

Report for: Strategic Planning Committee 17 October 2024

Title: Planning and Building Control 2024/25 Q1-Q2 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

Denis Ioannou, Interim 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 from April to September 2024.
- 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 2024/25 Q1-Q2 Update**

Planning cross-cutting matters

Awards

- 5.1 On 13 June 2024 Haringey Council won **Local Authority Planning Team of the Year Award** at the national **Planning Awards 2024**.
- 5.2 At the same awards ceremony Haringey also shared a win for **Award for Planning to Address Climate Change** with London Councils and Hackney Council for our Carbon Management service's work on the Low Carbon Development Toolkit.
- 5.3 On 27 June 2024 Haringey Council won **Planning Authority of the Year Award** at the **Royal Town Planning Institute London region** awards.
- 5.4 The awards recognise Haringey's journey from being named as the 'worst' planning authority in 2012 to now being one of the best performing. The judges also recognised that Haringey has delivered a "much better quality service at below average cost".

Planning Internal Audit

- 5.5 In September 2024 an **internal audit** has been undertaken of the Planning service as part of the Council's routine audit plan. A final report is expected in October. This will be reported to the appropriate Audit Committee in due course and will also be reported to the next available Strategic Planning Committee.

Planning Reforms

- 5.6 On 30 July 2024 the Government published a **Consultation on 'Proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system'**¹. Consultation closed on 24 September 2024.
- 5.7 Whilst Haringey did not respond directly to the consultation, officers have attended numerous meetings to contribute towards sector-wide consultation responses such as through London Councils and the Royal Town Planning Institute.

¹ www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system

5.8 Key **highlights** of the proposed reforms include:

- Taking steps to enable “universal coverage of **strategic planning** within this Parliament”
- A new “Standard Method” for assessing **housing needs** and setting targets
- Re-strengthening the **5 Year Housing Land Supply** requirement
- No changes to the **Housing Delivery Test**
- More emphasis on “**social rent**” housing and less emphasis on “affordable home ownership”
- Emphasising that development on **brownfield land** “should be regarded as acceptable in principle”
- Removing most references to “**beauty**” in the NPPF
- Moving away from requiring “district-wide design coding” and instead focusing on “**localised design codes**, masterplans and guides”
- Explicitly supporting **upwards extensions** and “mansard roofs”
- Considering how best to use “**carbon assessments**” and “carbon accounting in plan-making and planning decisions”
- Supporting “**laboratories, gigafactories and data centres**”
- A “vision led approach” to promoting **sustainable transport**
- **Local Plans** “should continue to progress... to adoption under the existing system without delay” and transitional measures i.e. “submitted for examination under the existing 2004 Act system no later than **December 2026**”
- “**Modernising planning committees**” and introducing a “**national scheme of delegation** that focuses planning committees on the applications that really matter, avoids a potential development being reviewed multiple times even where it’s been included in the local plan, and places more trust in skilled professional planners” – this is expected in the forthcoming Planning & Infrastructure Bill

5.9 In particular with regard to **Green Belt**:

- Encouraging **Green Belt reviews** where an authority cannot meet its identified development needs
- New “**golden rules**” for releasing or allowing development on Green Belt:
 - 50% affordable housing
 - Necessary improvements to local or national infrastructure
 - New or improved accessible green space
- A new concept of “**Grey Belt**” which in simple terms is Green Belt which makes only a limited contribution to Green Belt purposes and features:
 - Land containing substantial built development or which is fully enclosed by built form
 - Land which makes no or very little contribution to preventing neighbouring towns from merging into one another
 - Land which is dominated by urban land uses, including physical developments
 - Land which contributes little to preserving the setting and special character of historic towns

5.10 With regard to **planning application fees**:

- Overall funding shortfall for local authority **Development Management** (planning application) services is £262m nationally
- Additional funding shortfall for local authority **Planning Policy, Enforcement, Conservation, Heritage** services is £384m nationally
- 80% of applications account for only 20% of fee income
- Seeking **increased performance** and holding authorities to account
- **Increasing householder fees** from £258 to **£528**
- Considering **increasing other planning fees**, and introducing fees for some types of application which are not currently charged
- Government consulting on whether to keep fees set nationally or allow **local variation**

5.11 Different elements of the reforms will be further consulted on, implemented and take effect at different times. As ever, officers will ensure that reports to Planning Sub Committee refer to the most up-to-date legislation and policy at that time as necessary.

Development Management & Enforcement

Performance overview

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

- Applications received during April to Sept 2024/25: **1,434**
- Applications received during same period 2023/24: **1,492**
- Number of valid cases on-hand end of Sept) 2024: **675**
- Number of valid cases on-hand end of Sept 2023: **833**
- Appeals decided during April to Sept 2024/25: **32**
- Appeals decided during same period 2023/24: **27**
- Appeals dismissed (won) during April to Sept 24/25: **23 (72%)**
- Appeals dismissed (won) during same period 2023/24: **17 (63%)**
- Cumulative performance (applications in time) 2024/25
 - **Majors: 100%**
 - **Minors: 90%**
 - **Others: 92%**
 - **PS1 Only: 97%**
 - **Decisions excluded from statutory figures: 70%**

5.13 As set out above performance is at 100% for 'Majors' applications. Our performance for 'Minor' and 'Other' applications shows a significant improvement on this time last year. Appeal performance has also improved.

