

Planning Applications Committee

04 September 2024



Reading
Borough Council
Working better with you

Title	Consultation on proposed reforms to the National Planning Policy Framework and other changes to the planning system
Purpose of the report	To make a decision
Report status	Public report
Report author	Mark Worringham, Planning Policy Manager
Lead councillor	Councillor Micky Leng, Lead Councillor for Planning and Assets
Corporate priority	Inclusive Economy
Recommendations	The Committee is asked: 1. To note the report and agree that officers should agree full responses in consultation with the Lead Councillor for Planning and Assets and the Chair of Planning Applications Committee.

1. Purpose of report

- 1.1 To advise Committee about a current consultation by the Government on changes to the National Planning Policy Framework that was published on 30 July 2024, which also deals with some other proposed changes to the planning system.
- 1.2 The consultation paper seeks responses to 106 questions. Therefore, the officer comments provided below are concentrated on those proposals most pertinent to Reading. The full list of questions is set out in Appendix 1. The deadline for responding is 24 September 2024.
- 1.3 Due to the length of the consultation and its arrival during periods of leave, officers have not had the time at this stage to draft responses to the consultation questions in full. Committee's agreement is therefore sought for officers to agree full responses with the Lead Councillor for Planning and Assets and the Chair of Planning Applications Committee before submission.

2. Background

- 2.1 The current consultation proposes changes to the National Planning Policy Framework (NPPF). It represents the first significant proposals relating to planning by the new government, and its primary stated intention is to boost levels of housebuilding.
- 2.2 The full consultation text can be found online¹, together with the detail of the proposed changes².

¹ [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

² [National Planning Policy Framework: draft text for consultation \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

3. Proposed changes

3.1 The paragraphs below set out the main proposed changes with implications for Reading.

3.2 Planning for the homes we need

- 3.2.1. Changes are proposed to the policy on how local authorities should identify their local housing need in preparing local plans. There is currently a standard methodology for assessing local housing need highlighted in the NPPF and detailed in Planning Practice Guidance which is an advisory starting point for setting need, and the proposal is that a revised standard methodology becomes a mandatory approach to need. Some wording that had been added to the NPPF in December 2023 around housing targets being subject to significant changes in character would be removed. The need to demonstrate a five year housing land supply even if an up-to-date local plan is in place (removed in December 2023) would also be reinstated.
- 3.2.2 In terms of the methodology itself, the current methodology starts with national household projections from 2014, includes an adjustment for local housing affordability and then includes a 35% urban uplift for the 20 largest towns and cities, including Reading. Based on current figures, this generates a housing need for Reading of 878 homes per year.
- 3.2.3 The proposed methodology would be based on an annual 0.8% in existing dwellings, and then includes a much-strengthened affordability adjustment. It removes the urban uplift. However, due to the fact that the affordability adjustment would be much more substantial, the resulting housing need for Reading is significantly higher at 1,023 homes per year. The effects on housing need of almost all of our neighbouring authorities (with the exception of Slough) will be similar or even more dramatic.
- 3.2.4 The consultation also proposes moving towards more strategic planning with the aspiration of universal coverage of Spatial Development Strategies (currently only prepared by combined mayoral areas). There is little detail on how this would be achieved, but in the meantime there are proposals for strengthening the requirement for local authorities to co-operate with one another in plan making.

3.3 Brownfield land

3.3.1 The consultation proposes making clear that the default answer to development on brownfield land for housing and other identified needs should be yes. This will have clear implications for how a great many proposals in Reading are determined.

3.4 Delivering affordable, well-designed homes and places

- 3.4.1 The consultation emphasises the need to improve the existing system of securing developer contributions (through Section 106 and Community Infrastructure Levy) rather than proceed with a new Infrastructure Levy, the legislative basis for which had already been laid in the Levelling Up and Regeneration Act 2023.
- 3.4.2 One particular change of relevance to Reading is the proposal to increase flexibility in the tenure of affordable housing that is required by local planning authorities. As it stands, local authorities are expected to secure 10% of all homes on major sites for an affordable home ownership product. They are also expected to secure 25% of affordable homes delivered through developer contributions as First Homes, a new affordable home ownership product focused on first time buyers. The consultation proposes removing these restrictions so that local authorities are able to determine the tenures most needed in their local areas.
- 3.4.3 Proposed changes would also promote mixed tenure developments, with a mix of tenures and ownership, including affordable rented, build to rent, and housing for specific groups such as older people and students, subject to policies supporting developments for primarily affordable housing.

3.4.4 In terms of design, the proposals include removing the many references to 'beauty' and 'beautiful' development that were introduced to the NPPF over recent years, as well as reducing the unusual emphasis on mansard roofs in the existing NPPF.

3.5 Building infrastructure to grow the economy

3.5.1 There are proposed changes to the NPPF to support some key economic developments that are considered to be particularly significant for the growth of the economy. These cover laboratories, gigafactories (battery cell manufacturing plants), digital infrastructure including data centres, and freight and logistics. Plans would need to identify land which is suitable for such uses. There is also a proposal that laboratories, gigafactories and data centres would be directed into the Nationally Significant Infrastructure Projects (NSIP) regime.

