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DATE: 02 September 2014

DEVELOPMENT CONTROL COMMITTEE

Meeting to be held on Thursday 4 September 2014

Please see the attached report marked "to follow" on the agenda.

8 RESPONSE TO GOVERNMENT CONSULTATION ON FURTHER CHANGES TO THE PLANNING SYSTEM (Pages 1-14)

Copies of the documents referred to above can be obtained from www.bromley.gov.uk/meetings

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Report No.
DRR14/088

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **September 4th 2014**

Decision Type: Non-Urgent Non-Executive Non-Key

TITLE: **TECHNICAL CONSULTATION ON PLANNING: RESPONSE TO CONSULTATION BY DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT**

Contact Officer: Tim Horsman, Planning Development Control Manager
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Chief Officer: Jim Kehoe, Chief Planner

Ward: All Wards

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1. Reason for report

To set out the Council's proposed response to the government consultation "Technical Consultation on Planning"

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2. RECOMMENDATION(S)

Members are asked to agree the response.

Corporate Policy

Existing policy:

Financial

1.	Estimated cost	Included within existing staff workload
2.	Non-recurring cost	
3.	Budget head	Planning
4.	Total budget for this head	£3.3m

Staff

1. Number of staff (current and additional) - 1
2. If from existing staff resources, number of staff hours - 5

Legal

1. Statutory requirement:
2. Call-in is not applicable:

Customer Impact

Estimated number of users/beneficiaries (current and projected) - All users of planning process

3. COMMENTARY

3.1 This Consultation was published on 31 July 2014 and requires responses by 26 September 2014. The consultation seeks views across a range of issues that build upon the recent planning reforms.

The Government is proposing reforms to the planning system as follows:

1 **Neighbourhood Planning** - proposals to make it easier for residents and businesses to come together to produce a neighbourhood plan or neighbourhood development order;
2 **Permitted Development** - proposal to expand permitted development rights with the aim of reducing the need for planning applications to support housing growth;
3 **Planning Conditions** - Improve the use of planning conditions to enable development to start on site more quickly;
4 **Planning Application Process Improvements** - Improving engagement with statutory consultees so that they are consulted on in a proportionate way;
5 **Environmental Impact Assessment** - Raise the EIA screening threshold for industrial and urban development projects outside of defined sensitive areas;
6 **Nationally Significant Infrastructure Projects** - Improvements to the NSIP planning regime.

The consultation document seeks responses to a number of questions in respect of each topic area where these are considered appropriate and relevant to London Borough of Bromley (LBB) interests A brief summary of the proposed changes together with our suggested responses in respect of these topic areas is set out below:

3.2 NEIGHBOURHOOD PLANNING

The Council has not had any direct experience of neighbourhood planning and at this stage considers that it is appropriate for those Local Planning Authorities who have experience to comment fully on this section of the consultation.

3.3 PERMITTED DEVELOPMENT

The consultation document proposes to reduce planning regulation on businesses to increase their flexibility to adapt existing premises to meet changing demand. This will result in an increase in the number of uses which can change to residential (including light industrial, warehouses, storage units and some sui generis uses) with the aim of increasing housing supply. It will also result in more change of use within the high street including a wider retail use class, it will enable some sui generis uses to change to restaurant and leisure uses; retailers to alter their premises; commercial filming; larger solar panels on commercial buildings; minor alterations within waste management facilities and for sewerage undertakers; and extensions to houses and business premises.

The consultation also seeks views on the proposal to require a planning application for a change of use to a betting shop or pay day loan shop.

The document also proposes limits on the compensation payable when an Article 4 Direction is made to remove permitted development rights.

3.4 Question 2.1: Do you agree that there should be permitted development rights for (i) light industrial (B1(c)) buildings and (ii) storage and distribution (B8) buildings to change to residential (C3) use?

Answer: No – the existing prior approval process for the change of use of offices to residential has resulted in the loss of viable and often occupied office premises to residential, without any requirement to demonstrate that the unit is empty or no longer viable. An extension to the use

classes involved would further exacerbate the problem and therefore has the potential to be counter-productive and harmful to the economy.

The buildings involved are often located in areas that would not be considered suitable for housing development and the buildings themselves have not been designed for residential use. This proposed extension to permitted development rights has the potential to result in the creation of substandard housing accommodation and an increase in the conflicts between the different land uses and users, particularly in terms of noise and other environmental issues.

