

Respondent details

a. What is your name?

Name

Martin Maund

b. What is your email address?

Email

c. What is your organisation?

Organisation

Taplow Neighbourhood Plan Working Party

d. What type of organisation are you representing?

Personal view Local authority Neighbourhood planning body, parish or town council Developer Other private sector organisation Professional body Interest group or voluntary organisation Other (please specify)

If you answered "other", please provide further details

Chapter 1 – Introduction

1. The Government has made clear that sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people. Our approach to delivering this growth will focus on three pillars: stability, investment and reform.

2. Nowhere is decisive reform needed more urgently than in our planning system. The December 2023 changes to the National Planning Policy Framework (NPPF) were disruptive to the sector and detrimental to housing supply. The Chancellor's speech on 8 July committed to consulting on reforms to the NPPF to take a different, growth-focused approach.

3. Today, we set out specific changes we propose to make immediately to the NPPF following this consultation. These changes – amending the planning framework, and universal, ambitious local plan coverage – are vital to deliver the Government's commitments to achieve economic growth and build 1.5 million new homes. Specifically, they will:

- a. make the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard constraints and that they have exhausted all other options;
- b. reverse other changes to the NPPF made in December 2023 which were detrimental to housing supply;
- c. implement a new standard method and calculation to ensure local plans are ambitious enough to support the Government's manifesto commitment of 1.5 million new homes in this Parliament;
- d. broaden the existing definition of brownfield land, set a strengthened expectation that applications on brownfield land will be approved and that plans should promote an uplift in density in urban areas;
- e. identify grey belt land within the Green Belt, to be brought forward into the planning system through both plan and decision-making to meet development needs;
- f. improve the operation of 'the presumption' in favour of sustainable development, to ensure it acts an effective failsafe to support housing supply, by clarifying the circumstances in which it applies; and, introducing new safeguards, to make clear that its application cannot justify poor quality development;
- g. deliver affordable, well-designed homes, with new "golden rules" for land released in the Green Belt to ensure it delivers in the public interest;
- h. make wider changes to ensure that local planning authorities are able to prioritise the types of affordable homes their communities need on all housing development and that the planning system supports a more diverse housebuilding sector;
- i. support economic growth in key sectors, aligned with the Government's industrial strategy and future local growth plans, including laboratories, gigafactories, datacentres, digital

economies and freight and logistics – given their importance to our economic future;

j. deliver community needs to support society and the creation of healthy places; and

k. support clean energy and the environment, including through support for onshore wind and renewables.

4. The proposed changes are explained in this document and set out in an accompanying draft NPPF. The Government will respond to this consultation and publish NPPF revisions before the end of the year, so that policy changes can take effect as soon as possible.

5. Alongside these specific changes, the document also calls for views on:

a. whether to reform the way that the Nationally Significant Infrastructure Projects (NSIP) regime applies to onshore wind, solar, data centres, laboratories, gigafactories and water projects, as the first step of the Government's NSIP reform plans;

b. whether the local plan intervention policy criteria should be updated or removed, so the Government can intervene where necessary to ensure housing delivery; and

c. proposals to increase some planning fees, including for householder applications, so that local planning authorities are properly resourced to support a sustained increase in development and improve performance.

6. Finally, it sets out how and when we expect every local planning authority to rapidly create a clear, ambitious local plan for high quality housebuilding and economic growth.

Chapter 3 – Planning for the homes we need

1. Do you agree that we should reverse the December 2023 changes made to paragraph 61?

NO

The planning reforms aren't necessary as there are more than 1.1 million homes granted planning permission in England in the last decade but yet to be built - the Government should concentrate their energies getting the housebuilders to build these houses as priority which would only mean another 400,000 homes required to be allocated for the 5 year plan period for 1.5 million homes which could easily be delivered in the the final year or two within the current planning system.

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?

NO

Authorities should not need to provide evidence to apply for a lower housing requirement when they have Areas of Outstanding Natural Beauty, National Parks, Green Belt land, protected habitats and flood risk areas etc. within their areas as this land should not be considered as developable land fullstop and therefore excluded from the standard method.

