



Ministry of Housing, Communities & Local Government

Government response to the Planning for the right homes in the right places consultation

A summary of consultation responses and the Government's view on the way forward



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March 2018

ISBN: 978-1-4098-5212-4

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Introduction

On 14 September 2017 the Secretary of State for Housing, Communities and Local Government launched, ‘Planning for the right homes in the right places: consultation proposals’, to supplement the housing White Paper, ‘Fixing our broken housing market’.

The consultation paper explained a number of proposals and how they would operate. In brief, we set out our ideas on:

- a standard method for calculating local authorities’ housing need. First, the use of household growth projections published by the Office for National Statistics (ONS) to establish how many new homes will be needed to meet rising need. Second, increasing the number of homes stated to be needed in less affordable areas. The third and final step was a cap on the level of increase that local authorities should plan for;
- how neighbourhood planning groups can have greater certainty on the level of housing need to plan for;
- a statement of common ground to improve how local authorities work together to meet housing and other needs across boundaries;
- making the use of viability assessments simpler, quicker and more transparent; and
- increased planning application fees in areas where local authorities are delivering the homes their communities need.

Consultation closed on 9 November 2017, and all responses have been carefully considered.

Overview

There were 1,233 total responses to the ‘Planning for the right homes in the right places: consultation proposals’. Not all respondents answered every question. All responses have been analysed and given full consideration in the preparation of the revised National Planning Policy Framework (the ‘Framework’). We are grateful to everyone who took the time to respond to the consultation.

The table below provides a breakdown of the consultation responses by type of respondent. This document provides a factual report of responses and does not attempt to capture every point made.

Type of consultation respondent

	Number	Percentage
Personal view	466	38%
Local authority¹	306	25%
Private sector organisation²	142	12%
Neighbourhood planning body, parish or town council	139	11%
Interest group or voluntary organisation³	114	9%
Other	66	5%
Total	1,233	100%

¹ Including National Parks, Broads Authority, the Greater London Authority and London Boroughs

² Including housebuilders, housing associations, businesses and consultants

³ Including trade associations, and charitable organisations

Proposed approach to calculating local housing need

Question 1

- a) Do you agree with the proposed standard approach to assessing local housing need? If not, what alternative approach or other factors should be considered?
- b) How can information on local housing need be made more transparent?

Question 1(a) response

There were 1,125 responses to this question and just over a quarter (28%) of respondents agreed with the proposal. Points raised include:

- The idea of a standard method was generally supported, but there were concerns about various aspects of the detail of the proposal such as the use of the ONS data, the simplicity of the proposed adjustment method and the use of the cap.
- Of the local authorities that responded, under half (41%) were in agreement and just over a third (39%) were against the proposal.

Government response

Having considered the responses, we consider that the proposed approach to assessing local housing need is the most appropriate method that meets the three key principles of being simple, realistic and based on publicly available data. We will be publishing draft guidance on the proposed methodology alongside the revised Framework. The standard method is a key part of the Government's ambition to deliver the right number of homes in the right places. The methodology is based on population growth projections which can change. We propose to keep the methodology under review to ensure that quantity and approximate distribution of need that is established by the standard methodology remains appropriate.

Question 1(b) response

There were 846 responses to this open question. Points raised include:

- Respondents favoured easy-to-find, clear, concise and accessible information.
- The most commonly raised suggestion by all groups was the potential for local authorities to publish information on local housing need and how they could do so.

Government response

The Government welcomes the suggestions on how local housing need can be made more transparent. The proposed standard method is based on publicly available data, which increases transparency. We will consider further ways of improving the transparency of information on local housing need as the proposed method is introduced.

Question 2

Do you agree with the proposal that an assessment of local housing need should be able to be relied upon for a period of two years from the date a plan is submitted?