The impact of introducing residential uses into many industrial areas would be unacceptable and potentially detrimental to the future of these areas which are important to both the local and wider economy.

Where prior approval is granted there is mechanism to enable the LPA to seek Section106 contributions to health and education etc, thereby increasing pressure on local services.

The Council has given Prior Approval for over 5% of the existing office stock within the Borough. Identified as a restricted borough for the transfer of industrial land to other uses within the London Plan, it is expected that the pressure on all B use classes will be greater than on the general office stock due to the significant difference between industrial and residential values. There is already a forecast shortage of floorspace to meet employment projections, and the proposed changes are contrary to securing sustainable development and a balance of the economic, social and environmental roles of planning set out in the NPPF.

The proposed changes are therefore considered likely to hamper the ability of the Council to deliver sustainable development and undermine the principles which underpin the plan-led system.

3.5 Question 2.2: Should the new permitted development right (i) include a limit on the amount of floor space that can change use to residential (ii) apply in Article 1(5) land i.e. land within a National Park, the Broads, an Area of Outstanding Natural Beauty, an area designated as a conservation area, and land within World Heritage Sites and (iii) should other issues be considered as part of the prior approval, for example the impact of the proposed residential use on neighbouring employment uses?

Answer:

i) If the change is imposed it should include a limit on the amount of floorspace that can be converted to residential to a maximum 500 square m.

ii) Article 1(5) land should be exempt from any changes to permitted development rights if the rules are relaxed due to the potential for harm to such environments as a result of uncontrolled development. The pressure on these environments would be significant due to the desirability of these areas and potential for substantial commercial gain.

iii) It is important that all relevant issues are considered including the impact on the existing employment area and on neighbouring uses. Sites should be considered on their own merits and not be subject to a limited list of criteria that may or may not deal with the relevant issues on a specific site and may not safeguard the quality of our local environments. Increasing the number of criteria that can be considered will add further layers of complexity to the planning system, when this could be adequately dealt with by a full planning application.

3.6 Question 2.3: Do you agree that there should be permitted development rights, as proposed, for laundrettes, amusement arcades/centres, casinos and nightclubs to change use to residential (C3) use and to carry out building work directly related to the change of use?

Answer: It is important that the implications of such changes of uses on the surrounding owners/occupiers are properly assessed, and a change of use to residential may not always be acceptable, or result in residential development that is of an appropriate standard/quality or that is compatible with surrounding uses. Therefore, there should be no relaxation of permitted development rights in this area and full planning permission should be required for such changes of use including external alterations, where these do not fall within permitted development.

3.7 Question 2.4: Should the new permitted development right include (i) a limit on the amount of floor space that can change use to residential and (ii) a prior approval in respect of design and external appearance?

Answer:

i) If this is imposed there should be strict limits on the amount of floorspace to a maximum of 500 square m.

ii) The scale of such proposals and the requirement for building works and approval for external changes is likely to vary significantly. Whilst minor changes to the façade, for example the insertion of windows and doors could be subject to the prior approval process, any new development should require a full planning application.

3.8 Question 2.5: Do you agree that there should be a permitted development right from May 2016 to allow change of use from offices (B1(a)) to residential (C3)?

Answer: No – the permitted change of use has resulted in the loss of viable offices, many of which have been occupied prior to the date of the application, which is harmful to the local economy and therefore counter-productive. It has also resulted in the creation of sub-standard housing in inappropriate locations and increased the level of conflict between different land uses and users. It also undermines the LPA's attempts to effectively plan for sufficient office and employment land as freeholders of office space have pursued short term financial gains.

The process has not included any mechanisms to take account of the impact of the proposals on local services or contributed towards affordable housing.

3.9 Question 2.6: Do you have suggestions for the definition of the prior approval required to allow local planning authorities to consider the impact of the significant loss of the most strategically important office accommodation within the local area?

Answer**:** If the prior approval process is retained this should only be the case in circumstances where the freeholder can demonstrate with evidence that the unit has been vacant and that it has been effectively marketed for a sustained period without success.

3.10 Question 2.7: Do you agree that the permitted development rights allowing larger extensions for dwelling houses should be made permanent?

Answer: No - this system has resulted in a proliferation of inappropriate development, some with inadequate amenity space, and been detrimental to the quality of the environment within the Borough. It has also resulted in an increasingly complex planning system that the general public finds difficult to understand.

