

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

Responding to Consultation – August/September 2024

Note prepared by Steve Tilbury Consulting for member councils of WSALC/ESALC

Dear Members

This note has been prepared by our planning advisor to help you respond to the government's consultation on planning reforms which closes on 24 September 2024¹.

This consultation focus on changes to the wording of the National Planning Policy Framework ('NPPF') and to the mechanism (called the 'standard method') which is used for calculating how many houses are needed in each LPA.

The key driver behind the proposed changes is the government's manifesto commitment to deliver of 1.5 million new homes over the next five years. That is actually the same as the overall target set by the previous government, but the way in which this number is distributed will change significantly, with large increases for many authorities in the south east. There will also be more pressure from government for each local planning authorities ('LPA') to deliver their 'share' of the national total. Many of the changes proposed are therefore about reducing the scope for an LPA to justify lower levels of housing delivery than the government is now setting out for them.

Changes are proposed to the circumstances in which development may be permitted in the formally designated Green Belt around some of our larger cities. This will not affect West Sussex or East Sussex directly because there is no land designated as Green Belt in either county. This does not mean that you cannot or should not comment on the proposed changes if you want to. **No changes are proposed to the level of protection or constraints on development which are given to the South Downs National Park, or to our National Landscapes (still referred to in some places as Areas of Outstanding Natural Beauty).** Significant changes are proposed to promote renewable energy and provide for major commercial development.

No changes are proposed in the consultation to the way in which neighbourhood plans operate and the government does not propose to reverse the amendment introduced in December 2023 which means that neighbourhood plans which allocate sites for development gain a 5 year window of increased protection against speculative development being allowed (it was previously 2 years). That remains a potential major benefit for such plans. As long as it is, the current consultation does not cover all of the planning reforms the government has announced, for instance new towns, the introduction of national development management policies and the detailed changes to the process for producing local plans. There will, presumably, be further consultation on these in due course.

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Given the manifesto commitment, it is reasonable to assume that the government will implement all or almost all of the changes it is proposes. The consultation is about the 'how' and some of the details, not the overall approach.

All of the 106 questions in the consultation are set out in the first column of the table below. In the next column is a brief explanation of what specific proposal or change the question is about, which ideally should be read alongside the consultation document itself. The final column contains suggestions as to what you might want to consider when discussing your response. It is **not** intended to suggest what you should say or what opinion you should have, but to prompt and focus your discussions.

Hopefully the format will suit an agenda item or discussion document and make it easier to work through the consultation. Even if you do not intend to respond, you may well find the table a useful summary of the government's proposals.

The government's preferred method for you to provide your response is via its Citizen Space portal at:

<https://consult.communities.gov.uk/planning/planning-reform>

The on-line response form is very simple to complete and prompts answers mainly in the form of a yes or no ('do you agree or not with our proposal?') followed by a free text box for an explanation if you wish to provide one. There are some open questions.

Question No.	Question	What is the question about?	Discussion/Response Points
1	Do you agree that we should reverse the December 2023 changes made to paragraph 61?	<p>This change would mean that the ‘standard method’ for calculating housing need MUST be used for local plans and (when relevant) for calculating a 5 year housing land supply (‘5YHLS’) with no exceptions. This is what the government means when it talks about a ‘mandatory’ housing target.</p> <p>It is important to point out that the government is not saying that this will then be, without exception, the number of homes which must be provided for in a local plan. It accepts that there may be environmental or practical reasons (‘hard constraints’ it calls them) why it may not be possible to accommodate the number in full. So there will still be a two stage process as there is now. But it makes clear that ‘hard constraints’ do not include a reluctance on the part of the LPA to plan for this number of new homes or a local preference for a different figure.</p>	<p>This is not a question about whether you agree with a particular formula or housing number, it is a question about whether using the government’s standard method should be ‘mandatory’ rather than ‘advisory’.</p> <p>This is not quite as big a change as it might first appear however, because even under the current NPPF, the use of anything other than the standard method is very hard to justify and very few LPAs have done so. The government is effectively now saying ‘don’t even waste your time debating this – we’ve told you what the formula is and you have to use it’.</p> <p>However, as noted, it is not saying that without exception you must provide for that number (because suitable sites have to be found and the LPA may not be able to do this) but there is a clear emphasis elsewhere in the proposed reforms on making sure that LPAs can do so.</p>
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?	This would be consequential on implementing the change in Q1. If no alternative approaches are permitted then of course no explanation of these is required.	This would follow from your answer to Q1

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3	Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?	The 20 largest cities in England are currently required to plan for a further 35% more housing on top of the figure calculated using the standard method. This has always been considered an arbitrary figure, with little evidence that it could ever be delivered. Removing the uplift means that these homes are then added back into the overall 'pot' where the government believes there is more chance of them actually being built. This is one of the reasons why the housing figures for other LPAs have risen.	Whilst no-one would disagree that existing urban areas should provide for additional housing wherever possible, if they are given an arbitrary 'top up'(in additional to the numbers they already have) then this just means it is likely to be missed – and housing delivery get worse. But of course 'relocating' numbers away from cities means that they will be redistributed via the new formular to the numbers for other areas .
4	Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?	P130 of the NPPF gives LPAs a reason to decline making new housing allocations if the consequence would be that housing density is out of character with a local area. It would appear that this was intended to prevent suburban areas being overdeveloped. It was not intended to be a reason for refusing to allocate a new development in a rural village. This would be deleted from the NPPF because the government considers it unnecessary and that higher densities should be encourage in appropriate urban areas.	<p>P130 was never intended to prevent, for instance, a small development of new homes being allowed in a village just because it had a different density to other parts of an community.</p> <p>It might however have had the benefit of reducing pressure to significantly increase density in or around suburban parts of a larger settlement which have a particular character (many seaside towns for instance).</p> <p>You may be concerned about the loss of the safeguard that this policy might have provided.</p>
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	This is a change proposed to the role of design codes (which help to promote good design and layout of new development) to help achieve higher density housing in appropriate urban areas.	Using design codes more selectively to help achieve higher quality new development, especially at scale, rather than covering whole areas would generally be considered positive. It would seem to make better use of resources than

