



NATIONAL PLANNING POLICY FRAMEWORK CONSULTATION RESPONSE

Centre for London Consultation Response

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OUR RESPONSE TO THE NPPF CONSULTATION

Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?

Yes, we agree that the standard method for establishing borough-based housing targets should be clearly set without 'alternative methods'. Amid the housing crisis we find ourselves in, housing targets should not be reducible through alternative means – they are established as a minimum level of need and should be used to drive forward as much housing development as possible. Alternative methods are also not adequately defined, meaning they are open to misinterpretation and misuse.

That said, in the London case, we continue to support the GLA's devolved planning and target setting powers in the form of the London Plan. London boroughs cover small geographical areas, as such a pan-London approach to both housing need and delivery is a more appropriate model for development and strategic planning.

We refer to the Mayor of London's response to a question regarding the NPPF on the Standard Method from last year [here](#).

The revised standard method must act as a guiding principle, especially as the revised method reduces volatility of housing targets, but the London Plan should remain the authoritative voice on housing targets in the capital.

Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

Yes, we agree that the use of alternative approaches has sometimes been used as a 'get out of jail free' card, allowing areas to under-build. We refer to our answer to question 1 about how the standard method should be applied to London.

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

Yes, we agree that the inclusion of urban uplift has led to housing targets disproportionate of need and scaled up beyond realistic deliverable quantities in the capital. With the urban uplift, London's housing target was set at 100,000 new homes required to be built annually – almost triple what is currently delivered.

Our analysis at Centre for London suggest London needs to double the numbers of homes delivered annually, from roughly 37,000 to 74,000 every year for the next 15 years to end the housing crisis. The London Plan's target is current at 52,300 new homes annually – this does not represent their estimate of need, which they place at 66,000 new homes a year. The revised target is created to factor in 'deliverability', that is, how possible it will be to deliver this number of homes. While we support the inclusion of deliverability to estimate accurate regional housebuilding, this is not reflective of need and should not be seen as such.

With the removal of the urban uplift and release of small sections of 'green belt' land, the housing target of 74,000 homes per year would be reachable with innovative spatial planning. As such, we support the removal of the urban uplift and look to the GLA to

provide realistic figures of housing proportionate to the scale of need in the capital. We will further discuss this in the section on the green belt.

However, we strongly reiterate that the removal of the urban uplift in the NPPF should not signal a reduction in momentum and financial support for housebuilding in the capital. While the 100,000 figure was undeliverable, the reality is that in the capital 1 in 4 live in poverty following housing costs, over 324,000 households are on the waiting list for social housing and over 63,000 are living in temporary accommodation. As mentioned, even with the urban uplift removed, the London Plan does not currently meet housing demand. Removal of the urban uplift must not mean that central government funding levels for housing delivery in London are reduced.

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

Yes, we agree that paragraph 130 should be deleted. London's peak density is significantly lower than other global cities according to comparable data from 2015. Despite this, the December 2023 change provided increased grounds on which local councils could limit densification. This represented an obstruction to potential innovative planning policies, where densification could deliver much-needed new homes close to existing transport links and public infrastructure.

Housing delivery in London has already been hampered by resistance to appropriate densification even prior to the December 2023 addition to the NPPF, as evidenced by the scrapping of Croydon's densification plans in 2022. This plan looked specifically at small sites, considering, for example, how two adjoining houses could be built upon to create as many as 20-30 homes. Between 2018 and 2021, Croydon completed nearly 2000 new homes on small sites. Russell Curtis estimates if all 19 outer London Boroughs had engaged in similar densification projects it would have resulted in an additional 25,000 homes. Despite these successes, arguments that densification 'changed the local character' meant this scheme was scrapped in 2022.

According to our polling with Savanta last year, 61% of Londoners support more homes being built in their area, in comparison to 19% who were opposed. We greatly welcome this policy reversal which removes additional levers for local councils and council leaders to prematurely end innovative housebuilding schemes.

Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes, we agree with the switch in focus of design codes which encourage consideration of opportunities for densification, for the reasons mentioned above in question 4. We further support design codes which have local visions, allowing for LA's to plan for their local communities.

While we agree with the promotion of 'large new communities', we are aware that, particularly in London, these can take time to deliver. Small site densification creates opportunities for rapid delivery of new homes. Innovative design should factor in long-term goals for the development of large communities and additionally provide clear guidance for small site densification projects. We recommend the Croydon plan referenced in our answer to question 4 be used as a blueprint for urban/ suburban densification projects.

We would also note that, in our polling with Savanta, 38% of Londoners stated they would be less supportive of a new development if it 'is considered a 'high-rise' of more than 7-10 storeys', with only 33% being in favour of new high-rise buildings. In comparison, almost double the number of Londoners (61%) generally supported more homes being built in their area. As such, it is even more important that new design codes encourage local planning authorities to tailor their spatial visions to the needs and character of their communities, but with an overarching emphasis on meeting housing need which requires all suitable delivery models (including densification) are considered fully.

