

Chapter 14 – Table of questions

Questions	DDDC Suggested Response
<p>Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?</p>	<p>If the ambition is to be achieved then making a target mandatory is one of achieving this. However the key is ensuring that the methodology produces what is required in the right locations.</p> <p>The evidence published by research consultancies suggests that many rural locations such as Derbyshire Dales are receiving a disproportionate increase in future residential targets, which will not, without significant investment in other services and facilities deliver sustainable development. Rather they will deliver large dormitory settlements and high levels of out commuting.</p> <p>It is considered that more emphasis in the outcome of the methodology should be placed upon delivering sustainable development in locations such as urban areas, which are already inherently more sustainable than rural areas.</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>No – Chapter 3 Para 7 in the consultation document suggests that there will be circumstances where local planning authorities could use an alternative approach, and that further guidance will be set out in Planning Practice.</p> <p>Given the circumstances that Derbyshire Dales has in respect of the split between local planning authorities responsibilities and the impact of the statutory purposes of the National Park it is considered that it is important that an alternative approach is available which allows for such situations to be adequately addressed.</p> <p>If guidance is issued, as suggested, then if the advice in the NPPF which as alluded to would not include such an alternative arrangements, there is likely to be considerable risk of inconsistent advice being issued which would cause the potential for confusion as to what is the most appropriate way forward.</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>The Urban uplift was designed to ensure that there was a focus of new housing development in the largest urban areas across the country. In principle seeking to focus new development to the more densely built urban areas achieves better opportunities for delivering sustainable development.</p> <p>However the outcome of the new SM method has a perverse outcome in that it appears to direct increased residential development in more rural areas, and urban areas proportionally have less. This cannot be correct.</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>Making efficient use of land is another key facet required to achieve sustainable development. Density needs to be appropriate to the character and appearance of its location, and in some instances it is appropriate for an uplift in density and others not. The use of design codes will help guide circumstances when it is appropriate for higher densities.</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>Yes - this has been the focus of our engagement with Lathams on Design Codes.</p>

Questions	DDDC Suggested Response
Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?	Seem reasonable and makes it clearer when it would become engaged.
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?	This is a return to situation pre December 2023 and gives clarity to the position for all local planning authorities which previous wording caused confusion over.
Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?	Yes as it gives clarity to the calculation the 5 YLS and makes it simpler to understand
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?	Yes a buffer of 5% is appropriate as it allows for none implementation of planning permissions and for some market flexibility
Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?	It is considered that 5% is reasonable.
Question 11: Do you agree with the removal of policy on Annual Position Statements?	Whilst there is merit in having an Annual Position statement to set out an agreed 5YLS figure in reality having such a formal process for limited numbers of APS is a waste of public resources. So agree with the removal. In reality each local planning authority is likely to prepare an annual 5YLS and monitor over the course of the year.
Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?	Yes - the more co-operation the better the potential for the implementation of the plans.
Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?	They are generic enough to be able to test the proposals at this level.
Question 14: Do you have any other suggestions relating to the proposals in this chapter?	No
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>Whilst the use of stock will provide the stability and the accelerated growth the Government wishes to achieve it is a crude mechanism for assessing the future needs of an area. The use of population based forecasts would provide a much more suitable basis of assessing the future needs of an area. Although such an approach has its fallacies it is likely to be more reflective of an area's needs, and likely to result in a policy approach which sees future housing stock being identified to meet future needs.</p> <p>The main issue with the proposed Methodology is that it appears to assume that all a local authority needs are to be delivered within that District Council's local planning authority area. That is reasonable where the two areas coincide.</p> <p>However in areas such as Derbyshire Dales, where only half the District is the local planning authority area because the other half is situated within the Peak District National Park, which is its own local planning authority area, taking the Wording of Footnote 1 on the published revised housing needs spreadsheet this suggests all the increased housing requirement would need to be provided within the local planning authority area. This would result in a disproportionate level of growth for the Derbyshire Dales local planning authority area, which has 72% of the housing stock. The proposed methodology should allow in such circumstances for a proportionate level of growth to take place outside of National Parks.</p> <p>It is only when you consider Chapter 3/Para 7 does it become clear that in circumstances such as Derbyshire Dales and the Peak District National Park that the Government may be willing to consider the use of alternative approaches to the Standard Methodology. It goes on that the Government proposes to publish further guidance on this 'small number' of special circumstances in Planning Practice Guidance. It is disappointing that this guidance wasn't published in full at the same time as the NPPF because as</p>

