

## **RESPONSE FROM THE Highbury Group on Housing Delivery**

The Highbury Group on Housing Delivery comprises an independent group of specialists from the public, private and independent sectors with a membership drawn from housing, planning and related professions; it offers advice and makes representations to Government and other agencies on a variety of subjects, with the aim of maintaining and increasing the output of housing, including high quality affordable housing. The views and recommendations of the Highbury Group as set out in this and other papers are ones reached collectively through debate and reflect the balance of member views. They do not necessarily represent those of all individual members or of their employer organisations. The group's core membership and previous statements and research presentations are on the group's website: <https://e-voice.org.uk/highburygroup>.

In responding to this consultation we have focused on the questions which relate directly to the objectives of the group. "No comment" against other questions does not mean that we have no views, or approve the changes, simply that the questions lie outside our field of shared expertise.

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

*YES*

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?

*NO. We do not consider that the proposed stock based methodology (with an adjustment for affordability based on local price-income ratios) is an appropriate method of assessing housing need. It is not consistent with Government guidance on objective assessment of housing need, as it does not reflect local needs assessments, including assessment of homelessness, overcrowding, council waiting lists and other data on different forms of housing need, and has no relationship to either the existing or predicted demography in a specific area. It is essential that the Government urgently develops an appropriate methodology to replace both the exiting methodology and the methodology currently proposed*

*Pending the development and promulgation of such methodology guidance, we would commend referring to independent assessments of housing requirements by Bramley published in 2018-19 and updated in 2024, which have been widely acknowledged across the sector and parliamentary committees as the best available. These provide indicative numbers for total new housing and for social housing within that, based on a methodology which takes account of demography and affordability, but also of homelessness and other housing needs relative to existing supply, while also considering land capacity and recognising the potential dangers, in some localities, of oversupply and low demand.*

*Comparison of these indicative targets with the draft targets proposed in the July paper suggests that the latter are systematically too low in some areas of high demand and potential, while being over-generous in some areas of weaker demand, and too high for*

*realistic capacity in the case of London. In the attached spreadsheet comparisons are made between the proposed July targets and the targets derived from Bramley (2024) study, at regional level and for selected sub-regional housing market areas.*

*These discrepancies could together pose serious challenges to the Government's overall housing strategy. A combination of physical capacity limits in some areas (notably London) and low demand/nonviability of development in a range of other areas will mean that the actual numbers achieved will fall well short of the official total. Furthermore, promulgating an unrealistically high target in an economically weak market area is a recipe for both bad planning (haphazard development on disjointed sites which cannot be feasibly serviced with infrastructure) and for the re-emergence of low demand of the kinds which blighted many neighbourhoods in the period around 2000.*

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

*YES*

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

*This paragraph should be modified rather than deleted as DRAFT character (including built form and availability of local services) remains a relevant factor in determining appropriate development density and built form in a specific location. Local planning authorities should set out density zones in their local plans which reflect these characteristics, while enabling the provision of the range of housing types appropriate to meeting the range of housing requirements assessed in their Strategic Housing Market Assessments.*

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, subject to design codes enabling rather than obstructing the provision of the appropriate range of housing types in relation to assessed housing requirements.*

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

*YES*

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*

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

YES

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

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

YES

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

YES

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. This is essential. There are no current arrangements to ensure housing requirements are met on a cross-boundary basis within a housing market area. The Government should define housing market areas and require planning authorities within a housing market to jointly produce a strategic plan which ensures housing requirements are met in full within the housing market area. This is essential in circumstances where a local authority has insufficient land and residential development capacity to fully meet its housing requirements within its own administrative boundary. We would welcome further discussions with MHCLG officials on specific options for introducing a new strategic planning framework.*

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

YES

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

*We would welcome discussions with appropriate MHCLG officials in relation to a) alternative methodologies for assessing housing needs including requirements for housing by type and tenure; b) the relationship between housing needs assessments and housing targets, and c) policy and guidance on strategic planning to ensure housing requirements are met in full on a cross-authority basis.*

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?

NO

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?

*NO. The Department commissions indicators of housing affordability as part of the periodic Indices of Deprivation exercise, which are available at local authority and small area level, although they refer to affordability to buy or to rent in relevant local housing market areas. The current indicators refer to affordability for younger resident households based on full household income (excluding means tested benefits) which is more appropriate than an indicator based on individual earnings alone and focuses on the key demographic group. As such these are more appropriate to answering questions about the net need for additional affordable housing which can be linked to demographic and supply (social relets) information, as would be done in a SHMA. These indicators are currently being updated as part of the ID25 project which the Department has commissioned, and an additional pair of indicators focussed on older private renters (aged 40-65) is also being introduced. A further addition to these indicators will be an additional indicator of 'core homelessness' to complement the existing indicator of statutory homelessness used in the ID*