	2020/21	2021/22	2022/23	2023/24	2024/25 (end Sept)
Majors	100%	100%	100%	100%	100%
Minors	95%	90%	80%	88%	90%
Others	97%	91%	87%	88%	92%
PS0+ PS1	91%	91%	87%	98% (PS1 only)	97% (PS1 only)
PS Exclude			73%	60%	70%

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'

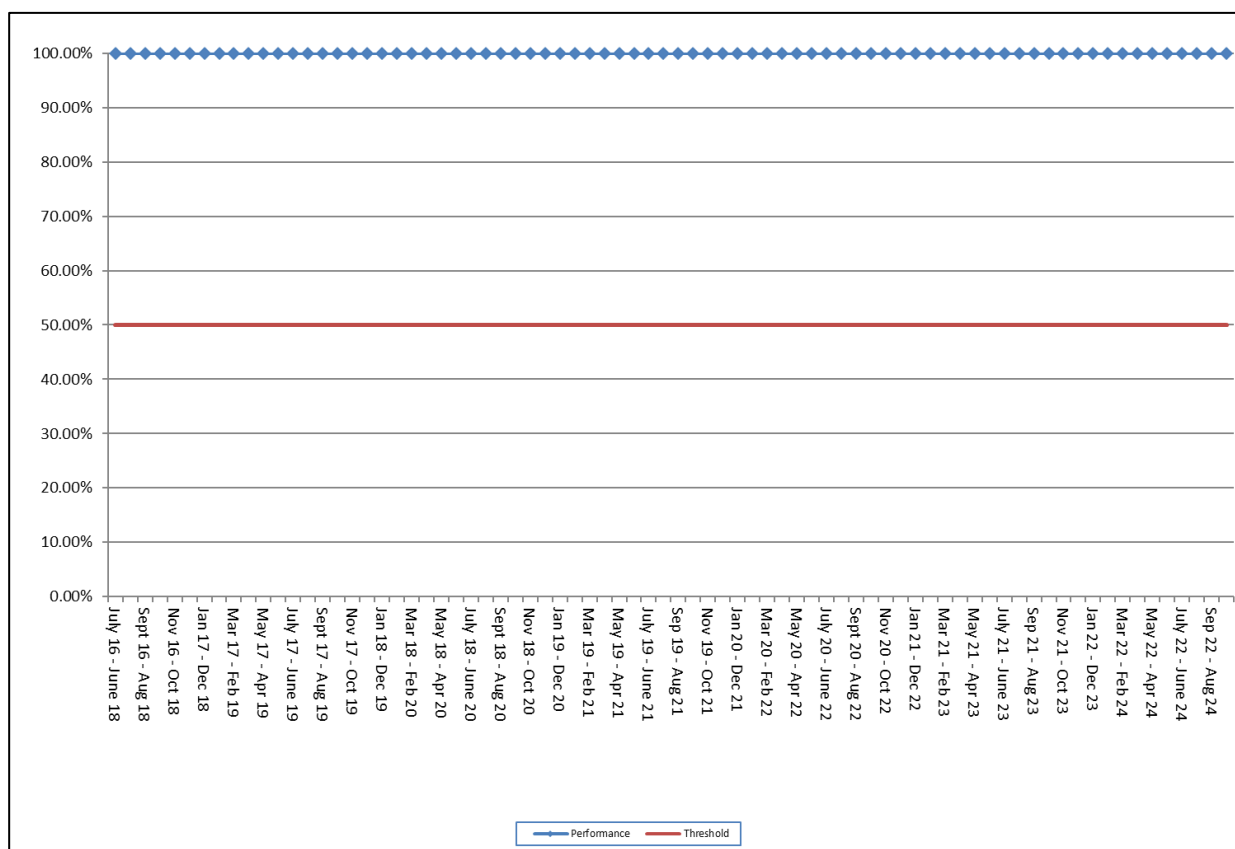
5.14 This table gives a further breakdown on the numbers of appeals:

	2020/21	2021/22	2022/23	2023/24	2024/25 (end Sept)
Appeals received	84	117	103	77	33
Appeals decided	56	106	106	56	32
Appeals allowed	13	23	20	24	9
Appeals dismissed	41	78	86	32	23
Appeals split Decision	2	5	0	0	0
% Appeals won	77%	78%	81%	57%	72%

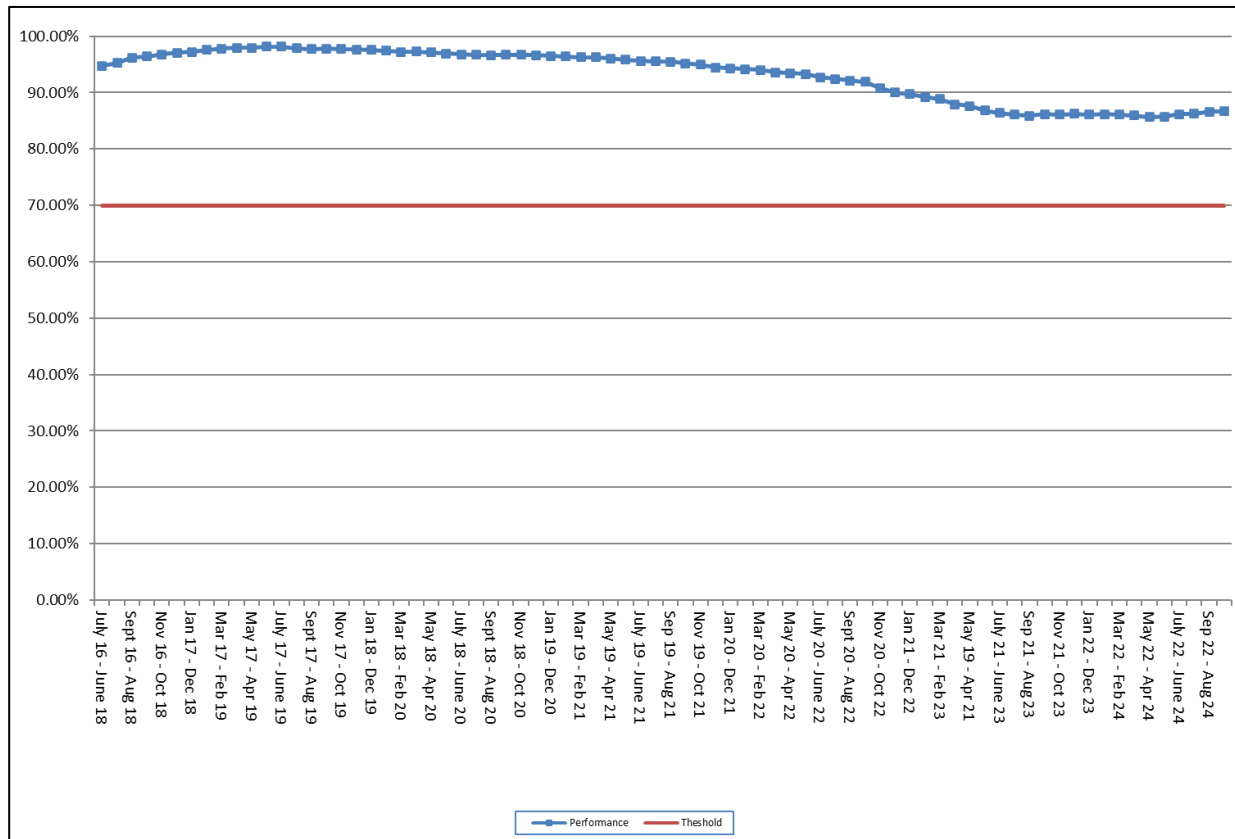
5.15 The Government has three measures of application performance which the Council must remain within thresholds for. If we breach these thresholds we may be designated as a poorly performing planning authority and developers will then have the option of applying directly to the Planning Inspectorate 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):

