

Consultation on the proposed changes to the National Planning Policy Framework – comments invited until 11.45pm on Tuesday 24 September 2024.

Chapter 14 – Table of questions	Corsham Town Council Comment
Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?	No.
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?	No.
Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?	<p>No. Cities have many more facilities and services therefore brownfield land in these locations should be developed first.</p> <p>Undeveloped brownfield sites in urban areas serve only to bring down local communities. At the same time, urban areas are better suited to absorption of additional homes since they already have suitable infrastructure in terms services, including public transport.</p>
Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?	No. This paragraph helps to avoid developments which are not in keeping with their surroundings.
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?	We agree that design codes and guides need greater focus as suggested. The use of specific design codes to be applied to specific towns or even developments would be valuable. The development of large new communities needs considerable care and central co-ordination to ensure that public services – including education, healthcare,

	transport, water and access to employment are integrated into the development from the start and come on stream in accordance with the population build-up.
Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?	No.
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?	No. The system is too open to manipulation by developers who do not build out consented schemes.
Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?	No. This would make it open to exploitation by developers bringing forward new sites prematurely.
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?	No. A buffer is unnecessary. The current system is too open to manipulation by developers who do not build out consented schemes. There needs to be a mechanism introduced to ensure such schemes are built out in a timely fashion.
Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?	No. There is no need for a buffer.
Question 11: Do you agree with the removal of policy on Annual Position Statements?	No comment.

<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>We agree with extending the duty to co-operate. We disagree that housing allocations which cannot be met in one area should be passed to another. Targets must be appropriate and achievable.</p>
<p>Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?</p>	<p>Yes.</p>
<p>Question 14: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>There needs to be a mechanism to ensure that once permission is granted on a site that it is built out quickly. If delays are caused by developers, this should not be allowed to adversely affect local authorities' housing land supply requirements.</p> <p>Developers must not be permitted to remove elements of their scheme which made the application attractive and suitable for planning approval in the first place. For example, the inclusion of employment land, hotels, older people's accommodation etc. which end up being removed from the scheme on 'viability' or need grounds. Alternatively, if the developer is unable to develop the land in accordance with the approved plans, the land should be offered to the local authority or community to ensure delivery of a suitable scheme.</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>No. It is too simplistic.</p>
<p>Question 16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?</p>	<p>No.</p>

<p>Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?</p>	<p>No.</p>
<p>Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?</p>	<p>No.</p>
<p>Question 19: Do you have any additional comments on the proposed method for assessing housing needs?</p>	<p>Changes need to be made to give local authorities more power over where new houses are built. In addition, profit levels from greenfield sites need to be addressed. There needs to be a mechanism to cap land values so that developers can then be asked to add in much greater provision for infrastructure, including affordable housing. The mechanism could be similar to that used for assessing land values when implementing compulsory purchase i.e. based on existing use values.</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 with aims but more needs to be done to provide a working solution to unlock brownfield sites in urban areas. A different approach would be needed in rural areas where access to services and facilities is much more limited.</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>Broadly agree. Clause b) iv should be removed as it is too open to interpretation.</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>No.</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>No comment.</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>No comment.</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>No comment.</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>No comment.</p>

<p>Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?</p>	<p>Yes.</p>
<p>Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?</p>	<p>Yes.</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>No comment.</p>
<p>Question 32: Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?</p>	<p>No comment.</p>
<p>Question 33: Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?</p>	<p>No comment.</p>
<p>Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?</p>	<p>No comment.</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</p>	<p>Affordable housing percentages should be non-negotiable on viability grounds on any sites. See comment on land values.</p>

<p>should the Government or local planning authorities be able to set lower targets in low land value areas?</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>Equal public access to the benefits of nature should apply to all developments.</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 Government should do this for all greenfield land.</p>
<p>Question 38: How and at what level should Government set benchmark land values?</p>	<p>Landowners/developers with an option on open countryside land, whether green belt or not should receive a maximum uplift on agricultural land values to be determined by government and set at a significantly lower level than current development land values – see response to Q19 where we have suggested a method for setting benchmark land values based on existing use values. With lower land values, developers and local authorities will be able to work together to deliver significantly higher levels of infrastructure and Section 106 agreements for providing more new affordable homes.</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>See answer to Q38.</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>Affordable housing delivery levels should be prescriptive and unchallengeable.</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>No comment.</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>No comment.</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>The 'Golden Rules' should apply to both green belt and green field developments.</p>
<p>Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?</p>	<p>See response to Q38.</p>
<p>Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?</p>	<p>No comment.</p>

