

WEST NORTHAMPTONSHIRE COUNCIL PLANNING POLICY COMMITTEE

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Rebecca Breese, Strategic Planning, Built Environment & Rural Affairs

Report Title **Response to Government consultations on proposed changes to the Planning System**

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Appendix A – Suggested WNC response to government consultation on increases in planning fees and improving capacity, capability and performance in local planning authorities

Appendix B - Suggested WNC response to government consultation on Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making consultation

1. Purpose of Report

- 1.1 For members to consider suggested responses to the current Government consultations on:
- Increases in planning fees and improving capacity, capability and performance in local planning authorities

- Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making consultation

2. Executive Summary

- 2.1 The report summarises the government's proposed changes to parts of the planning system and suggests responses from this Council.

3. Recommendations

- 3.1 It is recommended that Planning Policy Committee:

- a) Agrees the suggested response to the consultations on proposed changes to the planning system as set out in Appendices A and B.

4. Reason for Recommendations

- 4.1 To ensure that Government is aware of this Council's views on proposed changes to the planning system and in some cases to seek to persuade government to revise its proposed changes.

5. Report Background

- 5.1 The Government has published two consultations relating to proposed changes to the planning system. The first consultation relates to planning fees and improving capacity, capability and performance in local planning authorities.

- 5.2 The consultation document summarises the changes as follows:

- increase planning fees by 35% for major applications and 25% for all other applications
- additional fees for bespoke or 'fast track' services
- make an annual inflation-related adjustment to planning fees
- ring-fence additional fees income
- double fees for retrospective applications
- remove the 'free-go' for repeat applications
- introduce a prior approval fee for the permitted development right allowing the Crown to develop sites within the perimeter of a closed defence site
- build planning capacity and capability within local authorities, including challenges in recruitment and retention, and how these can be addressed
- reduce the Planning Guarantee from 26 weeks to 16 weeks for non-major applications
- improve the quality of the local authority planning service by monitoring more performance measures.

- 5.3 The second consultation relates to proposals to introduce new permitted development rights. These are summarised in the consultation document as follows:

- A new permitted development right to support temporary recreational campsites.
- Changes to the existing permitted development rights for solar equipment and a new permitted development right for solar canopies.
- Amendment to the existing permitted development right which allows local authorities to undertake certain development. This change would allow bodies to undertake the work on behalf of the local authority.
- Changes to the existing permitted development right allowing for the temporary use of buildings or land for film-making purposes.

- 5.4 It is proposed that a new permitted development right would allow for the temporary use of land for recreational campsites. In effect, this would permit the temporary use of land for the placing of tents, and the provision on that land of moveable structures related to the campsite use, such as portable toilets. The right would be subject to limitations and conditions to control impacts and protect local amenity. The new right would only apply to the placing of tents and the provision on that land of moveable structures related to the campsite use. In order to limit potential impacts on the land and highways, the Government is proposing that the right should not allow for the siting of caravans, motorhomes and campervans. It is proposed that the site owner or operator would have to notify their local authority before a recreational campsite commences. This would be required every calendar year before land could be used as a campsite
- 5.5 Changes are also proposed to permitted development rights for domestic solar equipment to facilitate its take-up. There are four existing permitted development rights which allow for the installation of such equipment on and within the curtilages of domestic and non-domestic premises without having to submit a planning application. All of the permitted development rights are subject to limitations and conditions.
- 5.6 Currently solar panels can be installed providing they are not more than 0.2 metres beyond the plane of roof slope. The proposal is to allow solar panels on flat roofs provided this does not exceed 0.6 metres above the highest part of the roof. It is also proposed that solar equipment be permitted on walls that front a highway in Conservation Areas.
- 5.7 The permitted development rights relating to stand alone domestic solar are proposed to be extended to allow them to be installed closer to the highway than a house or block of flats in Conservation Areas.
- 5.8 The current rights for non-domestic buildings allow for the generation of electricity up to 1MW. Where the solar equipment being installed will generate electricity over 50 kW and up to 1MW, prior approval from the local planning authority is required in regard to the design or external appearance and impact of glare on occupiers of neighbouring land. In order to bring more rooftop space into scope of the permitted development right and maximise rooftop coverage, the Government is proposing to remove the existing capacity threshold of 1MW. As a result of this change, the prior approval would still apply to the installation of any solar equipment which generates above 50kW of electricity.
- 5.9 Non-domestic solar equipment cannot be installed so that it is closer to the highway than the building on article 2(3) land (including conservation areas, Areas of Outstanding Natural Beauty,

the Broads, National Parks and World Heritage Sites) It is proposed that this limitation be removed to provide further flexibility on where stand-alone solar could be installed within the curtilage of a non-domestic building in article 2(3) land.