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

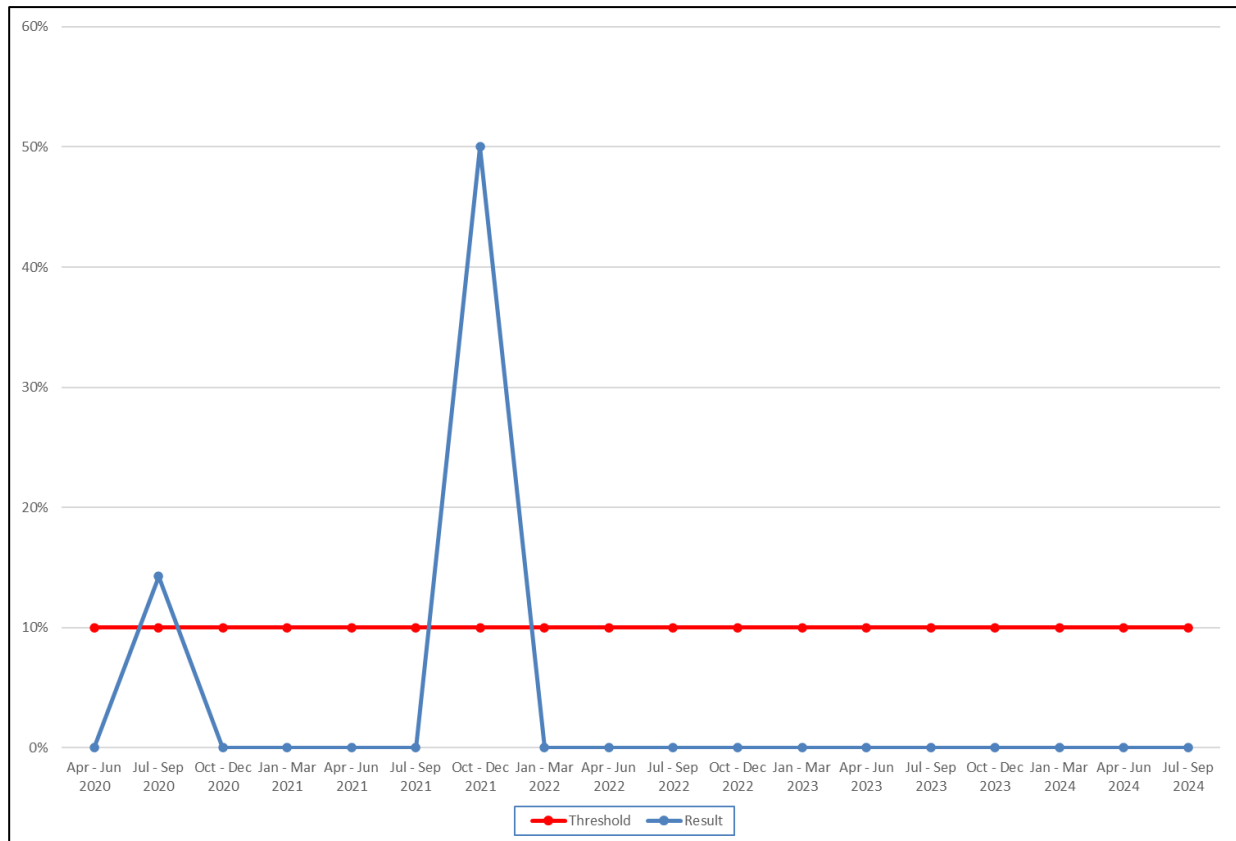
5.16 Major planning applications are assessed within a rolling 2-year period. A major application is deemed as 'within time' if the application is determined within the statutory 13-week deadline, or within the agreed extension of time / Planning Performance (PPA) agreement. We are consistently at 100% performance within this area. Our current rolling figure reflects the period of October 2022 – September 2024 and is at 100% performance based on 43 out of 43 Major applications determined within time:



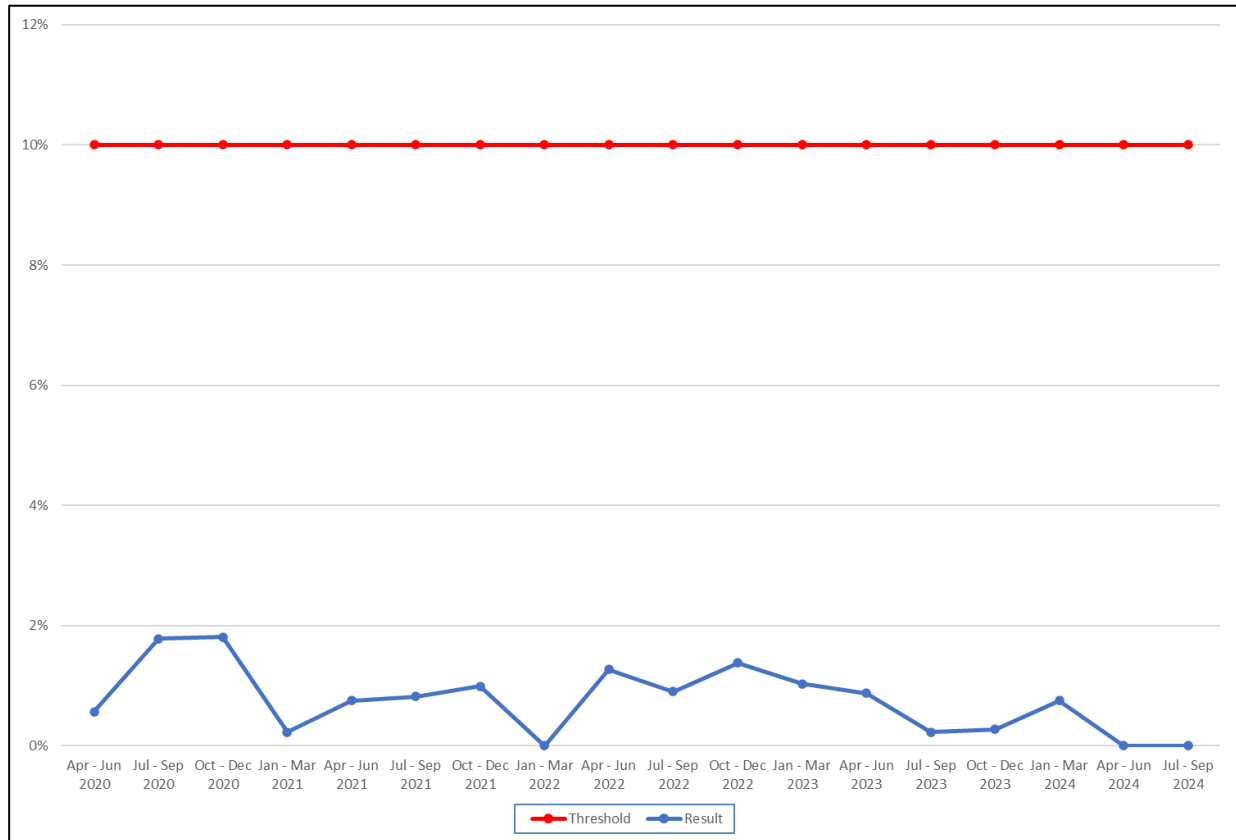
5.17 Planning minor / other applications are assessed as a combined decision count within a rolling 2-year period. A planning minor / other application is deemed as 'within time' if the application is determined within the statutory 8-week deadline, or within the agreed extension of time. We are consistently performing well above the 70%. Our current rolling figure reflects the period of October 2022 – September 2024 and is at 87% performance based on 2,596 out of 2,994 minor / other applications determined within time:



5.18 Major planning applications overturned within a 2-year rolling period is currently at 0%, which is below the 10% threshold. The figure is monitored on a quarterly basis. We must also note that the Planning Inspectorate have a lag of 6 – 12 months to when a decision is made on an appeal, and therefore our last 6 – 12 months' worth of data is subject to change. We currently have no Major pending appeals awaiting determination by the Planning Inspectorate, and therefore expect our performance to be maintained at 0%:



5.19 Minor / other planning applications overturned within a 2-year period is currently at 0%, which is below the threshold of 10%. This figure is monitored on a quarterly basis. We must also note that the Planning Inspectorate have a lag of 6 – 12 months to when a decision is made on an appeal, and therefore our last 6 – 12 months' worth of data is subject to change. There are currently approximately 50 minor / other planning appeals pending with the Planning Inspectorate which could potentially increase our result line from January 2024 onwards, however we are well below the 10% threshold and are not expecting these decisions to affect our performance negatively.



5.20 For April to September 2024/25 we decided the following:

- **12 ‘Major’** applications (compared to the **10** last year this time)
- The average time of decision has increased from 433 to 457 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.

	20/21	21/22	22/23	23/24	24/25 (end Sept)
Major Apps decided	20	15	16	22	12

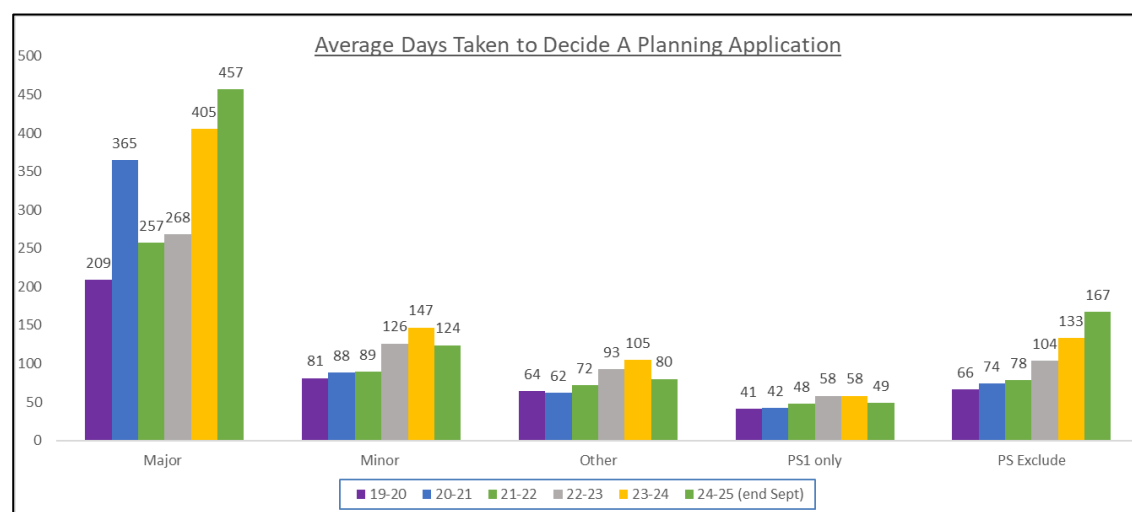
Major applications decided over past five years