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

NO

Reducing the Cities and Urban Centres housing numbers to build is flawed as it directs homes away from where they are most needed out of accord with the Government's aim to "direct homes to where they are most needed and least affordable". This alleviates them of the pressure to build in the way that they should - whilst pushing their needs into other areas which is unfair and unacceptable.

The largest conurbations are in fact of remarkably low density and if you encourage development to spread out it creates the need for more commuting which is not eco-friendly and not in line with Government energy policy.

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

NO

It is wholly appropriate that local planning authorities are required to use authority-wide design codes to evidence the impact on character, if not then local area design codes must replace the authority-wide codes. Areas cannot be stripped of its character particularly when unprecedented levels of development are being imposed - the heritage of the UK and its towns and villages should be treasured and preserved not risk being lost

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?

NO

Cities and urban centres can accommodate greater density generally without loss of character due to the developments within them that have taken place over recent decades, however as stated in 4. above towns and villages should not be subjected to loss of character with development that does not reflect that areas heritage, which good developers should be able to achieve - and which localised design codes, masterplans and guides for areas would deliver which should be made a mandatory requirement instead of district-wide design codes.

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

NO

The country has a reported 1.1 million homes with permission - and so should only require an additional 400,000 new homes to be built within the 5 year timeframe for 1.5 million homes. Effort should be directed to ensuring these 1.1 million are actually proceeded with.

The 300,000 homes a year number appears to be a choice not based on population size or growth projections or the ability of the construction industry to deliver. Publishing some meaningful data would be a persuasive argument to convince the public.

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?

NO

This is an unnecessary additional workload each year for authorities who are already overstretched and also the consequent impact on Neighbourhood Plans that relies on the goodwill of volunteers to continually update them

8. Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

NO

It is wrong and counter-productive to penalise authorities who have over-supplied previously by not allowing them to off-set that over-supply against upcoming supply - all you would be encouraging is for authorities to hold back development to fit in with a schedule where they can utilise it against their quota, which as you are keen to add more housing stock asap is rather short-sighted and defeats the objective.

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?

NO

A further 5% contingency is not necessary as there are already 1.1 million homes in the planning system which have permission to be built but landowners are sitting on - the Government needs to put an end to this practice in order to overcome the housing shortages which would immediately provide over 3 years housing supply.

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

Yes (5% is an appropriate buffer) No (It should be a different figure)

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

NO

It is an unnecessary cost and workload for authorities to have to conduct Annual Position Statements if their Local Plan has demonstrated 5 years housing supply - the current arrangement works fine that it becomes appropriate to submit an Annual Position Statement should they have significantly under delivered against their housing requirement, and the requirement for renewal of housing figures as part of the current system caters for this.

12. Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

NO

The revocation of the Duty to Cooperate was the correct thing to do as it cannot be right that authorities can simply not meet their housing requirements and then force their unmet quota on to another neighbouring authority, and the amendment of the NPPF to further support effective co-operation on cross boundary and strategic planning matters should not effectively deliver this right by imposing the sharing of unmet housing need and other strategic issues on another authority.

This would undermine the Governments aim of directing homes to where they are most needed and least affordable, by simply pushing the houses required for one County into another, so being many miles away from where the housing is needed.

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

YES

Housing requirements is spelt out in fine detail but infrastructure is only referred to in the broadest terms. Without specific standards for required infrastructure strategic scale plans will be unsound.

Historic failures to provide appropriate infrastructure has created large swathes of the country where appropriate services are simply not available.

14. Do you have any other suggestions relating to the proposals in this chapter?

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Chapter 4 – A new Standard Method for assessing housing needs

15. Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

YES

The only stable basis. However it does imply that the densest areas are committed to ever higher densities which could become absurd and may need further thought.

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?

NO

The housing target of 1.5m over 5 years will have no material impact on prices. The key affordability issue is the provision of very substantial social housing numbers and the proposed revisions to the NPPF simply do not address this with any realism.

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

NO

See response to Q16

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?