- 5.10 The government is also proposing a new permitted development right which would allow for the installation of solar canopies in ground-level off-street car parks in non-domestic settings. To limit the potential for visual impacts of solar canopies, there would be a height limit of 4 metres and any structure would have to be 10 metres from any dwelling curtilage boundary. There would be no limit on the area that could be covered, however certain sites would be excluded e.g. conservation areas.
- 5.11 The existing rights allow local authorities to undertake certain forms of development such as the erection, improvement, and alteration of various items of street furniture and equipment, including electric vehicle (EV) charging points. The proposal is to extend this in order that bodies working on behalf of the local authority could undertake the works. This would enable local authorities to appoint charge point providers to install public EV charge points on their behalf.
- 5.12 The changes for film making would increase the amount of time that structures could remain on land from 9 to 12 months in any 27 month period, and allow for larger sites and for taller temporary structures.

6 Issues and Choices

- 6.10 The purpose of this report is to suggest responses from this Council to the Government on its proposed changes to the planning system. Members could decide to submit amended responses.
- 6.11 An alternative approach would be to not respond to the consultations.

7 Implications (including financial implications)

7.10 Resources and Financial

- 7.10.1 There are no financial implications arising specifically from this report. If the Government decided to increase the fees as set out in this report, then the Council would clearly receive additional income.

7.11 Legal

- 7.11.1 There are no legal implications arising specifically from this report.

7.12 Risk

- 7.12.1 There are no risks arising from the recommendations in this report.

7.13 Consultation

7.13.1 Responding to the Government's consultation enables the Council to ensure that Government is aware of its views on proposed changes to the planning system. There are no direct implications for the Council's own local consultation activities arising from this report.

7.14 Consideration by Overview and Scrutiny

7.14.1 Not applicable

7.15 Climate Impact

7.15.1 There are no climate change impacts arising specifically from this report.

7.16 Community Impact

7.16.1 There are no community impacts arising specifically from this report.

7.17 Communications

7.17.1 None directly arising from this report.

8 Background Papers

[Technical consultation: Stronger performance of local planning authorities supported through an increase in planning fees](#)

[Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making consultation](#)

Appendix A:

Suggested WNC response to government consultation on increases in planning fees and improving capacity, capability and performance in local planning authorities

Question 1. Do you agree that fees for planning applications should be increased by 35% for major applications?

Yes/no/don't know. Please give your reasons.

Yes, the increase of fees by 35% is supported. This should be the minimum amount by which fees are increased.

Question 2. Do you agree that the fee for householder planning applications should be increased by 25%?

Yes/no/don't know. Please give your reasons.

Yes, the increase of fees by 25% is supported. This should be the minimum amount by which fees are increased.

Question 3. Do you agree that fees for all other planning applications should be increased by 25%? If not, please include in the comments box the particular application types where you believe the proposed increase is too high or too low. Your comments should be accompanied with evidence/costs if possible.

Yes/no/don't know. Please give your reasons.

Yes, the increase of fees by 25% is supported. This should be the minimum amount by which fees are increased.

Question 4. Are there any other application types or planning services which are not currently charged for but should require a fee or for which the current fee level or structure is inadequate?

Yes - please explain / No.

Yes, when undertaking their plan-making activity local authorities undertake a call for sites. Many sites are submitted through this process which imposes a significant resource requirement on the local authority to make individual site assessments. Given that some, at least, of these sites have the prospect of being allocated, it would be appropriate to make a charge (probably based on area) to anyone submitting a site for assessment.

The approach to charging for the discharge of conditions should be reviewed. Currently the same fee applies irrespective of the number of conditions which are being discharged.

Question 7. Do you consider that the additional income arising from the proposed fee increase should be ringfenced for spending within the local authority planning department?

Yes/no/don't know. Please give your reasons.

It is more important that the planning service is, overall, adequately funded, rather than parts of its funding being ringfenced.