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

Yes, we support the presumption clause being amended to 'tilt the balance' towards accepting high quality planning proposals, especially the clarification that this policy is invoked when there is insufficient land supply.

With only 21% of London LA's currently having a robust 5-year housing supply according to Savills, presumption is likely to occur regularly in the capital. As such we further support the changes which will reference locational and design policies, and affordable housing policies. Presumption must not allow for low-quality building. In London, partially due to the aging nature of our housing stock, 1 in 6 privately rented homes do not meet the decent homes standard, while 2 in 5 London households experienced mould in the 12 months prior to Spring 2023 according to our polling with Savanta. For presumption to be a successful policy, it must create housing stock which is future-proofed and high quality.

Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

Yes, we agree with this proposal. Long term planning is fundamental to allow architects, developers and investors to build. The changes made in December 2023 to reduce this requirement in some instances has been widely unpopular, damaging the security of housing supply and limiting forward-planning.

Restoration of the five-year land supply will encourage local planning authorities to develop long-term visions, but also a clear pipeline of deliverable projects - a key aspect of planning that currently limits private development in the capital.

This five-year housing supply should continue to work alongside local and sub-regional strategic policies which the NPPF currently states should "look ahead over a minimum 15-year period from adoption", identifying where housing land supply meets long-term local and national strategic goals.

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

As outlined in our other responses, housing need in London has reached a dangerous point. Removing the word 'oversupply' is likely to currently make little impact on housebuilding in the capital due to the chronic undersupply. We doubt there will be an instance of oversupply in the capital for the foreseeable future, with only 21% of LA's able to provide a five-year land supply according to Savills.

Nonetheless, we welcome the removal of the word 'oversupply' to support future housebuilding and limit future iterations of London's housing crisis.

Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

Yes, the changeable nature of both housing stock and land supply, combined with continued under delivery in the capital based on projections, means a buffer is required.

Housing land supply estimations tend to have an optimism bias in year 1. In London, according to Lichfields' recent data analysis in their report 'mind the gap', London boroughs 'do not appear to be accounting for the reality of the difficulty in converting permissions into completed dwellings'. A buffer will rectify some of the optimism bias.

Meanwhile, as mentioned in question 8, London is the worst performing region in both providing a robust 5-year-housing supply and in the 2022 housing delivery test. As such, boroughs need to be supported in their ability to find housing supply, which will be greatly aided by the release of low-quality sections of the green belt. They also need to be supported in finding appropriate land/ creation of new communities by being provided with clear and deliverable timelines on new transport infrastructure projects which can unlock significant numbers of new homes.

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

In London, housing land supply optimism bias currently sits at an estimated 9%, according to the Lichfields report mentioned in our answer to question 9. We believe the figure should be higher than 5%, to counter this higher optimism bias – subject to regular review.

New release of previously developed land and 'grey belt' land on the green belt will unlock new land supply. As such, London Authorities will have greater flexibility when allocating land within their 5-year housing supply – we believe this will result in a small increase in realism within calculations.

These changes to unlock more land also make it feasible to increase the buffer. We would suggest an initial recommendation of setting the buffer at 10% to factor in optimism bias at the point of estimate. This is subject to further consultation on the viability of finding this 10% buffer within their 5-year housing supply by London Authorities following the release of low-quality green belt land.

Within this, we strongly support the 20% buffer in the case of significant under delivery over the period of three years. In the capital, we have seen significant under-delivery in many of the London boroughs based on the 2022 housing delivery test.

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

Yes, we agree that, as the policy is rarely used, the annual position statements should be removed.

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

Yes, we strongly support all policies which strengthen co-operation across boundaries and the close working relationship this is set to establish with Mayoral Combined Authorities.

London has created Spatial Development Strategies in the form of the London Plan for two decades. As such, the GLA and London Plan team should work closely with fellow Mayoral Combined Authorities to share best practice and highlight learnings from creating the London Plan to date. The London Plan itself should continue to set a pan-London housing

target – based on a combination of the standard method, and realistic projections of deliverable plans.

We welcome the addition of paragraph 27 to the NPPF. Consistency in infrastructure development, especially in London where LA's cover smaller geographical areas, is vital and must occur beyond the single adjoining boundaries. This is crucial both for LA's to share best practice between LAs as well as for developers to understand expectations when delivering plans for new housing across the capital. We also welcome the expectation of sharing unmet need between boroughs, although anticipate that in the capital this policy will not be invoked in the short term due to high demand for housing in all boroughs. Finally, we welcome all national government support for cross borough collaborations and recommend both the government and the GLA look to create new sub-regional delivery bodies such as mayoral development corporations to further assist with land acquisition and cross-boundary cooperation.

Looking to the relationship between London and the wider South East, we suggest that when national government begins to 'identify priority groups of other authorities where strategic planning... would provide particular benefits', the GLA is encouraged and supported in working with LAs in the wider South East along transport corridors. This approach is supported by our research into London's relationship with the wider South East, which used Heathrow as a regional case study. The research highlighted how, primarily due to the capital's size, London government struggles to engage effectively with its neighbouring regions. It remains difficult to engage with all LAs bordering or a commutable distance from the capital. Focussing on transport corridors, such as the Elizabeth Line in the case of the Heathrow Region, allows London governance to focus its cooperation, so projects are manageable and deliverable. This should be done in tandem with local planning groups – best practice examples can be shared by our partner on this research, the Heathrow Strategic Planning Group.