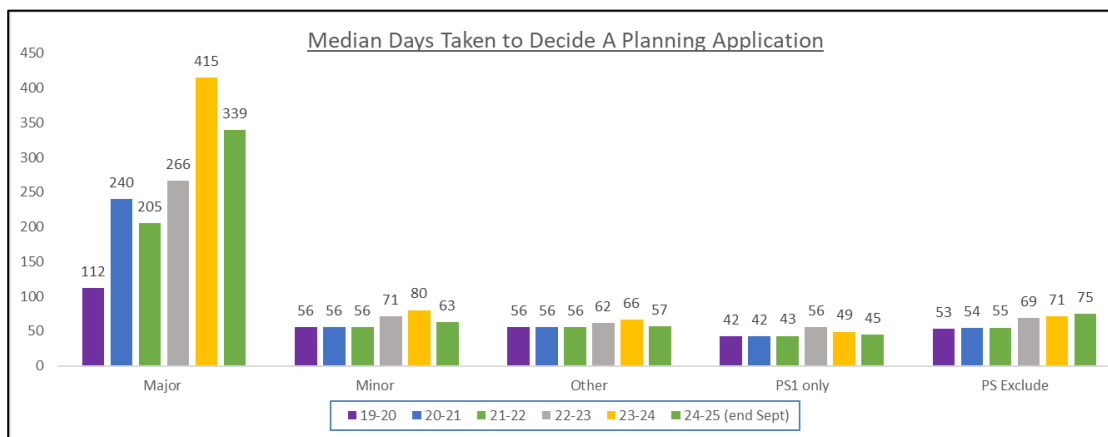
- **283 ‘Minor’** applications (compared to the 361 ‘Minor’ applications last year)
- The average decision time has decreased from 130 days to 124 days
- **441 ‘Other’** applications (compared to the 1203 ‘Other’ applications last year)
- The average decision time has decreased from 99 days to 80 days

5.21 The end to end times for different types of applications are set out below. The average times have largely decreased in the current year but ‘Excluded’ applications average times have increased due to work to clear backlog applications:

Average and Median days to decision 2024/25

	Average Days to Decision	Median Days to Decision
Major	457	339
Minor	124	63
Other	80	57
PS1 only	49	45
Exclude	167	75



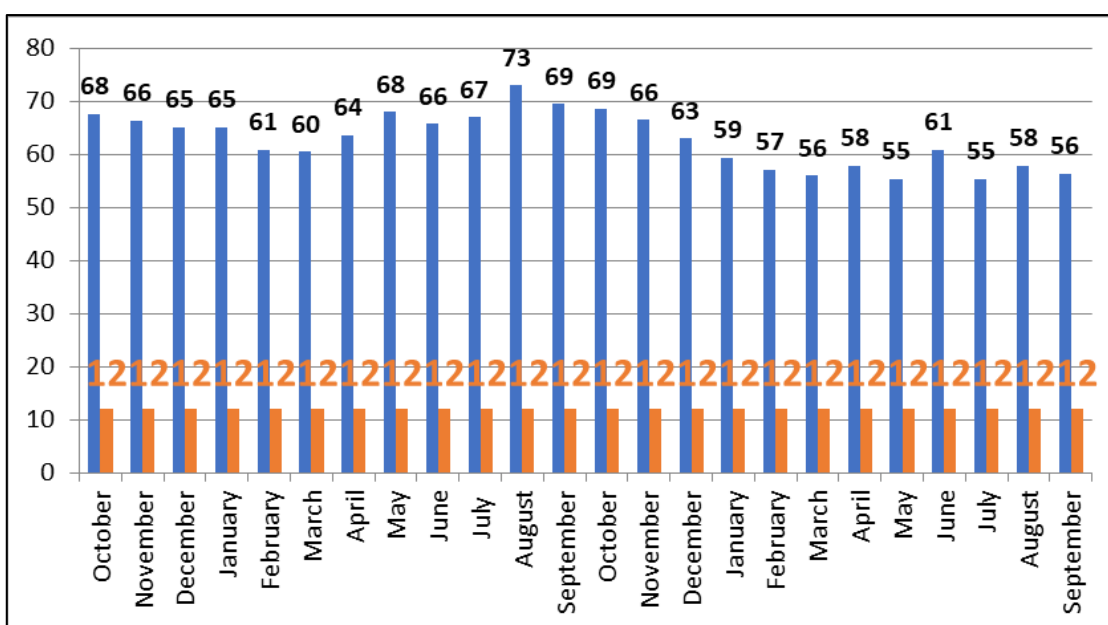


5.22 The overall numbers of applications received, approved, and refused over recent years is set out below:

	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Received	3359	3522	3140	2750	1434 (end September)
Approved	2590 (85%)	2535 (84%)	2533 (88%)	2421 (88%)	1192 (88%)
Refused	475 (15%)	499 (16%)	333 (12%)	340 (12%)	159 (12%)
Total decided	3,065	3,034	2866	2761	1351

5.23 The length of time taken to validate an application is at an average of 17 days, decreased from 19 days due to workloads improving.

