Title: High Speed Rail (London-West Midlands) Act 2017 -

introducing fees for requests for planning approval

IA No: DfT00381

RPC Reference No: N/A

Lead department or agency: Department for Transport

Other departments or agencies: Department for Communities and

Local Government, HS2 Ltd

Impact Assessment (IA)

Date: 27/02/2017

Stage: Final

Source of intervention: Domestic

Type of measure: Secondary legislation

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RPC Opinion: Not Applicable

Summary: Intervention and Options

	Cost of Preferred (or more likely) Option						
Total Net Business Net Present Value Present				One-In, Three-Out	Business Impact Target Status		
	£0m	N/A	N/A	Not in scope	Non qualifying provision		

What is the problem under consideration? Why is government intervention necessary?

Section 20 and Schedule 17 to the High Speed Rail (London-West Midlands) Act 2017 ("the Act") allow the Secretary of State for Transport and the Secretary of State for Communities and Local Government to introduce a fee regime that will enable local planning authorities ("LPAs") to recover the costs associated with processing requests for planning approval in relation to HS2 Phase One. The fee regime currently used by LPAs for planning applications does not apply to HS2 Phase One. Therefore, a new regime needs to be introduced to ensure that LPAs can charge fees for processing requests for planning approval and recover their costs.

The Regulations proposed under the preferred option (3) do not regulate or deregulate business and so an Impact Assessment is not required. However, the Department has completed an Impact Assessment to provide additional information to assist with understanding the purpose and effect of the Regulations.

What are the policy objectives and the intended effects?

The policy objective is to provide LPAs with a fee regime that will enable them to recover the costs associated with processing requests for planning approval in relation to HS2 Phase One and provide a clear basis for charging. In turn, this will assist with the timely delivery of HS2 Phase One and avoid a reduction in the standard of planning services provided by LPAs for residents/businesses.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

1) Do nothing

Under this option no fee regime would be introduced. If a fee regime is not introduced there will be no fee regime in place for LPAs to use in relation to HS2 Phase One.

2) Implement a fixed fee regime

Under this option the same fee would be payable for every request for planning approval submitted by the HS2 Phase One nominated undertaker ("the nominated undertaker") to LPAs, regardless of the size and nature of the development.

3) Implement a fee regime that reflects the regime set out in the current Town and Country Planning fee regulations - (Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (2012 No. 2920) ("the 2012 Regulations")

Under this option the fees payable for requests for planning approval would reflect the fee regime set out in the 2012 Regulations. These Regulations introduce a fee regime whereby the fee payable is based on the size and nature of the development concerned.

4) Negotiate fees on an individual basis with each LPA

Under this option the nominated undertaker would negotiate the fees payable for each request for planning approval on an individual basis with each LPA. This would mean that the fees would be more likely to reflect the actual costs associated with each request.

The justification for the preferred option (3) is set out in the Evidence Base section of this document. In summary, it is the option that currently best achieves the objective of providing LPAs with a fee regime that will enable them to cover the costs associated with processing requests for planning approval in relation to HS2 Phase One and provide a clear basis for charging.

Will the policy be reviewed?

Yes. It will be reviewed on an ongoing basis throughout the construction of HS2 Phase One through the HS2 Phase One Route Wide Planning Forum Meetings, which currently take place approximately once every 8 weeks.

Does implementation go beyond minimum EU requirements? N/A				
Are any of these organisations in scope?	Micro No	Small No	Medium No	Large No
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)			Non- N/A	traded:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Summary: Analysis & Evidence

Policy Option 3

Description: Implement a fee regime that reflects the regime set out in the current Town and Country Planning fee regulations

FULL ECONOMIC ASSESSMENT

Price Base	PV Rase	Time Period	Net Benefit (Present Value (PV)) (£m)			
Year: 2012	Year: 2017	Years: 2017- 2024	Low: 0	High: 0	Best Estimate: 0	

COSTS (£m)	Total Tra (Constant Price)	nsition Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	N/A	1	0	0
High	N/A	N/A	0	0
Best Estimate	N/A		N/A	N/A

Description and scale of key monetised costs by 'main affected groups'

Central Government and LPAs are the main affected groups.