Overall, to encourage this cross-boundary cooperation, and to bring this together with the suggested new policies on the green belt, we recommend the government and the GLA establish 10 new strategic sites on the green belt near transport hubs for housebuilding.

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

We suggest soundness of strategic scale plans needs to factor in drop off rates in delivery and current funding environments. This could be done by incorporating that plans must be realistic – meaning aware of current rates/ levels of delivery and factor in funding/ increased costs due to inflation. This could be considered within the definition of 'deliverable', but we would argue that realistic expectations of cost need to be factored in more explicitly.

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

The strength of long-term plans are often dependent on planning around other major infrastructure projects – most notably transport infrastructure.

For strategic planning over a 15-year period to be effective, LAs and Mayoral Combined authorities need to have a complete understanding of the pipeline of new major infrastructure projects, including those led by central government, and realistic updates on ongoing major infrastructure projects. Recent years have seen a breakdown in the

relationship between local government and development corporations. This needs to be re-established to realistically allow for successful, future-proofed planning.

Question 15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

Yes, we have consistently heard from key stakeholders in development and from local authorities that the volatility of household projections provides a poor baseline for the standard method. As this consultation states, housing stock tends to be more grounded, but also provides a more realistic base point from which to assess housing need in a borough.

In London, this new standard method is likely to set the overall regional target at roughly 80,000 new homes built per annum. This is in line with our own analysis which recommend building 74,000 new homes every year in London over the next 15 years in our research project 'Homes Fit for Londoners: Solving London's Housing Crisis'.

As stated previously, the standard method must continue to be used as an advisory method for London, feeding into the London Plan. This pan-London approach should be properly supported, consulted on and delivered by local authorities, and therefore must be included in target setting stages of the London Plan.

Question 16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

As a standard method which can be replicated across the country this is a considered and measured approach to target setting.

However, there are some key omissions which will have significant impact in the capital. Most crucially, the rental sector is not included – this is especially significant for London as a much higher proportion of Londoners rent privately or in the social sector than the rest of England. We will discuss this issue further in the questions below.

We re-iterate that the standard method will provide an informed position from which the Mayor can set pan-London targets. It should not, however, dilute the current devolution deal which allows London to set its own targets based on a holistic assessment of the capital's housing needs that draws on multiple data sources rather than a single metric.

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

As this is a new standard method, we are yet to see if factoring in affordability as such will bring down the heightened costs of housing in the capital.

It is crucial that the impact of the proposed standard method on affordability is closely monitored, and that central and local government collaborate to ensure that sufficient affordable housing is delivered within the new targets proposed under the method. This is especially important given the substantial reductions in overall targets for London boroughs with some of the highest levels of housing need - for example, Newham's housebuilding target has almost halved (to 2178), despite being the borough with the highest number of households living in temporary accommodation (6,269).

We support the Mayor's statement earlier this year (as discussed in question 1) that the standard method in London should be used as a guiding principle to assess need. However, other factors such as number of households in temporary accommodation, waiting times for social housing and rent prices should be included to provide a holistic and appropriate assessment of both housing need and affordability.

Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Yes, we believe that rental affordability should factor into the standard method. According to the 2021 census, 30% of households in London rent privately. According to the English Housing Survey 2021 to 2022: social rented sector, 22% of households in London live in social rented homes.

London house prices remain 55% higher than the English average, however inflation of house prices in the capital has remained low in the past years. This does not reflect a reduction in demand for housing in the capital, with rent inflation consistently higher than the English average, and currently at 9.7% according to ONS data released in August. The average rent is 60% higher than the English average, currently sitting at £2,114 and rising. Estimates suggest Londoners are spending between 35% to 50% of household incomes on rent on average. This is an affordability crisis: one in four Londoners live in poverty after paying their housing costs.

For affordability to be properly reflected in the capital's housing needs assessment, rent must be included in the standard method. We recommend a formula which incorporates 'percentage of population renting', 'average cost of rent', and 'average salary'. If this is not done, the standard method can only be used as a guide in the capital, as it will not accurately reflect the level of need within the private rental sector.

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

N/A

Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes, we support the proposed change providing extra weight to brownfield land.

Due to extra costs sometimes incurred by brownfields sites – namely demolition and/ or decontamination – policies which smooth the planning process for developers looking to build homes on brownfield sites are welcomed. We need developers to see brownfield sites as desirable opportunities for development, so if the government will not directly finance demolition and decontamination, planning policy must encourage developers as much as possible to bid for and build on brownfield land.

Some brownfield land will not be appropriate for development due to lack of local infrastructure because of sites' previous industrial usage. All plans on brownfield land must contribute to the necessary public infrastructure as laid out in paragraph 8 on 'sustainable development'. We recommend additional specific reference to transport infrastructure, either in 8(a) or 8(b).