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	change such as greater density, in particular the development of large new communities?		<p>trying to draw up design codes covering areas where no development of any scale is proposed.</p> <p>Neighbourhood plans use design codes in a local area if this is something a community wishes to pursue.</p>
6	Do you agree that the presumption in favour of sustainable development should be amended as proposed?	It is proposed to add some additional words to the Para 11 of the NPPF to emphasise that even when local plan policies are out of date for housing applications, they must still demonstrate high quality design and layout. The government feels this is necessary because it expects that at least for a while there will be more applications to which the presumption applies.	This additional emphasis on the quality of design and layout is positive. It does ensure there is no doubt that this should be taken into account, even where applications are being considered under P11 (the ‘tilted balance’ as it is often called), but it should be something that is considered very important with any planning application.
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?	The current NPPF allows some LPA’s to use different calculations of whether that they have enough land for new housing, changes introduced for the first time when it was revised in December 2023. The government proposes to reverse these changes and go back to a requirement for a five year supply of housing land in all cases. The purpose is to try to ensure higher levels of housing delivery.	The principle of the 5YHLS has been established as part of the planning system for many years. The question here is only whether the more relaxed provisions of the current NPPF are removed and we revert back to the pre December 2023 approach. Views on this are likely to be shaped by whether you think the pressure this creates on LPAs to identify and allocate sites through local plans is helpful – or whether you think it creates a window for speculative development.
8	Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?	P77 of the NPPF points to guidance elsewhere which suggests that LPAs can reduce their future housing requirement if they ‘over-performed’ in previous years. The government proposes to remove this provision. Again, this is a measure to increase housing requirements for new plans.	Depending on the LPA and the approach they have taken to this calculation, this might have the effect of increasing the future housing requirement. You might think LPAs should be continue to be able to recognise past performance in future figures.

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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?	The 5% buffer is a ‘top up’ of the housing requirement because it is assumed that there will always be some shortfall in actual delivery. It was removed in the current NPPF but the government now wishes to reintroduce it.	<p>The 5% figure is designed simply to inflate housing requirements further – the choice of 5% might be reasonable in one case and unreasonable in another.</p> <p>You might consider that with the proposed changes to the standard method pushing up housing requirements in most places, there is even less justification for a 5% buffer.</p>
10	If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?	The buffer figure could be any figure the government thinks is reasonably necessary.	At a local level even a 5% buffer might be considered unnecessary but 5% was used previously.
11	Do you agree with the removal of policy on Annual Position Statements?	Annual Position Statements are a technical mechanism by which an LPA can obtain a formal confirmation from the Planning Inspectorate of its 5YHLS figure. They have rarely been used (because there are very few circumstances where they serve any purpose) and most professionals would agree that there is little point to retaining them within the system.	<p>Don’t confuse an ‘Annual Position Statement’ with the ‘Authority or Annual Monitoring Report’ which all LPAs have to produce. They are not the same thing – Authority/Annual Monitoring reports are a valuable annual update on policy matters and will continue.</p> <p>Annual Position Statements have never had much practical use.</p>
12	Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?	The government has said that it will introduce specific legislation to reintroduce strategic level planning in due course. In the meantime, the ‘duty to cooperate’ will be retained, and the NPPF amended to place more emphasis on cross border cooperation between authorities. The aim is to put more pressure on LPAs to look seriously	Almost all local authority and private sector planning professionals and many elected members agree that without effective strategic and cross border planning, delivering high quality new development and the infrastructure to support it will be very difficult. The absence of proper strategic planning is a major weakness of the current system.

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		at making provision for any previously unmet housing need between them and their neighbours.	Of course no one can be sure what the outcome of cross border co-operation will be, and it might mean that more development is proposed in some areas than others.
13	Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?	The tests of soundness are those used by a planning inspector when examining a local plan (NOT a neighbourhood plan – that’s a different process). The question is asking whether there are any ideas as to how a planning inspector could be asked to ensure that they were satisfied that a plan did properly address the issue.	You may not have a specific suggestion, but you may wish to consider whether this is a general principle you can support to ensure that co-operation between LPAs is given more emphasis when plans are examined.
14	Do you have any other suggestions relating to the proposals in this chapter?	An open question for any other thoughts or ideas on this section of the consultation.	An opportunity for any general comments you might want to make. You may wish to comment here on the general issue of housing numbers and the impact of the revised standard methodology on your area.
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?	The formula for the calculation of housing need (which is referred to as ‘the standard method’) is found in the on line Planning Practice Guidance (‘PPG’) rather than the NPPF itself. The government proposes to amend the current formula in a number of ways. This which would increase the overall national provision to 370,000 homes per annum. The assumption is that this will lead to approximately 300,000 new homes a year actually being delivered.	If the aim of a policy is to more accurately reflect housing need in an area there is a good case for using the existing stock as a baseline rather than household projections.