Under the preferred option (3) no net costs will be created. Instead, there will be a transfer of costs associated with processing requests for planning approval in relation to HS2 Phase One from LPAs to the nominated undertaker. Therefore, there is no net cost to be monetised and the nature of the transfer is a transfer within the public sector.

It is currently estimated that the cost of requests for planning approval in relation to HS2 Phase One will be in the range of £3m to £6m. This estimate is based on information provided by the HS2 Ltd Town Planning Team. However, it should be noted that HS2 Phase One is still in the early stages of design and it is currently extremely difficult to accurately estimate the number of requests for planning approval that will be required and the associated costs. The range provided should cover the most likely outcomes.

The estimated costs that will be incurred by the nominated undertaker as set out above are essential in order to facilitate the timely delivery of HS2 Phase One.

The fees that will be payable by the nominated undertaker are outlined in the table in Annex A of this document and reflect the fee regime set out in the 2012 Regulations.

The regulations that will follow from the implementation of the preferred option (3) do not regulate or deregulate business and are therefore outside the scope of the Business Impact Target and One-In, Three-Out.

Other key non-monetised costs by 'main affected groups'

Not applicable

BENEFITS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	N/A		0	0
High	N/A	N/A	0	0
Best Estimate	N/A		N/A	N/A

Description and scale of key monetised benefits by 'main affected groups'

Central Government and LPAs are the main affected groups.

Under the preferred option (3) LPAs will be able to recover the costs of processing requests for planning approval in relation to HS2 Phase One.

Other key non-monetised benefits by 'main affected groups'

Under the preferred option (3) LPAs will be able to recover the costs of processing requests for planning approval in relation to HS2 Phase One and this will assist them with providing an adequately resourced local planning service, both for residents/businesses and the HS2 Phase One project.

Preferred option (3) will also assist with the timely delivery of HS2 Phase One by increasing the predictability of the project's costs and reducing the chance of requests for planning approval being delayed.

Key assumptions/sensitivities/risks

Discount rate (%)

3.5%

The information provided above has been based on information provided by the HS2 Ltd Town Planning Team.

It is currently estimated that around 2000 requests for planning approval will be submitted by the nominated undertaker to LPAs during the construction of HS2 Phase One and that the cost of these will be in the range of £3m

to £6m. However, it should be noted that HS2 Phase One is still in the early stages of design and it is currently difficult to accurately estimate the number of requests for planning approval that will be required and the associated costs. The range provided should cover the most likely outcomes.

If preferred option (3) is not implemented, LPAs would be unable to charge fees for processing requests for approval in relation to HS2 Phase One. This would mean that they would be unable to recover the costs incurred, potentially leading to a decline in the service that they are able to provide for residents/businesses and increasing the risk of delay to the delivery of the HS2 Phase One project.

BUSINESS ASSESSMENT (Option 3)

Direct impact on b	usiness (Equivalent	Annual) £m:	Score for Business Impact Target (qualifying
Costs: N/A	Benefits: N/A	Net: N/A	provisions only) £m: N/A

Evidence Base

Problem under consideration

Section 20 and Schedule 17 to the Act make provision for the Secretary of State for Transport and the Secretary of State for Communities and Local Government to introduce a fee regime that will enable LPAs to recover the costs associated with processing requests for planning approval in relation to HS2 Phase One.

The fee regime currently used by LPAs for planning applications does not apply to HS2 Phase One. Therefore, a new regime needs to be introduced to ensure that LPAs can charge fees for processing requests for planning approval and recover their costs.

The Regulations proposed under the preferred option (3) do not regulate or deregulate business and so an Impact Assessment is not required. However, the Department has completed an Impact Assessment to provide additional information to assist with understanding the purpose and effect of the Regulations.

Policy objective

The policy objective is to provide LPAs with a fee regime that will enable them to recover the costs associated with processing requests for planning approval in relation to HS2 Phase One. In turn, this will assist with the timely delivery of HS2 Phase One and avoid a reduction in the standard of planning services provided by LPAs for residents/businesses.