NO

Rental levels are volatile and influenced by many factors other than housing supply.

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

NO

Chapter 5 – Brownfield, grey belt and the Green Belt --

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

YES

Allocated Brownfield should be built on first before any released Green Belt land can be considered for construction. This is a failure of the current system.

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?

NO

Limited infilling in the Green Belt restrictions must not be relaxed under the auspices of prioritising Permitted Development Land (PDL) for development.

Limited infilling in the Green Belt is a totally different matter to PDL, which requires its own policies without including the general ability to infill in the Green Belt which must carry the proviso unless it is PDL and designated as Grey Belt land.

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?

NO

It is important that glasshouses are retained and developed to ensure our horticultural production is maintained, and it would be inappropriate to include glasshouses and hardstanding as PDL as this would be easily abused by landowners who could erect them or lay down hardstanding just for the purpose of deliberately undermining the planning system.

Likewise stables should also be excluded from being considered as PDL.

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

YES

The proposed definition of grey belt land is agreed including the additional guidance list under "Land which makes a limited contribution to the Green Belt purposes will:" which is within item 10. of "Defining The Grey Belt Land"

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

YES

To be added as exclusions for removal from the Green Belt to ensure its not degraded to meet grey belt criteria;-

Non-Designated Heritage Assets (Local Heritage Assets) and their settings in the Green Belt.

Add to the end of item iv. in the additional guidance list "and settlements", so it reads; "iv. Land which contributes little to preserving the setting and special character of historic towns and settlements"

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?

YES and it should be contained within the NPPF

The additional guidance list would enable authorities to know what areas they can and cannot consider for designating Green Belt land which would remove any confusion or scope for disputes whilst also speeding up the process.

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?

YES

We consider that your proposed guidance including the additional guidance list does set out appropriate considerations but with a couple of additional items that we have logged in Q24 - which is that we feel that the following should be added;-

Non-Designated Heritage Assets and their settings in the Green Belt should be added as an exclusion for removal from the Green Belt.

Add to the end of item iv. in the additional guidance list "and settlements", so it reads; "iv. Land which contributes little to preserving the setting and special character of historic towns and settlements"

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?

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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?

YES

We agree that previously developed and Grey Belt land is identified first and that planning authorities can prioritise the most sustainable locations - but Green Belt land that has not been designated as Grey Belt land cannot be selected for development by planning authorities, as further dilution of the protection of Green Belt land should not be allowed.

Further, Brownfield land must be built on first before construction is allowed on PDL / grey belt land.

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?

YES

This is categorically important that Green Belt land and its purpose is not undermined as a result of the designation of Grey Belt land. This is why Green Belt land should not be considered for development at all unless it is designated as Grey Belt land by the definition and additional guidance relayed in Section "Defining the grey belt".

30. Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

NO

Green Belt land should not be considered as fair game for development under any circumstances apart from the approved PDL / Grey Belt areas.

Allowing the Green Belt to be considered to suit an authorities requirements is inappropriate and should only be supported by further national legislation.

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?

NO

No concerns on allowing the release of grey belt land to meet commercial and other development needs providing the plan-making and decision-making take into account the environment the land is in and that it is not out of keeping with it.

However, we do not agree with the release of Green Belt land for this purpose unless it has been designated as Grey Belt land. Your item 21 which is where this question is formed under "Supporting release of Green Belt land for commercial and other development." talks only of releasing Green Belt land for this purpose which we are categorically against.

Green Belt should be considered sacrosanct and development should not be considered for it apart from the approved PDL / Grey Belt areas.

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?

NO

Traveller sites should not be accommodated on precious Green Belt land.

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?

YES

Traveller sites should not be accommodated on precious Green Belt land, and accordingly a costly and time consuming Green Belt review should not be necessary to undertake just for this purpose.

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

YES

Agreed the level of affordable housing which is to include Social Rent housing and that it should be up to authorities as to what type of housing is appropriate for an area - however your question refers to Green Belt land which we fundamentally do not agree with the release of for any form of development unless the land has been officially designated as Grey Belt land.