Question 21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

Yes, we strongly support all policies which strengthen planning permission on Previously Developed Land (PDL) land in the green belt. Recent research by Knight Frank has identified 11,000 PDL sites in the green belt, comprising of less than 1% of green belt designated land. 40% of these sites have been identified within the metropolitan green belt, providing significant opportunity for housebuilding in and around the capital. This could provide an estimated 40,000-80,000 family homes, and larger numbers of homes if mixed tenure and low-rise flats are incorporated into designs and strategic spatial planning documents.

Question 22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

We would recommend an expanded definition of PDL. Cumulatively, building on only 5% of PDL and low-quality sections located in the metropolitan green belt is estimated to unlock nearly 900,000 new homes in and around the capital. While these sites will not all be able to be built upon in the next 5 years, it highlights a significant opportunity to deliver significant share of the 1.5 million homes promised by the government.

The NPPF lays out a clear and substantial definition on the protection of green belt land, and therefore there is space to expand the PDL definition while retaining the core purpose of the green belt.

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

While the definition is strong, we believe it should state 'limited or low-quality contributions' and provide clear examples of grey belt land while the term is in the early stages of use. We recommend adding a 'such as' section including examples like disused car parks, wasteland and old petrol stations to provide clear examples of 'grey belt' land to local authorities.

Our polling of Londoners with Savanta showed that, when asked about the green belt, 51% of Londoners were in favour of building on small low-quality sections of the green belt close to transport hubs, with only 19% in opposition to this policy. This is, in part, why we strongly support the addition of the phrase 'low-quality'.

We would like strongly to reiterate our support for the inclusion of the 'grey belt' in the NPPF. As mentioned, it unlocks new avenues for the 5-year housing supply, creates new opportunities for sustainable and affordable housing development and is the single most significant policy lever in the NPPF which can be pulled to reach the Government's target of 1.5 million homes.

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

No, the policy retains clear and necessary protections for Green Belt land and is strict in its release policies, as well as its golden rules to establish high quality biodiversity in new projects. We strongly support the policy as it stands.

Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Yes, we agree that while the information itself is clear, there are likely to be questions which arise as we start to release large quantities of green belt land which would previously not permit development. This additional guidance should be in Planning Practice Guidance, not

in the NPPF itself, to be flexible to the challenges which may arise in the early stages of grey belt release. We believe local authorities are best placed to make the final decisions on land within their local communities, so guidance rather than policy in the NPPF is preferable.

Question 26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Yes, we support the proposed guidance for appropriate considerations. They are clear, concise and provide opportunities for building on what we refer to in our research as 'low-quality' sections of the green belt. These should be subject for review as release of greenbelt land becomes more commonplace.

Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

No, we defer to specialists in Local Nature Recovery Strategies in LAs and rural specialists.

Question 28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

Yes, we agree with the sequential release of land, and with protecting genuinely 'green' land.

However, we believe that as the proposals stand, developers will prioritise brownfield land in urban centres above releasing PDL on the green belt due to the presumption in favour of sustainable development. However, there is a risk that this could result in slower housing delivery. Brownfield land in the capital – according to the previous government's estimates – would provide at best 11,500 new homes. This is significantly below the additional 37,000 new homes estimated to be needed annually. Additionally, brownfield sites can be costly and slow to reach completion.

While we agree with the sequential release of land within the green belt as stated above, we recommend developing on PDL on the green belt is further encouraged by the government. Given the scale of need in and around the capital, we need to fast track sustainable development opportunities. We believe the government needs to strengthen planning applications for PDL land – for example, by adding PDL land on the greenbelt to brownfield registers.

We further suggest devolving greater power to greenbelt designation to LAs. In some instances, higher-quality land located directly next to pre-existing infrastructure may be more appropriate for development. LA's must be given the power to make decision on re-designation of greenbelt land where appropriate.

Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes, we agree to a certain extent. The function of the Green Belt to maintain biodiversity and protect England's depleting natural environment is fundamental. Housing delivery must come hand in hand with plans for improving biodiversity – including on brownfield sites and in urban centres.

However, we believe that the Green Belt as an arbitrary restrictor of urban sprawl is less crucial. The metropolitan Green Belt has significantly grown since its initial conception in 1938. As it has grown, it encompassed more 'low-quality' sites. While unlimited urban sprawl can have adverse impacts, expansion of urban communities around the capital is vital to meet housing need, promote economic growth and encourage healthy lifestyles, preventing overpopulation of the city. We recommend the government and the GLA considers Copenhagen's 'green fingers' model, where development is permitted along transport links coming out of the city, while green spaces around these are retained.

This is in keeping with findings from our recent polling with Savanta as mentioned, where 51% of Londoners were in favour of "building on small low-quality sections of the green belt close to transport hubs", with only 19% in opposition to this policy.

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

Yes, local councils and mayoral combined authorities should retain the right to make decisions on Green Belt land due to their local knowledge of both housing need and current use of green belt designated land.