Policy options

Four options were considered to resolve the problem outlined above:

- Option 1: Do nothing
- Option 2: Implement a fixed fee regime
- Option 3: Implement a fee regime that reflects the regime set out in the current Town and Country Planning fee regulations (Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (2012 No. 2920) ("the 2012 Regulations") – this is the preferred option
- Option 4: Negotiate fees on an individual basis with each LPA

Option 1: Do nothing

Under this option, no fee regime would be introduced. If a fee regime is not introduced there would be no fee regime in place for LPAs to use in relation to HS2 Phase One requests for planning approvals and they would be unable to recover the costs associated with them.

The absence of a fee regime (and consequently the inability of LPAs to recover their costs) would likely have a negative impact on the capacity of LPAs (because they would be unable to fund the resources needed to process HS2 Phase One requests for planning approval in addition to delivering the local planning services required by residents/businesses). This in turn could negatively impact the timely delivery of HS2 Phase One, because the nominated undertaker would not receive the planning approvals necessary to complete the works required for the scheme within the appropriate timescales. At the same time, it is possible that under this option local residents/businesses would experience a deterioration in the quality of the planning services that they receive from LPAs.

If this option were to be implemented, it would signal a departure from the fee regime set out in the 2012 Regulations and the precedent established by the Crossrail Act fee regulations.

Option 2: Implement a fixed fee regime

Under this option, each request for planning approval submitted by the nominated undertaker to LPAs would have the same fee, regardless of the size and nature of the development.

This option would enable LPAs to recover the costs incurred by processing HS2 Phase One requests for planning approval. It would also ensure consistency in the fees paid by the nominated undertaker to LPAs across the HS2 Phase One route and that both LPAs and the nominated undertaker have clarity about the fees payable for development. This in turn would also increase the predictability of the project's costs.

However, under this option, each request for planning approval submitted by the nominated undertaker to LPAs would have the same fee, regardless of the size and nature of the development concerned. For example, the cost incurred by the nominated undertaker for submitting a request for planning approval for a small shed would be the same as for a depot building, when it is arguable that processing a request for planning approval for the latter will require an LPA to invest considerably more time and resource than it would for the former. As this option would be unable to adequately cater for the varying nature of HS2 Phase One requests for planning approval it is deemed to be unsuitable for the purposes of HS2 Phase One.

Under this option, there is a risk that those LPAs which receive the most complex and resource intensive requests for planning approval will not be compensated appropriately for processing those requests and that those LPAs that receive relatively straightforward requests will be overcompensated. This could lead to an unfair redistribution of wealth from the nominated undertaker to LPAs.

This option could also lead to inefficiency in the processing of requests for planning approval by LPAs. If a regime was established by which LPAs could recover a level of cost higher than that which they had paid out to cover the resources required to process a request, there could be little incentive for LPAs to seek efficiency in the processing of such requests.

If a regime of this nature was implemented, it would also be unable to reflect the fact that individual LPAs may have different costs associated with processing the same type of requests for planning approval (e.g. due to their size or current resource capability)

Finally, if this option were to be implemented it would signal a departure from the existing fee regime set out in the 2012 Regulations and the precedent established by the Crossrail Act fee regulations.

Option 3: Implement a fee regime that reflects the regime set out in the current Town and Country Planning fee regulations - (Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (2012 No. 2920) ("the 2012 Regulations")

Under this option, the fees payable by the nominated undertaker to LPAs would reflect the planning fees regime set out in the 2012 Regulations. The fee payable would reflect the size and nature of the development concerned (which reflects the regime set out in the 2012 Regulations).

This option would enable LPAs to recover the costs incurred by processing requests for planning approval in relation to HS2 Phase One. It would also be familiar to them (because it is based on the current fee regime for planning applications) and so it would be easy for them to use. This option would also ensure consistency in the fees paid by the nominated undertaker to LPAs across the HS2 Phase One route and would ensure that both LPAs and the nominated undertaker have clarity about the fees payable for different types of development.

Overall, this would also help to facilitate the timely delivery of the HS2 Phase One project by increasing the predictability of the project's costs and also reducing the risk of requests for planning approval being delayed (as through the recovery of costs, LPAs would be able to have the appropriate resources to provide an adequately resourced local planning service for residents/businesses as well as the HS2 Phase One project).