Question 8. Do you agree that the fee for retrospective applications should be doubled, i.e. increased by 100%, for all applications except for householder applications? Yes/no/don't know. Please give your reasons.

Agree that retrospective applications should attract at least a double fee. However the exemption for householder development is not supported.

Question 9. Do you consider that the ability for a 'free-go' for repeat applications should be either:

(a) removed

(b) reduced for re-applications within 12 months

(c) retained

(d) none of the above

(e) don't know

Please give your reasons.

The 'free-go' for planning applications should be removed as it can be mis-used e.g. to avoid using pre-application advice.

Question 11. What do you consider to be the greatest skills and expertise gaps within local planning authorities?

Overall there is a significant shortage of trained planners in both the public and private sector which needs to be addressed as a priority to provide capacity in the profession and unlock development opportunities.

Specifically skills gaps include;

Digital

Viability

Biodiversity

Flooding.

Question 12. In addition to increasing planning fees, in what other ways could the Government support greater capacity and capability within local planning departments and pathways into the profession?

Please provide examples of existing good practice or initiatives if possible.

The government could play a greater role in promoting the value of planning in creating great places, unlocking development, facilitating regeneration, and protecting and enhancing our most valued assets. This would help to make the profession more attractive to all and thereby help to encourage people to enter and stay in the profession. It is important that various pathways into the planning profession are provided, and the suggested approaches in the consultation paper including growing expertise in-house through apprenticeships and graduate training programmes are supported and are being pursued by this council.

Question 13. How do you suggest we encourage people from under-represented groups, including women and ethnic minority groups, to become planning professionals?

In addition to what we have said in the response to question 12, it is important that planning is promoted positively as a career choice early in people's education.

This is a role that the Government and RTPI, working closely together, could pursue.

Question 14. Do you agree that the Planning Guarantee should better mirror the statutory determination period for a planning application and be set at 16 weeks for non-major applications and retained at 26 weeks for major applications?

Yes/no/don't know. Please give your reasons.

No, the reduction to 16 weeks for non majors is not supported because some non major applications can still be complex e.g. single self build applications which require section 106 agreements.

Question 15. Do you agree that the performance of local planning authorities for speed of decision-making should be assessed on the percentage of applications that are determined within the statutory determination period i.e. excluding extension of times and Planning Performance Agreements?

Yes/no/don't know. Please give your reasons.

No. Extensions of time and PPAs are helpful tools to enable the planning service to operate more effectively and are generally supported by the development industry. Not allowing for these in the performance data could result in applications being refused, which could otherwise have been negotiated into an acceptable form of development.

Planning authorities are currently not able to hit demanding performance targets due to a lack of resources. This issue should be fixed in the first instance before demanding performance targets are imposed.

Question 16. Do you agree that performance should be assessed separately for

(a) Major applications - Yes / no / don't know

(b) Non-Major applications (excluding householder applications) - Yes / no / don't know

(c) Householder applications - Yes / no / don't know

(d) Discharge of conditions - Yes / no / don't know

(e) County matters applications - Yes / no / don't know.

Please give your reasons. If no, please indicate which application types should be and should not be assessed and give your reasons for this.

The discharge of conditions should not be monitored separately. The work involved in the discharge of conditions varies considerably, some require consultation with internal and external consultees which can take time to garner responses.

Question 17. Do you consider that any of the proposed quantitative metrics should not be included?

A. Average Speed of decision-making

- 1. Average time taken to determine majors (inc. Extension of Time (EoT) and Planning Performance Agreements (PPAs))*
 - 2. Average time taken to determine non-majors (inc. EoT and PPAs)*
 - 3. Average time taken to determine householders (inc. EoT and PPAs)*
 - 4. Average time taken to determine discharge of conditions (inc. EoT and PPAs)*
 - 5. Average time taken to determine county matters (inc. EoT and PPAs)*
-

B. Quality of decision-making

- 1. Major appeals allowed by Planning Inspectorate as percentage of all appeal decisions.*
 - 2. Non-major appeals allowed by Planning Inspectorate as percentage of all appeal decisions.*
 - 3. Householder appeals allowed by the Planning Inspectorate as percentage of all appeal decisions*
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C. Extension of Times

- 1. Total number of EoTs as percentage of all decisions majors*
 - 2. Total number of EoTs as percentage of all decisions non-majors*
 - 3. Total number of EoTs as percentage of all decisions householders*
-