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		<p>One of the changes is to use the existing stock of homes in an area as a baseline rather than the projected rate of formation of new households (which it considers flawed because projections are based behaviour which is itself influenced by housing availability).</p>	
16	<p>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>This is proposed change to the part of the formula which assesses the affordability of housing in an LPA area – in this case the aim is to make the formula a little less volatile by using a longer term average.</p>	<p>The key change here is use of a three year rolling average rather than the data from a single year. That makes means it will fluctuate less and you may think that is a sensible change.</p>
17	<p>Do you agree that affordability is given an appropriate weighting within the proposed standard method?</p>	<p>The proposed formula gives considerably more weighting to affordability (or rather the lack of affordability) than the current version. This means that housing requirement will be proportionately higher where housing is already less affordable relative to average income.</p>	<p>The proposed change places more emphasis on affordability, which itself is a proxy for the shortfall in housing supply in an area relative to housing need. You may have views on whether that is the right approach, but bear in mind that the consultation is on the change proposed, not on whether affordability should be part of the calculation at all.</p>
18	<p>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>At present the formula only operates on the basis of open market housing. It does not include any element relating to the cost or availability of renting a property – which of course is a large element of any housing market. The government has no detailed proposal to make; it is asking for views.</p>	<p>Your answer will depend on whether you have a view on whether you think the government should do this, and if so how.</p>

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19	Do you have any additional comments on the proposed method for assessing housing needs?	An open question for any other thoughts or ideas on this section of the consultation.	An opportunity to offer any views or observations on the way that housing need – across the spectrum of different housing types – is assessed and utilised.
20	Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports? <i>(Note that the paragraph reference – in the consultation is incorrect. The new para reference would be P122c)</i>	The government wants brownfield (also sometimes called ‘previously developed’) land to be used first in meeting housing need. It proposes that the principle of developing (of at least some) brownfield land should always be considered acceptable. Surprisingly, this is the first time that such an explicit statement to favour and support development on brownfield land has appeared in a key planning policy document. A ‘brownfield passport’ is the idea that there is a fast-track system for consenting brownfield development – that is not proposed in this consultation.	If you support the use of brownfield land for development as a priority – which most people would - would then you might want to support this proposal. The revised wording of what would be P122 still refers to brownfield land ‘within settlements’ not in any location, so brownfield land in the countryside would not benefit from the presumption if the wording is retained.
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?	It is important to stress that Green Belt (capital G capital B) is a formal policy designation to prevent urban sprawl around some cities and conurbations. It is not an environmental designation – land in the Green Belt does not have to be ‘green’, although most of it is, and some of that is covered by another designation which IS environmental – such as a National Landscape. A small percentage of land already had development on it when it was included in the designation, or has been developed more recently for one reason or another. This amendment would make it clear that redeveloping this land is much more likely to be acceptable than it is at present.	There is no Green Belt in West Sussex or East Sussex, and any changes to Green Belt policy would have no direct effect in either county. If you do want to answer this question and any of the others on Green Belt policy, the starting point is really whether, as a principle, you would accept that releasing more land in the Green Belt would be acceptable (bearing in mind that for some LPAs there is very little land which isn’t in the Green Belt), and if so, whether the use of brownfield/previously developed land would be preferable in the first instance.

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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>The government is considering extending the definition of previously developed land (this would apply everywhere – not just in the Green Belt) to include areas of hardstanding and glasshouses. Some existing horticultural businesses would therefore fall within the definition of previously developed land when currently they do not. Whilst that might be reasonable for some redundant or non-viable sites, the government is aware that this could then put viable sites ‘at risk’ – something that would particularly affect parts of West and East Sussex where commercial horticulture is a traditional land use often close to existing urban areas.</p>	<p>Extending the definition in this way could create more incentive for the owners of existing businesses to sell up and for their land to be put forward for residential development.</p> <p>You might want to consider whether it is possible for there to be adequate safeguards to differentiate in the way the government suggests, especially in some parts of the country where land in horticultural use has already been under a great deal of pressure.</p>
23	Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?	<p>It is important to say again that Green Belt is a formal designation – it is not just a reference to any or all undeveloped open land. Land which is in the Green Belt may also be within a National Landscape (AONB) or National Park because of its landscape quality but that is not why it is designated as Green Belt. There is some previously developed land in Green Belt, and some land in the Green Belt is located where its contribution to preventing sprawl might be described as fairly limited.</p> <p>The proposal is to create a new category for describing land within the Green Belt (not anywhere else) as ‘grey belt’ land. This would be land which is of limited value in making sure that the Green Belt designation is effective. This could be as a result of where it is, whether it is previously developed and what contribution is</p>	<p>If you do want to provide an answer then you may want to consider whether you think it is possible to differentiate land in the way the government suggests. Some groups and organisations which are concerned about what they see as a threat to the integrity of the Green Belt are likely to suggest that this would be very difficult and create a ‘slippery slope’ eroding the Green Belt. Other views would be that the release of some Green Belt land is necessary, and that it is possible and useful to create such a distinction.</p>

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		actually makes to preventing sprawl. No land can be called 'grey belt' unless it currently within the formally designated Green Belt.	
24	Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?	It would obviously be of concern if land were deliberately degraded so that a case could be made to call it 'grey belt' in the future. The government is asking for ideas on how to ensure this does not happen.	Given the criteria the government suggests it is quite difficult to see what deliberate action could degrade any land currently in the Green Belt. If this is a concern a mechanism might be to fix a 'base date' for any assessment on or around the date of this consultation.
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?	The government is conscious that this could become a very contested definition and so is asking for thoughts on how to ensure that it provides enough guidance to ensure there is very little room for doubt (and for future litigation).	To avoid (reduce) the scope for uncertainty and requirement for litigation a well drafted definition and guidance would be helpful.
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?	Effectively this question is asking whether you agree that there is any land in the Green Belt which makes a limited contribution to its purpose. Some organisations will argue that all land in the Green Belt makes the same contribution, taken as whole, whatever it looks like or wherever it is located.	Any answer you give to this question would flow from your views on the release of 'grey belt' or other land from the Green Belt.
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?	Local Nature Recovery Strategies (none of which are yet formally in place) are the new county wide strategies for improving biodiversity. An LNRS might be another way to identify the contribution that some Green Belt land makes to the environment (as opposed to just preventing sprawl).	You might consider it appropriate that any Green Belt land which had an important role (or potential role) in promoting biodiversity should receive a higher level of protection

