

**Report for:** Strategic Planning Committee 19 February 2024

**Title:** Planning and Building Control 2023/24 Q3 Update

**Report authorised by:** Rob Krzyszowski, Assistant Director, Planning, Building Standards & Sustainability

**Lead Officer:** Robbie McNaugher, Head of Development Management & Enforcement

Bryce Tudball, Interim Head of Planning Policy, Transport & Infrastructure

Bob McIver, Head of Building Control

**Ward(s) affected:** N/A

**Report for Key/**

**Non Key Decision:** For information

- 1. Describe the issue under consideration**  
A report on the work of the Planning and Building Control services to December 2023.
- 2. Recommendations**  
That this report be noted.
- 3. Reasons for decision**  
Not applicable.
- 4. Alternative options considered**  
This report is for noting and as such no alternative options were considered.
- 5. Planning and Building Control 2023/24 Q3 Update**

## Planning cross-cutting matters

### Planning Service Peer Challenge

- 5.1 Further to the Council's Corporate Peer Challenge held in Spring 2023, the Planning service hosted an external "Planning Service Peer Challenge" from 17-19 October 2023.
- 5.2 The Planning Peer Review report was received in November 2023 and is reported to the Strategic Planning Committee as a separate agenda item at this meeting.

### Planning Skills Delivery Fund

- 5.3 In July 2023 the Government announced a new 'Planning Skills Delivery Fund' where local planning authorities could bid for up to £100,000 for:
  - **Backlog funding** – planning applications which have not been determined by their statutory deadline
  - **Skills funding** – to address skills gaps in local planning authorities e.g. design, conservation, transport, landscape, ecology, waste, viability etc
- 5.4 In September 2023 the Council submitted a bid to the Fund for £75k for backlog funding for the Development Management service and £25k for skills funding for the Planning Policy team.
- 5.5 The Government announced successful bids on 19 December 2023. Haringey has been awarded the £75k for the backlog but unfortunately the bid for £25k skills funding was unsuccessful.
- 5.6 The current backlog is just under 200 planning applications. This consists of major developments for over 1,000 dwellings, a care home, and over 14,000sqm of commercial floorspace and minor development for just under 100 dwellings and enhancements to over 20 commercial premises. This represents at least £1m of annual Council Tax as well as substantial business rates income.
- 5.7 Haringey's initial approach will be for officers to work additional paid hours to clear the backlog. We believe this will yield results quicker and provide a longer-term investment in skills and experience than bringing external resource. Existing staff have a working knowledge of Haringey and the cases, they do not require training or integration and are motivated to return to the levels of service they have historically delivered. This will be carefully managed to ensure additional hours are realistic, not excessive, and do not compromise the progress of more recently received applications.
- 5.8 We anticipate each officer will need to determine up to 13 applications each before the May target attached to the funding to reduce the backlog entirely. Reports have been put in place to monitor progress and outputs from officers, all relevant applications have been identified and allocated a manager to oversee their progress, the relevant hours required have been recorded and

work is underway to categorise applications and address any blockages. Around 20 eligible applications have been decided already. Officers will be participating in workshops with other authorities to share good practice.

### Housing Delivery Test (HDT): 2022 Measurement

5.9 On 19 December 2023 the Government published the results of the Housing Delivery Test (HDT) 2022<sup>1</sup>. The HDT looks back over the last 3 years at the number of homes physically completed in a borough and compares this against the housing requirement (or ‘target’), with some allowance made for the period of the pandemic.

5.10 The published data for Haringey shows that it has met 99% of its adjusted\* housing requirement over the 3 years measured:

Haringey	Number of homes required (adjusted*)	Number of homes delivered
2019-20	1375	867
2020-21	1000	1458
2021-22	1502	1503
Total:	3877	3827
Number of homes delivered as % of (adjusted*) requirement over 3 years		99%

\*The housing requirement (or ‘target’) was reduced to make allowance for the period of the pandemic. Haringey’s current annual housing requirement target set in the London Plan 2021 is 1,592 homes per year

5.11 This means that Haringey is no longer subject to the ‘Presumption in Favour of Sustainable Development’ additional requirements (although this does still exist as a general policy in the NPPF anyway) and does not need to publish a HDT Action Plan as it has had to do in previous years.

5.12 It should of course be borne in mind that the nature of homebuilding means there is a lag time of often several years between a planning permission being granted and homes actually being delivered and completed, so these figures reflect planning permissions granted several years ago. Planning permissions must keep up with (and exceed) the annual target of 1,592 homes per year if delivery in future years is going to meet the target on an annual basis.

### Ongoing national planning reforms

5.13 On 19 December 2023 the Government published a range of updates on national planning reforms and other matters, including:

- **Government response to consultation<sup>2</sup>** on Levelling-up and Regeneration Bill: reforms to national planning policy (the original consultation was reported to Strategic Planning Committee on 20 February 2023)

<sup>1</sup> [www.gov.uk/government/publications/housing-delivery-test-2022-measurement](https://www.gov.uk/government/publications/housing-delivery-test-2022-measurement)

<sup>2</sup> [www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy](https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy)

- A new **updated National Planning Policy Framework (NPPF)**<sup>3</sup> (with a correction update published the following day on 20 December)
- **Written ministerial statement**<sup>4</sup> 'The next stage in our long term plan for housing update' by the Secretary of State to parliament
- **Speech**<sup>5</sup> 'Falling back in love with the future' by the Secretary of State
- **Letter**<sup>6</sup> 'Housebuilding in London' from the Secretary of State to the Mayor of London