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?

This question is inappropriate as it only gives the option as Green Belt land and by answering it appears to give the agreement to building on Green Belt land - accordingly all answers in regards to this should be disregarded as consultees may unwittingly complete it not realising this.

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

The utilisation of Green Belt land should ensure the securing of benefits for nature and the retention of green space access to the public

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?

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

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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?

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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?

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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?

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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?

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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?

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

YES

We are unable to comment on Annex 4 as there is no reference to it or its purpose within the information provided

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

YES

We do not agree with the approach in Paragraph 31 as its based on the assumption that Green Belt land will be released in addition to Grey Belt - whereas Green Belt land should not be released for development UNLESS it has been designated as Grey Belt.

This is the Paragraph 31 wording that we refer to;- "31. The Government considers that limited Green Belt release, prioritising grey belt, will provide an excellent opportunity for landowners to sell their land at a fair price,"

This principle of releasing Green Belt land (in addition to Grey Belt) is completely unacceptable particularly when paragraphs 31 & 32 contain the potential of forcing land to be sold by various means including compulsory purchase powers!

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

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Chapter 6 – Delivering affordable, well-designed homes and places

47. Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

YES

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

YES

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

YES

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

NO

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

YES

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

The only effective way to deliver Social Housing is via state funding, either government or local authority based

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?

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

Make second home ownership more expensive and difficult

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

YES

56. Do you agree with these changes?

YES

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?

YES

The entire approach of the NPPF to Social Housing is inadequate, unrealistic and needs recasting

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

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?

YES

Beautiful is too subjective to be helpful

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

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

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Chapter 7 – Building infrastructure to grow the economy

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

YES

In principle agree, although difficult without knowing what the detail of the changes are - but where the sites are identified surrounding settlements should be consulted and should not be significantly disturbed or effected by their presence and all measures to mitigate these effects should be taken.

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

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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

It should not be necessary to include industry such as those proposed to be granted the consenting regime of the NSIP in the same way as our primary services are (such as energy, transport, water, waste water, waste)

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?

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

YES

The necessary infrastructure and service to support these proposed industries must be planned and delivered ahead of development for them. They will require an immense amount of capacity in all services and must be supplied in order that existing users (industry and the public alike) do not suffer loss or deterioration of services.

In regards to data centres, their water demand is extreme, and as we as a nation do not carry the capacity of water that is currently required this will require creating water storage facilities in abundance and in addition to those already required

Chapter 8 – Delivering community needs

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

YES

Key public services infrastructure such as hospitals and criminal justice facilities do need to be improved, modernised or built.

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

YES

Creating training, experience and workplaces is of great importance for post-16 young adults as is childcare provision to assist parents to work.

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

YES

We are in favour of the 'vision-led' transport planning policy and its benefits

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

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

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Chapter 9 – Supporting green energy and the environment

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

NO

Onshore wind turbines disfigure the landscape and local residents should be consulted through the planning system which the NSIP regime.

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

NO

NPPF Paragraph 163 footnotes 57 and 58 should remain as it is only right and proper onshore wind projects could only be considered acceptable if:

- a. they were in areas allocated in a local or development plan or through Local Development Orders, Neighbourhood Development Orders and Community Right to Build Orders; and
- b. the proposal had proven community support (unless brought forward by Neighbourhood Development Orders or Community Right to Build Orders).

However, by introducing the proposed amendments to existing paragraph 163 and paragraph 160 should help overcome the delays cited as they would direct decision makers to give significant weight to the benefits associated with renewable and low carbon energy generation and also set a stronger expectation that authorities proactively identify sites for renewable and low carbon development when producing plans, thus this should increase the desired likelihood of local planning authorities granting permission to renewable energy schemes and contribute to reaching zero carbon electricity generation by 2030.

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?

YES

Carbon sequestration is of the utmost important and so the habitats that achieve this should be retained and protected robustly.

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?

NO

We have disagreed in our earlier questions that Wind Farms should be consented under the NSIP regime

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?