3.6 Delivering community needs

3.6.1 There are proposals to further emphasise the need to deliver public service infrastructure such as hospitals and prisons, and also make specific reference to the need to expand early-years provision. The consultation also asks questions on how national policy can better assist in promoting healthy communities and tackling childhood obesity.

3.6.2 There is also a reference to moving towards a 'vision-led' approach to transport planning. In practice, this seems to involve moving away from predicting and providing and planning for a worst case scenario, and instead designing the transport interventions necessary to achieve the vision for the development. It is not entirely clear what this would mean in practice.

3.7 Supporting green energy and the environment

3.7.1 Changes to the NPPF would give significant weight to the benefits associated with renewable and low carbon energy generation, and proposals' contribution to meeting a net zero future. They would also increase expectation that suitable sites for such energy generation be identified in plans.

3.7.2 The consultation also asks relatively open questions on how national policy can do more to support in planning for a low-carbon future, and also managing flood risk arising from climate change.

3.7.3 Water resilience is also dealt with in the consultation, and there are proposals to give greater certainty to infrastructure providers by amending the definition of NSIP projects to include relevant proposals. This would require amendments to the Planning Act 2008.

3.8 Changes to planning application fees

3.8.1 There is a clear recognition in the consultation of budget shortfalls in local planning authorities arising from the fact that application fees frequently do not cover the cost of determining an application.

3.8.2 The most specific change that is proposed is to increase the fee for a householder planning application from £258 to £528 in recognition of the fact that this application type often results in significantly more cost than can be covered by the existing fee.

3.8.3 The consultation also asks which other application fees should increase. Examples cited of where the fee does not cover costs include approval of details reserved by condition and prior approvals for certain permitted development rights.

3.8.4 Another question posed by the consultation is whether fees should be charged for some types of application that are currently free. Examples given are tree works applications, listed building consents and demolition in a conservation area. In this case, the balance between recovering costs and incentivising developers to avoid applying for consent will need to be struck.

3.8.5 Alternatively, the consultation also asks whether fees should be set at local level, either by passing the responsibility for fee setting fully to local authorities, or by setting default fees nationally which local authorities have the option of altering in their areas.

3.8.6 The question is also asked whether fees should be raised to enable application fee income to fund the entire cost of running a planning service, which includes policy, enforcement and conservation functions. This would clearly result in much higher fees, but would make a substantial change to planning authority budget shortfalls.

3.9 The future of planning policy and plan making

3.9.1 It is emphasised that local planning authorities should proceed with plan-making without delay. In view of this need, transitional arrangements are proposed for those authorities such as Reading that have already made progress with local plans, but some of these arrangements are conditional on plans delivering high levels of new housing. Of relevance to Reading is the proposal that authorities that reach Regulation 19 stage (pre-submission) within one month of publication of the new NPPF and have a housing provision figure within 200 per year of the figure produced under the new standard methodology will be able to proceed to examination under the existing NPPF. Our Regulation 19 stage is planned for November this year, and the final housing figure that we plan for may fall within 200 per year of the new figures.

3.9.2 The consultation also states that it intends to implement the plan-making reforms that are already set in the Levelling Up and Regeneration Act 2023 but not yet brought into effect from summer or autumn 2025.

3.10 Other matters

3.10.1 There are a number of matters which are also dealt with in the consultation that have not been outlined above as they are considered to be less likely to have direct implications for Reading. These include:

- Significant changes to policy around the Green Belt, including identification of a 'Grey Belt' within the Green Belt that makes limited contribution to its significance;
- Proposals to give local planning authorities the ability to recover their costs from involvement in the NSIP process;
- A significantly more positive stance on onshore wind generation; and
- Changes to the criteria for the Secretary of State to intervene in local plan-making where insufficient progress is being made.

4. Officer comment

4.1 Many of the proposals in the consultation will directly impact Reading, and responses to the consultation will therefore need to be carefully considered.

4.2 The proposed changes to fees are largely positive and officers expect the Council's response to be largely supportive, albeit with some caveats about the concern that setting fees for tree works applications and listed building consents may result in higher levels of unauthorised works so must be carefully considered.

4.3 The increased flexibility for setting expectations around affordable housing tenure are also welcome. The ownership models promoted in existing policy do not meet Reading's most significant affordable housing needs, and removing these restrictions is therefore positive.

4.4 A return towards strategic planning is also a welcome step, albeit that the detail of this is missing. In an authority such as Reading, many issues have cross-boundary implications and require a better vehicle for these to be addressed than the existing duty to co-operate. Clearly, however, additional tasks will need to be adequately resourced.