Question 2 response

There were 1,125 responses to this question and just over a third (38%) of respondents agreed with the proposal. Points raised include:

- Around a third (32%) of local authorities responding agreed with the proposal, because they felt it would establish a consistent approach. About half (46%) the local authority respondents disagreed with the proposal.
- More than half (57%) of private sector organisations responding were supportive of the proposal.
- Respondents who did not support the proposal made alternative suggestions: for instance, agreeing the local housing need figure at an earlier stage, or increasing the period of time when it is fixed.

Government response

The Government considers that a period of two years from the date of submission gives sufficient time for a local plan to be adopted using the assessment of local housing need. This should ensure that plans are up to date. We will set out this proposal in guidance, which will be published alongside the draft revised Framework.

Question 3

Do you agree that we should amend national planning policy so that a sound plan should identify local housing need using a clear and justified method?

Question 3 response

There were 1,125 responses to this question and overall there was considerable support (67%) for this proposal. Key points from the consultation response include:

- Respondents called for guidance to clarify key terms and make clear that the housing need figure produced by the method should be sufficient to satisfy inspection and not lead to challenge.
- There was strong support (76%) from local authorities. However, many considered that this is already covered in the existing tests of soundness.
- Developers emphasised the importance of guidance to ensure that the method is the accepted approach.

Government response

The Government welcomes the positive response to this proposal and proposes to adjust the soundness tests within the Framework accordingly.

Question 4

Do you agree with our approach in circumstances when plan makers deviate from the proposed method, including the level of scrutiny we expect from Planning Inspectors?

Question 4 response

There were 1,125 responses to this question and around a third (34%) of respondents agreed with this proposal. Points raised include:

- Respondents emphasised the importance of guidance when setting out key terms.
- Half (50%) of local authorities agreed with the proposal and called for clarity in guidance on the circumstances in which it would be acceptable to use an alternative method.
- Individuals were less supportive of the proposal and expressed concerns with deviation from the proposed method.

Government response

The Government welcomes suggestions for amending planning guidance. We intend to make clear in the revised Framework that we expect the standard method to be used unless there are exceptional circumstances that justify an alternative approach. This should ensure that the benefits of introducing a standardised method are fully realised.

Question 5

- a) Do you agree that the Secretary of State should have discretion to defer the period for using the baseline for some local planning authorities? If so, how best could this be achieved, what minimum requirements should be in place before the Secretary of State may exercise this discretion, and for how long should such deferral be permitted?
- b) Do you consider that authorities that have an adopted joint local plan, or which are covered by an adopted spatial development strategy, should be able to assess their five year land supply and/or be measured for the purposes of the Housing Delivery Test, across the area as a whole?
- c) Do you consider that authorities that are not able to use the new method for calculating local housing need should be able to use an existing or an emerging local plan figure for housing need for the purposes of calculating five year land supply and to be measured for the purposes of the Housing Delivery Test?

Question 5(a) response

There were 1,102 responses to this question, with around a third (35%) agreeing with the proposal and under half (44%) of respondents feeling neutral towards the proposal. Points raised include:

- For local authorities, about half (53%) agreed with the proposal, although some respondents noted that joint plans are complex and ambitious and require extra time. There were concerns that some areas would be in the process of adopting plans and that examinations may take longer because of the new figures.
- Where private sector organisations were supportive of deferrals they emphasised it should be the last resort.
- In relation to timescale for deferrals, respondents advocated one year or up to two years.

Government response

We are committed to supporting, speeding up and simplifying plan-making and ensuring a consistent approach to housing need. The proposal to defer the period for using the baseline will be kept under review.

Question 5(b) response

There were 1,102 responses to this question, with under half (40%) supporting the proposal and under half (43%) feeling neutral towards it. Points raised include:

- Of those local authorities that responded, some thought that joint monitoring should be optional and not a requirement.
- Comments suggested that it was unclear how joint monitoring would work in terms of sanctions across an area – there could be poor performance in one area but not in another.
- There was concern that this proposal may not deliver right homes in the right places and that delivery should match demand and not be pushed elsewhere.