5.14 Some of the key points include:

- Greater clarity on the **importance of delivering new homes and development**
- Keeping the requirement to have a **5 Year Housing Land Supply** but amending the approach
- Further support for the supply of **specialist older people's housing**
- Strengthen support for **small sites for housing** development with a further consultation soon
- More emphasis on **community-led housing** and development but further work to be done on affordability
- Further policy on seeking '**beauty**' and rejecting 'ugliness' in design
- Supporting **energy efficiency** and **low carbon heating** improvements to existing buildings
- An intention to review national policy regarding **climate change mitigation**
- **National Development Management Policies** will be introduced which will have equal weight to local/regional Development Plan policies
- Setting more **rigid timelines for developing Local Plans** and Neighbourhood Plans
- Setting out an expectation (although not a requirement) that **increased planning fees** must be spent on planning services
- Constraining the use of '**Extensions of Time**' for planning applications, including banning them for householder applications to improve planning performance and reporting
- Launching a **review into the statutory consultee** system to tackle unnecessary delay
- Laying out details of which local authorities are "most promiscuously" **rejecting planning applications against officers' advice** and making transparent the amount that it is costing the local council taxpayer
- Publishing data on **developers' build out rates** and this becoming a material consideration with another consultation on this matter soon
- An announcement launching a '**London Plan Review**' **group of expert advisers**<sup>7</sup> to report to the Secretary of State by 15 January 2024 to consider and make recommendations on specific changes to the London Plan regarding facilitating the delivery of new homes on brownfield sites

<sup>3</sup> [www.gov.uk/government/publications/national-planning-policy-framework--2](http://www.gov.uk/government/publications/national-planning-policy-framework--2)

<sup>4</sup> <https://questions-statements.parliament.uk/written-statements/detail/2023-12-19/hcws161>

<sup>5</sup> [www.gov.uk/government/speeches/falling-back-in-love-with-the-future](http://www.gov.uk/government/speeches/falling-back-in-love-with-the-future)

<sup>6</sup> [www.gov.uk/government/publications/housebuilding-in-london-letter-from-the-secretary-of-state-for-levelling-up-housing-and-communities](http://www.gov.uk/government/publications/housebuilding-in-london-letter-from-the-secretary-of-state-for-levelling-up-housing-and-communities)

<sup>7</sup> [www.gov.uk/government/publications/housebuilding-in-london-terms-of-reference-london-plan-review/terms-of-reference-london-plan-review-expert-advisers](http://www.gov.uk/government/publications/housebuilding-in-london-terms-of-reference-london-plan-review/terms-of-reference-london-plan-review-expert-advisers)

- 5.15 Officers will ensure that the latest requirements relevant to a planning application at the time of any decision are included and explained in reports to Planning Sub Committee.

Equality, Diversity & Inclusion (EDI)

- 5.16 The Council has been developing its corporate approach to Equality, Diversity & Inclusion (EDI) through a new EDI Strategy and Action Plan.
- 5.17 As part of this and to complement the corporate work, the Planning, Building Standards & Sustainability service is developing a 'local' EDI Action Plan.
- 5.18 This is currently work in progress and the Strategic Planning Committee will be updated at a future meeting.

## Development Management & Enforcement

### Performance overview

5.19 An overview of performance is as follows. **Appendix One** explains the categories of applications.

- Applications received during 2023/24 (1<sup>st</sup> April – 31<sup>st</sup> Dec): **2,455**
- Applications received during same period 2022/23: **2,447**
- Number of cases on-hand end of Dec) 2023: **755**
- Number of cases on-hand end of Dec 2022: **780**
- Appeals decided during 2023/24 (1<sup>st</sup> April – 31<sup>st</sup> Dec): **44**
- Appeals decided during same period 2022/23: **85**
- Appeals dismissed (won) during 23/24 (1<sup>st</sup> April – 31<sup>st</sup> Dec): **26 (59%)**
- Appeals dismissed (won) during same period 2022/23: **69 (81%)**
- Cumulative performance (applications in time) 2023/24 (1<sup>st</sup> April – 31<sup>st</sup> Dec)
  - **Majors: 100%**
  - **Minors: 87%**
  - **Others: 86%**
  - **PS1 Only: 93%**
  - **Decisions excluded from statutory figures: 69%**

5.20 As set out above performance is at 100% for 'Majors' applications. Our performance for 'Minor' applications has improved again for this quarter giving a significant improvement on last year for the year to date. Appeal performance has declined but still remains high.

	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>
<b>Majors</b>	100%	100%	100%	100%	100%
<b>Minors</b>	94%	95%	90%	80%	87%
<b>Others</b>	96%	97%	91%	87%	86%
<b>PS0+ PS1</b>	91%	91%	91%	87%	93% (PS1 only)
<b>PS Exclude</b>				73%	69%

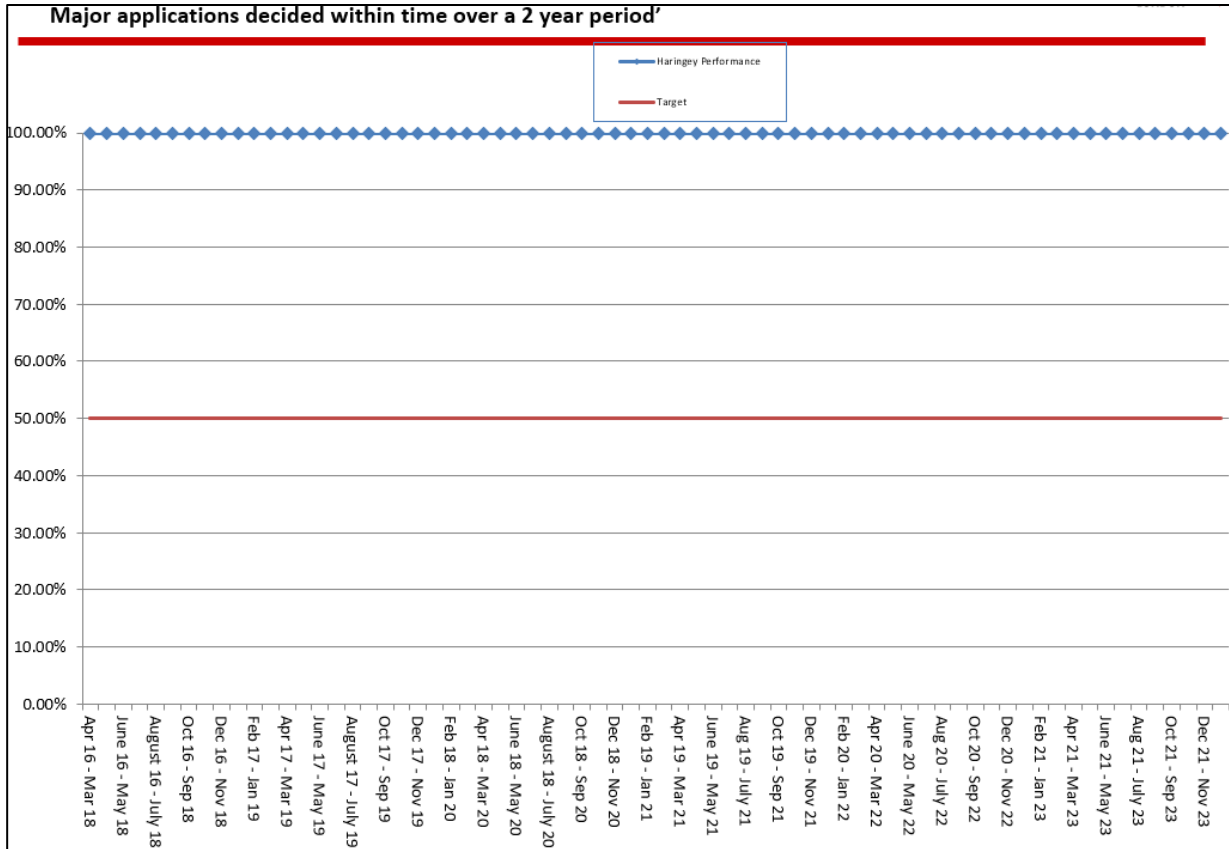
Cumulative Performance. As of Sept 2022/23 'PS1' and 'PS Exclude' figures are reported separately within the new Arcus system. Prior to that both PS1 and PS Exclude were reported as a single return under 'PS0'

