

## Response ID ANON-SNQ4-RD94-9

Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system  
Submitted on 2024-09-24 16:33:44

### Scope of consultation

#### Respondent details

a What is your name?

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b What is your email address?

Email:  
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c What is your organisation?

Organisation:  
Plumpton Parish Council

d What type of organisation are you representing?

Neighbourhood planning body, parish or town council

If you answered "other", please provide further details:

#### Chapter 1 – Introduction

#### Chapter 2 – Policy objectives

#### 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

Please explain your answer:

The government's standard method should be 'advisory' rather than 'mandatory' as it represents a 'one size fits all' national approach that fundamentally does not address the two most fundamental aspects at the local level – demand (i.e. objectively assessed need) and supply (i.e. the availability of land).

For Districts like Lewes which 'loses' a lot of available building land to the South Downs National Park, the standard method results in an unachievable and unnecessary volume of houses.

There is undoubtedly a pressing need for social housing given the lack of investment over many decades, and that should be a priority, but that should be directed to where it is required and not be arbitrary.

There is also a significant gap for affordable homes for those that earn too much to qualify for social housing, but too little to command a mortgage.

Relying on the market to address these segments is unlikely to work – it has been the model for decades, but the building industry produces to a level that does not materially move market prices. It is unwilling and unable to increase production significantly to meet the affordable sector requirements, indeed often being allowed to renege on the affordable element of development where it is deemed by them to be uneconomic.

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

Please explain your answer:

The standard method does not take into account either the true local need or the availability of suitable land. Local authorities should have the flexibility to address specific local needs, such as prioritising social housing waiting lists and increasing affordable housing. These flexibilities would allow planning decisions to be tailored to the unique demands of each area, ensuring that housing solutions directly meet local requirements.

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

No

Please explain your answer:

It is entirely appropriate that urban areas that tend to benefit from infrastructure and offer more sustainable housing with greater brownfield opportunities should accommodate more housing, rather than building on greenfield, predominantly agricultural sites in (typically Southern) rural locations that provide the greatest profit to developers.

However, the use of arbitrary uplift targets does not address either need or availability of sites.

A strategic, regional approach to direct housing to sustainable locations requires more effort, but should be the preferred option.

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

No

Please explain your answer:

LPAs should have the power to reject new housing allocations if they would lead to densities that are inconsistent with the character of the area, unless that is part of a strategic regional plan.

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?

Yes

Please explain your answer:

This should apply to ALL developments, not just large ones, as high density in agreed locations has the potential to use less land, and provide greater sustainability than building in greenfield rural sites with little supporting infrastructure, which is simply resulting in car-dependence.

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

No

Please explain your answer:

The additional emphasis on design is supported, but overall this presumption requires radical revision as it has simply acted as a developers charter and encouraged unplanned sprawl.

Taken together with the revised standard method that appears to skew development away from sustainable population centres and to rural areas where developers make greater profits, the threat of unnecessary further erosion of valuable sites that deserve better protection than they receive from Footnote 7 means that the balance between the economic, the social and the environmental objectives is not achieved.

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

Please explain your answer:

The key test is the adoption of a needs-based plan for the strategic period – that plan must have sufficient sites to guarantee supply over the plan period.

Within the plan period, monitoring should be focussed on LPAs approving plan sites in a timely manner. That recognises that LPAs do not control deliverability; monitoring must address all developers sitting on granted permissions to maximise profitability.

Local experience of the 5 year land supply issue is that it is simply a tool for opportunistic developers to succeed in 'out of plan' developments.

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

No

Please explain your answer:

This would seem to risk increasing targets, penalising achievement.

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

Please explain your answer:

This would seem to be a further obsession with the flawed 5 year supply issue that potentially allows developers to manipulate LPA 'performance' to their advantage.

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

Not Answered

Please explain your answer if you believe a different % buffer should be used:

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

Yes

Please explain your answer:

These appear to be rarely used and detract from the effective monitoring of the local plan.

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

No

Please explain your answer:

There is no doubt that there needs to be a much greater strategic focus on cross border issues as they relate to infrastructure and large developments, but the Duty to Cooperate does not go anywhere near to addressing that – it appears simply to play out as a way of moving unachievable targets between LPAs.