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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?	The government acknowledges that meeting its more ‘forceful’ approach to housing delivery will require the release of more land for development. It aims to ensure that previously developed land and ‘grey belt’ land are used first, but also to ensure that development occurs where it is most sustainable – which often means closest to existing urban areas. That creates a tension because not all brownfield sites are exactly where we would choose them to be.	<p>You may wish to consider whether you think that the approach the government is setting out: prioritising brownfield land, ‘grey belt’ land (which only exist in certain places and over which there is, by definition, little or no choice), is likely to conflict with making the right selection of sites for new development.</p> <p>Although redeveloping brownfield land is generally preferred, not all brownfield sites are in good, sustainable locations, or supported by their local community.</p>
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?	The government does not want to undermine the fundamental purpose of the Green Belt. In its view there is scope to release some land within the Green Belt (which could be ‘grey belt’ or sometimes genuinely ‘green’) without undermining the fundamental purpose. This question is asking whether you agree with that proposition.	It is difficult to see why anyone would not agree with this point.
30	Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?	The change proposed would mean that if a planning application was made on a piece of land which met the ‘grey belt’ definition AND the LPA did not have a 5YHLS AND the ‘golden rules’ set out below are met AND the release of the land would not undermine the purpose of the Green Belt THEN it would not be ruled out JUST BECAUSE it is land in the Green Belt – but still might be refused for other reasons of course. Genuinely ‘green Green Belt’ sites would not be included – but could still be granted planning	<p>No community in West Sussex or East Sussex will have any development to which this could apply because there is no Green Belt.</p> <p>For communities where it is an issue, it is better that these requirements apply than there are no criteria at all. How practical and workable they are will no doubt be an issue for some respondents.</p>

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		permission as they are now if the need for doing so is significant enough.	
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?	There are types of development other than residential which might be promoted on 'grey belt' land. This question is seeking views on what the criteria for doing so might be.	For those communities which are concerned about releasing land from the Green Belt, large commercial buildings raise different issues (some better, some worse) than residential development.
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?	The intention is that the proposed changes to the criteria for grey belt/Green Belt would also apply to proposals for traveller sites. This question is asking whether you agree with this.	Finding sites to meet the needs of the gypsy and traveller community is not easy, and it is probably better that there are more options than there are now, but this will be a contested point.
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?	Assessing the need for additional traveller sites has some technical difficulties (in definitions) and is often controversial. This is an open question most likely to be answered by those with a special interest in the subject	As above

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34	Do you agree with our proposed approach to the affordable housing tenure mix?	It is proposed that any land released from the Green Belt for residential development will be subject to a number of ‘golden rules’ including a requirement for 50% affordable housing overall, with the mix of tenure types (social rent, affordable rent etc) decided at LPA level on a case by case basis.	It would certainly be preferable for LPAs to make their own decisions about local housing need than for the government to determine a ‘one size fits all’ solution.
35	Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?	The 50% target might be difficult to achieve in some areas where land values are lower (remember that there is Green Belt around some cities where house prices and demand are not as great as they are in the south east of England). This question is asking whether there needs to be a flexible approach.	As above
36	Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?	Any residential development on grey belt land would be subject to a requirement for public access to good quality green spaces and green infrastructure. It is not clear that this is very different from what would be expected on any form of development anyway – but it certainly does no harm to reinforce the point.	It is unlikely that anyone would disagree that development, whether in the Green Belt or not, should include high quality green space.
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?	This is a technical question around the way in which viability assessments will be undertaken for land which is released from the Green Belt. The government is keen to ensure that there is a reasonable but not excessive return for the landowner, and enough money available to fund infrastructure and affordable housing. It is contemplating setting benchmarks for	This question is really aimed at LPAs and professional land agents. The underlying principle is that a landowner should only gain a reasonable, and not an excessive, uplift in the value of their land. That means that more money will be available to pay for infrastructure and high quality design. Most local communities would support that principle because it would help to

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		assumptions about the value of land when viability assessments are undertaken.	mitigate the impact of development on the existing area.
38	How and at what level should Government set benchmark land values?	A number of professional organisations and commercial firms are likely to offer advice on whether and if so how, the government should calculate land value to create a willingness to sell whilst not generating excessive returns to the landowner (who by and large has no risk or costs associated with their land suddenly being worth far more than it is now).	See above
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?	Effectively this is suggesting that if land transactions take place above the values the government sets, then viability assessment must ignore these actual figures and make their calculations on what “should” have happened. That then acts as a disincentive for any such higher transactions to take place.	See above
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?	The government is suggesting that LPAs will not be able to ask for anything over and above the policy requirement in the national guidance – which is the flip side of the developer not being allowed to negotiate a lower figure (although they will still be able to do so if they ‘play by the rules’ and still cannot afford to meet the full requirement).	Many respondents are likely to agree that it is not unreasonable for the government to ensure that there is a level playing field for such negotiations.
41	Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development	A late stage review occurs to update the assumptions in a viability assessment once more information is to hand – for instance from actual sales receipts rather than estimates.	Again, many respondents would think this is a reasonable proposition, and it is already operated on some larger developments.