The clear national policy laid out in the NPPF will enforce some release of green belt land in the case of under-delivery and will limit councils to the phased release of green belt land as outlined in question 28. This means the necessary caveats are in place to both ensure release of green belt land for building when necessary and limit over-development on green belt land.

Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Yes, we agree that commercial and other development needs could trigger release of grey belt land. However, we would add a line stating all commercial use must either contribute significantly to local, sustainable economic growth and/ or contribute to a healthier/ safer community through providing local goods, services and retail opportunities. All green belt release should centre housing, with commercial release allowed to support local infrastructure, job opportunities and significant economic growth.

Question 32: Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

We defer to experts and community representatives to answer this question.

Question 33: Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

We defer to experts and community representatives to answer this question.

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

Yes, we strongly agree with the proposed approach to the affordable housing tenure mix. As mentioned, London has over 324,000 households on the waiting list for social homes and over 62,000 in temporary accommodation. Given this high level of need, we welcome the

specific reference to the appropriate proportion of Social Rent housing, to favour socially rented homes within the affordable housing tenure mix.

We also call for further financial incentives to increase the delivery of social homes.

We agree that the decision-making powers for the affordable housing tenure mix should be retained by LAs, who will have the most local knowledge and data on current and projected local need. Housing associations should equally be consulted in the planning process to properly assess local affordable housing tenure mix requirements and popularity.

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

Yes, estimates in our recent report, Homes for Londoners: Solving London's Housing Crisis, set the scale of need for socially rented housing at 40% of the overall housebuilding target (roughly 30,000 new socially rented homes built annually in the capital).

As affordable housing targets will be mixed tenure, the 50% target will be required on all Green Belt developments including PDL to meet demand for affordable housing in and around the capital if we are to meet the level of demand for social rent homes.

This needs to be matched by central government grant funding and the streamlining of pre-existing funds to unlock wider investment into the social rent sector.

We do welcome some flexibility in this allocation and would reiterate the importance of local authorities to provide bespoke local solutions to problems. For example, in some areas or within some applications, the development may meet substantial community infrastructure needs without meeting the 50% affordable housing target. LA's require the flexibility in decision making, while also being held to high national standards and targets on affordable housing.

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

Yes, we strongly agree with the proposed approach to securing benefits for nature and public access to green space. Green space is vital for promoting a healthy living environment, as well as aiding in climate mitigation strategies. We recommend that, alongside the planning policy for trees as laid out in the NPPF, green space access must also include provisions of wild meadows to increase biodiversity levels.

Currently, 74% of children and young people could easily walk to a park/ playing field/ playground in England. We should aim to retain such high numbers, as access to green spaces is a cornerstone of what makes England a safe, healthy and enjoyable place to live.

Question 37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

Yes, we agree that setting indicative benchmark land values will provide a foundation which LAs can build on to set their own appropriate land values. Careful consideration must be taken to set the value of the benchmark land value: if the land is valued too low, landowners will be disincentivised to sell, while if the land value is too high, developers will be disincentivised to create as much affordable housing as possible. We believe that setting benchmark land values in this way will encourage LAs in similar areas to set similar land

values, allowing developers in London to take a pan-London approach to large developments.

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

We defer to developers and local authority experts to advise on the level that benchmark land values should be set. As emphasised in our answer to question 38, levels should be set at a value which encourages landowners to sell, while ensuring development at scale is viable for developers.

Question 39: To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

Yes, we agree with the proposed approach, as long as benchmark land values are set at a reasonable rate.

Question 40: It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

To ensure that developments remain viable for developers, and so that we can deliver on the number of homes needed to be built in the UK and London, we agree with this approach.

Question 41: Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

We would support the proposed late-stage viability review approach, building on a practice well established in London. However, we believe that the 50% affordable housing requirement for land released from the green belt cannot be included in any late-stage reviews – this must be prioritised as part of the pre-application negotiations and reflected in the land value. This is because providing high levels of affordable homes is reliant on the development being appropriately costed from the beginning of the planning process.

Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

In the case of commercial development, we recommend any reduction in green space and biodiversity due to building must be replaced within the planning application. For other specific types of development, including travellers' sites, we defer to experts in those specific sites.

Question 43: Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

We defer to developers and local authority experts to answer this question.

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

We are broadly supportive of the approach proposed at Annex 4, building on the principals of viability assessment well established in London. However as mentioned in our earlier answers, the benchmark land values must be set at a reasonable rate.

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

Yes, we would support the use of compulsory purchase powers in order to deliver the level of new homes required in areas where this measure might be necessary. However, we believe that using compulsory purchase powers for smaller sites could be challenging for LAs, as they could be met with local resistance. LAs will need additional resource and expertise to support them to use these powers.

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

N/A

Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes, we are strongly in favour of the NPPF making increased and specific reference to Social Rent, based on the data on levels of housing need in London referenced in our answers to questions 4, 18 and 35.

London boroughs have significant social housing wait times. Croydon estimates the average person waits 8 years. In Hounslow, the waiting list for a 1-bedroom/ studio apartment, for those situated within their highest priority band, is currently 2 years. At Centre for London we are currently in the process of researching social housing wait times in different London Authorities, and we will have a fuller picture by the end of this year. Socially rented homes must be the priority tenure type within affordable housing requirements.