If the blunt standard method were to be replaced with a strategic regional development framework, based on local need and land availability, the DTC would not be required.

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

No

Please explain your answer:

This would appear to be already addressed by the inspector of a local plan – what appears to be lacking is the context that would be provided by strategic regional plans that inform a Local Plan through proper evidence-based analysis of all aspects including climate mitigation and future food security.

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

Please provide any other suggestions relating to the proposals in this chapter. :

Think more strategically:

Focus less on arbitrary targets and more on objective need. Don't penalise LPAs where the market is not delivering.

Recognise that home ownership is not a universal aspiration and that delivering rental stock has also to be supported through policy.

Acknowledge that the market does not operate effectively for housing, and that developers only build what they can sell. Intervention is required to meet social and affordable needs.

Prioritise sustainability and reduce unnecessary car-dependence, protecting the natural world, mitigating climate change and preserving agricultural land for food production.

#### 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?

No

Please explain your answer. :

The standard method is arbitrary and does not direct housing in any strategic way.

It takes no account of available or required infrastructure, and is independent of any consideration of sustainability.

Any calculation should not be based on what has gone before, but instead what is required going forward. That requires a return to a focus on objectively assessed need. Particular emphasis on the needs of an ageing population is required, whilst also considering the vulnerable and those with special needs.

The affordability factor also appears flawed in many respects as it reflects home ownership which is not the universal requirement and certainly not a proxy for local need.

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

Please explain your answer:

Moving to a three year average is an improvement, but the affordability factor should be replaced in its entirety.

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

No

Please explain your answer:

The changes do not accurately reflect the spectrum of housing need, and there is no evidence that supply and demand operate on a commodity basis in the housing market.  
Simply giving areas of high housing prices a greater target for building will have little or no practical benefit on provision of social and affordable housing.

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

Please explain your answer:

The inclusion of rental in strategic planning is supported, but the standard method and the NPPF require radical attention.  
Strategic planning and associated policy making should be evidenced-based, and start from the assessment of national need.  
It must acknowledge granted consents that have not been built out, and also address why so many granted consents are not brought forward in a timely manner.  
It should look at the impact of the very large number of dwellings that are truly empty and unused, recognising that holiday letting is economically important also.  
It must set targets for social housing and compel developers to meet that need, not opt out when it is less profitable.

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

Please provide any additional comments on the proposed method for assessing housing needs.:

It should be objective and evidence-based, not statistical.  
It should prioritise social and affordable housing over open market housing.  
It should drive development to where there is need, not simply where developers make most profit.

## 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

Please explain your answer:

It is common sense that where there is local need, brownfield should be used first. There is even the argument that greenfield development should not be allowed where brownfield is available.  
Tax breaks should be considered as an incentive for brownfield sites to be developed.  
The revised wording refers to brownfield land 'within settlements' which would appear redundant – all brownfield sites should be prioritised.

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?

Yes

Please explain your answer:

Whilst there is no greenbelt in East Sussex it would appear sensible to use sustainable sites that do not fundamentally compromise the purpose of the green belt.

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?

Please provide any further views:

East Sussex has a large number of such sites, and these should be prioritised for food production.

Creating an incentive for owners to make large and immediate returns for development would be concerning.

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

Yes

Please explain your answer:

Whilst there is no green belt in East Sussex, it makes sense to acknowledge that not all green belt is equal, especially when previously developed.

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

Yes

Please explain your answer:

It is a feature of the current NPPF that landowners can degrade land to reduce its ecological rating and therefore more easily achieve biodiversity net gain, so the same is likely to occur for grey belt.

Monitoring this would be the operational challenge.

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

Please explain your answer:

Otherwise planning decisions would be open to challenge.

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?

No

Please explain your answer:

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?

No

Please explain your answer:

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?

No

Please explain your answer:

Whilst laudable to promote brownfield and grey belt sites first, local consideration is required as to whether they meet the local need, including location and sustainability.

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

Please explain your answer:

That would appear to be common sense.

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

Not Answered

If not, what changes would you recommend?:

No Comment

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?

Not Answered

Please explain your answer:

No Comment

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?

Not Answered

Please explain your answer:

No Comment

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?

Not Answered

Please explain your answer:

No Comment

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

No

Please explain your answer:

LPAs should be able to decide based on local need, not a national 'one size fits all' approach. In particular a limit of 50% affordable housing may be too low in some instances.