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	<p>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>		
42	<p>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>Other forms of development such as a warehouse or laboratory could not be subject to a requirement for affordable housing. The government is asking whether there is any other way in which they might be required to contribute if they are allowed on grey belt land.</p>	<p>If you do have any suggestions on this point, this is where to make them.</p>
43	<p>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>Some local plans which have progressed to a very late stage (including examination) have already included releases of land in the Green Belt without the golden rules being applied (which they couldn't have been because the LPA did not know about them. The question is asking whether these should be retrospectively subject to the new rules</p>	<p>This does not apply to any LPA in West Sussex or East Sussex so you may feel it is not relevant to comment.</p>
44	<p>Do you have any comments on the proposed wording for the NPPF (Annex 4)?</p>	<p>Annex 4 is the proposed new technical definition of benchmark land value.</p>	<p>Unless you have expertise in this area, it is unlikely that you would wish to answer this question.</p>

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45	Do you have any comments on the proposed approach set out in paragraphs 31 and 32?	P31 and P32 relate to the use of compulsory purchase powers to acquire land but on the basis of existing value and without paying the so-called 'hope value' of land (i.e. the extra value it acquires on the open market when there is reasonable 'hope' that it might be given planning permission in the future).	As this relates only to Green Belt land, you may not feel any need to comment on this question.
46	Do you have any other suggestions relating to the proposals in this chapter?	An open question for any other thoughts or ideas on this section of the consultation.	An opportunity to offer any views or observations you have. The government is always interested in specific examples which illustrate a general point.
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?	The government wishes to place more emphasis on creating properties available for rent at lower cost ('social rent' as it is called) through the planning system. This is largely uncontroversial as it has always been a concern to LPAs. The problem in doing so is more associated with the financing of social rented properties than any specific planning considerations.	Social rent is the most affordable of housing options and has been difficult to provide and finance in recent years. As a result the proportion of social rented properties has declined in new development. You may wish to reflect on your own community and to offer comments on whether you support the provision of more social rented property.
48	Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?	The 10% figure was introduced into the NPPF to provide a minimum figure for home ownership products, even if the LPA did not have one. Removing this requirement does not reduce the requirement for affordable housing, rather it removes the requirement that a specific proportion must be for ownership rather than rent – because that might not be the local priority.	If you consider that LPAs should be free to determine a local priority for the number and nature of the affordable housing provided on a site, you might wish to support this proposal.
49	Do you agree with removing the minimum 25% First Homes requirement?	First Homes is a specific product in which homes are sold at below market value and that discount passed on in all subsequent sales. Most planning and housing professionals felt that the	Most professionals would strongly support this change, on the basis that it will increase flexibility and local choice.

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		requirement was unhelpful (it is not necessarily the right product for every site) and would support this change.	
50	Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?	First Homes may have their place as a product and therefore retaining them in the definition of affordable homes would be uncontroversial.	Again, most professionals would support retaining First Homes as an option.
51	Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	Very few LPAs do not already have policies to promote mixed tenure communities so this change is unlikely to be controversial (or to have much in the way of an impact).	An opportunity to offer any views or observations you have. The government is always interested in specific examples which illustrate a general point.
52	What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?	An open question for any other thoughts or ideas on this issue.	If you have any experience (good or bad) of trying to secure social rented properties within a development, this would be an opportunity to share any points you think the government might address.
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?	A follow up to the previous question asking for comments on how any policy to promote development of social rent/affordable housing does not have unintended social or economic consequences.	You might wish to share any experience (again, good or bad) of development which is predominantly of socially rented properties which suggests there are limits on how large such development might be (or not).
54	What measures should we consider to better support and increase rural affordable housing?	An open question for any other thoughts or ideas on how affordable housing which meets the needs of rural areas and faces the challenge of rural sites might be promoted.	If you are a rural community and have experience or views on what would make it more likely that affordable housing could be delivered for your residents, it would be helpful to share these.
55	Do you agree with the changes proposed to	The change(s) proposed is to include children looked-after by a local authority in the definition of those people whose housing need should be paid	The principle of good quality accommodation being available is not one to which many people would object in principle. Proposals for housing

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	paragraph 63 of the existing NPPF?	special attention. In practice this would mean being sure that there was enough purpose built or adapted accommodation within the community to meet the expected need.	options to provide looked after children can occasionally generate planning issues and if you have experience of these you may wish to mention them in your answer.
56	Do you agree with these changes?	This question relates to the proposals in the draft NPPF to widen the definition of community led housing projects which would mean that more such projects could benefit from support within the planning system. That would generally be considered a positive step.	If you support the idea that community led housing projects could be brought forward on a wider range of sites then you may wish to support this change.
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?	At present only organisations which are ‘registered providers’ of housing for rent can bring forward affordable housing schemes under certain policies of the NPPF. This means that some small community led organisations which would like to promote housing, usually in rural areas, cannot do so, because they cannot (and often do not want) to meet all of the criteria for that status. The consultation is asking an open question as to whether this policy should be made more flexible.	It might be that you support extending the definition as proposed because this would enable a wider range of organisations to bring forward community led housing projects.
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?	LPAs are expected to allocate at least 10% of the housing requirement in their local plan on small sites of less than 1 hectare in size. The object is to try to ensure that there are sites which can be built out by smaller developers and self-builders. But the policy is difficult to implement because even where such sites are put forward they are often in isolated areas or rural communities and cannot be considered suitable. The government is keen to pursue the policy objective, but is seeking views on how the mechanism can be improved.	If you have any experience or observations of development on small sites, or of problems with small sites being identified, then you might want to share these and make any suggestions about how the situation could be improved.