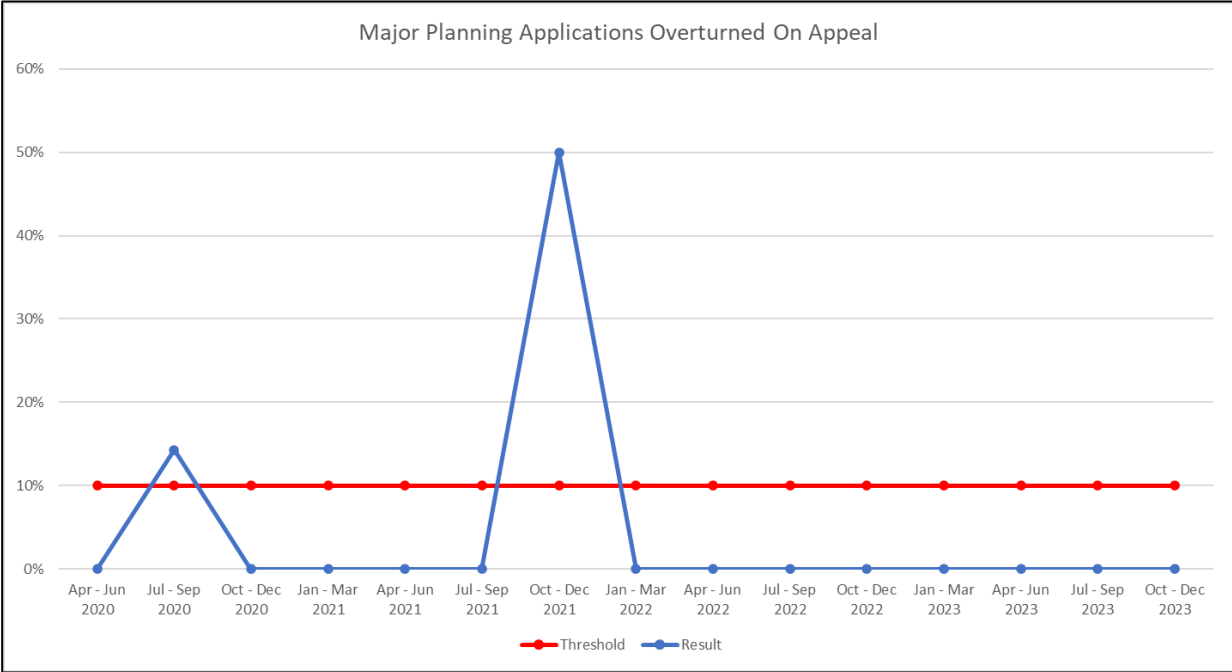
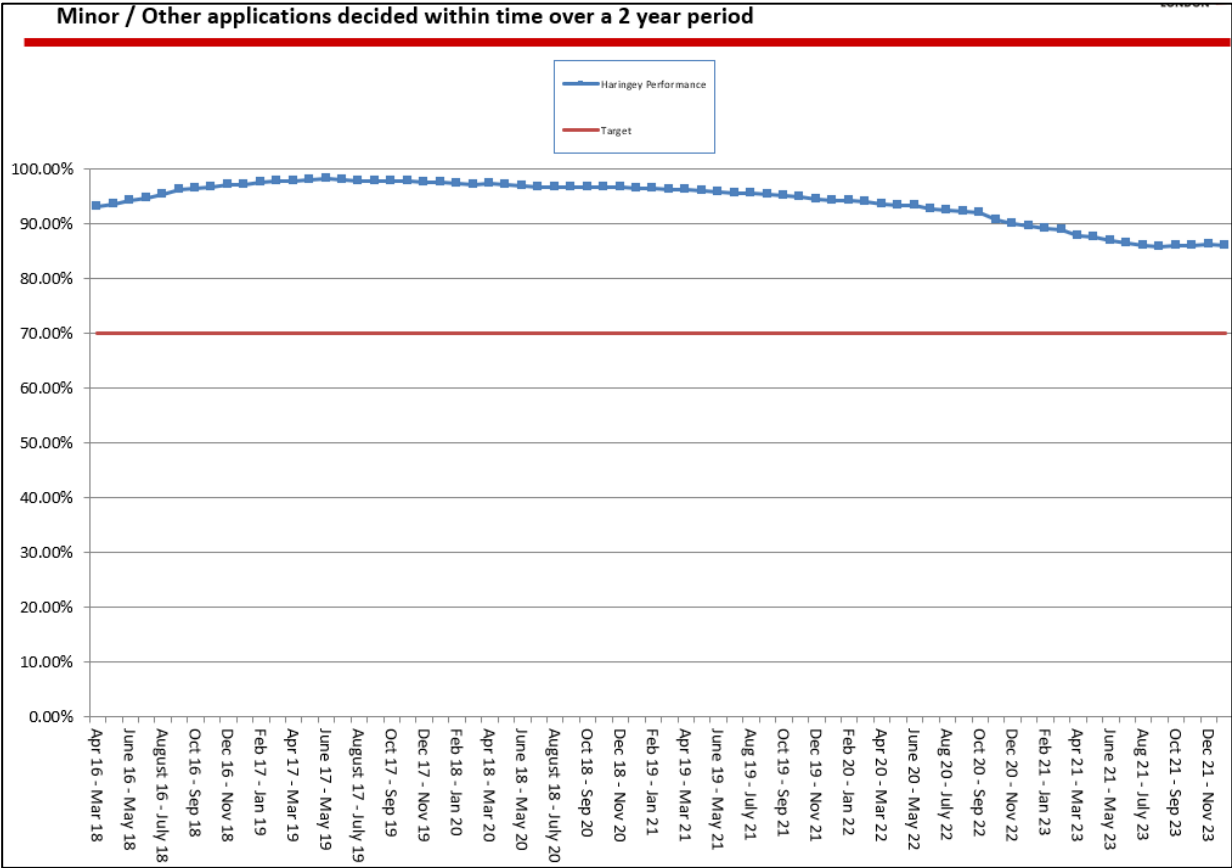
5.21 The Government has three measures of application performance which the Council must remain within thresholds for. If we breach these thresholds we may be designated as a poorly performing planning authority and developers will then have the option of applying directly to the Planning Inspectorate for planning permission. This would mean that we don't get the fee income for that application but we are still required to undertake the consultation. In addition we lose the democratic right to determine the application. These are (assessed over a two-year rolling period):