NO

We do not agree that solar farms should be consented to under the NSIP regime - solar farms require a lot of land to accommodate them and land that is valuable in other areas, such as agricultural, farming etc. should not be swallowed up in preference to solar farms and accordingly the decision making should come under the conventional planning system enabling all local stakeholders the ability to comment.

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

NO

We do not believe alternative thresholds should apply as we do not agree that onshore wind or solar farms should be consented to under the NSIP regime as explained in our preceding answers.

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

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79. What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Please explain your answer

We do not think that accurate tools and data are yet available. Lack of international agreements on how to account and lack of consistency in such things as carbon taxing and recognition of greenwashing by exporting carbon creation are all challenges without satisfactory answers today. It is important that they should be progressed by research and diplomatic efforts. Effective introduction at planning level will be erratic at best.

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

YES

The current flood risk tests in the development process are not fit for purpose - the Exception Test and Sequential Test are far too easily overcome permitting building on flood zones which shouldn't be built on; just a simple elevation of a building on stilts shouldn't then enable land at risk of flooding in flood zone 3 to be allowed and this needs to be tackled by preventing development on flood zone 3 - particularly with climate change increasing the risk and depth of flooding on these flood zones.

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

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

NO

The footnote should remain as it ensures that agricultural land is given due consideration before being allowed to be released for yet more development - agricultural land of all sorts benefits the country not just in food security which you have recognised is important for our national security, but also to our economy in decreasing imports and increasing exports plus in provision of jobs etc., and this land is far too valuable to release for development that could go elsewhere.

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

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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?

YES

Heartily agree that we should improve the current water infrastructure provisions.

The provision will require to be considerably more than the five billion litres a day need by 2050 if data centres are to be based in the UK as they are huge water consumers..... and accordingly this requirement needs to be considered additionally

It is imperative that water company leaks are reduced and ideally negated as much as possible, and the delivery of new water resources infrastructure, such as reservoirs, is urgently addressed up and down the country.

The efficiency of the water companies and their responsibilities also requires attention and an agreement about the level of dividends being paid out against performance must be achieved.

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?

NO

Possibly re-nationalising the water companies should an agreement not be reached with them concerning the level of dividends being paid out against performance achieved.

Should the water companies shareholders not be inclined to invest the money required to improve their efficiency given the degradation of it since privatisation and the colossal amounts in dividends that have been paid out and which they've benefitted from then the Government should 'switch the tap off' and bring the water companies back into national ownership.

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

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Chapter 10 – Changes to local plan intervention criteria

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

NO

The Government should not have such powers to further influence or penalise authorities who are appointed by their public to act in accordance with their wishes.

It appears that there are already sufficient intervention policy criteria powers in place, as confirmed by the several occasions over the past seven years that action has been taken.

Any further strengthening which thus dilutes the controls of the local authority and by virtue of this from the public that voted it into power is not necessary.

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

NO

The criteria should remain in place as it gives a measure of requirements and expectations, and the legal tests serve to support that - further centralisation of powers to Westminster act against the interests of the local area and community, particularly when the Government proposes the issuing of plan-making directions through to the removal of plan-making powers.

Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

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

NO

It cannot be overlooked that all householders are Council taxpayers who pay for all Council services including planning services by way of their annual Council tax - and accordingly the Planning Department costs and thereby application fees are already part funded which should counter-balance the shortfall in householders application fees to cover actual costs.

Accordingly, whilst an increase might be in order it is inappropriate to expect Planning Application fees to fully cover the cost of the associated planning services - although a charging sliding scale in line with size of development would be more relevant as the larger developments would tie up more planning officers time and those developers would be able to afford the fees that the smaller applications made by the public would not. Furthermore, larger developments would generally be made by Companies who do not pay Council tax in the area applied within and so it would be appropriate that they pay more than householders who would otherwise be part-funding the Company's application.

Applications for single house extensions / developments from householders should be kept as low as possible to encourage such developments and ensure that they do in fact make an application rather than going ahead without approval.

90. If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50%

increase to the householder fee would increase the application fee from £258 to £387.