D. Backlog

- 1. Average time taken to validate planning applications*
 - 2. Total number of cases beyond the Planning Guarantee period (currently 26 weeks for all applications but proposed to change to 16 weeks for non-major applications)*
-

E. Planning Enforcement

- 1. Average number of weeks taken to respond to suspected breaches of planning and determine the appropriate course of action.*
 - 2. Average number of weeks to take action where a breach of planning has occurred, having decided it is expedient to do so.*
 - 3. Total number of cases over 6 months old as percentage of all open cases.*
-

- F. Planning Committee**
- 1. Percentage of delegated decisions and committee decisions**
 - 2. Percentage of committee decisions to refuse against officer recommendation that are subsequently allowed at appeal**
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Yes/no/don't know. Please give your reasons and, if appropriate, state the metric letter(s) and number(s) that you believe should not be included.

In regard to the proposed metrics, we believe that all of the metrics should be included apart from D Backlog (2). The reason for that is that it will/could potentially result in fee incomes being effected.

Question 18. Are there any quantitative metrics that have not been included that should be?

Yes / no / don't know. Please indicate what additional quantitative metrics you consider should be included.

No, we haven't identified any.

Question 19. Do you support the introduction of a qualitative metric that measures customer experience?

Yes/no/don't know. Please give your reasons.

Yes, in principle. The customer experience is extremely important and local planning authorities need to work hard on this to get it as right as possible.

Question 20. What do you consider would be the best metric(s) for measuring customer experience?

Careful consideration needs to be given to any measurement to ensure it reflects the true customer experience. There is a risk that people's experience is 'clouded' by their dissatisfaction with a decision that the Council has made.

Question 21. Are there any other ways in which the performance of local planning authorities or level of community engagement could be improved?

Community engagement is a very important part of the planning service. It is however very resource hungry if it is to be done well. Providing a better resourced planning service would enable councils to do more in this area, both in for their development management and planning policy functions. The Government could work with the RTPI and engagement experts to develop consultation and engagement techniques using new forms of technology, which would help authorities reach a wider audience in an efficient way.

Question 22. Do you have any views on the implications of the proposals in this consultation 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 comment

Appendix B:

Suggested WNC response to government consultation on Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making consultation

Q1. Do you agree that a new permitted development right should be introduced that will allow the temporary use of land for recreational campsites and associated facilities?

Yes/No/Don't Know. Please give your reasons.

Yes, this seems reasonable in principle.

Q2. Do you agree that the permitted development right should only apply to the placing of tents?

Yes/No/Don't Know. Please give your reasons.

Yes, the impact of tents is relatively modest compared to caravans and motorised vehicles, etc so it is important that controls remain in place for those.

Q3. Do you agree that the permitted development right should allow up to a maximum of 30 tents to be erected on the land?

Yes/No/Don't Know. Please give your reasons. If you have responded no, please provide your alternative suggestion and justification.

Yes, but guidelines are needed as to what is meant by 'land', otherwise this becomes impossible to implement (and enforce against if it is unclear what a breach would be), for example if landowner has two adjoining fields could they have 60 tents, or plant a hedgerow down the middle of one field and have 60 tents on what was once one field

Q4. Do you agree that the permitted development right should be limited to up to 60 days per calendar year?

Yes/No/Don't Know. Please give your reasons. If you have responded no, please provide your alternative suggestion and justification.

Yes, this would seem a reasonable balance between allowing some freedoms and it not becoming a permanent feature.

Q5. Do you agree that the permitted development right should require the provision of temporary on-site facilities to provide waste disposal, showers and toilets?

Yes/No/Don't Know. Please give your reasons and provide details of any other facilities that should be required.

No, whilst the requirement to provide these facilities is laudable, it is not clear that this is a planning issue.

Q6. Do you agree that the permitted development right should not apply on land which is in or forms part of sites of special scientific interest, Scheduled Monuments, safety hazard areas, military explosives storage areas and land within the curtilage of a listed building?

Yes/No/Don't Know. Please give your reasons.

Yes, agree, these would seem to be appropriate safeguards.

Q7. Are there any other planning matters that should be considered?

Yes/No/Don't Know. Please specify.

Prior approval should be required for the access.

Q8. Do you agree that the permitted development right should require annual prior notification to the local authority of the matters set out above?

Yes/No/Don't Know. Please give your reasons.