- Majors applications performance at least 50%
- Minor and Other applications performance at least 70%
- Appeals lost (below 10% in both categories)

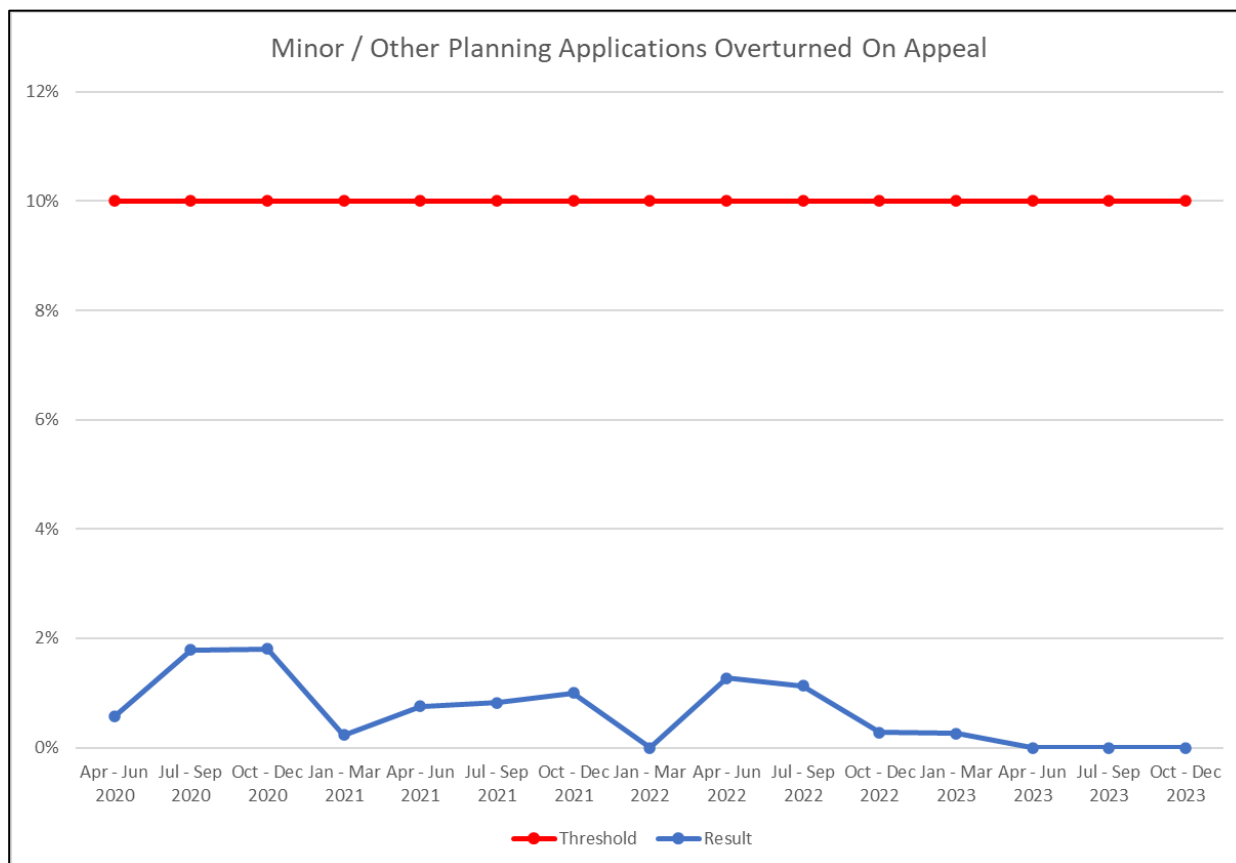
5.22 The government has set out that it is concerned with the use of ‘extensions of time’ (EoTs) on smaller applications and intends to launch a consultation on reducing their use later this year. Given our current performance if EoTs are disregarded this is a concern and could lead to designation in the minor and others measure. Performance without EoTs for minors and other is as follows:

- Minors: 40%
- Others: 43%









5.23 For 2023/24 we have decided the following:

- **16 'Major'** applications (compared to the **10** during the same period last year)
- The average time of decision has increased from 312 to 416 days but all have been subject to planning performance agreements or extensions of time due to the need for S106 agreements on applications of this scale.