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

Yes, due to the necessary prioritisation of socially rented housing as outlined above. The prescription of affordable home ownership, without any requirement for socially rented homes is not representative of the highest level of need in the capital.

LAs and developers of affordable housing should be able to adapt their plans to the affordable housing tenure mix required of the local area.

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

Yes, due to the necessary prioritisation of socially rented housing as outlined above. The First Homes scheme in the capital has had does not appear to have had an observable impact on the affordability crisis in the capital. This requirement does not meet any of the greatest needs within London and therefore should be immediately removed.

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

In London, many of the boroughs have not enforced the new provisions on first homes – with shared models and social rent being preferred.

We, alongside key stakeholders within affordable housing, would reiterate our commitment to socially rented tenures especially given the crisis and waiting lists in the capital.

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

Yes, we agree with promoting mixed tenures and types. There is evidence to suggest that mixed tenure types tend to be the most successful housing development, and as mentioned in paragraph 6 of the consultation, they both create diverse communities and support the timely build out of sites. We strongly agree with the promotion of mixed tenure sites, although there should still be flexibility for some single tenure developments (for example, student accommodation or sites for integrated retirement communities).

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

There are a number of ways to promote high percentage Social Rent/ affordable housing developments.

The first is long term rent settlements for social housing landlords to provide a stable income, which allows for greater long-term financial planning and therefore the ability to upgrade current housing stock and build new affordable housing.

The second is to consider viability and ensure that all requirements continue to encourage, rather than disincentivise, development. In the current climate, we are not only competing with development in and across the UK, but also competing within global markets. To crowd in funding from international developers and investors into our own social housing market, we need to carefully consider the international picture. We would recommend the government conduct an analysis to find out where in specific neighbourhoods worldwide social housing is being effectively delivered at scale, in what circumstances investors fund mixed affordable housing tenures, and how we can replicate such schemes in the UK.

The third is to make high percentage social rent/ affordable housing developments desirable amongst existing local communities by delivering increased public infrastructure. In our polling produced by Savanta, 72% of Londoners stated they would be 'more supportive of new development in their area' if 'the development is accompanied by new services such as a new school, doctor, or dentist in the local area', while 67% stated they'd be more supportive if 'The development is accompanied by new public transport routes (e.g. buses running more frequently)'. This will not only provide public support for social rent/ affordable housing developments but is likely to also unlock further support for government grants within affordable house-building.

Finally, and crucially, high percentage Social Rent homes will not be built at scale without government funding. We strongly support an increase in the Affordable Housing Programme to £15.1bn a year as outlined in our recent report 'Homes Fit for Londoners: Solving London's Housing Crisis'. Not only is this necessary to end the housing crisis, according to analysis by the National Housing Federation, such investment in affordable homes would also boost the economy in the future.

Question 53: What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

A size's site and the impact on the community is likely to differ based on the density of an area, so a flat maximum site size is not an appropriate way to ensure against unintended consequences.

Instead, the implementation of key infrastructure is the best way to safeguard against unintended consequences. Current legislation states that to promote healthy and safe communities you must have 'well-designed, clear and legible pedestrian and cycle routes, and high-quality public space'. We would also suggest adding a line which required 'well-lit' streets into the NPPF. This would encourage local authorities and design panels to strongly consider lighting within planning applications. For more information, see our report 'Seeing clearly: How lighting can make London a better city'.

Single tenure, social rent homes can be unpopular with communities due to the potential unintended consequences of their development on local residents. To mitigate this, we refer to our answer to question 52 on how to promote high percentage Social Rent/ affordable housing developments through increased public infrastructure.

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

We defer to organisations in the rural housebuilding sector.

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

Yes, in London, one child in every classroom is living in temporary accommodation. Children living in temporary accommodation in London represent 58% of the overall number of children living in temporary accommodation across the entirety of England.

This results in families with children being moved out of their local area, requiring them to move schools and away from their support systems. Temporary accommodation is often unsafe, through being too cold, mouldy or damp, or otherwise unfit for purpose.

Children must be prioritised; we support the addition of the phrasing 'looked after children' to accommodate all children who deserve safe housing. This provision should protect children who are have experienced care, who are at elevated risk of homelessness, from future housing insecurity and its associated harms.

Question 56: Do you agree with these changes?

Yes, we strongly agree with the strengthening of community-led development, especially community land trusts, as well as the removal of the size limit for community led development.

In London, we are seeing crucial, innovative and high-quality housing built through community-led development – for example, the Rural Urban Synthesis Society (the RUSS) in Lewisham. Models such as these should be encouraged and restrictions lifted on size so as to provide greater flexibility and larger potential for experimentation.

Question 57: Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

No, we have no further comment on these amendments.

Question 58: Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Yes, we refer to our response to question 4 on densification. The Croydon model for densification should be used as a best practice example for outer London specifically. We

refer to Russell Curtis' 'Towards a Suburban Renaissance' article for further details and mapping tools.