The process does not allow the LPAs sufficient revenue from fees to administer the system.

3.11 Question 2.8: Do you agree that the shops (A1) use class should be broadened to incorporate the majority of uses currently within the financial and professional services (A2) use class?

Answer: No – A proliferation of non-A1 uses in some areas of centres or parades can lead to a sterilisation of the retail environment during the day, or at specific times of the day, reducing footfall and lead to the loss of other A1 uses which may be detrimental to the vitality and viability of the centre/parade. Control over such uses enables LPAs to seek to ensure that where there is a risk that this might occur it can be carefully managed and the health and long term future of these areas can be maintained.

3.12 Question 2.9: Do you agree that a planning application should be required for any change of use to a betting shop or a pay day loan shop?

Answer: Yes – There has been a proliferation of such uses and this proposal will allow LPAs greater control over these specific (non A1 uses) in areas where an agglomeration of such uses could be detrimental to the vitality and viability of the centre or parade.

3.13 Question 2.10: Do you have suggestions for the definition of pay day loan shops, or on the type of activities undertaken, that the regulations should capture?

Answer: No - as an authority we have had limited experience of pay day loan shops.

3.14 Question 2.11: Do you agree that there should be permitted development rights for (i) A1 and A2 premises and (ii) laundrettes, amusement arcades/ centres, casinos and nightclubs to change use to restaurants and cafés (A3)?

Answer: No - Such premises often have residential uses above or to the side/ rear, and the impact of a change of use to restaurants/cafes can be considerable due to changes in the nature of the use in terms of hours of operation parking and ventilation requirements etc. Premises will vary significantly in terms of scale and location and need to be dealt with on a case by case basis based upon the merits of the scheme. This is best done through the existing planning application process.

3.15 Question 2.12: Do you agree that there should be permitted development rights for A1 and A2 uses, laundrettes, amusement arcades/centres and nightclubs to change use to assembly and leisure (D2)?

Answer: No - Such premises often have residential uses above or to the side/ rear, and the impact of a change of use to assembly/leisure can be considerable due to changes in the nature of the use in terms of hours of operation parking. Premises will vary significantly in terms of scale and location and need to be dealt with on a case by case basis based upon the merits of the scheme. This is best done through the existing planning application process.

3.16 Question 2.13: Do you agree that there should be a permitted development right for an ancillary building within the curtilage of an existing shop?

Answer: Many retail units have residential properties above and to the side/rear, therefore, the impact of an ancillary building would need to be properly assessed and this is best achieved through a full planning application.

Increasingly such premises are being used as unsatisfactory, substandard and unauthorised dwellings and the proposal will further exacerbate this problem.

3.17 Question 2.14: Do you agree that there should be a permitted development right to extend loading bays for existing shops?

Answer: No – the highways and safety implications of such changes need to be properly assessed.

3.18 Question 2.15: Do you agree that the permitted development right allowing shops to build internal mezzanine floors should be increased from 200 square metres?

Answer: Yes - provided suitable safeguards are in place to ensure that any highways implications resulting from the installation of the mezzanine can be effectively addressed. The potential impact of significant increases in retail floorspace in out-of-town locations on town centres also need to be carefully considered.

3.19 Question 2.16: Do you agree that parking policy should be strengthened to tackle on-street parking problems by restricting powers to set maximum parking standards?

Answer: Local Planning Authorities should have the flexibility to adopt their own policy and deal with proposals on a site specific case by case basis.

3.20 Question 2.17: Do you agree that there should be a new permitted development right for commercial film and television production?

Answer: As an LPA we have limited experience of such activities but have little objection to this in principle.

3.21 Question 2.18: Do you agree that there should be a permitted development right for the installation of solar PV up to 1MW on the roof of non-domestic buildings?

Answer**:** Yes – However, there does need to be some consideration of the aesthetics of a proposal and the impact on the streetscene and the visual amenities of the area. Large areas of solar PV on the front roof slope of commercial buildings may be unsightly where these are prominently sited or on gateway sites or primary access routes which are highly visible to the public.

3.22 Question 2.19: Do you agree that the permitted development rights allowing larger extensions for shops, financial and professional services, offices, industrial and warehouse buildings should be made permanent?

Answer: No - this system has resulted in a proliferation of inappropriate development, some in close proximity to existing residential uses, and been detrimental to the quality of the environment within the Borough. It has also resulted in an increasingly complex planning system that not only the general public but also commercial agents find difficult to understand, creating additional work for LPAs..

