



Ministry of Housing, Communities
& Local Government
2 Marsham Street
London
SW1P 4DF

Guildford Society

24 Bury Fields
Guildford GU2 4AZ
Surrey

23rd September 2024

Response to the Consultation on the NPPF

We are the Guildford Civic Society. We are linked to Civic Voice, the national charity for the civic movement in England.

As a Civic Society we cover the borough of Guildford with an interest in:

- Conserving the best of Guildford town, urban area, villages and countryside
- Promoting high standards of planning and architecture
- Influencing the pace and type of development
- Responding to increasing challenges relating to the environment (including risks to the AONB and Greenbelt) and local economy.
- Identifying, integrating and considering matters that impact across the borough, such as transport flows, and the balance between development in the Town and Countryside.
- Raising public awareness on these issues and promoting informed debate.

Please find at page 3 our response to the questions posed by the ministry concerning the revised NPPF.

We have the following summary comments:

Framework

The NPPF is a Framework document, it would be useful to provide a simple diagram as how this framework extends and links to other critical planning processes notably the Spatial Development Strategies (SDS), that are proposed to be implemented for England, and the Nationally Significant Infrastructure Projects (NSIP) processes and policies. This would also allow the accountabilities and responsibilities between the various parts of the planning system to be articulated.

Permitted Development Rights

As we comment in the answers, we believe strongly that Permitted Development Rights (PDR's) are damaging the planning system and making local plan making difficult to administer and manage. They should be integrated and controlled via the NPPF.

Standard Method.

Although we understand the desire to have a simple measure of housing demand as a basis for plan making, we suggest that the method needs to be validated as to its appropriateness against a variety of Local Planning Authorities.

Green Belt Grey Belt

We believe what the Grey Belt definition is seeking to achieve is not clear, and could be dangerous in distracting from the need to develop Brownfield Sites.

Focus of the NPPF

The NPPF is very focused on the need to add sites for housing, using a simplistic Standard Method. The government is proposing to re-instate Spatial Development Strategies for yet to be defined areas. We believe Spatial Development Strategies need to be implemented quickly, to ensure Local Plans relate properly to an agreed view as to how the economy will be balanced and unsustainable overdevelopment avoided.

New Towns Taskforce

The NPPF makes no mention to the New Towns Taskforce. How the recommendations are to be integrated into local Plans (by Spatial Development Strategies?) is not clarified.

Planning Passports

These have been announced by the Prime Minister. How these relate to the NPPF needs to be determined. The planning system needs to be kept simple not subject to endless add-ons which destroy the value of Local Plans and the involvement of local communities.

Beauty

We are happy to see this terminology removed, we believe Quality should be an aspiration for our building development encompassing Design, Setting, Building Standards, Environmental Footprint etc.

Yours Faithfully



Alistair Smith

07711 01576

WWW.GUILDFORDSOCIETY.ORG.UK

<p>Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?</p>	<p>The Standard Method is a very crude assessment of housing need. Has the Ministry done a sensitivity analysis as to whether the proposed method is accurate?</p> <p>The government mentions that Spatial Strategies are to be implemented across the country. This implementation should be referenced in this paragraph. If Strategic Planning is to be effective there may need to be guidance to encourage population growth in certain areas and not in others.</p> <p>We note that the Standard Method as detailed in Para 61 should <u>inform</u> plan making. Guidance to Local Planning Authorities' (LPA) as to other considerations to take into account e.g. Density of Development, Local Infrastructure needs to be explicit.</p>
<p>Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?</p>	<p>Happy that it is removed provided the proposed Standard Method is validated as fit for purpose to be an advisory starting figure.</p>
<p>Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?</p>	<p>Agree provided the government implements proper SDS mechanisms for areas. Foot note 28 that is also deleted is a useful statement that needs to be incorporated in the NPPF elsewhere.</p>
<p>Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?</p>	<p>Does this removal create the danger that areas of distinct character e.g. clusters of historic buildings are not properly considered by Local Planning Authorities.</p>
<p>Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?</p>	<p>Agree but there needs to be a proper parallel development of proper regional policies to agreed timescales. The NPPF is silent on this aspect.</p> <p>How these Spatial Policies impact Local plans should be included in the NPPF.</p>