If this option were to be implemented it would follow the fee regime set out in the 2012 Regulations and the precedent established by the Crossrail Act fee regulations, which also reflected the Town and Country Planning fee regulations at that time.

However, if a regime of this nature was implemented, it would be unable to reflect the fact that individual LPAs may have different costs associated with processing the same type of requests for planning approval (e.g. due to their size or current resource capability).

Option 4: Negotiate fees on an individual basis with each LPA

Under this option, the nominated undertaker would negotiate the fees payable for requests for planning approval on a individual basis with each LPA. This would mean that the fees would be more likely to reflect the actual costs associated with each request.

This option would enable LPAs to recover the costs incurred by processing requests for planning approval in relation to HS2 Phase One. It would also ensure that the fees payable by the nominated undertaker accurately reflect the costs incurred by LPAs, rather than adopting a 'one size fits all' approach.

However, the transaction cost of this option is likely to be high as it would be extremely time consuming and expensive for both the nominated undertaker and LPAs to negotiate fees in this manner. A conservative estimate provided by the HS2 Ltd Town Planning Team is that negotiating fees on an individual basis would require at least four people (a lawyer, an economist, a policy lead and a town planning lead) at a senior level from both the nominated undertaker and relevant LPA to be involved in discussions over an extended period of time (lasting a year or more). There would also likely be substantial costs associated with the regular engagement required to conduct negotiations, assessing the different types of requests for planning approval required and providing the relevant documentation and analysis to justify the level of fees to be implemented.

This option also carries the risk that the nominated undertaker and LPAs would not reach agreement on the level of fees payable and a fee regime (such as those outlined in options (2) and (3)) would need to be implemented.

The process of negotiating fees could also negatively impact the timely delivery of HS2 Phase One (particularly if agreement between the nominated undertaker and LPA was not reached) because the nominated undertaker would not receive the planning approvals necessary to complete the works required for the scheme within the appropriate timescales.

This option would also reduce the predictability of the project's costs and carries the risk that LPAs along the HS2 Phase One route would receive different fees for processing requests for approval for the same type of development, which could cause presentational issues.

If this option were to be implemented, it would signal a departure from the fee regime set out in the 2012 Regulations and the precedent established by the Crossrail Act fee regulations.

Preferred option

The preferred option is Option 3 – Implement a fee regime that reflects the regime set out in the current Town and Country Planning fee regulations - (Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (2012 No. 2920) ("the 2012 Regulations")

This option will be implemented through the making of the High Speed Rail (London-West Midlands) (Fees for Requests for Planning Approval) Regulations 2017 ("the Regulations") which will provide LPAs with a fee regime that will enable them to meet the costs of processing requests for planning approval in relation to HS2 Phase One.

Calculation of fees

In the formulation of the Regulations, the Crossrail Act fee regulations were used as a starting point. This is because the 'planning conditions' schedule (Schedule 17) of the High Speed Rail (London-West Midlands) Act 2017 is very similar to the planning conditions schedule (Schedule 7) of the Crossrail Act 2008. The Crossrail Act fee regulations were structured to align directly with the different categories of works for approval within Schedule 7 and were also largely based on the Town and Country Planning fee regulations at that time. Consequently, it made sense for the Regulations to follow the same format and approach.

The current fee regime for planning applications set out in the 2012 Regulations is based on the notion of calculating the fee payable on the amount of floor space created by the proposed development. The same approach has been adopted for the Regulations.

The fees proposed under the preferred option (3) are outlined in the table in Annex A of this document. These fees are based on the 2012 Regulations. For example:

- The fees for category 1 A (i) to (iv) and D (ii) reflect the fees set out in Part 2 (2) (2) of Schedule 1 to the 2012 Regulations
- The fee for category 1 B reflects the fee set out in Part 2 (2) (2) of Schedule 1 to the 2012 Regulations (where no floor space is created)
- The fee for category 1 C reflects the fee set out in Part 2 (10) (2) of Schedule 1 to the 2012 Regulations, which has been deemed to be the most appropriate comparison.
- The fee for category 1 D (i) reflects the fee set out in Part 2 (2) (2) of Schedule 1 to the 2012 Regulations (where no floor space is created)
- The fees for category 2 A-G (construction arrangements) have no equivalent in the 2012 Regulations and so reflect the fee set out in Part 2 (2) (2) of Schedule 1 to the 2012 Regulations (where no floor space is created), which has been deemed to be the most appropriate comparison.
- The fee for category 3 reflects the fee set out in Part 2 (2) (2) of Schedule 1 to the 2012 Regulations (where no floor space is created)
- The fee for category 4 reflects the fee set out in Part 2 (12) of Schedule 1 to the 2012 Regulations
- The fee for category 5 reflects the fee set out in Part 2 (2) (2) of Schedule 1 to the 2012 Regulations (where no floor space is created)
- The fee for category 6 reflects the fee set out in Part 2 (2) (2) of Schedule 1 to the 2012 Regulations (where no floor space is created)
- The fee for category 7 reflects the fee set out in Part 2 (2) (2) of Schedule 1 to the 2012 Regulations (where no floor space is created)
- The fee for category 8 reflects the fee set out in section 16 (1) (b) of the 2012 Regulations.
- The fee for category 9 reflects the fee set out in section 17 (b) of the 2012 Regulations.

Costs

Under the preferred option (3) no net costs will be created. Instead there will be a transfer of the costs associated with processing requests for planning approval in relation to HS2 Phase One from LPAs to the nominated undertaker. Therefore, there is no net cost to be monetised and the nature of the transfer is a transfer within the public sector.

It is currently estimated that the cost of requests for planning approval in relation to HS2 Phase One will be in the range of £3m to £6m. This estimate has been based on information provided by the HS2 Ltd Town Planning Team. However, it should be noted that HS2 Phase One is still in the early stages of design and it is currently extremely difficult to accurately estimate the number of requests for planning approval that will be required and the associated costs. The range provided of £3m to £6m should cover the most likely outcomes. It is currently estimated that the costs associated with requests for planning approval will be relatively low for the first year of the project, before rising as construction on the scheme intensifies and then reducing once most of the requests for planning approval have been submitted to LPAs.

It is estimated that around 2000 requests for planning approval will be submitted by the nominated undertaker to LPAs with the fees payable expected to range from approximately £300 for approval of the design of footbridges to £3,000 for the detail design of tunnel vent shafts and from £100,000 to £250,000 for the detailed design of the stations at Euston, Old Oak Common and in Birmingham. The range of estimated costs is large because HS2 Phase One is still in the early stages of design and there is currently a lack of detail regarding the design of the stations, the extent of earthworks required for construction and the number and size of ancillary structures. The estimate is based on an assumption that half the applications will be chargeable at £195 and the other half will have a mean fee of c£3,000 (low estimate) to c£6,000 (upper estimate).

Benefits

The preferred option (3) will provide a tested regime which is familiar to LPAs.

Under the preferred option (3) LPAs will be able to recover the costs of processing requests for planning approval in relation to HS2 Phase One. This will assist them with providing an adequately resourced local planning service, both for residents/businesses and the HS2 Phase One project.

Preferred option (3) will also assist with the timely delivery of HS2 Phase One by increasing the predictability of the project's costs and reducing the chance of requests for planning approval being delayed.

Consultation

The implementation of the preferred option (3) was discussed at the HS2 Phase One Route Wide Planning Forum Meetings in May and December 2016, which are attended by representatives from the Department for Transport, HS2 Ltd and LPAs.

The Department explained its intention to implement the preferred option and explained the principles of the Regulations to LPAs. LPAs were asked to review the Crossrail Act fee regulations and provide comments which would be considered in the preparation of the Regulations. No comments were received and no objections were raised by LPAs in relation to the preferred option (3).

Impacts

These Regulations do not regulate or deregulate business and are therefore outside the scope of the Business Impact Target and One-In, Three-Out.

Review

The Regulations will be reviewed on an ongoing basis throughout the construction of HS2 Phase One through the HS2 Phase One Route Wide Planning Forum Meetings, which are attended by representatives from the Department for Transport, HS2 Ltd and LPAs and currently take place approximately once every 8 weeks.