<p>Question 46: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>There needs to be a mechanism to build in the importance of delivering infrastructure in advance or at least at the same time as development.</p>
<p>Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?</p>	<p>Yes.</p>
<p>Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?</p>	<p>No comment.</p>
<p>Question 49: Do you agree with removing the minimum 25% First Homes requirement?</p>	<p>Yes.</p>
<p>Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?</p>	<p>No.</p>
<p>Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?</p>	<p>Yes.</p>
<p>Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?</p>	<p>Please see our responses to Q19 and Q38. We suggest that lower land values for development land will make the greatest contribution to delivering more Social Rent and Affordable housing. There may still be a need initially for some government subsidy for housing providers but in the longer term with lower land values bedded in as the norm, this requirement should decline. In the meantime, it makes sense to enable the use of capital borrowing to reduce the revenue impact of housing benefits.</p>

	<p>We believe the best way to boost affordable housing provision overall is through the compulsory provision of serviced land to councils by developers for councils or housing associations to build and manage. This land should be spread evenly over a development site.</p>
<p>Question 53: What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?</p>	<p>Providing serviced land spread evenly over a development site will ensure mixed development and prevent the creation of obviously social housing areas. The concentration of social housing in one area of a new large development could be extremely detrimental, a mix of housing types spread all over a development is far more appropriate.</p>
<p>Question 54: What measures should we consider to better support and increase rural affordable housing?</p>	<p>Affordable housing should, as a rule, be provided in all rural developments in concert with the local community. Any development of more than two houses in a rural area should have the same affordable housing requirement as elsewhere. We do not believe contributions for offsite delivery are appropriate here as the supply of land is not sufficient to make this viable. Affordable housing should be delivered on site in all cases.</p>
<p>Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?</p>	<p>Yes.</p>
<p>Question 56: Do you agree with these changes?</p>	<p>Yes.</p>
<p>Question 57: Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?</p>	<p>We are concerned about the viability of community led housing developers to achieve the scale needed to support affordable rental properties. We would rather see existing registered providers involved in the provision of affordable rental properties</p>

	with the caveat that a registered provider should not be allowed to sell affordable rental properties.
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?	Small sites are not being allocated because planning policy has allowed the volumetric house builders to completely dominate the housing delivery market, driving other developers out. This has been extremely detrimental both in terms of housing delivery and of the quality of housing provided. We believe that by removing the profit that volumetric developers gain from the uplift in land value and ensuring that development sites are parcelled up so that 50% are being delivered by councils or housing associations will encourage the employment of smaller developers to build this out. Any medium or large allocation of housing should require a significant percentage of the housing to be built by smaller developers.
Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?	<p>No. We strongly disagree with the removal of the references to 'beauty' and 'beautiful' from paragraph 138 of the existing NPPF. We need to build future communities that people want to live in. To achieve this, we need to ensure that new developments are beautiful places.</p> <p>We believe that the removal of references to beauty will result in developers ignoring the local vernacular and removing attractive design features from their proposals.</p>
Question 60: Do you agree with proposed changes to policy for upwards extensions?	No comment.
Question 61: Do you have any other suggestions relating to the proposals in this chapter?	<p>Yes</p> <ul style="list-style-type: none"> • Homes need to be as energy efficient as possible to reduce energy use.

	<ul style="list-style-type: none"> • All heating should be electric (heat pumps)-no fossil fuel boilers should be installed. • No mains gas should be supplied to new developments. • Any development over 500 homes should have its own community energy supply. • Swift and bat bricks should be incorporated on all new developments and homes. • Grey water re-use should also be incorporated in new developments.
<p>Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?</p>	<p>Yes.</p>
<p>Question 63: Are there other sectors you think need particular support via these changes? What are they and why?</p>	<p>We believe that flexibility needs to be given to supporting the armed forces in terms of the provision of commercial space near to, but not inside, defence establishments to facilitate the private sector in working with the emerging needs of the defence sector.</p>
<p>Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?</p>	<p>No comment.</p>