Questions	DDDC Suggested Response
	written there is significant emphasis on the use of the new Standard Method as a means of guiding new development.
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?	Yes - for DDDC this provides the higher ratio when compared to the resident based ratio and is more reflective of those likely to be in housing need i.e. those living and working in Derbyshire Dales.
Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?	Yes as this allows for an uplift to enable the delivery of affordable housing. However what would be more useful is that the uplift element is set aside specifically for affordable housing and not be subsumed as part of the overall need.
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?	There are one or two housing intelligence models that could be used e.g. Hometrack is something that MHCLG could access and/or provide extracts from. It is a product banks and lending institutions use to assess the housing market. We use it locally for affordability ratios and parish housing needs surveys. It carries quite a bit of info on rental affordability and is consistent across the UK.
Question 19: Do you have any additional comments on the proposed method for assessing housing needs?	<p>Not in terms of the methodology, but more in terms of the outcome of the changes that the SM provides. It is clear from maps of changes published by research companies that this appears to deliver a disproportionate increase on rural areas compared to urban areas, and as such on the face of it might not deliver sustainable development in the most appropriate way, with urban areas being much more sustainable compared to rural areas.</p> <p>The second comment to make, given the circumstances facing Derbyshire Dales and the Peak District National Park, is the extent to which the SM is relevant to the area, and the extent to which the use of strategic policy to determine a more appropriate and sustainable distribution of new homes is more appropriate. A strategic approach for example at MCCA level is likely to enable the circumstances facing Derbyshire Dales and the Peak District National Park to be taken into account and deliver more relevant outcomes.</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?	Yes - however there needs to recognition that there is likely to be additional constraints with bring forward brown field sites which will affect delivery. The Government should give consideration to funding opportunities to help deliver brown field sites as a priority to get them moving.
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?	N/A
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?	No
Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?	N/A
Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?	N/A
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?	N/A

Questions	DDDC Suggested Response
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?	N/A
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?	N/A
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?	Support the principle of brown field first, so long as it is situated in the most sustainable locations and that there are financial mechanisms in place to help them get released in advance of greenfield sites. Otherwise the policy will not be appropriate for Derbyshire Dales.
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?	N/A
Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you commend?	N/A
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?	N/A
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?	N/A
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?	N/A
Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?	Increasing the requirements for affordable housing as well as changing the potential tenure mix is to be welcomed, however this should be tested through Local Plan viability to determine whether it can be delivered as envisaged.
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?	N/A
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?	N/A
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?	N/A
Question 38: How and at what level should Government set benchmark land values?	N/A
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?	N/A as applies to Green Belt
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?	N/A
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	N/A as applies to Green Belt

Questions	DDDC Suggested Response
reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?	
Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?	N/A
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?	N/A
Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?	N/A
Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?	N/A
Question 46: Do you have any other suggestions relating to the proposals in this chapter?	N/A
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?	Yes, but understanding that social rent is a different product to affordable rent (being a rent charged up to 80% of the market rent, while social rent is the historic rent for council housing). So its important not to get lost in translation. The Dales is in the social rent category for Homes England funding when RPs provide new build affordable housing – so they get more grant to make up for the lower rents. Social rents also better reflect the Local Housing Allowance rates. The only caveat to all of this is that on s106 sites where there is a management company in place, affordable rents are preferred because the service charge is included in the rent. If they were social rents then the service charge is an additional payment made by the tenants.
Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?	Yes - as places such as Derbyshire Dales, where the affordability ratios are high (in excess of 10 x income) even discounted ownership can be unaffordable based upon local incomes etc.
Question 49: Do you agree with removing the minimum 25% First Homes requirement?	Yes - this gives local planning authorities more choice over what affordable housing is required, and does not dictate a tenure type which may not be appropriate in any specific local authority where for example First Homes will not be affordable because of high affordability ratios etc.
Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?	The overwhelming need is for social rent with some shared ownership. Feedback from developers about First Homes is poor and First Homes create more risk. At least with shared ownership developers get the cash flow when they sell the affordable homes to an RP. The RP can they recycle the shared ownership sale receipts into the next affordable housing scheme.
Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	Yes - by taking such an approach it ensures that the open market development can subsidize the affordable housing. This should however, be already happening with developments as at DDC where future housing needs have dictated an appropriate mix of properties in the Local Plan to ensure future housing needs meet the needs of the community.
Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?	Derbyshire Dales DC has supported delivery of affordable schemes which are all social/affordable rent and shared ownership. These are typically no bigger than 40 units. Good design and management are key, whilst accepting that social housing needs to meet a wide range of needs from people in work, in work and on benefits and those not in work. The % of people in work and receiving benefits is often over 60% and together with people priced out of market homes, affordable housing is one of the few options available. Promoting these factors would be sensible.