YES

This fee increase on top of the plus 25% increase in December 2023 which was only 9 months ago is therefore a significant and inflation busting increase, however this charge is most probably more reasonable in line with private sector charges and would assist the authorities in covering a fair amount of their costs.

This said, a sliding scale charging structure based on the size of development should be introduced as the larger developments would understandably be charged more to reflect the time and services they would require of the authority.

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

(selected **No** – it should be lower than £528)

We have advised in question 90. that we consider the fee should be increased to £387, and that a sliding scale charging structure based on the size of development should be introduced.

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.

YES

Larger developments would likely tie up more resources and a sliding scale charge structure should be introduced so that the planning fees are fairer across the board and those requiring more of the authority resources would pay towards it helping the authority to cover costs.

As a result of sliding scale fee chart being introduced, whilst it is informed that major developments generally do cover costs, there is no reason why their fees cannot be increased beyond cost to cover any shortfall in houseowner fees as the major developments make sizeable profits whereas houseowners generally don't (extensions to assist better living standards etc.) and the major development profits can help contribute to the authority's overall planning department's costs of dealing with applications.

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.

YES

It is perfectly reasonable to charge fees for consent to undertake demolition in a conservation area. These types of applications are usually made by developers who will be looking to redevelop the site

for a profit and an application fee would be a very small outlay when compared to the potential profit that could be made. This fee should be set at the houseowner rate as a minimum.

Listed building consents should not have fees applied.

Tree works in a Conservation Area or to TPO's should not have fees applied.

These tree works are inescapable as owners cannot opt out of these designations and burdens are imposed on the owners with regard to preservation and maintenance that are in the public interest. Further, these works reoccur frequently and the applicant would be penalised for applying when trying to abide by the rules to ask for permission whereas a fee would merely encourage either lack of maintenance which is not in the areas or public interest or non-compliance with tree works request for permission in order to avoid the charge.

It also has to be remembered that tree cutting services are expensive and planning application fees added to this cost would prevent a lot of people undertaking the necessary tree maintenance and thus negatively affecting amenities to the area which would suffer as a result.

94. Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

NO

Local authorities should not be able to set their own planning application fees as this could lead to large disparities between authorities - even neighbouring authorities, and also lead to confusion, mis-pricing and mis-management. A national table of charges should apply which would be clear to everyone.

95. What would be your preferred model for localisation of planning fees?

Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee. Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally. Neither Don't Know
(selected **Neither**)

Our response to Question 94 informs that we feel that local authorities should not be able to set their own planning application fees.

96. Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

YES

It certainly isn't appropriate to expect all planning services to be covered by planning application fees as the Government imposes demands upon planning departments and with continual planning policy changes and/or guidances placing additional workload upon these departments and therefore additional cost.

We have also covered that householders by virtue of their annual Council tax charges already pay towards the costs of all local authority services and therefore it is inappropriate for householders charges to increase beyond the £387 application fees proposed

However, we have recommended that sliding scale fee charges be introduced, which would enable major developments who make huge profits to pay beyond cost to help contribute the funding of wider planning services.

97. What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

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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?

YES

99. If Yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Please explain your answer

Any planning service utilised by applications for development consent orders under the Planning Act 2008 should have their full costs recovered - this could be applied on a fee charge basis as opposed to a fixed fee so that the authority may be able to apply charges for all services rendered.

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

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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.

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

YES

It cannot be overlooked that all householders are Council taxpayers who pay for all Council services including planning services by way of their annual Council tax - and accordingly the Planning Department costs and therefore Application fees are already part funded which should counter-balance the shortfall in householders application fees to cover actual costs.

There is evidence that some small developers grossly abuse the Enforcement and Appeal processes. The Enforcement processes should be reviewed to speed them up and appeal processes revised to ensure that vexatious appeals will penalise the applicant to a higher level than just costs allocation.

Chapter 12 – The future of planning policy and plan making

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

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104. Do you agree with the proposed transitional arrangements?

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

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Chapter 13 – Public Sector Equality Duty

106. Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

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