Question No.	Question	What is the question about?	Discussion/Response Points
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?	The references to ‘beauty’ this refers to were inserted into the NPPF by the previous government which had become attached to the concept of ‘beauty’ as a philosophical principle for design and layout. Important though this is, as a planning term it is vague and difficult to interpret. The consultation makes clear that the new government does not want to see less emphasis on good design and quality, but does not believe that the term itself is helpful in achieving this.	<p>You may think that the references to beauty in the current NPPF are helpful, in which case you would disagree with this proposal. On the other hand, you may agree that being rather vague and difficult to pin down, the term has been unhelpful as the consultation suggests.</p> <p>There is no suggestion that the new government does not want new development to be well designed or attractive to live in.</p>
60	Do you agree with proposed changes to policy for upwards extensions?	The current NPPF refers to the importance of upward extensions on tall buildings as a means to increase housing numbers, but makes unnecessarily specific reference to one particular form - mansard roofs. The revised text proposes to amend the detail but not the policy.	The consultation is not proposing a change to the principle of upward development so views are being sought on the detailed wording, not the principle.
61	Do you have any other suggestions relating to the proposals in this chapter?	An open question for any other thoughts or ideas on this section of the consultation.	An opportunity for any wider comments on the issues in the section.
62	Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?	The government proposes to place emphasis on the need to plan for (and therefore make land available for) large scale commercial development to meet changing economic needs, in particular data centres, distribution hubs and laboratories. These are (usually) large structures with specific locational requirements which can often be controversial – the aim is to make them more likely to gain approval as a boost to the national economy.	You may wish to consider whether you support more provision being made for these types of enterprise, and the reasons for your position.

Question No.	Question	What is the question about?	Discussion/Response Points
63	Are there other sectors you think need particular support via these changes? What are they and why?	Are there other business sectors which would merit specific mention in the new NPPF?	Are there any other types of business (new or old) that you would like to suggest would merit particular attention in the new NPPF?
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?	NSIP stands for ‘Nationally Significant Infrastructure Project’ and many parishes are familiar with the type of large project (Gatwick R2, Rampion 2 etc) which are given planning consideration by this route, rather than by individual local authorities. The question is asking whether the SoS should have the power to decide that some large commercial schemes – such as datacentres and major new laboratory/science campus type projects might be determined as NSIPs rather than dealt with by an individual LPA as they are now.	Some respondents might consider that these types of project are never really ‘national’ and should only be considered by the LPA in which they are proposed. Others will feel that once a certain scale is reached they could have wider implications and that the NSIP regime would be the most effective way to consider them.
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?	The ‘direction power’ referred to here is that referred to in Q64, so the question is what criteria, if any, should apply.	If you disagree with the principle then there would not any scale of project you agree with being included. Alternatively you might agree that there could be some appropriate criteria
66	Do you have any other suggestions relating to the proposals in this chapter?	An open question for any other thoughts or ideas on this section of the consultation.	An opportunity to offer any views or observations you have. The government is always interested in specific examples which illustrate a general point.
67	Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	It is proposed to amend the wording of P100 to make clear that significant weight should be given to the benefits of new infrastructure for public services – such as prisons or hospitals. This would make it more likely that any objections to such a proposal would be outweighed by the	If you agree that there should be more emphasis on getting major infrastructure delivered – and that this might be more important than some of the objections which are raised locally, then you might support this proposal.

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		benefits it provides and potentially speed up delivery.	Even if you do answer 'yes' you can explain any concerns or reservations you have.
68	Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	These changes would add reference to post 16 education and pre-school facilities into P99 of the NPPF, again making it more likely that these would be provided for in local plans or given approval on application.	Again, your answer will depend on whether you agree with giving more weight to getting these types of project delivered possibly against some degree of public concern about the consequences.
69	Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?	The government does not want requirements for new transport infrastructure to be based necessarily on accommodating the worst possible levels of traffic or demand, rather than accepting that there can be other ways of managing demand. This is the so-called 'vision led' approach. However, it is not entirely clear what this would mean in practice or what difference it would make in specific cases.	It would be helpful for the consultation to have made clear exactly what the government thinks the impact of this change would be. A 'vision led' approach presumably includes reasonable scenarios in which traffic demand is reduced 'at source' rather than managed with new highway works, principally by achieving a shift to alternative modes of transport. But if that is correct, those scenarios would have to be realistic and not just fanciful. More information would be helpful here.
70	How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?	An open question for any other thoughts or ideas on how the planning system could help to achieve these objectives.	If you have any suggestions as to how planning policies could improve public health then this is an opportunity to make them in the consultation.
71	Do you have any other suggestions relating to the proposals in this chapter?	An open question for any other thoughts or ideas on this section of the consultation.	Again, an open question in relation to this section.
72	Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?	Previous versions of the NPPF effectively made it impossible to promote on shore wind farm projects. The new government has already changed that policy, but the NSIP process does not currently provide for larger projects, and the government plans to update this.	Your answer will probably depend on whether you think that your LPA should always (or up to a certain level) make the decision on an on shore wind scheme. You might want to bear in mind that they can have a visual impact (in particular) across a long distance and the NSIP process