<p>Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?</p>	<p>If this is to be strengthened the NPPF needs to be very explicit on how this presumption interacts with national and local policies on Landscape Protection, Heritage Assets and Quality of design. Although this is mentioned in the 'Proposed reforms to NPPF.....' detail is lacking</p>
<p>Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?</p>	<p>Is this feasible at a time where it is recognised that LPA's are under resourced. Suggest that it would be sensible to phase this change in over time.</p>
<p>Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?</p>	<p>See answer above.</p>
<p>Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?</p>	<p>Seems reasonable</p>
<p>Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?</p>	<p>5% looks to be reasonable, in the absence of any evidence.</p>
<p>Question 11: Do you agree with the removal of policy on Annual Position Statements?</p>	<p>Agree</p>
<p>Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?</p>	<p>Agree but the appears to be real confusion on Spatial Development Strategies. Spatial Development Strategies development is a critical missing element in the planning system and needs to be in place to support the Economic Strategy of the government, the New Towns taskforce, and the National Infrastructure Plan. How all these initiatives are integrated is critical.</p>

<p>Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?</p>	<p>The proposed Spatial Development Strategies regime should have tests incorporated for soundness. A critical issue is to get critical supplying organisations e.g. Network Rail, Water Companies, National Highways to properly commit to delivery. (We are suffering with a local plan where for example National Highways have delayed planning key road improvements despite these being deemed essential by the Local Plan inspector.</p>
<p>Question 14: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>Spatial Development Strategies creation will need a skilled set of resources, and in particular a proper system for engagement and review of the resulting plans. The UK has a long history of not been good at Strategic Planning – how is this going to be rectified?</p>
<p>Question 15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?</p>	<p>This seems reasonable with a clear definition of what housing stock encompasses e.g. how is Shared Co-living development going to be counted, second homes.</p>
<p>Question 16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?</p>	<p>It is obviously an easy method for which reasonable statistics are available. As mentioned above it does need a sensitivity analysis to see if it is workable.</p> <p>The Standard Method, as proposed doesn't take into account issues such as areas that have high levels of travel to work out of area, with a local workforce on lower salaries – which applies to areas surrounding London.</p> <p>A review is needed to see how good the Standard Method is as a proper allocation of housing need, which may also change due to the implementation of Spatial Development Strategies. There is no indication that this work has been done for a selection of LPA's.</p>

<p>Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?</p>	<p>One must assume the affordability ratio was determined by the desire to achieve a 1.5m housing target. Mathematically it is assumed to be correct.</p> <p>We do note that CPRE have produced a report in 2022 highlighting that 1.2M dwellings could be built on Brownfield sites.</p>
<p>Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?</p>	<p>If the Standard Method is seen as informing the planning system, rather than a mandatory target a simple system is best with the LPA concerned allowed to propose and agree adjustments for local factors, e.g. Towns with a high proportion of student housing, or severe limitations on space.</p>
<p>Question 19: Do you have any additional comments on the proposed method for assessing housing needs?</p>	<p>The NPPF seems to be very focuses on the Standard Method, it is critical if it is to be an advisory number that clear guidance is provided as to how this advisort number is adjusted for practical local conditions, e.g. risk of overdevelopment, impact on Natural Landscape etc.</p>
<p>Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?</p>	<p>Agree</p> <p>Consider adding a footnote based on the removed Footnote 28</p> <p>In doing so, strategic policies should promote an effective use of land and optimise site densities in accordance with chapter 11. This is to ensure that homes are built in the right places, to prioritise brownfield and other under-utilised urban sites, to utilise existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable.</p>
<p>Question 21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?</p>	<p>No Comment</p>