5.24 Officer caseloads are at around 56 per officer at the end of September 2024, which has decreased from 69 last year due to work to reduce the backlog.



Planning Skills Delivery Fund & Backlog

- 5.25 In July 2023 the Government announced a new 'Planning Skills Delivery Fund' where local planning authorities could bid for up to £100,000 to tackle backlog and skills issues.
- 5.26 The Government announced successful bids on 19 December 2023. Haringey was awarded £75k for tackling the backlog.
- 5.27 The backlog identified 230 planning applications. These consisted 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.
- 5.28 After some preliminary work in August 2023 the project began in January 2024. Officers have been working additional paid hours to clear the backlog. DLUHC has sought data on progress as of 31 May. The initiative has resulted in over 400 backlog applications being determined to date. This funding has now been exhausted but a backlog still remains and will be addressed through ongoing work. The number of applications beyond their statutory deadline was as low as 317 in May when the backlog project concluded and has since risen slightly due to some illness and leave within the team to 543 applications.
- 5.29 As a result of this backlog work the number of on hand applications has leveled off. As of the end of September 2024, there were 675 pending valid applications (down from 833 on this time last year). The number of applications not yet validated or registered is currently 108 'new' applications, with a further 78 invalid applications awaiting information from applicants. Giving a total of 861 pending planning applications.
- 5.30 The number of applications over 26 weeks at the end of September was 95. This is a decrease from 219 at the end of September last year. The majority of these cases are now approval of details applications for major developments requiring detailed discussions with consultees. The work to reduce the backlog has improved the monitoring of these cases and reduced them significantly.
- 5.31 With the introduction of increased planning fees the government has reduced the Planning Guarantee time from 26 to 16 weeks. This was aligned with new fees which came into effect on 8 December 2023 so applications have begun to reach this threshold and are being closely monitored. Currently 118 applications have reached this threshold rising from 24 at the end of 2023/24 so backlog work is now focusing on addressing this.

Planning Advice Services

- 5.32 In April 2024 the Development Management Service worked with stakeholders to develop a Planning Advice Service Action Plan. This involved a review of the Council's Planning Advice Services internally and with customers to create an action plan for improvement. Several actions were taken including:

- A new portal for the submission of planning advice requests
- Improving monitoring to ensure timely responses
- Providing clarity of processes for fastrack applications
- Improving internal procedures to improve the quality of feedback

5.33 This has so far had a positive impact on pre-application income.

5.34 During April to September 2024 there were:

- 127 pre-application meetings (same period last year: 77) generating a total of £223,087 in income (same period last year: £145,833)
- 38 householder pre-application meetings (same period last year: 39) generating £33,957 in income (same period last year: £17,623)

5.35 The use of Planning Performance Agreements (PPAs) generated £531,216 in income, compared to £271,808 last year.

5.36 For express householder written advice, fast-track certificate of lawfulness and fast-track application services in April to September 2024 we received the following:

- 31 instances of Express Pre-applications (same period last year: 16) generating a total of £18,799 (same period last year: £5,090)
- 8 instances of Fast Track Certificate of Lawfulness application (same period last year: 11) generating a total of £2,348 (same period last year: £8,040).
- 12 instances of Fast Track Householder applications (same period last year: 8) generating a total of £5,238 (same period last year: £6,352).

Planning Decisions

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

5.38 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.

5.39 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.

5.40 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.

5.41 For the 2024 designation period (2022-24) we will not be designated.

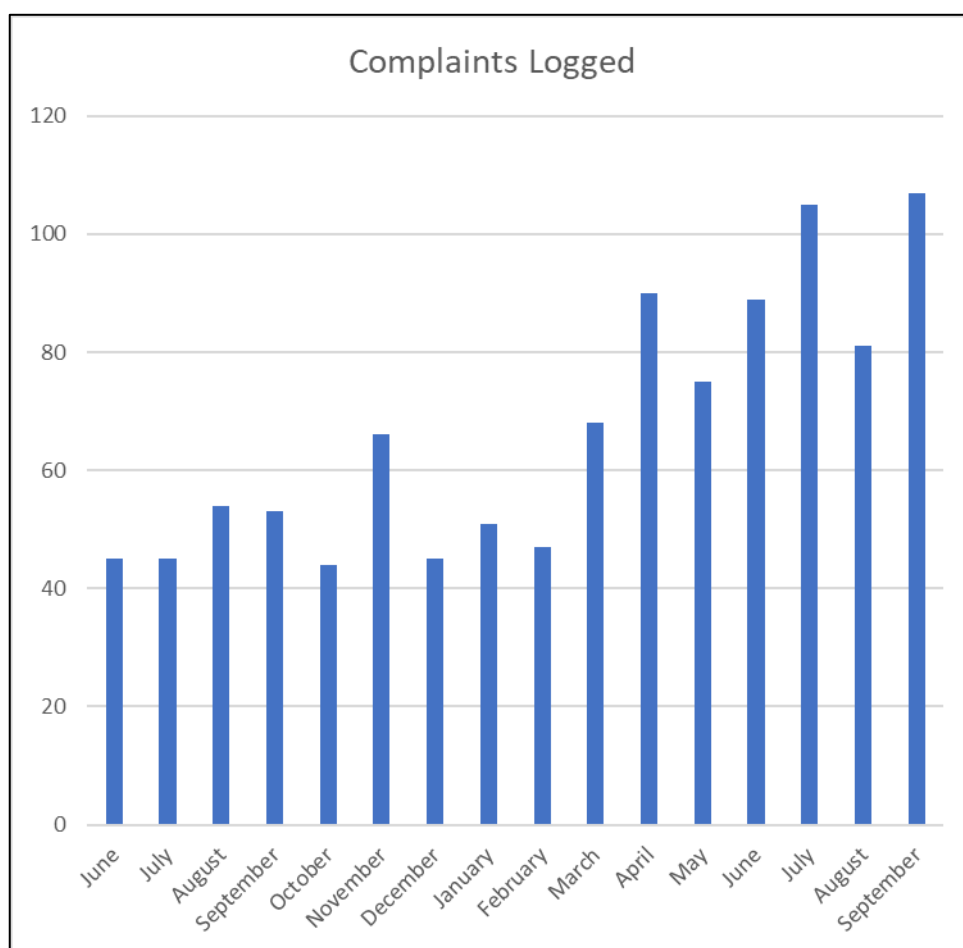
5.42 Haringey's performance is as follows:

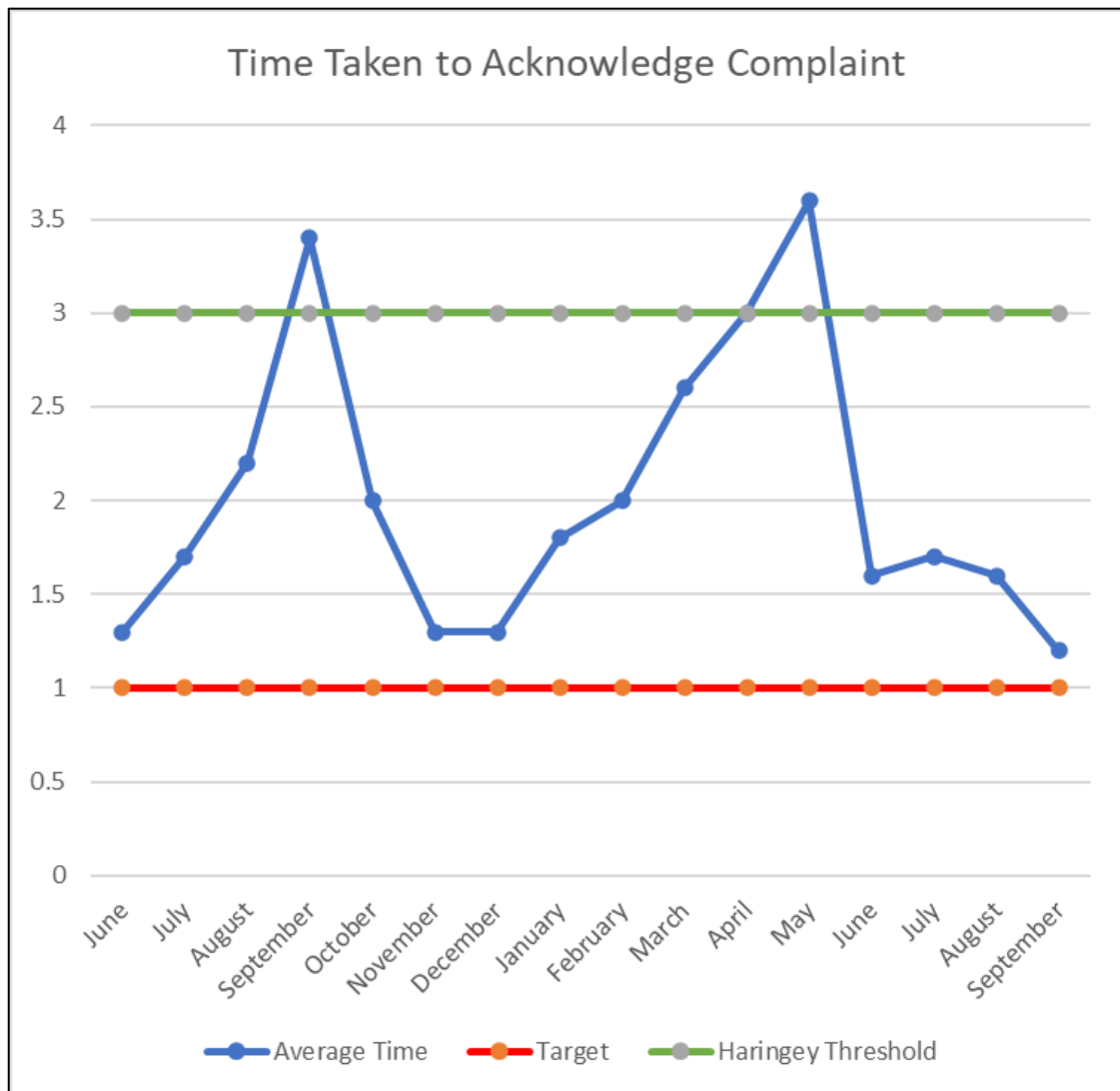
Type of application	Number of apps	Number of overturns	% (Threshold 10%)
Majors 2023/24	43	0	0%

Planning Enforcement

- Enforcement complaints received during April to September 2024: 457 compared to the 292 Enforcement complaints received last year.
- Enforcement notices served during 2024/25: 16 compared to the 20 Enforcement notices served during the same period last year.

5.43 For 2024/25 enforcement complaints were acknowledged within an average of 2.1 days of receipt. The Planning Enforcement Team has a target to make a decision on all enforcement complaints within 8 weeks.





	2022/23	2023/24	2024/25
Cases received	632	605	559
Cases decided within 8 weeks	68/176 (39%)	121/258 (47%)	139/373 (37%)
Cases decided not within 8 weeks	28/176 (16%)	14/258 (5%)	2/373 (1%)
Cases with no decision past 8 week target date	80/176 (45%)	123/258 (48%)	232/373 (62%)

- 5.44 There is an ongoing issue with high caseloads that has been significantly exacerbated by high numbers of HMO referrals. Changes in the Private Sector Housing referrals procedure has meant almost all their applications are now being referred to planning. To put this into context the team received about 54 HMO referrals in 2022/23 for the whole of the year but has received roughly 200 HMO referrals in 2024/25 to date. Officers are working with Private Sector Housing on a process that will help to prioritise HMO cases that should be progressed and to create efficiencies to help reduce officers being overwhelmed by the influx of the cases.