Government response

We are committed to supporting joint approaches to strategic plan-making. We intend to set out in guidance how joint approaches to monitoring five year land supply and measurement against housing delivery should be carried out.

Question 5(c) response

There were 1,102 responses to this question, about half (45%) were neutral towards the proposal, while just over a third (39%) agreed with it. Points raised include:

- Some respondents were uncertain if the question related only to areas which do not align with local authority boundaries.
- There was support for using both existing and emerging plans for the purposes of monitoring, though there were reservations about using unexamined plan figures and concern that figures might not be up to date and sound.
- For developers and some other groups, the apportioning of figures *pro rata* was a popular solution.

Government response

For five year land supply monitoring, we intend to produce guidance to indicate that in a limited number of areas where local planning authorities do not align with local authority boundaries, local authorities would be able to use a locally identified figure as the basis of five year land supply monitoring. This guidance will also clarify that the Housing Delivery Test will not be applied in National Park Authority and Broads Authority areas due to their particular circumstances and data availability.

Guidance will set out in more detail the approach that should be taken in Urban Development Corporation and Mayoral Development Corporation areas.

Question 6

Do you agree with the proposed transitional arrangements for introducing the standard approach for calculating local housing need?

Question 6 response

There were 1,102 responses to this question, and around a third (30%) of respondents agreed with the proposal. Points raised include:

- There were concerns about further delays in the plan-making process where local authorities had made significant progress with a plan, but would not be ready for submission before the deadline under the proposed transitional arrangements.
- About half (46%) of local authorities agreed with this proposal. Many proposed alternative transitional arrangements and called for further clarity on how the transitional arrangements should apply to local authorities with plans at different stages in the process.
- Developers raised concerns about how the proposed transitional arrangements would affect the timing of plan submissions, causing either a rush to submit early or else delaying the process.

Government response

The Government is keen to maximise the benefits of the new standard method of calculating housing need by bringing it into effect as soon as possible. However, we recognise that a number of plan-making authorities have made significant steps in preparing plans which we want them to complete. In the revised Framework, we are proposing to introduce transitional arrangements to allow plans to be examined against the old framework, where they are submitted for examination within six months of the revised Framework's final publication.

Statement of common ground

Question 7

- a) Do you agree with the proposed administrative arrangements for preparing the statement of common ground?
- b) How do you consider a statement of common ground should be implemented in areas where there is a Mayor with strategic plan-making powers?
- c) Do you consider there to be a role for directly elected Mayors without strategic plan-making powers, in the production of a statement of common ground?

Question 7(a) response

There were 822 responses to this question, with about half (45%) of respondents agreeing with the proposal. Points raised include:

- About half (52%) of local authorities supported the proposal but some were concerned that the proposed arrangements would create another level of difficulty in plan-making that will delay the process and not add real value as there is no duty to resolve disputes.
- There was considerable support (68%) from private sector organisations, but respondents suggested that the proposal may be challenging for local authorities and thought that statutory consultees should be included in the process.
- Respondents suggested that guidance is required on how a statement of common ground is produced and maintained.

Question 7(b) response

There were 251 responses to this open question. Points raised include:

- The question produced a wide variety of views with relatively few common themes emerging, and little common ground within particular interest groups.
- There was a marked divergence of views depending whether respondents were inside/adjoining such a Mayoral area.
- There was some support for Duty to Cooperate requirements being extended to these areas.

Question 7(c) response

There were 822 responses to this question, with a considerable proportion (65%) of respondents feeling neutral towards this proposal, and around a fifth (22%) were in agreement. Points raised include:

- The biggest support for this proposal was from private sector organisations, with about half (45%) being supportive.
- There was limited consensus on what the role of such Mayors should be.
- Supportive arguments included the benefits of Mayors playing a coordination role or being a signatory/key consultee on a statement of common ground.
- Most of those opposed to Mayors having a role had concerns about additional burdens, or extra layers adding delay and confusion to plan making.