	19/20	20/21	21/22	22/23	23/24
No. of Major Apps decided	19	20	15	16	16

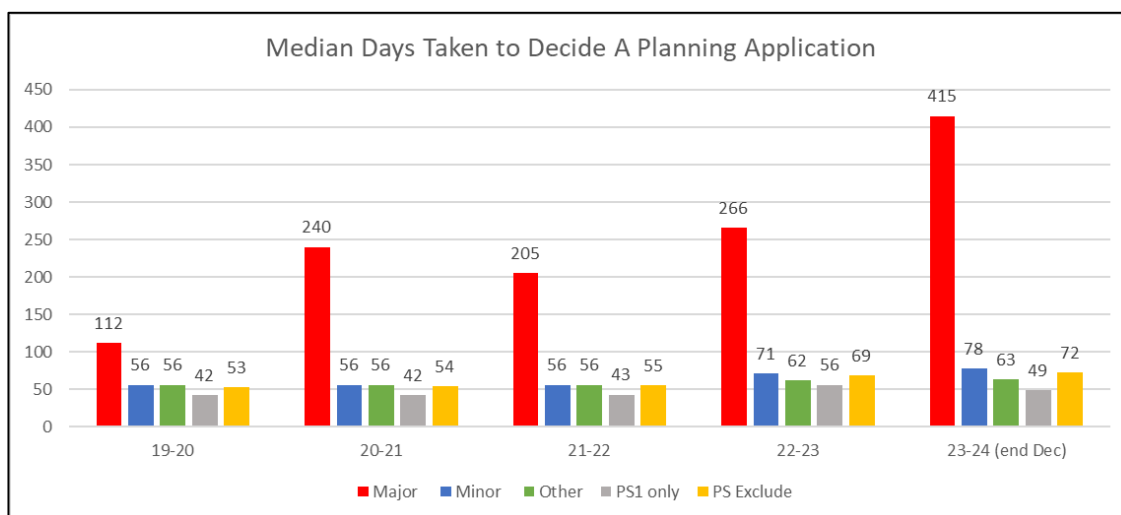
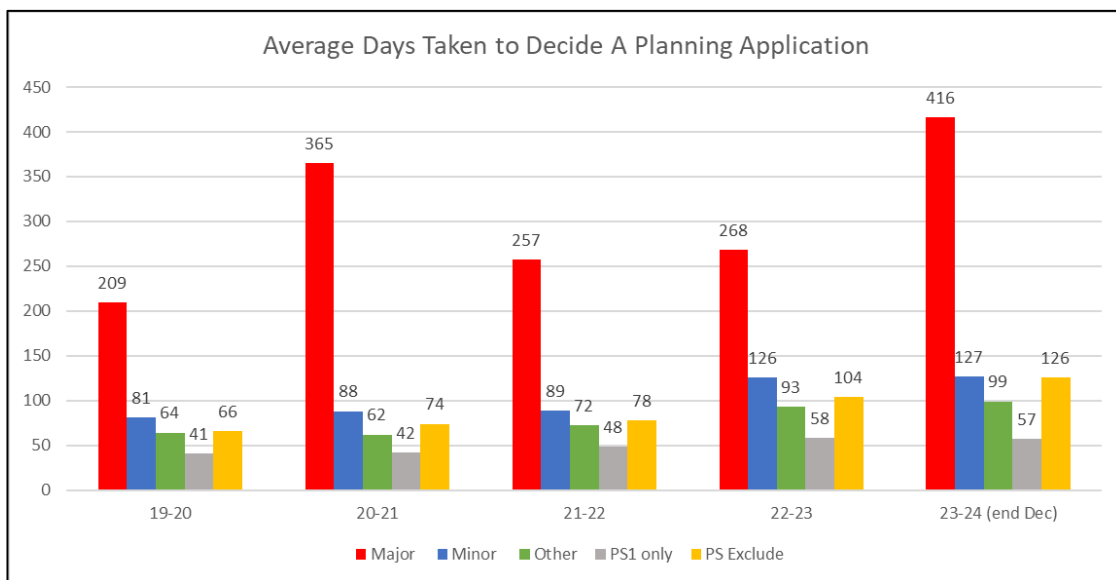
**Major applications decided over past five years**

- **414 'Minor'** applications (compared to the 246 'Minor' applications last year)
- The average decision time has decreased from 137 days to 127 days
- **722 'Other'** applications (compared to the 942 'Other' applications last year)
- The average decision time has increased from 92 days to 99 days

5.24 The end to end times for different types of applications are set out below:

**Average and Median days to decision 23/24 - (April 23 – December 23)**

	Average Days to Decision	Median Days to Decision
Major	416	415
Minor	127	78
Other	99	63
PS1 only	57	49
Exclude	126	72