<p>Question 65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?</p>	<p>No comment.</p>
<p>Question 66: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No comment.</p>
<p>Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?</p>	<p>We do not understand what the change is trying to achieve. It is unclear whether this is Local Planning Authority or developer led.</p>
<p>Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?</p>	<p>Yes.</p>
<p>Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?</p>	<p>Suggest amendments are re-considered – the term ‘vision led’ is ambiguous.</p>
<p>Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</p>	<p>Firstly, by ensuring that new developments are located in the right place, have the right design and contain the right mix of facilities to develop social cohesion and healthy living. And, secondly, that the right public services - for example for health and education – are available.</p> <p>As to location, there should always be convenient walking or cycling access to shops and reliable access to regular public transport.</p> <p>The design of a development should provide for easily accessible open spaces which would encourage safe communal activity outside of their houses for both adults and children.</p>

	<p>Larger developments should be required to construct and equip doctors' surgeries and, as necessary, schools and such other public facilities as the local authority may demand.</p> <p>To improve social inclusion affordable housing should be evenly distributed throughout developments.</p>
<p>Question 71: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>In larger developments, particularly if community services and good quality open spaces are to be provided, a proper management system should be introduced, with the developer required to fund the costs for a set period and to arrange for continuation of that system on completion of that set period. If measures such as SUDS are shown to be ineffective there should be accountability by developers to rectify any issues.</p> <p>Where there is a Town or Parish Council in place they would be best suited to manage any open spaces.</p>
<p>Question 72: Do you agree that large onshore wind projects should be reintegrated into the s NSIP regime?</p>	<p>Yes.</p>
<p>Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?</p>	<p>We support this proposal providing it is matched with a clear definition of cumulative impact in the planning process. There are increasingly villages that are surrounded by an 'industrial' landscape of solar farms. There needs to be balance in the way that renewable energy is provided for. The key here is cumulative impact and the need to properly define what 'too much' renewable energy generation is inside any specific area.</p> <p>There must be national, joined-up thinking which takes account of the national need and connections to the grid without overwhelming a particular community with a plethora of solar and/or wind farms.</p>

	<p>Renewable energy schemes which impact communities should also benefit those communities.</p> <p>Subject to suitable Environmental Impact Assessment, renewable energy schemes should be located as close to the grid connection as is feasible, to limit their impact on wider communities.</p>
<p>Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?</p>	<p>Yes. We support additional protection of areas of high carbon sequestration provided the types of landscape making up such areas are clearly and comprehensively defined. We also feel that areas of high-quality agricultural land should be protected to preserve the long-term self-sustainability of the country.</p>
<p>Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?</p>	<p>No. Keep the threshold as it currently is.</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>No. Keep the threshold as it currently is.</p>
<p>Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?</p>	<p>Remain as now.</p>
<p>Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?</p>	<p>National Planning Policy needs to ensure that all new development of any form is zero carbon in operation. Better design standards need to be developed and enforced to ensure that developments do not create heat islands but instead are well planted to help dissipate heat. Planning should also clearly specify what forms of carbon capture are acceptable and support their development where it is appropriate. A</p>

	rapid change to building regulations is required, in concert with these changes, to achieve meaningful progress.
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?	There needs to be greater consistency and accuracy when measuring carbon in the planning process. A nationally accepted approach would be helpful.
Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?	The current approach to flood risk, based on mitigation, is not clear enough. Wider focus needs to be given to the implications of flooding on a new development in its entirety and not just on the housing inside it. There also needs to be better evidence provided to address concerns about run off impacting flooding in neighbouring areas.
Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?	The proposed approach in the revised NPPF is going to strongly encourage urban sprawl and green field/green belt development. This creates lower density housing spread out from existing facilities with very little infrastructure provision given the piecemeal way such development is built the numbers not being sufficient to generate for example a new school. If government is serious about tackling climate change, we strongly believe: that it needs to do so by ensuring that a majority of new housing is inside existing settlements, especially cities; that it combines increased housing density with improvements in design; that it is built in areas that have effective public transport and so can support it; and that it should be designed, where built inside cities, to minimise car use. Where development is occurring as urban sprawl on the edge of settlements, car use cannot be built out of such developments because of the lack of effective public transport and the reliance of residents on the car.
Question 82: Do you agree with removal of this text from the footnote?	We oppose the removal of this footnote. With a growing population, the UK is going to need to be able to feed itself in a future where a combination of climate change and