We also refer to our response to question 5 on design codes. Inclusion of small sites in design codes will allow for more accurate small site allocation, and more innovative plans for small site development.

Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

Yes, Paragraph 132 already states buildings must be 'visually attractive', 'sympathetic to local character' and 'establish or maintain a strong sense of place'. These are further reinforced within local design codes. 'Beautiful' is subjective, and 'visually attractive' is a better predicator for well-designed buildings.

In our polling with Savanta, 66% Londoners stated they would be more supportive of new developments if they were "well-designed and complements the local area", with only 9% stating this would make them less supportive of a new development. As such, the 'sympathetic to local character' and 'maintaining a strong sense of place' are the key drivers of public support for new developers when it comes to design.

However, these were not their primary concerns when it came to support for new developments. New public infrastructure, including transport, feature heavily, with affordable housing close behind. As such, design must be carefully considered, but we agree that 'beautiful' is not the correct word in this case.

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

Yes, we agree with the broadening of the upwards extensions policy to include all upward extensions rather than specifying Mansard Roofs.

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

N/A

Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Yes, we agree with the proposed changes to support new infrastructure and digital technologies within our economy.

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

Yes, we believe creative industries should be supported via these changes. For example, the screen sectors often require large areas of land for studio production. According to the British Screen Forum, Screen Sectors have outperformed the overall economy in the last decade. To properly support this sector in its economic growth, they should be included in the NPPF.

There is significant research in this sphere from organisations such as the British Screen Forum, the BFI, Screen Skills and similar bodies.

Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

We defer to other organisations and experts in digital infrastructure and laboratories to answer this question.

Question 65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

We defer to other organisations and experts in digital infrastructure and laboratories to answer this question.

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

To encourage sustainable freight travel in the capital, we suggest adding a section in chapter 95 (d) which adds a line relating directly to freight and urban logistic hubs in local communities. For more information on urban logistic hubs, see our report 'Urban logistics hubs: what are London's needs?'

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

Yes, increased public infrastructure is crucial to new developments.

52% of Londoners do not believe development in their local area has benefitted 'people like them', according to our recent polling with Savanta. As mentioned, 72% of Londoners stated they would be 'more supportive of new development in their area' if 'the development is accompanied by new services such as a new school, doctor, or dentist in the local area', while 67% stated they'd be more supportive if 'The development is accompanied by new public transport routes (e.g. buses running more frequently)'.

Plans which provide new, expanded or upgraded public service infrastructure are vital to unlocking public support for new developments and providing healthy, safe and enjoyable living environments.

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

Yes. Productivity in the capital has stagnated since the financial crash with dire effects for the wider UK economy. Sufficient nursery spaces to allow parents who wish to work to return to be able to afford to return to work should boost economic activity and participation in the labour market .

We also support efforts to support those over the age of 16 to engage in high-quality education. This should specifically include adult education for those looking to re-train/ re-enter to the workforce. We recommend that either 'post-16 facilities' be extended to explicitly include adult education or that adult education facilities are referenced separately. Adult education is fundamental to increased productivity: for more information see our report 'Rebooting London's Economy'.

Additionally, we recommend inclusion of the phrase 'a range of post 16 facilities including vocational courses' to increase the range of skills available. With severe skills shortages in vocational skills such as construction, we need to ensure our young people have the opportunities to train in these much-needed sectors.

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

Yes, we agree a vision-led approach to transport provides appropriate and ambitious scope for future-led thinking on connectivity and sustainability.

However, a vision-led approach must come with government transparency on major infrastructure projects and more realistic assessments. If the NPPF includes 'a vision-led approach' to sustainable transport modes, developers, architects and LAs must be able to shape these plans around realistic projections and pipelines for major infrastructure projects – factoring in delays, cancellations and realistic costs of these projects.

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

To promote healthy and safe communities we recommend paragraph 94 (b) makes explicit reference to 'well lit' pedestrian as recommended in our report 'Seeing clearly: How lighting can make London a better city' and 'segregated' cycle routes as recommended in our report 'What influences Londoners' wellbeing, and what can help?'. The segregation of cycle routes has become increasingly important with the rising popularity of electric bikes and scooters, as they are able to travel at much higher speeds.

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

N/A

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

Yes, onshore wind projects will be vital as we move towards decarbonisation and a net-zero future. They are a vital part of the NSIP regime, and will be crucial to reaching both the targets set by the Paris Agreement and London's own net-zero by 2030 goals.

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

Yes. To reach London's 2030 net-zero goals and the wider UK's 2050 net-zero goals, greater planning support to renewable and low carbon energy is needed.

Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

We defer to specialists in this area.

Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

We defer to specialists in this area.

Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

We defer to specialists in this area.

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

We defer to specialists in this area.

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

We recommend long-term thinking when it comes to NPPF policy on climate change. Climate change mitigation and adaptation within policy has often relied upon short-term rapid changes which disrupt architects' plans and developers' planning applications.