The Regulations will only apply to requests for planning approval submitted by the nominated undertaker to LPAs in relation to HS2 Phase One. Once all requests for planning approval have been submitted by the nominated undertaker (currently expected to be by 2024), the Regulations will cease to have effect.

ANNEX A: Table of Fees Payable

The table below specifies the fees that will be payable by the nominated undertaker to LPAs and can be found in Schedule 2 to the High Speed Rail (London-West Midlands) (Fees for Requests for Planning Approval) Regulations 2017.

Column 1	Column 2
Category of development for which approval is sought	Fee payable
1. Plans and specifications for the following works	
A	
(i) Building works - the erection, construction, alteration or extension of a building, other than a temporary building and excluding anything in C	(a) where no gross floor space is to be created by the development, £195;(b) where the area of gross floor space to be
below.	created by the development does not exceed 40 square metres, £195;
(ii) Fences and walls – the erection, alteration or extension of any fence or wall (other than sight, noise or dust screens)	(c) where the area of gross floor space to be created by the development exceeds 40 square metres but does not exceed 75 square metres, £385;
(iii) Sight, noise or dust screens - the erection, alteration or extension of any fences, walls or other barriers (including bunds) for visual or noise screening or dust suppression.	(d) where the area of gross floor space to be created by the development exceeds 75 square metres but does not exceed 3750 square metres £385 for each 75 square metres or part thereof of that area;

	,
(iv) Artificial lighting equipment - the erection, alteration, extension or installation of lighting equipment.	(e) where the area of gross floor space to be created by the development exceeds 3750 square metres, £19,049; and an additional £115 for each 75 square metres or part thereof subject to a maximum of £250,000.
B Road vehicle park – does not include anything that is a building.	£195.
C Earthworks – the erection, alteration or extension of any terracing, cuttings, embankments or other earth works.	£195 for each 0.1 hectares or part thereof of the site, subject to a maximum of £1,690.
(i) Telecommunications masts or pedestrian access to the railway line.	£195.
(ii) Transformers	The criteria in (a) to (e) in category 1A apply for the calculation of the fee.
2. Matters ancillary to development	2425
A. Handling of re-useable spoil or top soil – handling during removal, storage and re-use of any spoil or top soil removed during the course of carrying out the development.	£195.
B. Storage sites – sites on land within the Act limits at which materials are to be stored until used or re-used in carrying out the development or disposal as waste.	£195.
C. Construction camps – sites on land within the Act limits which are to be used for the residential accommodation of persons engaged in carrying out the development.	£195.
D. Works screening – the provision where necessary on land within the Act limits of any screening for working sites on such land required for the purpose of carrying out the development.	£195.
E. Artificial lighting – the use of artificial lighting on land within the Act limits for the purpose of carrying out the development.	£195.
F. Dust Suppression – the suppression of dust caused by construction operations carried out on land within the Act limits for the purpose of carrying out the development.	£195.
G. Road mud control measures – the measures to be taken on land within the Act limits to prevent or reduce the carrying of mud on to any public highway as a result of carrying out the development.	£195.
3 Road transport	
3. Road transport Arrangements concerning road transport – the arrangements regarding the routes by which anything is to be transported on a highway by a large goods vehicle(1) to a working or storage site; a site where it will be re-used; or a waste disposal site.	£195.
4. Waste and spoil disposal and excavations	
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(¹)

See paragraph 6(7) of Schedule 17 to the High Speed Rail (London – West Midlands) Act 2017 where this term is defined.

The development to the extent it consists of waste and spoil disposal or the excavation of bulk materials from borrow pits.	£195 for each 0.1 hectares or part thereof of the site area, subject to a maximum of £29,112.
5. Bringing scheduled works or depots into use	
Arrangements for bringing into use scheduled works and depots.	£195.
6. Mitigation schemes	
A mitigation scheme consists of reasonably practicably measures to mitigate the effect of the works or operation (paragraph 9(4)(b) of the Schedule).	£195.
7.0	
7. Site restoration schemes	
A site restoration scheme	£195.
8. Additional details	
Additional details request.	£97.
9. Non-material changes	
The request for a non-material change to any approval (paragraph 21 of the Schedule).	£195.