Government response

We are proposing to amend the Framework so that local planning authorities and Mayors or combined authorities (with plan-making powers) are expected to prepare and maintain one or more statements of common ground when preparing their plans. These statements will document joint working undertaken throughout the plan-making process across their housing market area, or other justified geographical area.

Guidance accompanying the Framework will include further detail on the administrative arrangements for statements of common ground.

Mayors without strategic plan-making powers should be a signatory on those statements prepared by authorities in their area where they have responsibilities for delivering strategic priorities (such as transport improvements). In addition it is possible for Mayors (with or without plan-making powers) to play a role in helping to co-ordinate duty to cooperate discussions at the local planning authority level, and can update and maintain statement(s) of common ground should local planning authorities involved decide this would improve co-operation.

Question 8

Do you agree that the proposed content and timescales for publication of the statement of common ground are appropriate and will support more effective co-operation on strategic cross-boundary planning matters?

Question 8 response

There were 815 responses to this question with around a third (36%) of respondents agreeing with this proposal. Points raised include:

- More than half (58%) of private sector organisations were supportive of the proposals.
- Under half (40%) of local authorities agreed with the proposal, some were concerned that the proposed timescales to reach agreement on these matters is too onerous.
- Local authorities responding supported the idea that a statement of common ground is a 'live' document which should be able to change. However, they wanted flexibility to decide when and how updates are published.
- Across groups there was general support for guidance on how statements of common ground are to be produced and maintained, which suggested that a template should be provided to ensure consistency and clarity in approach

Government response

As well as proposing to amend the Framework, so that strategic plan-making authorities are expected to prepare and maintain one or more statements of common ground, guidance accompanying the Framework will include further detail on the content of these. We are proposing that the requirement for a Statement of Common Ground is brought into effect when the revised Framework is published.

Question 9

- a) Do you agree with the proposal to amend the tests of soundness to include that:
 - i. Plans should be prepared based on a strategy informed by agreements over the wider area; and
 - ii. Plans should be based on effective joint working on cross-boundary strategic priorities, which are evidenced in the statement of common ground?
- b) Do you agree to the proposed transitional arrangements for amending the tests of soundness to ensure effective co-operation?

Question 9(a) response

There were 815 responses to this question, with about half (52%) of those responding agreeing with this proposal. Points raised include:

- There was considerable support (69%) for the proposal from private sector organisations.
- About half (47%) of the local authorities responding were supportive.
- Respondents expressed concern that this is a duty to agree and that this is an unnecessary change, as the existing test of soundness is sufficient. Other respondents were concerned it might complicate the process of producing local plans and thereby cause delays in plan-making.
- There was also concern across groups of stakeholders that the proposal was too vague and that further clarification was needed.

Government response

We are proposing to amend the tests of soundness in the Framework so that the text more clearly encourages joint working and links to the statement of common ground. Further detail will be set out in guidance.

Question 9(b) response

There were 815 responses to this question, with under half (41%) of respondents agreeing with this proposal. Points raised include:

- About half (51%) of local authorities agreed with the proposal.

- Some local authorities and private sector organisations were concerned that local authorities may not have sufficient resources to participate. In addition, they considered this to be an unnecessary change as the statement of common ground will become the main evidence for local authorities to demonstrate agreement on cross-boundary issues.
- There were concerns among stakeholders that a 12 month timeframe is unrealistic (an 18 month time frame was suggested). The transitional arrangement should allow for flexibility where justified by the relevant local authority.

Government response

We are proposing that the amended tests of soundness will apply from six months after the final publication of the revised Framework. The proposals in the revised Framework will contain details of when these tests of soundness will not apply during the examination of a plan.

Planning for a mix of housing needs

Question 10

- a) Do you have suggestions on how to streamline the process for identifying the housing need for individual groups and what evidence could be used to help plan to meet the needs of particular groups?
- b) Do you agree that the current definition of older people within the Framework is still fit-for-purpose?