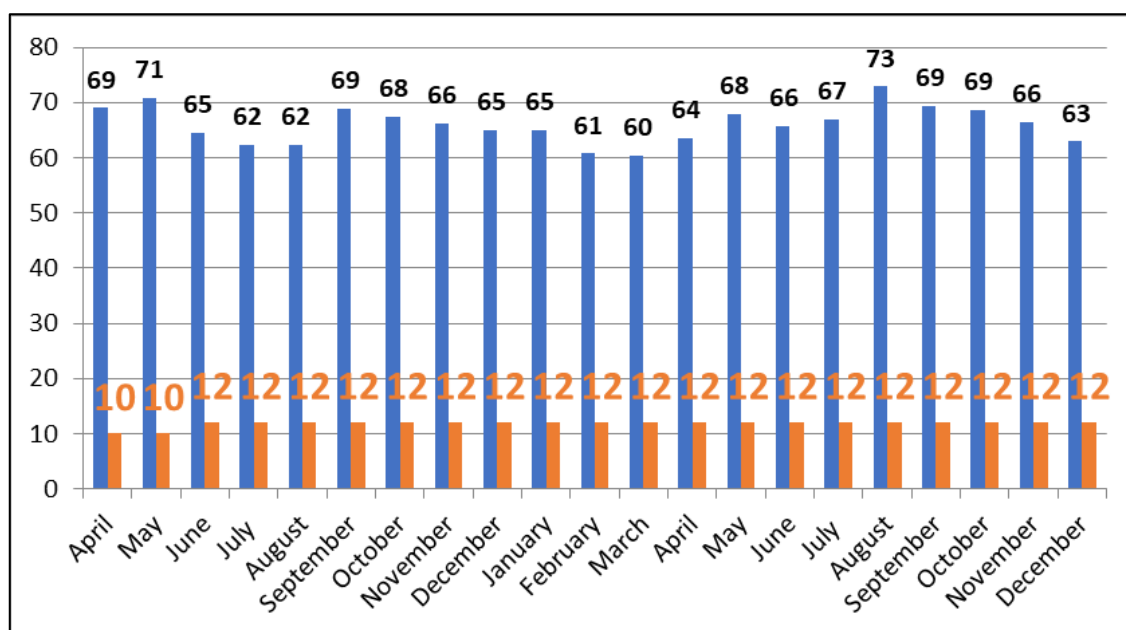


5.25 The overall numbers of applications received, approved, and refused over recent years is set out below:

	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024
<b>Received</b>	3094	3308	3375	3385	2455
<b>Approved</b>	2576 (89%)	2590 (85%)	2535 (84%)	2533 (88%)	1781 (87%)
<b>Refused</b>	314 (11%)	475 (15%)	499 (16%)	333 (12%)	272 (13%)
<b>Total decided</b>	2,890	3,065	3,034	2866	2053

5.26 The length of time taken to validate an application is at an average of 29 days, decreased from 35 days due to faster allocation of applications.

5.27 Officer caseloads are at around 63 per officer in Q3 of 2023/24 financial year, which has decreased from 65 last year due to targeted work to reduce the backlog in August last year.



5.28 After rising over previous years the number of on hand applications has now begun to reduce and is less than last year. As of the end of December 2023, there were 755 pending valid applications (down from 780 on this time last year). There are also a substantial number of applications not yet validated or registered and the new system allows for greater monitoring of this figure which is currently 159 'new' applications. Giving a total of 914 pending planning applications. This backlog of applications is a concern and has accumulated due to the implementation of the new system and recruitment delays leading to staff shortages. With funding now in place a significant effort is now being put towards eradicating this. In August the team made significant progress in reducing the number of applications and has continued to determine more applications than have been received in following months. As set out above the ambition is to clear the backlog by May 2024.

5.29 The number of applications over 26 weeks is now at around 230. This is a decrease from 315 at the end of September 2023. Some of these cases are complex or awaiting section 106 sign off and many are approval of details applications for major developments requiring detailed discussions with consultees but many are due to the current backlog. With backlog reduction initiatives underway as set out above this is expected to reduce significantly.

### Pre-application advice

5.30 During 2023/24 there have been:

- 104 pre-application meetings (same period last year: 141) generating a total of £254,534 in income (same period last year: £210,036)
- 63 householder pre-application meetings (same period last year: 67) generating £28,700 in income compared to (same period last year: £28,014)

5.31 The use of Planning Performance Agreements (PPAs) until the end of December 2023 has generated £380,282 in income, compared to £148,405 last year with a further £327,676 still to be received.

5.32 Express householder written advice, fast-track certificate of lawfulness and new fast-track application services have proved popular with customers whilst increasing income for the service. Until the end of December 23 we have received:

- 24 instances of Express Pre-applications generating a total of £7,709.
- 13 instances of Fast Track Certificate of Lawfulness applications generating a total of £8,743.
- 12 instances of Fast Track Householder applications generating a total of £9,576.

### Planning Decisions

5.33 The final government threshold relates to overturns of refusals (officer and committee) on applications on appeal. We are at 1% on minor / other applications.

5.34 For major applications the measure for quality of planning decisions is the percentage of the total number of decisions made that are then subsequently overturned at appeal, once nine months have elapsed following the end of the assessment period.

5.35 The nine months specified in the measure enables appeals to pass through the system and be decided for the majority of decisions on planning applications made during the assessment period. The assessment period for this measure is the two years up to and including the most recent quarter for which data on planning application decisions are available at the time of designation, once the nine months to be allowed for beyond the end of the assessment period is taken into account. The average percentage figure for the assessment period as a whole is used.

- 5.36 The threshold for designation on applications for both major and non-major development, is 10% of the total number of decisions on applications made during the assessment period being overturned at appeal. This is calculated as an average over the assessment period.
- 5.37 The Department for Levelling Up, Housing and Communities has confirmed that we have avoided designation this period (2019-21) achieving a figure of 2.7%.
- 5.38 For the 2023 designation period (2020-22) we will not be designated.
- 5.39 Haringey's performance for 2019/21 and 2020/22 is as follows:

Type of application	Number of apps	Number of overturns	% (Threshold 10%)
Majors 19/21	37	1	2.7%
Majors 20/22	35	1	2.9%

- 5.40 With the introduction of increased planning fees the government has reduced the Planning Guarantee time from 26 to 16 weeks. No applications have reached this new threshold as new fees came into effect on 8<sup>th</sup> December so it will be April before any applications will be affected by this. Measures are already in place to monitor this.
- 5.41 The government has consulted on further performance measures looking more widely at quantitative and qualitative performance. Proposed measures include measuring average speed of decision making, validation times, use of extensions of time and planning enforcement performance and potentially customer feedback.

### Planning Enforcement

- Enforcement complaints received during 2023/24: 447 compared to the 520 Enforcement complaints received last year.
  - Enforcement notices served during 2023/24: 38 compared to the 27 Enforcement notices served during the same period last year.
- 5.42 The Enforcement team is listed as 17<sup>th</sup> in the country for issuing enforcement notices for the year to September 2023 by DLUHC.