	global insecurity mean that the availability of foods globally are at risk. High-quality agricultural land needs protecting from development by planning policy.
Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?	<p>We believe that the most effective way to ensure that development supports food production is to increase the amount of development and re-development carried out inside our towns and cities. Every time we allow a developer to build on farmland we lose food production permanently.</p> <p>We suggest means to achieve this include:</p> <ul style="list-style-type: none"> a) Development being permitted only on brownfield land or within existing settlement boundaries unless otherwise provided in a Local Plan; b) The maximum uplift on agricultural land values above the benchmark land values set by government should be only marginally above current land values. This would deter landowners from speculative dealings with developers;
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?	We agree that water infrastructure, especially the creation of new reservoirs, needs to be picked up under the Nationally Significant Infrastructure Projects (NSIPs) regime.
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?	We believe that implementation of suitable water infrastructure in developments must be properly monitored during construction and any failures to implement the approved schemes rigorously enforced.
Question 86: Do you have any other suggestions relating to the proposals in this chapter?	No comment.

<p>Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?</p>	<p>Yes.</p>
<p>Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?</p>	<p>No.</p>
<p>Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?</p>	<p>Yes.</p>
<p>Question 90: If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.</p> <p>If Yes, please explain in the text box what you consider an appropriate fee increase would be.</p>	<p>N/A</p>

<p>Question 91: If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?</p> <p>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>	<p>Cost should be set by Local Authorities to cover their costs.</p>
<p>Question 92: Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.</p>	<p>No comment.</p>
<p>Question 93: Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.</p>	<p>No comment.</p>
<p>Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning</p>	<p>Yes.</p>

<p>application fee? Please give your reasons in the text box below.</p>	
<p>Question 95: What would be your preferred model for localisation of planning fees?</p> <p>Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee. Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally. Neither Don't Know</p> <p>Please give your reasons in the text box below.</p>	<p>Full localisation.</p>
<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>No comment.</p>

<p>Question 97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?</p>	<p>No comment.</p>
<p>Question 98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?</p>	<p>Yes.</p>
<p>Question 99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.</p>	<p>No comment.</p>
<p>Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?</p>	<p>None.</p>
<p>Question 101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.</p>	<p>We believe that given the pressure on local authority budgets and the difficulties recruiting to planning posts that it is entirely reasonable that those seeking to develop should cover the full costs of the assessment of their development proposals even if that involves uplifts for pay for planning officers.</p>

<p>Question 102: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No.</p>
<p>Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?</p>	<p>No. Any plan which has reached Regulation 19 stage should be examined against the current NPPF, regardless of the gap between the local planning authority's Local Housing Need figure and the emerging housing requirement. 200 dwellings per annum is an arbitrary figure and does not take into account differing sizes of LPA's.</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>We believe that the basic principle of the current NPPF in which developers or landowners put forward sites for development is misguided. A process where planning authorities determine which areas around existing settlements or inside them would be best chosen for planning and then goes to landowners to facilitate development and, if necessary, acquire land through compulsory purchase orders. The current system allows developers to prevent some areas of land coming forward for development which would be beneficial in the creation of functional future communities. The current situation where landowners can hold neighbouring developments to ransom needs to be stopped. Where land is identified for development local authorities should be able to step in and create a single plan for such land, equalising land values according to set criteria. Developers and landowners should not be able to hold up or cause difficulties for the development of sites because they are trying to maximise their own profits.</p> <p>Government should act inside the NPPF to compel the development of brownfield sites in urban areas ahead of building in the open countryside.</p> <p>Government should also use the NPPF to significantly reduce the uplift that can be gained through the development of agricultural land, ensuring that instead the vast</p>

	<p>majority of any uplift is passed onto local authorities to build infrastructure and affordable housing in a similar way to current Section 106 agreements.</p> <p>We believe government should reform the provision of affordable housing requiring developers to provide serviced land in lieu of actual housing which can then be developed by councils or by housing associations/registered providers.</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>