Question No.	Question	What is the question about?	Discussion/Response Points
			might be more effective in ensuring that there is meaningful consultation across a wide area
73	Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?	An open question for observations on whether the NPPF should give more support for renewable and low carbon energy projects - and therefore make it more likely that they will be given planning consent. This would include things like wind power, solar farms and battery storage arrays.	An opportunity for you to comment on the direction of travel that the government has set out and to raise any specific concerns.
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?	Should the additional support for low carbon energy projects be subject to ensuring that they do not harm irreplaceable habitats.	Many people would agree with this proposal and might suggest that there are some 'irreplaceable' habitats which should be protected in all circumstances.
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?	As both solar and wind technology become more efficient, projects can achieve higher outputs even though the physical impact of the scheme has not increased. The proposal is that the threshold at which a renewable energy project qualifies as an NSIP be increased to a much higher energy output so that only those schemes which really need to be treated as an NSIP are engaged.	Some respondents are likely to point out that even with improved technology, doubling the output threshold for an NSIP project could mean that LPAs have to deal with much larger projects (i.e. physically larger and with more implications) than they do now. Do you think they have the expertise and capability to do that?
76	Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under	See above – the government also hopes that this will mean that solar farm projects maximise their potential output. At present some appear to be deliberately limiting themselves to just below	As above – and solar farm projects are likely to be more common and more widely dispersed than onshore wind projects

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	the NSIP regime should be changed from 50MW to 150MW?	50MW to avoid being caught by the more challenging NSIP regime.	
77	If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?	The consultation has proposed some alternative thresholds for the distinction between a local scheme and an NSIP. The consultation is asking whether these are about right.	If you have a view on what the threshold for an NSIP project should be, this is the opportunity to make the point.
78	In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?	This is an open question in which you can offer any observations or ideas on how the planning system could do more to help tackle climate change.	If you have any comments or suggestions then this is an opportunity to put them forward.
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?	Despite all of the focus on carbon reduction, we do not have (as a country) a truly reliable means of measuring the actual carbon impact of particular measures or projects. We rely a lot on modelling and theory. To make good decisions we need a better understanding of what actually works so that we can model cost/benefit more accurately. The government is keen to try to develop more effective and useful tools to help decision making.	Even if you have no specific comments to make, you may wish to comment on the importance of the issue in general to good and effective decision making.
80	Are any changes needed to policy for managing flood risk to improve its effectiveness?	The government has been getting mixed messages about the effectiveness of various practical and policy measures to reduce flood risk. This question is asking consultees to share their views on how well current policy is working and what might be included in the future.	Many communities do have experience of flood risk management – either in the most practical sense when flooding occurs, or through controversial planning applications. This would be an opportunity to share your views on how this issue is currently dealt with, and what might be done in the future. Specific examples are always welcome in consultations because they help to illustrate the points made.

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81	Do you have any other comments on actions that can be taken through planning to address climate change?	An open question for any other thoughts or ideas on this section of the consultation.	A similar question to the Q78. Some commentators have already noted that the proposed reforms focus hard on economic growth, but have relatively little that is new in relation to climate change.
82	Do you agree with removal of this text from the footnote?	This question relates to text in a footnote which was added to the current NPPF which says that the availability of agricultural land should be ‘considered’ alongside other policies when deciding on sites for development. The change appeared to add little or nothing of practical effect and the government proposes to remove it. It states in the consultation that this is a tidying up exercise and that the role of best and most versatile land in planning decisions – such as it is – will at least remain the same (see Q83)	Whilst you might agree that the removal of this piece of text is not particularly significant, it may be that you consider the issue itself to be an important one, in which case you can make comments in your answer to Q83 below.
83	Are there other ways in which we can ensure that development supports and does not compromise food production?	The tension between releasing land for development, including renewable energy, and for biodiversity gain and being more self sufficient in food production is a difficult one for the planning system to address and current policy largely ducks the issue, leaving it to individual decisions which is hardly strategic. In some areas of the south east – particularly West Sussex, a great deal of the open land is also high grade agricultural land and it is difficult to avoid making use of it for development.	Links to your answer to Q82.
84	Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do	The proposal is that a wider range of infrastructure projects to promote water supply resilience are brought within the NSIP regime. This reflects concerns that decisions on this type of infrastructure are taking too long and are unduly	If you are concerned about these projects being dealt with as NSIPs, it might be that you wish to suggest any ways in which the process could be improved at local level.

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	you have specific suggestions for how best to do this?	driven by local concerns rather than the wider public interest when taken by an individual LPA.	
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?	This is an invitation to comment on other mechanisms or processes that might speed up or improve the decision making process for new water infrastructure.	If you have any additional comments or concerns on water infrastructure (including waste water disposal) this is an opportunity to present them.
86	Do you have any other suggestions relating to the proposals in this chapter?	An open question for any other thoughts or ideas on this section of the consultation.	An opportunity to make any broader observations or comments
87	Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?	The government is very concerned (as was the previous government) that too many local planning authorities are taking too long to put new local plans in place. By law, the government can give instructions to an LPA about the process of producing a plan (and in theory it could even write the plan itself, though this has never happened). The consultation proposes to update the current criteria for intervention, or switch to a case by case approach with no explicit criteria. In either scenario, intervention would arise if the LPA 'fail to do what is required' to put a plan in place and keep it up to date.	Keeping plans up to date is in the interests of everyone who relies on the planning system. Although the threat of government intervention may seem draconian and not very 'local', if an LPA is performing badly then it is local communities that will usually suffer the consequences. The only way for the LPA to be put back on the straight and narrow is sometimes through government action (or the threat of it). For that reason you may think that the government is right to have such powers, provided they are properly used. That said, you may not think that there is much difference between the existing and proposed criteria for intervention.
88	Alternatively, would you support us withdrawing the criteria and relying on the	See above	You may think it is always preferable for the government to publish the criteria it will use when it considers intervention.