The process does not allow the LPAs sufficient revenue from fees to administer the system.

3.23 Question 2.20: Do you agree that there should be a new permitted development right for waste management facilities to replace buildings, equipment and machinery?

Answer: No - waste facilities are particularly sensitive developments and have the potential to generate significant impacts on nearby residents and communities. Therefore, the impacts of any increase in the intensity of such uses needs to be carefully assessed as part of a full planning application.

3.24 Question 2.21: Do you agree that permitted development rights for sewerage undertakers should be extended to include equipment housings?

Answer: No objection

3.25 Question 2.22: Do you have any other comments or suggestions for extending permitted development rights?

Answer: Any changes resulting in additional work for local planning authorities need to be supported by an appropriate fee regime to provide the resources to enable the LPA to deliver the service.

3.26 Question 2.23: Do you have any evidence regarding the costs or benefits of the proposed changes or new permitted development rights, including any evidence regarding the impact of the proposal on the number of new betting shops and pay day loan shops, and the costs and benefits, in particular new openings in premises that were formerly A2, A3, A4 or A5?

Answer: No evidence to report

3.27 Question 2.24: Do you agree (i) that where prior approval for permitted development has been given, but not yet implemented, it should not be removed by subsequent Article 4 direction and (ii) should the compensation regulations also cover the permitted development rights set out in the consultation?

Answer: If the development has not yet been implemented, the Article 4 Direction should prevail, and compensation should be provided where appropriate. The compensation regulations should not cover the permitted development rights set out in the consultation.

3.28 PLANNING CONDITIONS

The Government is seeking to improve the use of planning conditions and how they are imposed by local planning authorities and the decision making stage, and speed up the discharging of conditions.

It is proposed that a new legal requirement will be introduced that local planning authority requests for additional information to support planning applications at the validation stage must be reasonable.

It is proposed that the need to submit a design and access statement with most planning applications will be removed and they will only be requested where they are needed.

The right of appeal will be introduced where discussions between applicants and local planning authorities about the information needed to validate planning applications breaks down.

3.29 Question 3.1: Do you have any general comments on our intention to introduce a deemed discharge for planning conditions?

Answer: Yes - LBB recognises the fact that a delay in the discharge of planning conditions can slow down the development process, however, there are often reasons for this delay including the time taken by developers to submit additional material, or additional research or investigations that may be required, for example, to address issues of contamination.

A deemed discharge for conditions should only be applicable where a LPA has been unreasonable in not discharging the condition(s) within a reasonable timescale. In such circumstances, there should be a clear procedure in place with a notice period to the LPA, allowing it the opportunity to respond.

Additional resources, linked to the achievement of targets for discharging conditions would achieve the same objective, without the risk that schemes could receive deemed approval without complying with the required conditions. A deemed discharge would allow LPAs less flexibility to negotiate with developers on the material submitted to discharge conditions and will result in more refusals of details, thereby delaying the process.

3.30 Question 3.2: Do you agree with our proposal to exclude some types of conditions from the deemed discharge (e.g. conditions in areas of high flood risk)?

Where we exclude a type of condition should we apply the exemption to all the conditions in the planning permission requiring discharge or only those relating to the reason for the exemption (e.g. those relating to flooding)?

Are there other types of conditions that you think should also be excluded?

Answer: Planning conditions are imposed for a reason as they are considered necessary for the development to proceed. The very fact that this is suggested demonstrates that the principle of deemed consent for the discharge of conditions is flawed and has the potential to result in inappropriate and potentially dangerous development.

Adopting this process could also delay planning applications as LPAs are likely to request more information up front prior to submission and/or determination.

3.21 Question 3.3: Do you agree with our proposal that a deemed discharge should be an applicant option activated by the serving of a notice, rather than applying automatically? If not, why?

Answer: If deemed consent is likely to be implemented, it should be an applicant option activated by the service of a notice, to retain the flexibility to negotiate on the material provided to discharge conditions and give the LPA the opportunity to respond. An additional fee could also be charged for this option which would assist LPAs in resourcing this service.

3.22 Question 3.4: Do you agree with our proposed timings for when a deemed discharge would be available to an applicant? If not, why? What alternative timing would you suggest?

Answer: No, this should be increased to 21 days to allow LPAs sufficient time to respond.