Yes, this would seem sensible as it enables the council to monitor activity and ensure compliance with the terms of the permitted development right. The notification should also identify the boundary of the land to which it relates.

This would place additional burdens on the Council, so a fee should be payable.

Q9. Do you think that, in areas of flood risk, the right should allow for prior approval with regard to flooding on the site?

Yes/No/Don't Know. Please give your reasons.

Yes, this would seem a sensible safeguard, to provide control over such uses in areas that might put people at risk.

Q10. Do you think that any of the proposed changes in relation to a new permitted development right for temporary recreational campsites could impact on: a) businesses b) local planning authorities c) communities?

Yes/No/Don't know. Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.

Yes, the changes could have both positive and negative impact on local communities, e.g. positively by creating jobs and negatively by the impact on local communities through increased potential noise traffic etc.

Q11. Do you think that proposed changes in relation to a new permitted development right for temporary recreational campsites could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

Yes/No/ Don't know. If so, please give your reasons.

No comment

Q12. Should the permitted development right for solar on domestic rooftops be amended so that they can be installed on flat roofs where the highest part of the equipment would be no higher than 0.6 metres above the highest part of the roof (excluding any chimney)?

Yes/No/Don't Know. Please give your reasons.

No, this allowance seems far too generous and could have an unacceptable adverse impact on neighbouring property and a negative impact on the character and appearance of conservation areas .

Q13. Are there any circumstances where it would not be appropriate to permit solar on flat roofs of domestic premises?

Yes/No/Don't Know. Please give your reasons.

See response to question 12

Q14. Do you agree that solar on a wall which fronts a highway should be permitted in conservation areas?

Yes/No/Don't know. Please give your reasons.

No, this could have an unacceptable impact on the character of the conservation area, if not properly controlled.

Q15. Do you have any views on the other existing limitations which apply to this permitted development right which could be amended to further support the deployment of solar on domestic rooftops?

Yes/No/Don't Know. Please give your reasons.

The other existing limitations should remain in order to afford protection to designated heritage assets, such as listed buildings and scheduled monuments

Q16. Do you agree that the existing limitation which prevents stand-alone solar being installed so that it is closer to the highway than the dwellinghouse in conservation areas, should be removed?

Yes/No/Don't know. Please give your reasons.

No, this could have an unacceptable impact on the character and appearance of the conservation area.

Q17. Do you have any views on how the other existing limitations which apply to this permitted development right could be amended to further support the deployment of stand-alone domestic solar?

Yes/No/Don't know. Please give your reasons.

The other existing limitations should remain in order to afford protection to non-designated heritage assets and designated heritage assets, such as listed buildings and scheduled monuments.

Q18. Do you agree that the current threshold permitting the generation of up to 1MW of electricity on non-domestic buildings should be removed?

Yes/No/ Don't Know. Please give your reasons.

No, whilst increasing opportunities for solar gain are supported in principle, it is important that appropriate safeguards are retained.

Q19. Is the current prior approval for solar equipment on non-domestic rooftops (where equipment is over 50kW but no more than 1MW) effective?

Yes/No/ Don't Know. Please give your reasons.

No comments.

Q20. Are there any circumstances where it would not be appropriate to allow for the installation of non-domestic rooftop solar where there is no limit on the capacity of electricity generated?

Yes/No/Don't Know. Please give your reasons.

Yes – see response to question 18, it is important that safeguards remain in place, through the requirement for planning permission or prior approval to ensure unacceptable impacts do not occur. Where development is acceptable, it will gain planning approval.

Q21. Do you agree that the existing limitations relating to the installation of solar on non-domestic buildings in article 2(3) land - which includes conservation areas, Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites – should be removed?

Yes/No/Don't know. Please give your reasons.

No, this could have an unacceptable impact on the character or appearance of those areas.

Q22. Do you have any views on how the other existing limitations which apply to the permitted development right could be amended to further support the deployment of solar on non-domestic rooftops?

Yes/No/Don't know. Please give your reasons.

The other existing limitations should remain in order to afford protection to designated heritage assets, such as listed buildings and scheduled monuments.

Q23. Do you agree that the existing limitation which prevents stand-alone solar being installed so that it is closer to the highway than the building in article 2(3) land - which includes conservation areas, Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites – should be removed?

Yes/No/Don't know. Please give your reasons.