Questions	DDDC Suggested Response
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?	Local Lettings Plans could be helpful whereby the % of households in work (whether on benefits or not) is considered at first allocation.
Question 54: What measures should we consider to better support and increase rural affordable housing?	DEFRA have provided short term revenue funding for Rural Housing Enablers. This is a start but more can be done with longer term commitments. Grant rates for affordable housing in protected landscapes is always an issue – we often exceed the financial viability limits for rural schemes and councils need to provide significant top up to make them deliverable. Local Authority Housing Fund rounds 1,2 and 3 have proved really helpful in urban areas but similar rural programmes could help to do more in relation to RTB buy backs. It only takes a few interventions in one village to make a difference to the school, shop and other facilities. Ending the RTB in protected landscapes is very important to support the delivery process and keep communities on board.
Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?	This is more for DCC to answer, but YES it is considered appropriate to support this proposed change
Question 56: Do you agree with these changes?	Yes - they will provide additional opportunities for the delivery of mostly welcomed affordable
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?	It is considered important to allow for a broad spectrum of provision so that we maximise the potential delivery routes available. Provision via the large registered provider housing associations, local authorities, community land trusts, Almshouses and faith groups are important as they all have potential to deliver in certain locations and circumstances.
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?	<p>One of the key issues with this is not so much that the 10% requirement is inappropriate, rather it is the wording of the NPPF which makes it ambiguous how the 10% is provided.</p> <p>For example does it mean that 10% of all allocations within the plan at the time the plan is submitted should be small sites or does it mean that 10% of all sites that contribute to delivering the Local Plan requirements should be small sites. i.e. this includes both commitments/completions and allocations</p> <p>If the former then the District Council will find it difficult to demonstrate that it can achieve as generally small sites are not normally identified through the Call for Sites for example.</p>
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>Whilst the notion of 'beauty and beautiful' can be regarded as subjective its removal could be interpreted to mean that there is a watering down of the emphasis on design quality in the NPPF if 'well-designed' remains the emphasis.</p> <p>It is considered that the NPPF should replaced this with high quality designed buildings and places to provide the right emphasis.</p>
Question 60: Do you agree with proposed changes to policy for upwards extensions?	No Comments
Question 61: Do you have any other suggestions relating to the proposals in this chapter?	No
Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?	Yes - ensuring that enough land for commercial development is available is a fundamental requirement for a strong local and national economy. However, it should be recognised that in many rural areas limited rural broadband is currently a constraint to developing a modern, knowledge driven economy.
Question 63: Are there other sectors you think need particular support via these changes? What are they and why?	Advanced Engineering and Manufacturing, Knowledge-based and Creative/Digital sectors specifically in rural settings require support and space to develop and grow in challenging conditions. These sectors are fundamental to the success of a higher value economy and to diversifying the rural economy beyond agriculture and tourism. Whilst investment in gigafactories and data centres is unlikely in a location such

Questions	DDDC Suggested Response
	as the Derbyshire Dales, such areas, offering a high quality environment / quality of life, have and, with support, can continue to attract clean/knowledge-based activities of a scale appropriate to the setting.
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?	Whatever regime is used to determine the appropriateness of locations of these and possibly other NSIP development there must a consistent approach which takes account of the impact upon the proposed location and that the decision is made following local consultation and in a timely manner which provides certainty to the local community and development industry about whether a location is suitable or otherwise.
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?	Yes - scale should reflect the character of the countryside / rural setting, particularly in areas such as the Derbyshire Dales which includes a National Park designation within the northern half of the district.
Question 66: Do you have any other suggestions relating to the proposals in this chapter?	No Comment
Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	This could be much clearer about when significant weight should apply - is this when there is certainty about new, expanded or upgraded public service infrastructure likely to be coming on stream or when there is lack of certainty about it coming on stream. The latter is likely to be a more prevalent scenario in DDDC if current conditions apply and may well lead to development be baulked than being brought forward.
Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	<p>Whilst the age groups at the start and end of their education requirements do require appropriate facilities, as written it appears to exclude the main group in education 5-16 year olds. The emphasis should be on the provision of education facilities for all age groups and sectors.</p> <p>If extra facilities are needed for the younger and older age groups then these should be included with general facilities across the whole of the education sector..</p>
Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?	Yes - both changes seem appropriate, and hopefully will result in beneficial changes to transportation planning, and decision making. Maybe the guidance should make it clear that this should be achieved through the BSIP process or the LTP ?
Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?	No Comments - Uses examples from areas where this works ??
Question 71: Do you have any other suggestions relating to the proposals in this chapter?	The emphasis in Chapter 8 and Chapter 9 appears to be on the delivery of more strategic level infrastructure rather than the smaller scale localised physical infrastructure which is needed to support development in areas such as Derbyshire Dales – this should include placing an emphasis on the provision of appropriate improvements to foul and surface water infrastructure, which are already operating at or very close to capacity, and in time of heavy rain cause localised flooding with often significant damage to local properties.
Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?	<p>These types of development are likely to generate considerable amount of local interest, which will need to taken into account in their determination.</p> <p>Whatever regime is used to determine there must a consistent approach which takes account of local interests, the impact upon the proposed location and that the decision is made in a timely manner which provides certainty to the local community and development industry about whether a location is suitable or otherwise.</p>