3.23 Question 3.5: We propose that (unless the type of condition is excluded) deemed discharge would be available for conditions in full or outline (not reserved matters) planning permissions under S.70, 73, and 73A of the Town and Country Planning Act 1990 (as amended).

Do you think that deemed discharge should be available for other types of consents such as advertisement consent, or planning permission granted by a local development order?

Answer: Possibly Advert Consents, but not LDOs as these types of applications require much more detailed submissions, and this would be likely to reduce the scope for negotiation and result in more refusals.

3.24 Question 3.6: Do you agree that the time limit for the fee refund should be shortened from twelve weeks to eight weeks? If not, why?

Answer: No – LPAs do not have the resources to comply with this, and therefore this will further exacerbate problems of under-resourcing, and be counter-productive.

3.25 Question 3.7: Are there any instances where you consider that a return of the fee after eight weeks would not be appropriate? Why?

Answer – see above

3.26 Question 3.8: Do you agree there should be a requirement for local planning authorities to share draft conditions with applicants for major developments before they can make a decision on the application?

Answer: No, this often happens anyway in respect of large schemes, however, making it compulsory is likely to delay the processing of planning applications.

3.27 Question 3.9: Do you agree that this requirement should be limited to major applications?

Answer: Yes – imposing it on smaller schemes would result in significant delays to the processing of minor applications.

3.28 Question 3.10: When do you consider it to be an appropriate time to share draft conditions:
• 10 days before a planning permissions is granted?
• 5 days before a planning permissions is granted? or
• another time?, please detail

Answer: 5 days and only on major schemes

3.29 Question 3.11: We have identified two possible options for dealing with late changes or additions to conditions – Option A or Option B. Which option do you prefer?

If neither, can you suggest another way of addressing this issue and if so please explain your alternative approach?

Answer: Option A – Option B will slow down the processing of planning applications and lead to developers having too much influence at the last minute over the nature, content and wording of conditions as LPAs are trying to meet their targets for determining planning applications.

3.30 Question 3.12: Do you agree there should be an additional requirement for local planning authorities to justify the use of pre-commencement conditions?

Answer: No – the reasons are normally obvious just from the content of the conditions, developers already have the right to seek this information if they require it and to challenge conditions through the appropriate process. If this is imposed as an additional requirement it will result in additional work and delay the process.

3.31 Question 3.13: Do you think that the proposed requirement for local planning authorities to justify the use of pre-commencement conditions should be expanded to apply to conditions that require further action to be undertaken by an applicant before an aspect of the development can go ahead?

Answer: No for the same reasons as indicated in response to Q3.13 above

3.32 Question 3.14: What more could be done to ensure that conditions that require further action to be undertaken by an applicant before an aspect of the development can go ahead are appropriate and that the timing is suitable and properly justified?

Answer: The developer already has the opportunity to request this information and challenge conditions through existing processes. Therefore, no further actions are required in this regard.

3.33 PLANNING APPLICATION PROCESS IMPROVEMENTS

This section seeks to achieve planning and application process improvements through a programme of simplification. Three main areas are proposed:

- Part A - measures to change the thresholds for statutory consultee involvement;
- Part B - proposed changes to the requirements for notification in respect of development close to railway land;

- Part C - Possible changes to the Town and Country Planning (development Management Procedure) (England) Order 2010 and measurement of the planning process.

3.34 Question 4.1: Do you agree with the proposed change to the requirements for consulting Natural England set out in Table 1? If not, please specify why.

Answer: LBB is happy to rely on the view of Natural England. In respect of this response.

3.35 Question 4.2: Do you agree with the proposed changes to the requirements for consulting the Highways Agency set out in Table 2? If not, please specify what change is of concern and why?

Answer: There should be no change to the existing position. The proposal does not account for site specific circumstances or highways issues, and 'volume' and 'character' are not the only material changes which have the potential to result in detrimental impacts that might be of interest to the Highways Agency.

3.36 Question 4.3: Do you agree with the proposed changes to the requirements for consulting and notifying English Heritage set out in Table 3? If not, please specify what change is of concern and why?

Answer: Yes, it makes sense to allow local authorities greater authority with Grade II buildings and conservation area applications

3.37 Do you agree with the proposed change to remove English Heritage's powers of Direction and authorisation in Greater London? If not, please explain why?

Answer: Yes, this is anachronistic and the change will bring practice in line with the rest of the country.