We recommend assembling a taskforce of climate scientists and developers to assess the climate change risks in the short and long term, and plan building policy which is specifically designed to address long-term requirements. For example, high rise buildings with large quantities of glass are likely to rise above temperatures safe for habitation in the future, so the taskforce would consider how we mitigate these issues in all new high-rise developments and any adaptations that developments currently being built could also take to suit these conditions.

All Mayoral Combined Authorities should be required to build a climate risk map, as has been created in London, to form the basis for climate change adaptation and mitigation policy.

Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

We defer to experts in carbon accounting.

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

We defer to experts on flood risks, but point to Lewisham Council's use of its parks and green spaces as a key example of best practice in managing flood risks.

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

N/A

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

We defer to agricultural specialists.

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

We defer to agricultural specialists.

Question 84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Yes, we agree that the current water infrastructure provision requires improvement. We defer to water specialists for specific suggestions on how to do so.

Question 85: Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

We defer to water infrastructure experts.

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

We defer to water infrastructure experts.

Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

No, we do not agree with the revised criteria, which relies heavily on the Secretary of State – a position that has changed hands multiple times over the last decade, providing little stability and zero long-term intervention plans for LAs. Intervention must be informed and enforceable, creating objective change in poorly planned and/or delivered developments.

The recent intervention of Michael Gove into the London Plan is a clear example of where intervention has been misused. The intervention disrupted the strategic planning process and resulted in little increase in housebuilding.

We recommend instead that the government create an Affordable Housing Commission as a first step to regulating and overseeing local plans for Social Rent and effective use of the Affordable Housing Programme Budget. This idea is in the early stages of formation but was supported by developers currently working in London when we raised it with them recently. For more details see our report 'Homes for Londoners: Solving London's Housing Crisis'.

If the Affordable Housing Commission is successful, we recommend extending the commission to oversee interventions on wider housing and public infrastructure plans.

Local authority planning departments are also significantly under-resourced. To move at the pace required to tackle the housing needs of London and the country more broadly, funding should be restored to 2010 levels– this includes funding the Planning Inspectorate to monitor and enforce standards.

For more further discussion of how national government should intervene in local plans, we defer to the GLA who has had recent issues with the intervention process as mentioned.

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

We refer to our answer above.

Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?

Yes, we strongly agree with the proposal to increase householder applications fees to meet cost of recovery. Application fees represent a small proportion of householder construction costs when for the overall cost of construction works, architectural plans and other direct costs are considered, and cost recovery for individual household works arguably need not be subsidised by the taxpayer.

We are pleased to see that the government has now tied all ties application fees to inflation, to allow for long-term funding of our planning services.

Question 90: If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

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

We support increasing the amount to recover the full cost of the planning application, for the reasons outlined above.

Question 91: If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Yes

No – it should be higher than £528

No – it should be lower than £528

no - there should be no fee increase

Don't know

We defer to LAs to provide insight into their actual costs and whether this would recover the entire amount.

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

Question 92: Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

We defer to LAs to provide insight into where fees are not covering their costs and incurring substantial costs.

Where planning fees are a small part of the development processes, increases to cover costs are necessary to allow planning to be adequately funded.

Question 93: Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

We defer to LAs to share data on current costs for planning applications where fees are not currently charged.

Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee? Please give your reasons in the text box below.

No. London boroughs cover small geographical areas, meaning individual fee setting would increase the complexity of the policy environment for developers. There is already concern with fragmentation of housebuilding in the capital, and this would be exacerbated by variations in fee-setting borough-to-borough.

We would instead support a pan-London approach to fee setting based on London averages for the costs of planning applications.

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

Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.

Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.

Neither

Don't Know

Please give your reasons in the text box below.

We support local variation, with national government creating a default fee and allowing some local fee setting based on economic geographies.

Default fee setting reduces the expectations on LAs to set costs. Further, the challenge of setting fees which both adequately recovers costs and compare competitively with other local authorities could disadvantage LAs with greater budgetary pressures and disincentivise developers from building where housing is needed most.

This is particularly the case for London, where developers and investors are choosing sites elsewhere in both the UK and in fellow global cities due to the complex borough-by-borough policy environment and the costs incurred by building in the capital.

The GLA is best placed to consult with London LAs on budgets for planning applications, while also collating information from similar urban centres on their application fees to not deter developers from building in the capital.

No LA should be able to provide application fees significantly below the nationally set default so as to prevent substantial cost disparities between LAs.

Within all fee setting, the GLA and national government should have to consult and work closely with LA planning experts.

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

We defer to local authorities to explain their current funding models.

If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?

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

We defer to local authorities to unpack their current funding models.

Question 98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

We defer to local authorities to unpack the current costs of relevant services and whether payable fees by applicants would deter developers from seeking vital information prior to submitting their planning applications.

Question 99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

We re-iterate our answer from question 98.

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

We defer to local authorities to unpack their own budgets.

Question 101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

N/A

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

N/A

Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

We defer to key stakeholders including developers and local authorities to state whether these transitional arrangements are adequate.

Question 104: Do you agree with the proposed transitional arrangements?

We reiterate our response to question 103.

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

N/A

Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

N/A