- 5.45 The Planning Enforcement Team continues to seek prosecutions against owners who have failed to comply with existing enforcement notices which can in turn lead to confiscation orders for ill gotten gains under the Proceeds of Crime Act (POCA) 2002.
- 5.46 An ongoing BT phone box project has so far resulted in the successful removal of five boxes and BT have earmarked a further 10 boxes for removal. Officers are looking to engage further with BT and to open a dialogue about voluntarily removing redundant problem boxes.

Member Training & Site Visits

- 5.47 A site visit took place on 5 July to the Tottenham Hotspur Stadium. Any suggestions are welcome for visits and training.

Spatial Planning

New Local Plan

- 5.48 The Planning Policy Team continues to prepare a New Local Plan consistent with the timetable shared with Strategic Planning Committee in June and copied below:

Document	Regulation	Date
New Local Plan First Steps Engagement consultation	Reg 18	November 2020-February 2021
Draft Local Plan consultation	Reg 18	Winter 2024
Proposed Submission Local Plan consultation	Reg 19	Summer 2025
Submission & Examination	Reg 22-25	Winter 2025
Adoption	Reg 26	Spring 2026

- 5.49 Following recommendation 2 of The Planning Service Peer Challenge that there should be a dedicated officer lead for the local plan, a new Planning Policy, Conservation and Design Manager has been appointed. This position replaces the position of Planning Policy Team Manager which has been unfilled since 2021 and will ensure highest priority is given to the production of the Local Plan.
- 5.50 Following receipt of Government funding to support the process of identifying robust design-led development capacities and carrying out site-specific viability analysis, the Planning Policy Team is in the process of appointing a Public Practice Urban Designer for one year which will provide further support to the timely progress of the New Local Plan.
- 5.51 Four meetings of the New Local Plan Member Working Group have been scheduled during October and November to enable Strategic Planning Committee members to inform emerging neighbourhood-based work including area visions site allocations.

Housing Delivery

- 5.52 In September of each year, London Boroughs are required to report to the Greater London Authority (GLA) the number of new homes which were completed in the previous financial year. Following a comprehensive completions audit by officers in the Planning Policy Team, including both desktop research and site visits, a completions figure of 1,193 (net) was reported to the GLA for 2023/24. Due to slight methodological differences for calculating the contribution of non-conventional housing units (e.g. student accommodation) this figure will equate to 1189 for the purposes of the Government's Housing Delivery Test.
- 5.53 The Government has not published a Housing Delivery Test measurement for 2023 or 2024 but estimated figures are set out in the below table:

	New homes completed (net)	Target for new homes (net)	Derivation of figures
2021/22	1503	1502	Figures from 2022 measurement
2022/23	911	1592	Estimated
2023/24	1189	1592	Estimated
Total	3603	4686	

Building Control

Awards

- 5.54 Haringey has been **nominated** for the **Local Authority Building Control Team of the Year** at the **LABC Building Excellence Awards 2024**. Winners are expected to be announced in January 2025.

Performance Overview

- 5.55 The applications to date this year are slightly below previous years, and market share has fallen, partly as a result of the new Regulatory regime and the uncertainty it has caused. 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	2024/25
Applications	1996	2323	1717	2645	2069	1517	668
Fees	604k	600k	561k	766k	698k	584K	230K
Site visits	6817	6278	5603	6243	5674	3800	1222
Market share	54%	62%	53%	57%	40%	40%	30%
Dangerous Structures	190	162	159	225	204	188	62
Demolition Notices	13	29	20	18	22	15	7

2024/25 - from 1 April to 31 August 2024

Dangerous structures

- 5.56 There have been 62 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. Additionally, we are part of a consortium with a number of other London Boroughs which improves efficiency and is more cost effective.

Building Control reforms

- 5.57 The Government continues to implement reform of the Building Control regime. The Grenfell Tower Inquiry Phase 2 Report was published on 6 September 2024. Many of the implications for Building Control are already well underway following the Hackett Review which published its final report in May 2018, the subsequent Fire Safety Act 2021, Building Safety Act 2022 and establishment of the Building Safety Regulator. The service will continue to monitor the Government's response to the Inquiry Report and wider reforms to Building Control to ensure Haringey continues to be fully compliant.

- 5.58 The new Building Control regime has now commenced. The deadline to ensure all officers undertaking regulated work were registered with the Building Safety Regulator was on the 6 July 2024. Haringey has been able to continue to undertake regulated work. At the time of writing this report three officers have achieved the Class 3 competency level required to inspect and ensure compliance on all buildings and to provide the required supervision of the officers waiting for their examination/interview results. One is able to benefit from interim measures which mean that whilst they are awaiting their competency result they are able to continue undertaking regulated work.
- 5.59 Updated job profiles have been re-evaluated to reflect the revised roles and responsibilities and these will be subject to staff consultation shortly, in advance of implementation.
- 5.60 We now have a total of two Apprentice building control surveyors in Haringey as part of the Local Authority Building Control (LABC) Academy programme to support the future resilience of the service.

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 1000m²
- Office / light industrial - 1000+ m² / 1+ hectare
- General industrial - 1000+ m² / 1+ hectare
- Retail - 1000+ m²/ 1+ hectare
- Gypsy/traveller site - 10+ pitches
- Site area exceeds 1 hectare

Minor Development

- 1-9 dwellings (unless floorspace exceeds 1000m² / under half a hectare)
- Office / light industrial - up to 999 m²/ under 1 hectare
- General industrial - up to 999 m²/ under 1 Hectare
- Retail - up to 999 m²/ under 1 hectare
- Gypsy/traveller site - 0-9 pitches

Other Development

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