<p>Question 22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?</p>	<p>No Comment</p>
<p>Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</p>	<p>Is Grey Belt really necessary or is it just a complication? We totally agree that Brownfield both within the and without the Green Belt should be the focus of development efforts.</p> <p>CPRE in their 2022 report identified from local councils' registers of brownfield land that over 1.2 million homes could be built on 23,000 sites covering more than 27,000 hectares of previously developed land.</p> <p>Green Belt land can already be subject to review and it is unclear what the designation of Greybelt adds to this rule that couldn't be accomplished by modifications to the existing Green Belt Designation.</p> <p>LPA's can already during a Greenbelt review argue for the release of Greenbelt land. Some of the Grey Belt ideas are useful but these could be included in Greenbelt reviews.</p> <p>Is it intended Greybelt will be allowed for inclusion in Land Supply calculations?</p>
<p>Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?</p>	<p>Grey Belt if accepted is a dangerous concept as the sites by their nature will tend to be easier to develop than true Brownfield land e.g. a surface car park vs. an old factory site. Grey Belt provides a potential reason for developers to ignore Brownfield sites. The sequential test needs to be applied rigorously across a whole LPA area to ensure Brownfield sites are not ignored.</p>

<p>Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?</p>	<p>Grey Belt land will have similar issues to land bordering AONB's etc. We have to be very careful with border areas which may not be high value but provide separation between built environment and high-quality areas. Grey Belt has the issue of increasing pressure on high quality areas.</p>
<p>Question 26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?</p>	<p>The third point related to 'Land which is dominated by Urban Land use.....' has the potential to impact local communities which may value open land even if of poor quality. Filling in areas has to be done with care.</p>
<p>Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?</p>	<p>These should be taken into consideration for Greenbelt.</p>
<p>Question 28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?</p>	<p>Agree with Previously Developed land as noted above unclear as to the Grey Belt categorisation. It is assumed, as at present, that developments can still be proposed in the Greenbelt.</p>
<p>Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?</p>	<p>Depends on the LPA involved and the likely % of Grey Belt.</p>
<p>Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?</p>	<p>This is a short term measure in the absence extant Local Plans for many LPA's. This policy would need to be monitored as in the absence of a full local plan development may occur on sites that might be needed for strategic development.</p>
<p>Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?</p>	<p>Agree, that it should broadly follow the criteria for releasing land for domestic use.</p>

<p>Question 32: Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?</p>	<p>Should follow sequential test.</p>
<p>Question 33: Do you have views on how the assessment of need for traveler sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?</p>	<p>Traveler sites need to be counted as dwellings in some way, this also relates to Co-living Buildings etc. Rules need to be established.</p>
<p>Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?</p>	<p>The affordable housing percentage is rarely met in existing applications due to viability concerns. 50% seems a high number.</p>
<p>Question 35: Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?</p>	<p>Some variability should be allowed/</p>
<p>Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?</p>	<p>Agree</p>
<p>Question 37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?</p>	<p>The critical issue is to ensure BLV is a fair value and also capture proper recompense for local impact using effectively managed CIL payments. Some councils still use Section 106 payments which appear to difficult to manage being small sums split between various bodies. CIL allows an LPA to fewer clear accounts to handle wider ranging schemes. Government needs to use a number of exemplar cases to determine best method as a trial – don't be afraid to experiment.</p>
<p>Question 38: How and at what level should Government set benchmark land values?</p>	<p>See above.</p>

<p>Question 39: To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?</p>	<p>Depends on the BLV finally determined and how close this is to market rates.</p>
<p>Question 40: It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?</p>	<p>Agree</p>
<p>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?</p>	<p>Agree</p>
<p>Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?</p>	<p>Believe with adaptation the golden rules should apply.</p>
<p>Question 43: Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?</p>	<p>Golden Rules should be used for any release in the Greenbelt.</p>
<p>Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?</p>	<p>Agree</p>
<p>Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?</p>	<p>Agree that there is a role for Local Authorities and Homes England to assemble land where appropriate.</p>

Question 46: Do you have any other suggestions relating to the proposals in this chapter?	No additional
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?	Agree
Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?	Doesn't appear to relate to the 50% discussed in Greenbelt Golden Rules. Very unclear.
Question 49: Do you agree with removing the minimum 25% First Homes requirement?	No comment
Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?	No comment
Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	Agree
Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?	Likely to be supported by Public Funds.
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?	Suggest any development should not be above 50% affordable or 200 units on a site. Due care should also be taken on Transport (Residents are likely to be more reliant on Public /Active Travel solutions) and Facilities
Question 54: What measures should we consider to better support and increase rural affordable housing?	Review the use that Councils are making of options such as extra council tax on second homes.
Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?	Agree