Question 10(a) response

There were 622 responses to this open question. Points raised include:

- The variety of answers received around issues of methodology and data sources suggested a need for guidance.
- Local authorities called for guidance to include a standard method and identify data sources.
- Developers also supported the provision of guidance and specified data that could be used to inform a method.
- From those outside the local authority and developer groups, there was a strong feeling that local authorities would benefit from working more closely with third sector organisations or community interest groups.

Government response

The Government welcomes the suggestions received on identifying the housing need for individual groups. We intend to build on existing guidance that sets out how the needs for different types of housing should be addressed and add further information where this would assist with the identification process.

Question 10(b) response

There were 811 responses to this question, and under half (42%) of respondents agreed with the proposal. Points raised include:

- Those who agreed that the definition is still fit-for-purpose found that it recognises the wide-ranging needs of older people.
- Many of the respondents in favour of amending the definition stated that it should not be restricted to retirement age in order to reflect the needs of people under this age who may wish to downsize or need specialist housing.
- Local authorities commented that the current definition is fit-for-purpose.

- Interest groups and charities were less supportive of the current definition with some calling for greater distinction between age ranges in the definition to reflect their differing needs.

Government response

The Government recognises respondents' concerns about the definition being linked to retirement age, and so we are proposing to widen the definition to include people approaching retirement. This will include planning for the needs of people seeking to move to more suitable accommodation at an earlier age, enabling them to live independently for longer. We are also preparing guidance for local authorities on how their local development documents should meet the housing needs of older and disabled people in accordance with the requirements of the Neighbourhood Planning Act.

Neighbourhood planning

Question 11

- a) Should a local plan set out the housing need for designated neighbourhood planning areas and parished areas within the area?
- b) Do you agree with the proposal for a formula-based approach to apportion housing need to neighbourhood plan bodies in circumstances where the local plan cannot be relied on as a basis for calculating housing need?

Question 11(a) response

There were 871 responses to this question, and about half (55%) agreed with the proposal. Points raised include:

- About half (45%) of local authorities opposed the proposal, suggesting that it could slow plan-making. In particular, concern was raised about requiring housing need to be set for all parishes as this could counter efforts to speed up production of local plans, which not providing a comprehensive approach that dealt with non-parished areas.
- Around a third (30%) were supportive, as they felt that this would add certainty to the neighbourhood planning process.
- About half (53%) of neighbourhood planning groups agreed with the proposal, as it would allow groups greater clarity and certainty about the housing needs in their areas, and would avoid the cost of using consultants. Some neighbourhood planning groups preferred to have the freedom to set their own housing numbers.
- There was strong support (78%) from the private sector with responses stating that the proposals would allow neighbourhoods to plan for an accurate housing number scrutinised at local authority level, providing increased certainty for all groups involved in the planning system.

Government response

We are proposing to amend the Framework so that strategic plans are expected to set out a housing requirement figure for designated neighbourhood areas, where this is possible, and to provide an indicative figure where it is not.

Question 11(b) response

There were 871 responses to this question, and around a quarter (24%) of respondents agreed with the proposal. Points raised include:

- There was considerable opposition (66%) to this policy proposal from local authorities who believed the formula was too simplistic. They suggested a formula could only be used as the starting point, as specific local constraints should be taken into account.
- Many neighbourhood planning groups believed the approach was too crude, although there were suggestions that a formula could work as a starting point if supported by guidance.
- About half (51%) of private sector organisations agreed with the policy proposal highlighting that the proposed formula can be a useful starting point to establish a baseline for housing need in the neighbourhood planning area.

Government response

We have considered the responses received and have decided not to take forward a simple formula-based approach to apportion housing need to neighbourhood areas.

Proposed approach to viability assessment

Question 12

Do you agree that local plans should identify the infrastructure and affordable housing needed, how these will be funded and the contributions developers will be expected to make?