No, whilst increasing opportunities for solar gain are supported in principle, it is important that appropriate safeguards are retained for sensitive locations.

Q24. Do you have any views on how the other existing limitations which apply to this permitted development right could be amended to further support the deployment of stand-alone non-domestic solar?

Yes/No/Don't know. Please give your reasons

No comment

Q25. Do you agree that permitted development rights should enable the installation of solar canopies in ground-level off-street car parks in non-domestic settings?

Yes/No/Don't Know. Please give your reasons.

Yes, this would seem sensible providing appropriate safeguards are in place.

Q26. Do you agree that a permitted development right for solar canopies should not apply on land which is within 10 metres of the curtilage of a dwellinghouse?

Yes/No/Don't Know. Please give your reasons.

Yes, this would seem an appropriate safeguard for the residential amenity of neighbouring property.

Q27. Do you agree that a permitted development right for solar canopies should not apply on land which is in or forms part of a site designated as a scheduled monument or which is within the curtilage of a listed building?

Yes/No/Don't Know. Please give your reasons.

Yes, it is essential that appropriate controls remain in place for these sensitive locations. This should also be extended to sites designated as a registered park and garden and registered battlefields.

Q28. Do you agree that the permitted development right would not apply to article 2(3) land - which includes conservation areas, Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites?

Yes/No/Don't Know. Please give your reasons.

Yes, it is essential that appropriate controls remain in place for these sensitive locations.

Q29. Do you agree that solar canopies should be permitted up to 4 metres in height?

Yes/No/Don't Know. Please give your reasons.

Yes, this seems a reasonable limit on height.

Q30. Do you think that the right should allow for prior approval with regard to design, siting, external appearance and impact of glare?

Yes/No/Don't Know. Please give your reasons.

Yes, this would be a sensible safeguard.

Q31. Are there any other limitations that should apply to a permitted development right for solar canopies to limit potential impacts?

Yes/No/Don't Know. Please give your reasons.

None identified

Q32. Do you think that any of the proposed changes in relation to the permitted development rights for solar could impact on: a) businesses b) local planning authorities c) communities?

Yes/No/Don't know. Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination and which right or rights they particularly relate to.

Yes, without the suggested safeguards, this new right could adversely impact on communities., particularly through impact on residential amenity.

Q33. Do you think that proposed changes in relation to the permitted development rights for solar could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

Yes/No/ Don't know. If so, please give your reasons and specify which rights any comment relates to.

No comment

Q34. Do you agree that the permitted development right allowing for development by local authorities should be amended so that the development permitted can also be undertaken by a body acting on behalf of the local authority?

Yes/No/Don't Know. Please give your reasons.

Yes, this would seem a sensible change. If the local authority has commissioned a body to undertake such works, it is reasonable to assume that it has taken the view that such works are acceptable in planning terms.

Q35. Do you think that any of the proposed changes in relation to the permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Yes/No/Don't know. Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.

Yes, local communities would not be able to comment on proposals which would otherwise have required permission. However as noted above the council will have considered this is appointing the body to undertake the work.

Q36. Do you think that proposed changes in relation to the permitted development right could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation)?

Yes/No/ Don't know. If so, please give your reasons.

No comment

Q37. Do you agree that the maximum period of time land or a building can be used for the purpose of commercial film making should be increased to 12 months in any 27 month period?

Yes/No/Don't Know. Please give your reasons.

Yes, this seems like a reasonable extension of the permitted development rights.

Q38. Do you agree that the maximum area of land or land on which the building is situated being used for the purposes of film making should be increased to 3 hectares?

Yes/No/Don't Know. Please give your reasons.

Yes, this seems like a reasonable extension of the permitted development rights.

Q39. Do you agree that the maximum height of any temporary structure, works, plant or machinery allowed for under the right should be increased to 20 metres?

Yes/No/Don't Know. Please give your reasons.

Yes, this seems like a reasonable extension of the permitted development rights.

Q40. Do you think that any of the proposed changes in relation to the permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Yes/No/Don't know. Please give your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.

Yes. There is the potential for filming activities to impact on local communities, however this has not been an issue under the current regime in this local authorities area. The proposals still keep safeguards in place albeit the allowances are more generous. On balance the proposals seem reasonable.

Q41. Do you think that proposed changes in relation to the permitted development right could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation)?

Yes/No/ Don't know. If so, please give your reasons.

No comment.