>Yes</p>
<p>Question 48: Do you agree with removing the requirement to deliver</p>	<p>No, this contradicts the basic need for housing nationally, the figure should be at least 50% as in the requirement for Green Belt</p>

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<p>10% of housing on major sites as affordable home ownership?</p>	<p>development.</p>
<p>Question 49: Do you agree with removing the minimum 25% First Homes requirement?</p>	<p>No, as in Q 48</p>
<p>Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?</p>	
<p>Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?</p>	<p>Yes, where practicable</p>
<p>Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?</p>	<p>Concentrate this as a priority in urban development</p>
<p>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?</p>	
<p>Question 54: What measures should we consider to better support and increase rural affordable housing?</p>	
<p>Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?</p>	<p>Yes</p>
<p>Question 56: Do you agree with these changes?</p>	<p>Yes</p>
<p>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?</p>	
<p>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?</p>	

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<p>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?</p>	<p>Beauty, although desirable, is a subjective quality. 'Well-designed' is essential but does not adequately cover the overall effect. Harmonious, aesthetically pleasing to the majority view?</p>
<p><u>Requiring "well designed" development</u></p>	
<p>Question 60: Do you agree with proposed changes to policy for upwards extensions?</p>	<p>Yes but subject to other legislation concerning the importance of retaining character, e.g., heritage sightlines.</p>
<p>Question 61: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>The protection of Conservation Areas and their environment needs to be addressed as well and National Parks, etc.,</p>
<p><u>Chapter 7 – Building infrastructure to grow the economy</u></p>	
<p>Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?</p>	<p>In principle but not on green belt in areas under pressure</p>
<p>Question 63: Are there other sectors you think need particular support via these changes? What are they and why?</p>	
<p>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?</p>	
<p>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?</p>	
<p>Question 66: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>This should be subject to a national strategy</p>
<p><u>Chapter 8 – Delivering community needs</u></p>	
<p>Question 67: Do you agree with the changes proposed to paragraph 100</p>	<p>Yes</p>

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<p>of the existing NPPF?</p>	
<p>Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?</p>	<p>Yes</p>
<p>Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?</p>	<p>Yes</p>
<p>Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</p>	<p>This should be tied to ensuring that all large developments must have proper supply of infrastructure in terms of flood and climate protection as well as education and health centre provision</p>
<p>Question 71: Do you have any other suggestions relating to the proposals in this chapter?</p>	
<p>Chapter 9 – Supporting green energy and the environment</p>	
<p>Question 72: Do you agree that large onshore wind projects should be reintegrated into the s NSIP regime?</p>	<p>In principle with clearly defined benefits to the local communities</p>
<p>Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?</p>	<p>In principle, with full protection for the heritage environment.</p>
<p>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?</p>	<p>Protection rather than compensation</p>
<p>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?</p>	<p>Yes, subject to qualifications in our responses to Q72 and Q73</p>
<p>Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant</p>	<p>Yes, subject to qualifications in our responses to Q72 and Q73</p>

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<p>and therefore consented under the NSIP regime should be changed from 50MW to 150MW?</p>	
<p>Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?</p>	
<p>Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?</p>	<p>Require all new building to have alternative energy capability</p>
<p>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?</p>	<p>Building regulations and enforcement on sustainability are too weak, but this requires national agreement with developers.</p>
<p>Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?</p>	
<p>Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?</p>	<p>There should be more effective requirement for developers to incorporate energy-saving features into all new buildings</p>
<p>Question 82: Do you agree with removal of this text from the footnote?</p>	
<p>Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?</p>	
<p>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?</p>	<p>Yes</p>
<p>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?</p>	<p>Yes</p>

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<p>Question 86: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>Yes</p>
<p>Chapter 10 – Changes to local plan intervention criteria</p>	
<p>Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?</p>	<p>Yes</p>
<p>Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?</p>	
<p>Chapter 11 – planning application fees + cost recovery related to National Infrastructure Projects</p>	
<p>Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?</p>	<p>No</p>
<p>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.</p>	<p>Yes £387</p>
<p>If Yes, please explain in the text box what you consider an appropriate fee increase would be.</p>	
<p>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?</p>	<p>No</p>
<p>Yes No – it should be higher than £528</p>	

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<p>No – it should be lower than £528 no - there should be no fee increase Don't know</p>	
<p>If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.</p>	
<p>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.</p>	<p>Commercial applications</p>
<p>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.</p>	
<p>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.</p>	<p>Not for individuals</p>
<p>Question 95: What would be your preferred model for localisation of planning fees?</p>	<p>Full localisation, with the proviso that zero-level fees should be retained for Listed Buildings applications, where owners are subject to much higher costs anyway.</p>
<p>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</p>	
<p>Please give your reasons in the text box below.</p>	
<p>Question 96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider</p>	

<p>Consultation questions</p> <p>This consultation will begin on Tuesday 30 July 2024 at 2pm and close at 11.45pm on Tuesday 24 September 2024.</p>	<p>https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system</p>
<p>planning services?</p>	
<p>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?</p>	
<p>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?</p>	
<p>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?</p>	<p>Yes</p>
<p>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.</p>	
<p>Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?</p>	
<p>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.</p>	
<p>Question 102: Do you have any other</p>	

<p>Consultation questions</p> <p>This consultation will begin on Tuesday 30 July 2024 at 2pm and close at 11.45pm on Tuesday 24 September 2024.</p>	<p>https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system</p>
<p>suggestions relating to the proposals in this chapter?</p>	
<p>Chapter 12 – The future of planning policy and plan making</p>	
<p>Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?</p>	
<p>Question 104: Do you agree with the proposed transitional arrangements?</p>	
<p>Question 105: Do you have any other suggestions relating to the proposals in this chapter?</p>	
<p>Chapter 13 – Public Sector Equality Duty</p>	
<p>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?</p>	