- 4.5 In terms of the levels of housing proposed, the number of homes that results from the proposed new standard methodology is well above what Reading is likely to be able to realistically deliver, and with housing levels also increased in adjoining authorities, there is little prospect of unmet needs being delivered outside our boundaries, at least until more formal strategic planning arrangements are in place. As currently proposed, the changes seem unlikely to deliver the levels of housing envisaged in the short term unless it is through high levels of speculative development or appeals.
- 4.6 There are also some concerns with the proposed transitional arrangements, which as currently worded seem likely to stall progress in many local authorities rather than accelerate it. The only authorities where progress is likely to be sped up are those (such as Reading) that were already at a more advanced stage. In officers' view, there is a need for slightly more generous transitional arrangements to avoid the changes having the opposite effect in terms of speed than intended.
- 4.7 In terms of what more national policy can do to support the move towards zero carbon, officers suggest that this is an opportunity to make the case from a move away from the stance of the Written Ministerial Statement of December 2023 that restricts local authorities' ability to set their own standards of energy performance of new buildings. This matter is conspicuous by its absence in the current consultation.
- 4.8 There will be a number of other points that officers have not yet had a chance to fully formulate. It is therefore recommended that Committee agree that officers prepare a full response and agree it with the Lead Councillor for Planning and Assets and the Chair of Planning Applications Committee before submission.

5. Contribution to strategic aims

- 5.1 Planning, including through the local plan, contributes to the following priorities in the Corporate Plan 2022/25:
- Healthy environment: through ensuring that policies are up to date to achieve the highest environmental standards in development, respond to the Environment Act and incorporate the approach of the Local Transport Plan;
 - Thriving communities: through ensuring that housing needs are met insofar as possible, including affordable housing of the right tenure to meet Reading's needs; and
 - Inclusive economy: through updating policies to meet development needs for economic development uses.

6. Community engagement

- 6.1 There are no implications for community engagement.

7. Equality impact assessment

- 7.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to:
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.2 The consultation asks a specific question about what the impacts under the Public Sector Equality Duty would be. No specific impacts have been identified at this stage.

8. Environmental and climate implications

8.1 The Council declared a Climate Emergency at its meeting on 26 February 2019 (Minute 48 refers).

8.2 A number of the proposals within the consultation would have environmental and climate implications. These include the following:

- Increased levels of housebuilding would have potential environmental implications including loss of undeveloped land and emissions associated with development activity;
- A focus on brownfield development will reduce the impact on undeveloped land and will help to support sustainable transport modes;
- New development to support key economic sectors such as freight and logistics will also have climate implications, associated not only with the development activity but with the ongoing use;
- An increase in onshore wind generation and other renewables associated with the proposals will assist in reducing emissions.

9. Legal implications

9.1 Most of the proposals in the consultation relates to national policy and would not have legal implications. However, some of these proposals including changes to NSIP or the implementation of some of the plan-making reforms would need primary or secondary legislation. In addition, there are expected to be further legislative changes to enact the new government's proposals for the planning system, and these are expected to be subject to further consultations.

10. Financial Implications

10.1 There are likely to be financial implications arising from this consultation, although at this stage in most cases the detail is not available to identify what the specific implications will be.

10.2 The consultation proposes changes to planning application fees, in recognition of an overall planning authority budget shortfall across the country, with the aim that fees should fully cover the cost of determining an application. The consultation specifically proposes that a fee for a householder planning application would increase from £258 to £528. In 2023, the Council received 347 householder planning applications, and this level of fee increase would result in an income increase of approximately £94,000.

10.3 The proposals around application fees are outlined in section 3.8 of this report. The direction of travel is therefore clearly towards ensuring that planning fees assist in covering local planning authority budget shortfalls.

10.4 Other proposals around plan-making may have financial implications depending on how they will impact Reading's plan-making process. As it stands, transitional arrangements may well enable our plan-making to continue under the existing NPPF, which will generate no financial implications. However, if these arrangements were to change there is a risk that the plan would need to be examined against a new NPPF which would likely cause delays and the need to commission additional evidence.

10.5 It is also worth noting in this context that the consultation proposes abandoning the Infrastructure Levy which was contained in the Levelling Up and Regeneration Act 2023 and not yet implemented, and this would affect how infrastructure is funded, but, since the details of the Infrastructure Levy were never determined it is not possible to identify the financial implications

Appendix 1 – Full list of consultation questions

- Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?
- 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?
- Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?
- Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?
- 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?
- Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?
- 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?
- Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?
- 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?
- Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?
- Question 11: Do you agree with the removal of policy on Annual Position Statements?
- Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?
- Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?
- Question 14: Do you have any other suggestions relating to the proposals in this chapter?
- 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?
- 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?
- Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?
- 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?

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

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

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?

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?

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

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

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?

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?

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?

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?

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?

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?

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?

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?

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?

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

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?

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?

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?

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

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?

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?

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?

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?

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?

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

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

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

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?

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

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

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

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

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

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?

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

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

Question 56: Do you agree with these changes?

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?

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?

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?

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

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

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

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

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?

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?

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

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

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

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

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

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

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

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

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?

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?

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?

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

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

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?

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

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

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

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

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?

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?

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

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

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

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

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.

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.

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.

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.

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.

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.

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?

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?

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?

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.

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

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.

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

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

Question 104: Do you agree with the proposed transitional arrangements?

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

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?