Questions	DDDC Suggested Response
Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?	In principle yes the District Council would support the greater weight being given to renewable and low carbon energy development, but this should not be considered to be blanket support, without there being appropriate checks and balances where landscape and other factors should be taken into account.
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?	Habitats that are beneficial to climate change should be protected from any form of development that is likely to have any adverse impact upon their integrity.
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?	It is difficult to comment on this it is not clear what this might look like in practice - is it for example 6, 10 or 20 turbines ? However by increasing the threshold it may result in more schemes having to be determined locally, in circumstances when resources and expertise may well be necessary to be bought to ensure that schemes are assessed in a timely manner and takes account of all factors.
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?	It is difficult to comment on this it is not clear what this might look like in practice - is it for example an extra 10, 20 50 Ha ? However by increasing the threshold it may result in more schemes having to be determined locally, in circumstances when resources and expertise may well be necessary to be bought to ensure that schemes are assessed in a timely manner and takes account of all factors.
Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?	No Comment
Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?	NO COMMENT - MEMBERS TO ADVISE ?
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?	The balance and availability of evidence is likely to held by developers, rather than a local planning authority and as such the lack of expertise will inhibit the development of policy and decision making.
Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?	The approach that is being taken appears to work will in setting an appropriate risk based approach to flooding.
Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?	No
Question 82: Do you agree with removal of this text from the footnote?	The footnote was inserted as a sop to those that were seeking to resist development on agricultural land such as solar farms. The previous approach had worked well for many years, without undue concerns about the impact upon food security etc Given the emphasis now being given to renewable energy development it is important to ensure that an appropriate balance is taken into account. As such it is considered that the removal of the footnote will achieve a more balanced approach.
Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?	Give greater support to development that result in more efficient agricultural practices.

Questions	DDDC Suggested Response
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?	Give greater support to development that result in more efficient agricultural practices.
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?	No comment
Question 86: Do you have any other suggestions relating to the proposals in this chapter?	No
Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?	The suggested changes appear reasonable. Having the statutory criteria and a policy approach allows for the policy approach to be revised from time in a much speedier way than making changes to legislation.
Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?	No, legal powers and policy is the most efficient way to set out intervention approaches.
Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?	Yes, the current fee does not allow for the recovery of the fee associated with this type of application.
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.	In regard to the suggested increase in the householder fees, it is suggested that the amount should double the current fee required for such proposals ie to £528
<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 £528No – it should be lower than £528no – 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>	As set out above it is considered that the proposed increase in the planning fee for householder applications should rise to £528.00, as this will allow for greater localised cost recovery.
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.	N/a.
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.
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.	It is considered that the District Council's should be able to charge for the full recover of the planning application (Officer time etc).
<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>	It would be preferable to see "Local Variation" in the planning fees. This will allow for the option to alter some planning application fees.
Question 96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?	Yes - Whilst he planning system is there to act in the public interest, it also sets up a framework for developers to make significant profits.

Questions	DDDC Suggested Response
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>Although the extraction of fees from developers for use towards plan-making could be seen as a 'bribe' from the development industry to ensure their interests are protected - however with the appropriate checks and balances in the system such as an EIP ensures that this bias is only perceived and not real.</p> <p>As such using fees for plan-making is appropriate.</p> <p>Difficult to quantify what any uplift would be as it varies from local planning authority to local planning authority</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?	Plan Making
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?	Yes.
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.	The cost of application is retained by PiNs, and the cost of potentially outsourcing the proposal cannot always be recovered through a PPA. If the PPA provided full cost recovery then any potential fee would be waived.
Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?	No limitations should be imposed.
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.	N/a.
Question 102: Do you have any other suggestions relating to the proposals in this chapter?	No.
Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?	Yes - Given the extent of the changes to the housing requirements for the District Council it will require extra time to consider the best delivery strategy.
Question 104: Do you agree with the proposed transitional arrangements?	Yes - Given the extent of the changes to the housing requirements for the District Council it will require extra time to consider the best delivery strategy.
Question 105: Do you have any other suggestions relating to the proposals in this chapter?	No
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?	No Comments