3.38 Question 4.4: Do you agree with the proposed changes to the requirements for referring applications to the Secretary of State set out in Table 4? If not, please specify what change is of concern and why.

Answer: Yes, this will reduce the need to consult on more minor schemes.

3.39 Question 4.5: Do you agree with the proposed minor changes to current arrangements for consultation/notification of other heritage bodies? If not, please specify what change is of concern and why.

Answer: Yes, no further comments

3.40 Question 4.6: Do you agree with the principle of statutory consultees making more frequent use of the existing flexibility not to be consulted at the application stage, in cases where technical issues were resolved at the pre-application stage?

Answer: Where the proposal remains unchanged and the submission of the planning application follows within a reasonable time scale after the initial pre-application advice this is appropriate and can save time and resources. Where the statutory consultee has confirmed this in writing a six month period is considered to be appropriate.

3.41 Do you have any comments on what specific measures would be necessary to facilitate more regular use of this flexibility?

Answer: No further comments

3.42 Question 4.7: How significant do you think the reduction in applications which statutory consultees are unnecessarily consulted on will be? Please provide evidence to support your answer.

Answer: LBB is happy to rely on responses from the statutory consultees who are best placed to respond on this point.

3.43 Question 4.8: In the interest of public safety, do you agree with the proposal requiring local planning authorities to notify railway infrastructure managers of planning applications within the vicinity of their railway, rather than making them formal statutory consultees with a duty to respond?

Answer: In the interests of public safety, they should remain as formal statutory consultees with a duty to respond.

3.44 Question 4.9: Do you agree with notification being required when any part of a proposed development is within 10 metres of a railway? Do you agree that 10 metres is a suitable distance? Do you have a suggestion about a methodology for measuring the distance from a railway (such as whether to measure from the edge of the railway track or the boundary of railway land, and how this would include underground railway tunnels)?

Answer: 10m is considered to be too arbitrary and this issue needs to be considered on the basis of the potential for impact on the operation of the railway operator or on the amenities of the surrounding land owners/occupiers.

3.45 Question 4.10: Do you have any comments on the proposal to consolidate the Town and Country Planning (Development Management Procedure) Order 2010?

Answer: A full review and update of the document rather than issuing numerous amendments is considered to be the preferred approach, and will improve clarity.

3.46 Question 4.11: Do you have any suggestions on how each stage of the planning application process should be measured? What is your idea? What stage of the process does it relate to? Why should this stage be measured and what are the benefits of such information?

Answer: No comments

3.47 ENVIRONMENTAL IMPACT ASSESSMENT THRESHOLDS

The Government is seeking to reduce the number of projects that are unnecessarily subject to screening for the need for an EIA.

3.48 Question 5.1: Do you agree that the existing thresholds for urban development and industrial estate development which are outside of sensitive areas are unnecessarily low?

Answer: the London Borough of Bromley does not receive many schemes that are subject to EIA or the requirement for screening. It therefore considers that the current thresholds are workable, however, it appreciates that authorities that receive a larger number of schemes that require screening may take a different view.

3.49 Question 5.2: Do you have any comments on where we propose to set the new thresholds?

Answer: No - No Comments

3.50 Question 5.3: If you consider there is scope to raise the screening threshold for residential dwellings above our current proposal, or to raise thresholds for other Schedule 2 categories, what would you suggest and why?

Answer: No comment

3.51 IMPOVING THE NATIONALLY SIGNIFICANT INFRASTRUCTURE PLANNING REGIME

The London Borough of Bromley has not been involved in any projects under the nationally significant infrastructure planning regime and therefore will rely on the responses from other LPAs that have more experience in this area.

4. FINANCIAL CONSIDERATIONS

4.1 Prior approval applications attract either zero fee or a substantially lower fee than normal planning applications. An increase in such applications alongside a potential reduction in full planning applications will add to workload whilst reducing income. The fee for prior approval applications covers a substantially smaller proportion of the cost of processing such applications than the fee for an equivalent or similar full planning application. Additionally, Local Planning Authorities are expected to check whether proposals for prior approval meet the general requirements for permitted development, which can add additional officer time to processing such applications.

Non-Applicable Sections:	POLICY, LEGAL, and PERSONNEL
Background Documents: (Access via Contact Officer)	DCLG Consultation July 2014: Technical Consultation on Planning – Department of Communities and Local Government

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