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

*NO*

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. The inability of lower income households to access private rented accommodation is a critical component of housing need and in setting the requirement for additional social housing which lower income households can afford to rent.*

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. See response to Q16 above; existing and proposed additional indicators of rental affordability are/will be available from the ID25 project*

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

*See our response to Question 2*

*It is unclear how the new proposed targets will relate to housing targets in approved local plans and in the approved London Plan. The borough targets in the London Plan are based on an assessment of residential development capacity derived from a Strategic Housing Land Availability Assessment. While any targets set from an amended national methodology need to inform the setting of local housing targets, local targets also need to take into account residential development capacity within a specific local planning authority area. Such capacity needs to be assessed on a nationally consistent basis, and it is essential that MHCLG urgently issue revised guidance on such assessments. The definition of affordable housing for social rent should be based on average lowest quartile household incomes.*

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

*NO. Release of 'grey belt' sites for development needs to be carefully managed by the local planning authority. We do not support the proposed wording or the move to 'brownfield passports'. All planning applications should be subject to assessment of compliance with policies as set out in the Local Plan and to standard processes for public consultation.*

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*

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?

*NO*

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

*The definition needs to be more specific and set out clear criteria against which a specific site can be assessed. This is essential to reduce uncertainty and the potential for legal challenges.*

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

*The criteria for 'high performing' need to be clear and objective. Agricultural land should be excluded from definition of 'grey belt' as should all publicly accessible land providing leisure facilities.*

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. This should be incorporated in the NPPF*

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?

*More specific guidance is required.*

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?

*Such strategies need to be consistent with specific allocations of land for development.*

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?

*In principle, YES but this approach requires further detailed guidance. The guidance should include criteria for location of new residential development such as public transport access; access to employment opportunities; access to health and education facilities; social infrastructure; access to utilities infrastructure including power, water and sewerage; access to shops, leisure facilities, open space and places of worship.*

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

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?

*Land release should be identified in Local Plans following a comprehensive Strategic Housing Land Availability Assessment which assesses the development potential of all sites within an area, whether brownfield or greenfield. Any review of the Green Belt should be within this context and not conducted as a separate exercise.*

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?

*Clearly any residential development needs to be supported by appropriate infrastructure including social infrastructure and access to public transport.*

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?

*Agreed criteria and the sequential test should be applied to all forms of development. Including travellers' sites.*

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?

*This is one type of housing need which may be relevant. See response to Q30 above, as the issue of travellers requirements is not necessarily limited to green belt sites.*

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

*Policies on affordable housing requirements should be consistent for brownfield and greenfield sites and should reflect assessments of housing requirements. Separate targets should be set for the provision of different types of sub-market housing, such as social rented housing, and should also include appropriate types of housing in terms of built form and*

*housing size, reflecting the fact that it can be more appropriate to provide family size housing at relatively low densities in suburban locations. Specialist older people's housing is better located in central urban areas with good access to local facilities and requires a separate affordable housing target.*

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?

*Application of targets need to reflect both housing requirements and the specific characteristics of a specific site.*

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*

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. These should be based on Existing Use Value.*

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

*The Government should provide guidance on the level of any premium to be paid above EUV. This may vary according to the type of land to be developed and its existing use. Existing Use Value. The local authority should have the power to acquire a specific site at EUV, where a landowner will not agree to sell at EUV + appropriate premium within a fixed period-for example: 6 months. This should apply to all sites allocated in a local plan for residential development, not just sites within the Green or Grey belts. The valuation office should published its estimates of land value by land use and planning authority, which have not been updated since 2019. <https://www.gov.uk/government/collections/land-value-estimates> last issued in 2020 and based on data for 2019. This data covers all types of land use and enables local authorities to set realistic policies for CIL and affordable housing provision as well as providing an agreed basis for site specific viability appraisal.*

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?

*Agreed. However, there is a difference between publicly led development where the land is to be acquired by the development vehicle and CPO may be invoked, and normal private led development subject to s.106 agreement. Viability should be based on a benchmark which is based on EUV (plus some margin).*

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?

*All development proposals should be subject to viability assessments as some sites will have a greater potential to support sub-market housing than others. In some cases, this may include the potential to support a higher level of social rented housing than the norm.*

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?

*Paragraph 58 in the NPPF needs to be amended as it implies the decision as to whether a financial viability assessment is required should be with the applicant. This should be revised to make it clear that this decision lies with the planning authority and should be undertaken in all cases where a schemes is not fully policy compliant. The assessment should be undertaken by the local authority.*

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?

*The rules should be applied consistently to all development proposals.*

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?