35 Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

The Government or local planning authorities should be able to set lower targets in low land value areas

Please explain your answer:

LPAs should be able to decide based on local need, not a national 'one size fits all' approach. In particular a limit of 50% affordable housing may be too low in some instances.

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

Yes

Please explain your answer:

This would appear to be common sense.

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?

Not Answered

Please explain your answer:

No Comment

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

Please explain your answer:

No Comment

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?

Not Answered

Please explain your answer:

No Comment

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?

Please explain your views on this approach:

The policy is inflexible and a 'one size fits all' national approach is not supported.

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?

Yes

Please explain your answer, including what support you consider local authorities would require to use late-stage viability reviews effectively:

To stop developers gaming the system.

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?

Not Answered

Please explain your answer:

No Comment

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?

Not Answered

Please explain your answer:

No Comment

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

Not Answered

Please explain your answer:

No Comment

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

Not Answered

Please explain your answer:

No Comment

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

Not Answered

Please explain your answer:

No Comment

## 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

Please explain your answer:

Social rent is the only option for some households, and in the absence of public building programs must be delivered through market development.

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

Yes

Please explain your answer:

LPAs should be free to determine a local priority for the number and nature of the affordable housing provided on a site.

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

Not Answered

Please explain your answer:

No comment

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

Not Answered

Please provide any further comments:

No comment

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

Yes

Please explain your answer:

LPAs should be free to decide based on local need.

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

Please explain your answer:

No comment

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?

Please explain your answer:

No comment

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

Please explain your answer:

Allow LPAs flexibility over affordable percentages and Not for profit public building capability.

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

Yes

Please explain your answer:

56 Do you agree with these changes?

Yes

Please explain your answer:

Community led housing can deliver more affordable homes.

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?

Not Answered

If Yes, what changes would you recommend?:

No Comment



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?

Yes

Please explain your answer :

Locally many small sites are not sustainable.  
A site must be suitable for development, regardless of size.

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

Please explain your answer:

The NPPF is far too subjective generally, and the concept of 'beauty' did nothing to support prescriptive policy.

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

Yes

Please explain your answer:

The references to mansard was unnecessarily specific.

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

Not Answered

Please explain your answer:

No Comment

## 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?

No

Please explain your answer:

There appears to be no good reason for all LPAs to identify sites unless there is a local need.

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

Yes

Please explain your answer:

Agriculture and the rural economy generally.

There is too much pressure on agricultural land for development locally, and the need for food security should be enshrined in policy.

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

Please explain your answer:

NSIP by definition should be considered on a national level, and delivered on a regional basis.

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

If Yes, what would be an appropriate scale? :

Clearly there should be rules as to what constitutes a NSIP.

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

Not Answered

Please explain your answer:

No Comment

## Chapter 8 – Delivering community needs

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

No

Please explain your answer:

Such developments should surely be considered as NSIP for this to be the case, and so will have the weight by that classification.

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

Yes

Please explain your answer:

As part of regional strategic plans.

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

No

Please explain your answer:

The changes are supported in principle but there is no substance on what 'vision led' would mean in practice.

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

Please explain your answer:

No Comment

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

Not Answered

Please explain your answer:

No Comment

## Chapter 9 – Supporting green energy and the environment

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

Yes

Please explain your answer:

Energy security is a legitimate national concern.

However, we are an island with every opportunity to locate wind projects offshore (which could aid tidal renewables in due course).

The additional short term cost of offshore is offset by the preservation of onshore land for other purposes, including food production and building.

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

Yes

Please explain your answer:

Large scale initiatives should be covered by NSIP.

Smaller scale projects should be subjected to clear sequential rules to protect for instance agricultural land being allocated to solar farms where the same capacity could be delivered on commercial rooftops etc.

No best and most versatile farmland should be assigned to solar farms.

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

Please explain your answer:

Additional protection should be in place for irreplaceable habitats, rather than a compensatory mechanism for their destruction.

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

Please explain your answer:

Onshore wind farms are not necessary.

If need is defined nationally, the NSIP classification can be invoked for specific projects.

Energy security is a national issue, and LPAs are not generally qualified to arbitrate effectively on these projects.