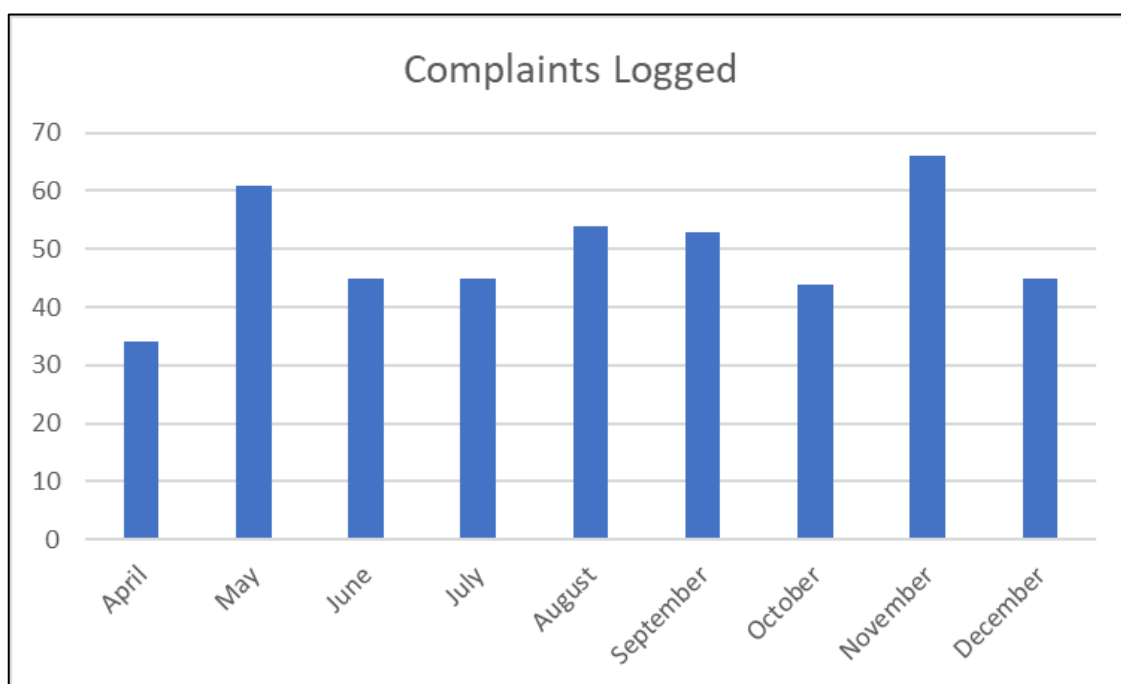
### Top 51 planning authorities that issued the highest number of enforcement notices in the year to September 2023

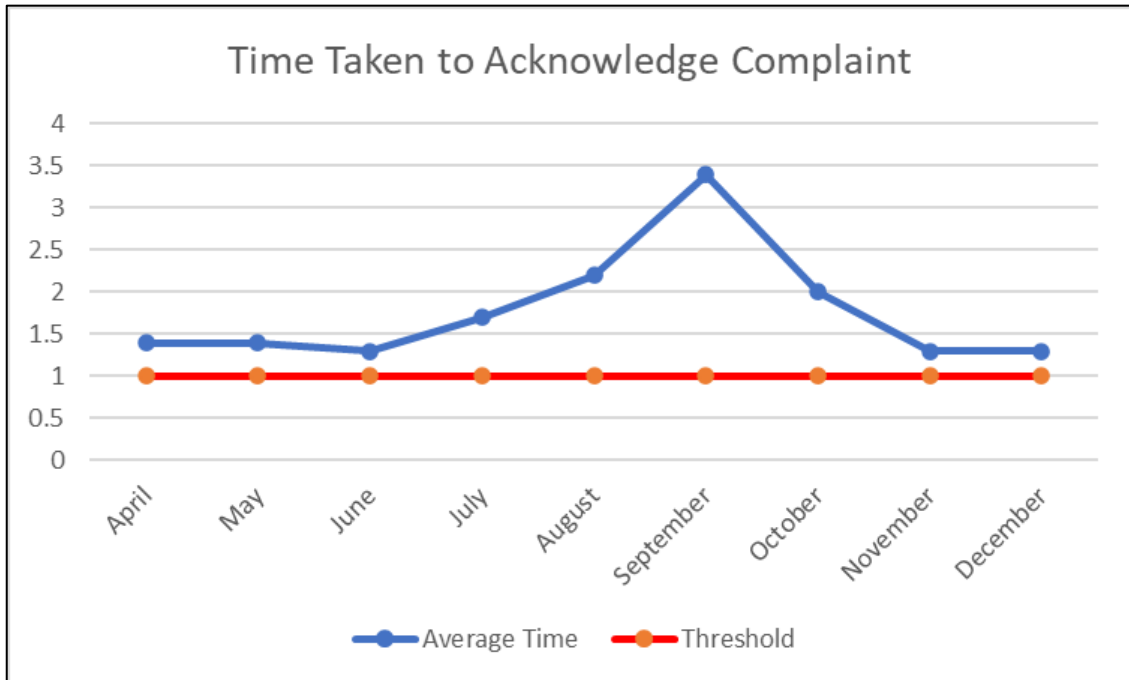
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Rank	Planning authority	Enforcement notices issued
1	Brent	149
2	Westminster	138
3	Newham	114
4	Barnet	102
5	Buckinghamshire	99
6	Ealing	85
7	Bradford	82
8	Cornwall	77
9	Camden	63
10	Hackney	62
11	Slough	57
12=	Colchester	56
12=	Leeds	56
14	Kirklees	50
15	Stockport	49
16	Lambeth	45
17	Haringey	44
18	Enfield	42
19	Hillingdon	41
20	Birmingham	39

5. 43 Of the complaints 51% were acknowledged within one working day of receipt. This measure is down from 66% last year, as a result of staff shortages in the Customer Services team. The Planning Enforcement Team has a target to make a decision on all enforcement complaints within 8 weeks.





	22-23	23-24
Cases received	520	447
Cases decided within 8 weeks	89 (17%)	251 (56%)
Cases decided not within 8 weeks	69 (13%)	45 (10%)
Cases with no decision past 8 week target date	0 (0%)	109 (24%)
Cases within 8 weeks yet to be decided	362 (70%)	42 (10%)

- 5.44 The performance has been affected by a number of factors such as, current high workloads due to backlogs caused by the loss to the team of a senior and experienced staff member last year, and some officers have not been updating the relevant fields in the new system though in many cases they have undertaken the initial investigation and in some cases have even issued enforcement notices. As such a weekly reminder has now been set up on the new system and circulated in advance of the 8 week decision. This should lead to an improvement in the 8 week decision performance.
- 5.45 The Planning Enforcement Team continues to seek prosecutions against owners who have failed to comply with existing enforcement notices. In addition to the prosecution proceedings, there has been a concerted effort in securing confiscation sentences under the provisions of the Proceeds of Crime Act (POCA) 2002. There are a number of prosecutions that are still going through the courts (these take a significant length of time) including a POCA confiscation court hearing that took place on 20 October 2023. Following this the sentencing hearing will take place on 9 February to finalise the sum awarded to the Council. The team is working on undertaking a direct action that will enable the compliance of an unresolved enforcement notice.
- 5.46 Officers are working with colleagues in other departments to explore bringing Financial Investigation Services in house to increase the proportion of income received from confiscation orders.