Question 56: Do you agree with these changes?	Agree
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?	No Comment
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?	No comment
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?	Suggest as well as 'Well Designed' the word Quality should be used as well to indicate the aspiration to make building in the UK built to improved standards.
Question 60: Do you agree with proposed changes to policy for upwards extensions?	Don't Agree – this will result in badly designed streetscapes. There is no mention of structural integrity e.g. foundations and impact on local services.
Question 61: Do you have any other suggestions relating to the proposals in this chapter?	Related to number 60 above is that Permitted Development rights needs to be added into the NPPF. PDR's are a blight on the planning system resulting in poor quality dwellings in inappropriate locations. Although changes of use and extensions are inevitable, they need to be developed with care to surroundings. The whole concept of PDR's needs revision.
Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?	Agree with changes but there should be a reference back to Spatial Development Strategies as this must support these sites e.g. power supplies for computer centres.
Question 63: Are there other sectors you think need particular support via these changes? What are they and why?	Green Technology, and Mini-reactor development.
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?	Yes

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?	Obviously for major developments that have regional significance
Question 66: Do you have any other suggestions relating to the proposals in this chapter?	None
Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	Agree
Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	Agree
Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?	Agree but there needs to reference to other transport modes e.g. use of Buses/Rail/Trams as part of vision led approach.
Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?	Highlight the preservation of Sports Facilities including Swimming Pools.
Question 71: Do you have any other suggestions relating to the proposals in this chapter?	It should be recognised that Transport is a critical issue for many and encouraging modal change particularly as the NPPF argues for densification needs to be included in the proposals.
Question 72: Do you agree that large onshore wind projects should be reintegrated into the s NSIP regime?	Agree
Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?	Agree
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?	Agree

<p>Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?</p>	<p>Agree</p>
<p>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?</p>	<p>Agree</p>
<p>Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?</p>	<p>No</p>
<p>Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?</p>	<p>A clarity of linkage to Building Standards that support the highest standards of Energy Efficiency for Build, Operation, and Demolition.</p> <p>Encourage built forms that are more efficient e.g. Use of terrace housing rather than semi-detached.</p> <p>Encourage adaptation, and re-use of buildings. (This also includes ensure new buildings are constructed with adaptability in mind)</p>
<p>Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?</p>	<p>Our understanding is that tools are in use abroad that may be better than UK capabilities. Learning required?</p>
<p>Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?</p>	<p>Developments are allowed into Flood areas with little consideration of mitigation. Policy management in this area needs strengthening and also better guidance on how to build on flood risk areas provided.</p>
<p>Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?</p>	<p>Spatial Development Strategies need to address this ara by promoting environmentally better transport solutions and also encouraging c-location of employment with housing</p>

Question 82: Do you agree with removal of this text from the footnote?	Agree
Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?	There is an emerging ability to use vertical farming, low cost lighting etc. to produce high value crops in industrial/town locations. The planning system should allow for this development.
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?	Agree
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?	Water facilities by their nature are often located in flood zones, are they being protected effectively from flood risk.
Question 86: Do you have any other suggestions relating to the proposals in this chapter?	None
Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?	Agree
Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?	Don't Agree
Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?	Agree
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.	No Comment
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.	No Comment
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.	Agree
Neither Don't Know	
Please give your reasons in the text box below.	

<p>Question 96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?</p>	
<p>If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?</p>	
<p>Question 97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?</p>	None
<p>Question 98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?</p>	Depending on the LPA DCO's maybe fairly rare. Is the bureaucracy worth it?
<p>Question 99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.</p>	No Comment
<p>Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?</p>	No Comment
<p>Question 101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.</p>	No Comment

<p>Question 102: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No Comment</p>
<p>Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?</p>	<p>No Comment</p>
<p>Question 104: Do you agree with the proposed transitional arrangements?</p>	<p>No Comment</p>
<p>Question 105: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No Comment</p>
<p>Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?</p>	<p>No Comment</p>