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

Please explain your answer:

Energy security is a national issue, and LPAs are not generally qualified to arbitrate effectively on these projects.

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

Please explain your answer:

No Comment

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

Please explain your answer:

1. Make initiatives like heat pumps and rooftop solar compulsory on all domestic and commercial sites, and not allow developers to resort to fossil fuel options for economic reasons. Statutory energy providers should also provide capacity for new builds.
2. Ensure that there are strategic regional plans for supporting infrastructure that cannot be decided by a single LPA, including public transport and cycle path networks
3. Bring empty properties back into use before building new ones

Plumpton has experience of recent planned developments being able to replace climate change mitigants with fossil fuel alternatives – sometimes on cost grounds, but also due to lack of local capacity in the National Grid.

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:

Not qualified to answer

Clearly there must be some learnings available from other countries further into the adoption of green technologies.

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

Yes

Please explain your answer:

The NPPF would benefit from being more rigorous as our experience is that LPAs are not able to decline applications in areas that routinely suffer surface water flooding as the Environment Agency and water companies produce theoretical capacity models that do not reflect the reality that our community experiences.

Flooding events post build appear not to be the developers responsibility.

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

Yes

Please explain your answer:

There are a range of well established options, including planting natural woodlands and the like, but generally climate change should be the responsibility of regional strategic planning to ensure holistic thinking that no single LPA should be expected to be responsible for.

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

Yes

Please explain your answer:

The change appeared to add little or nothing of practical effect.

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

Yes

Please explain your answer:

Food security needs to be our top priority given the climate change risks to our own domestic crops and imports. (It should have been in the main text, not a footnote). The deletion should be restored, the importance of BMV agricultural land should be given a high weighting in planning decisions.

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

Please explain your answer:

At the planning level, this should be removed from LPAs and handled with the NSIP regime as part of strategic regional plans.

At the operational level, OFWAT should perform more in the interest of consumers.

On current performance levels, nationalisation of water should be considered as the benefits of privatisation have been shown to be illusory. That would considerably simplify planning matters.

No other country appears to leave this to the private sector.

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?

Not Answered

Please explain your answer:

No Comment

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

Not Answered

Please explain your answer:

No Comment

## 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?

Not Answered

Please explain your answer:

Not qualified to comment.

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

Not Answered

Please explain your answer:

Not qualified to comment.

## 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?

Yes

Please explain your answer:

Otherwise the taxpayer picks up the cost.

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.

Not Answered

If Yes, please explain in the text box what you consider an appropriate fee increase would be. :

n/a

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?

Not Answered

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.:

Not qualified to comment.

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.

Not Answered

Please explain your answer:

Not qualified to comment.

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.

Not Answered

Please explain your reasons and provide evidence on what you consider the correct fee should be:

Not qualified to comment.

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

Not Answered

Please explain your answer:

Not qualified to comment.

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

Not Answered

Please give your reasons in the text box below:

n/a

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

No

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? :

Costs should be higher for 'out of plan' developer applications.

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

Please explain your answer:

Not qualified to comment.

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?

Not Answered

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:

Not qualified to comment.

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

Please explain your answer:

Not qualified to comment.

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.

Please explain your answer :

Not qualified to comment.

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

No

Please explain your answer.:

Plumpton Parish Council has no further suggestions.

## 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?

No

Please explain your answer:

Lewes has a local plan that runs until 2030, but was made to become 'out of date' by previous NPPF changes.

The standard method provides a target far higher than the objectively assessed need in the local plan.

This allows developers to exploit the 5 year land supply issue and we now see 3 times the development than is actually needed – community cohesion suffers as the village now grows by 25%.

Those LPAs that had an adopted plan should be allowed to revert to that plan under the transitional arrangements.

LPA officers could then focus on an evidence-based new plan rather than fielding many unplanned developments which inevitably go to appeal.

104 Do you agree with the proposed transitional arrangements?

No

Please explain your answer:

For those LPAs at an advanced stage there should NOT be a requirement to immediately start preparation of a new plan. What is the point of adopting a plan and then immediately reviewing them.

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

No

Please explain your answer:

## 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?

Please explain your answer:

Plumpton Parish Council has no additional views.

## Chapter 14 – Table of questions

## Chapter 15 – About this consultation