## Member Training & Site Visits

- 5.47 Members recently received training on viability. A programme of learning visits and training is being prepared and any suggestions are welcome for visits and training. Visits will focus on Council housing developments along with other completed developments and refresher training on issues arising on recent applications.



## **Planning Policy & Infrastructure**

5.48 The timetable for preparing the New Local Plan is set out in the table below.

<b>Document</b>	<b>Regulation</b>	<b>Date</b>
<b>New Local Plan First Steps Engagement consultation</b>	Reg 18	November 2020-February 2021
<b>Draft Local Plan consultation</b>	Reg 18	2024
<b>Proposed Submission Local Plan consultation</b>	Reg 19	2024/2025
<b>Submission &amp; Examination</b>	Reg 22-25	2025
<b>Adoption</b>	Reg 26	2025

5.49 The drafting of the Draft New Local Plan is at an advanced stage with recent work focusing on area-specific proposals. In the past 6 months the Planning Policy Team has been maximising opportunities to engage with a range of key placemaking stakeholders including neighbourhood forums, resident groups, statutory consultees (e.g. the GLA and TfL) and site owners, agents and developers.

5.50 Alongside this, the Planning Policy Team has been liaising closely with other areas of the Council including in relation to:

- Development of a Council vision for Haringey (a recommendation from the Corporate Peer Challenge);
- Tottenham placemaking matters (following the recent Tottenham Voices Engagement and in respect of the forthcoming Shaping Tottenham Strategy);
- Development of proposals for key Council-owned placemaking sites;
- New legislative requirements for mandatory Biodiversity Net Gain taking effect from February 2024;
- Allocation of accrued CIL funding, including a potential participatory budgeting approach for future spend of Neighbourhood CIL.

## Building Control

### Performance Overview

5.51 The applications to date this year are slightly below previous years, however our market share has stabilised, although we are concerned that as a result of the new Regulatory regime, it may again come under threat. Building Control has received a significant number of new housing schemes and continue to work on the majority of high schemes within the Borough and will be the go-to Building Control advisor for the Building Safety Regulator.

Building Control	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24*
Applications	1996	2323	1717	2645	2069	1240
Fees	604k	600k	561k	766k	698k	565k
Site visits	6817	6278	5603	6243	5674	3121
Market share	54%	62%	53%	57%	40%	40%
Dangerous Structures	190	162	159	225	204	140
Demolition Notices	13	29	20	18	22	12

\* 01 April – 19 January 2024

### Dangerous structures

5.52 There have been 140 dangerous structure calls to date this year. It should again be noted that where we request the help of our dangerous structure contractor, there is a cost attached to this that initially comes out of Building Control's budget until we can invoice the owner.

### Building Act & Building Control

5.53 The Government continues to release various consultation documents relating to the Building Safety Act and the secondary legislation that will provide the detailed timescales.

5.54 The new Building Control regime has now commenced and the register for Building Inspectors is open – Haringey officers are working on being registered by the April 2024 deadline. To enable this there is both a significant cost and staff have to prove their competence by exam and/or interview in order to become registered.

5.55 As previously advised there are ongoing risks associated with the new regime, namely 1. Surveyors failing to prove their competency and register with the Building Safety Regulator, 2. Surveyors not wanting to undertake the exams to prove competency and 3. Losing staff to other Building Control Bodies.

- 5.56 The risks outlined above could lead to Haringey not being able to fulfil that statutory function to provide a Building Control Service.
- 5.57 The current team are applying through the different channels available, but it is unknown as to whether they will be registered by the aforementioned date. In addition to the concerns over registration, there are 4 members of the team retiring by April, including the Head of Building Control. We are working to recruit to these posts as quickly as possible.
- 5.58 We are at present trying to get the job profiles re-evaluated in order that they reflect the revised roles and responsibilities, whilst at the same time trying to recruit agency surveyors to resolve the immediate problem. In addition we are also looking for an interim Head of Building Control.

## **6. Contribution to strategic outcomes**

- 6.1 The Planning and Building Control services contribute to the Corporate Delivery Plan's focus on tackling inequality, climate justice and health across all of the various themes.

## **7. Local Government (Access to Information) Act 1985**

Planning Applications are on the Planning Register on the Council's website and the Local Plan documents are also on the Council's website.

## **Appendices**

Appendix One – Definitions of Categories of Development

## **APPENDIX ONE**

### **Definitions of Categories of Development**

#### **Major Development**

- 10+ dwellings / over half a hectare / building(s) exceeds 1000m<sup>2</sup>
- Office / light industrial - 1000+ m<sup>2</sup> / 1+ hectare
- General industrial - 1000+ m<sup>2</sup> / 1+ hectare
- Retail - 1000+ m<sup>2</sup>/ 1+ hectare
- Gypsy/traveller site - 10+ pitches
- Site area exceeds 1 hectare

#### **Minor Development**

- 1-9 dwellings (unless floorspace exceeds 1000m<sup>2</sup> / under half a hectare)
- Office / light industrial - up to 999 m<sup>2</sup>/ under 1 hectare
- General industrial - up to 999 m<sup>2</sup>/ under 1 Hectare
- Retail - up to 999 m<sup>2</sup>/ under 1 hectare
- Gypsy/traveller site - 0-9 pitches

#### **Other Development**

- Householder applications
- Change of use (no operational development)
- Adverts
- Listed building extensions / alterations
- Listed building demolition
- Application for relevant demolition of an unlisted building within a Conservation Area
- Certificates of Lawfulness (191 and 192)
- Notifications
- Permissions in Principle (PiP) and Technical Detail Consent (TDC)