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	existing legal tests to underpin future use of intervention powers?		
89	Do you agree with the proposal to increase householder application fees to meet cost recovery?	Many LPA planning departments are struggling to meet the cost of processing planning applications in a timely fashion. Fees for larger planning applications have risen substantially in recent years, but those for householder applications have not. The government is proposing to increase these to a level that would reflect the average actual cost. This would be £528 (up from £258 at present).	Any costs of processing a planning application which are not met by an applicant fall on the local taxpayer. Although the planning service does have a community wide benefit, the customer is the applicant because they are the principle beneficiary. So you may consider that it is reasonable for there to be close to full cost recovery. Or you may think that such an increase is rather too much to justify in one go and might be phased in over two or more years.
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.	See above	See above
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	This is asking whether the government's estimate that £528 for cost recovery is enough or too much. This is really only a question for LPAs to answer.	This is probably only a question that an LPA can answer as it requires their knowledge of their service costs.

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	<p>increased to £528. Do you agree with this estimate?</p> <p>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</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>		
92	<p>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>At the moment fees for different types of planning application or process do not necessarily reflect the complexity or time involved. The government is asking for advice on where changes could or should be made.</p>	<p>Fees for different types of planning or related regulatory activity vary widely and not always logically. This is primarily a question for LPAs but you may have a specific example you wish to give.</p>
93	<p>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</p>	<p>Similarly, there are some planning processes where no fee is chargeable at all and the question is whether this should change.</p>	<p>As above</p>

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	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? Please give your reasons in the text box below.	At present planning fees are set nationally by the government. LPAs cannot charge a different amount even if they face higher (or lower) costs than average, or want to fund better services. Many larger housebuilders and professionals are not against higher fees if the income is used effectively to improve services – which could be good for all involved in the planning system. But there are concerns that the additional income could be syphoned off to fund other services.	How would you feel if your LPA was able to set planning fees locally to ensure full cost recovery based on their service costs? Would this improve services and benefit consultees such as parish councils (there is no suggestion that parish councils would receive any of this income by the way – as a consultee you are expected to meet your own costs).
95	What would be your preferred model for localisation of planning fees?	See above	See above
96	Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?	Planning activities such as preparing local plans can cost £100,000s but there is no income from any part of the planning system to fund these – they all fall on the tax payer. The suggestion is that fees from planning applications could be increased to include an element of funding for these services.	Services like planning policy do not generate any income but have a high cost to LPAs (and therefore to taxpayers). You may consider that this is a democratic function and should be paid for by the communities which benefit from plan making rather than people making planning applications (who have no choice in the matter) . Alternatively, you may think that planning applicants should make a contribution to plan making costs.
97	What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?	See above	See above

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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?	Although the LPAs which have most involvement in with the development consent order (DCO) for a major project – these are called ‘host authorities’ - have to contribute extensively to the process they can only recover any of their costs if they negotiate a voluntary agreement with the applicant. This is time-consuming and uncertain. The consultation is therefore considering an amendment so that host authorities can charge fees to applicants to cover at least part of their costs.	You may consider that this is a reasonable suggestion given that DCOs can place a substantial burden on LPA resources which should be recognised in the size and apportionment of the fees received.
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.	See above	If you consider that it is right for LPAs to be able to recover some of the costs they incur in dealing with a DCO, particularly if they are the authority that will be responsible for managing conditions and enforcement (the host authority) then this is the opportunity to explain the scope of this.
100	What limitations, if any, should be set in regulations or through guidance in relation to local authorities’ ability to recover costs?	See above	See above
101	Please provide any further information on the impacts of full or partial cost recovery	See above	This is probably a question only an LPA or applicant is able to answer in any detail, but you

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	<p>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>might wish to make general observations if you have experience of a DCO process.</p>
102	<p>Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>An open question for any other thoughts or ideas on this section of the consultation.</p>	<p>If you do have any suggestions on this point, this is where to make them.</p>
103	<p>Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?</p>	<p>This question relates to the transitional arrangements for implementing the new standard method housing numbers in plans which have already made some progress. For plans which have not reached Reg 19 stage before the new NPPF is published then the answer is simple – they must use the new figures from that point. If a plan has reached R19 stage but is within 200 homes per annum of the new figure then it can continue to examination. If it undersupplies by more than 200 homes per annum it must be reworked with the new figures before being submitted. If it is already submitted then it will be examined against December 2023 NPPF and the figures it already includes.</p>	<p>The government has framed the transitional arrangements to try to ensure that the new standard method is used as soon as possible and in as many plans as possible. But it also does not want to disrupt the examination of plans which are almost complete.</p> <p>Your view on these arrangements may well be influenced by the effect on your own LPA. It is worth bearing in mind that the transitional arrangements require that even a newly adopted plan is reviewed immediately if it was based on anything other than the latest standard method figures.</p>

Question No.	Question	What is the question about?	Discussion/Response Points
104	Do you agree with the proposed transitional arrangements?	This question relates to the transitional arrangements for the new way of producing local plans that was set out initially under the previous government and which the new government proposes to continue with. That has become even more complex as they now have to factor in the revised housing numbers.	The government has continued with the proposals to update the way in which local plans are produced. This is designed to speed them up, but in order to accommodate the new NPPF requirements it will, somewhat ironically, be necessary to give more time for the implementation of the new system. This is mainly a question aimed at LPAs and development interests.
105	Do you have any other suggestions relating to the proposals in this chapter?	An open question for any other thoughts or ideas on this section of the consultation.	If you do have any suggestions on this point, this is where to make them.
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?	This is a question to invite comments about the proposed reforms in respect of the Public Sector Equality Duty under the Equality Act 2010.	If you have any concerns that the proposals would impact disproportionately on people with a protected characteristic then this is the opportunity to say why and how.