YES

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

*Clear guidance should be issued on the application of these proposals.*

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

*This approach is supported*

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

*The assessment of site suitability and land value should be based on the same principles for greenfield and brownfield sites.*

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. This should be a priority in consideration of development proposals*



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

*YES. This requirement has in practice diverted capacity away from providing social rented homes. Any targets should be based on the local SHMA and the local planning authorities priorities for the most appropriate use of residential development capacity, rather than on any nationally determined fixed percentage.*

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

YES

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

*This is not a planning policy matter other than permissions for different types of housing provision should be based on an assessment of housing requirements. Any decisions as to subsidy need to be set within this context.*

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

*YES. This is critical to ensure appropriate development and applies equally to all sites, irrespective of whether brownfield, greenfield or 'grey'. The local plan should allocate a range of sites of different sizes and in a range of locations. This needs to be done across new development as a whole by bringing forward a mix of different types of sites in a range of locations. However small sites will struggle to meet the full range of housing requirements A size threshold for onsite provision may be appropriate. Very large sites (say 500 units and over) should be required to provide a mix of different types of housing. This will need to be supported by provision of adequate local facilities (including schools and health care) and transport links to ensure quality of life for local residents who are not car dependent*

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

*Planning policies reflecting the assessment of housing requirements should be supported by the necessary public funding where necessary.*

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?

*NO. This will reflect the characteristics and context of the individual site.*

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

*This is a matter for the funding authorities as to priority for different types of housing*

*provision. Schemes in rural locations should contribute to meeting priority housing needs as assessed by the local planning authority.*

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

*Agreed*

Question 56: Do you agree with these changes?

*Community led development' should be subject to the same criteria as other development. The removal or reduction of planning fees and a proactive approach by the local planning authority to identify appropriate small sites for development will enable community led developments much more effectively than any differential treatment in planning policy.*

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?

*The definition of social rent should be related to income. 30% of average income (net of benefits) for the lowest quartile of local household incomes should be set. A separate category is needed for sub market rent, which could use the current definition of 'below 80% of local market rent'.*

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?

*Local authorities tend to focus on larger sites which can make a substantive contribution to development and which may be more cost effective for developers to develop. Councils should be required to allocate all potential sites for appropriate housing development, however small. A reduction in planning fees would make development of small sites more viable. Small sites in low value urban areas may require public funding from Homes England to address dereliction and enable viable development to come forward, Councils should be required to use CPO powers where small sites are allocated and do not come forward – such sites when acquired should be remediated and taken to market within a specified time period.*

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?

*This is strongly supported. The term 'beauty' was inappropriate as it is entirely subjective.*

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

*Agreed*

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

*Local planning authorities should be required to set separate targets for a) social rented homes; other sub-market rented homes; sub market homes for sale (including shared ownership and rent to buy); market homes for sale; student accommodation; other non-self*

*contained homes, Targets should also be set by bedroom size and for supported housing for the elderly and for households with support needs. These should all be based on a comprehensive assessment of housing needs in the area.*

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

*No comment*

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

*No comment*

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?

*Decisions need to be based on an assessment of the land requirements for different forms of development within the local context. Sites suitable for residential development should not be reallocated for non-residential purposes by a national body not accountable to local democratic body and outside the context of the local plan.*

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?

*No comment*

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

*None*

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

*Agreed*

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

*Agreed*

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

*Agreed*

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

*Policies need to limit fast feed outlets, support measures to improve air quality and support leisure facilities including for exercise machines in public open spaces.*

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

*No*

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

*No comment*

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

*No comment*

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?

*No comment*

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?

*No comment*

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?

*No comment*

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

*No comment*

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

*Guidance should encourage residential development in urban locations with decent public transport rather than relying on greenfield development.*

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?

*No comment*

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

*Residential developments should not be built in flood risk area unless comprehensive flood protection strategies are in place before the start of development*

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

*No comment*

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

*No. This should be retained with guidance issued by the government on the assessment process.*

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

*No comment (other than above)*

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?

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?

*There should be a statutory requirement of water and sewerage providers to provide the necessary infrastructure to support residential development which meets planning policy requirements.*

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

*No*

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 comment*

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

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

*No comment*

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.

*No. Local authority consideration of planning applications should be a public service and funded out of general local taxation and not subject to fees. Local authorities should be required to demonstrate that they are providing a cost-efficient and timely service*

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

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

*see response to Q90*

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.

*See response to Q90*

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.

*see response to Q90*

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.

*See response to Q90*

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

*See response to Q90*

Please give your reasons in the text box below.

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

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?

*No.*

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?

*see response to Q96*

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?

*See response to Q90*

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.

*See response to Q96. We do not support a higher level of planning service being available for payment.*

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

*See response to Q96*

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.

*No comment*

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

*We do not support the principle of applicant payment for planning services which are a statutory requirement on the local authority*

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

*No comment*

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

*No comment*

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

*No*

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?

*No comment*

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