Question 12 response

There were 657 responses to this question, and strong support (77%) for the proposal. Points raised include:

- Some local authority respondents indicated that plans already identify infrastructure and affordable housing requirements.
- 15% of responding authorities cited possible difficulties in getting information from providers and site promoters, were the proposal implemented.

Government response

We intend to make clear in the revised Framework that plans should set out policy requirements for developer contributions towards infrastructure and affordable housing. Guidance will emphasise the need for landowners, developers, infrastructure and affordable housing providers to engage in the plan making and viability assessment process.

Question 13

In reviewing guidance on testing plans and policies for viability, what amendments could be made to improve current practice?

Question 13 response

There were 628 responses to this open question. Points raised include:

- Some respondents called for a standard methodology and for Government to define 'competitive return to the landowner and developer'.
- Respondents also called for more transparency around the price paid for land and said that overpaying for land should not result in reduced developer contributions.

Government response

We intend to make clear in the revised Framework that plans should be assessed for viability, and we propose to set out in guidance how this assessment can be done in a way that is proportionate, transparent and simple.

Question 14

Do you agree that where policy requirements have been tested for their viability, the issue should not usually need to be tested again at the planning application stage?

Question 14 response

There were 853 responses to this question, and under half (42%) of respondents agreed with the proposal, with a further 26% expressing a neutral viewpoint about the proposal. Points raised include:

- Comments raised were generally supportive of this proposal.
- Many respondents queried how it would be implemented in practice and argued that there should be an allowance for exceptional circumstances.

Government response

We propose to set out in the revised Framework that, where proposals for development accord with all the relevant policies in an up-to-date development plan, the proposals should be assumed to be viable and no further assessment of viability is needed. Where further viability assessment is required by the plan it should reflect the approach set out in guidance and be publicly available.

Question 15

How can Government ensure that infrastructure providers, including housing associations, are engaged throughout the process, including in circumstances where a viability assessment may be required?

Question 15 response

There were 624 responses to this open question. Points raised include:

- Many respondents considered infrastructure providers to be hard to engage with, with many suggesting that making engagement with providers a statutory requirement would help.
- Others felt that the duty to cooperate or new statement of common ground would suffice to ensure that infrastructure providers are engaged throughout the plan-making and viability assessment process.

Government response

We propose to make clear in the revised Framework that plans should be shaped by early, proportionate and meaningful engagement between plan-makers and communities, local organisations and businesses. We intend to emphasise in guidance the need for landowners, developers, infrastructure and affordable housing providers to engage in the plan making and viability assessment process.

Question 16

What factors should we take into account in updating guidance to encourage viability assessments to be simpler, quicker and more transparent, for example through a standardised report or summary format?

Question 16 response

There were 605 responses to this open question. Points raised include:

- Having regard also to the responses to Question 13, many respondents favoured a standard methodology supported by guidance to define terms, values and evidence.
- 28% of respondents said that guidance should encourage a standard format and there was support for more transparency and ‘open book’ assessment.

Government response

We propose to set out in the revised Framework that all viability assessments should follow the Government’s approach set out in guidance and be publicly available. We intend to define key terms in guidance and encourage the use of non-technical summaries to a standard format.

Question 17

- a) Do you agree that local planning authorities should set out in plans how they will monitor and report on planning agreements to help ensure that communities can easily understand what infrastructure and affordable housing has been secured and delivered through developer contributions?
- b) What factors should we take into account in preparing guidance on a standard approach to monitoring and reporting planning obligations?
- c) How can local planning authorities and applicants work together to better publicise infrastructure and affordable housing secured through new development once development has commenced, or at other stages of the process?

Question 17(a) response

There were 851 responses to this question and considerable support (73%) for the proposal. Points raised include:

- There was overall support for increased transparency.
- Some mentioned that this proposal could result in increased resource pressure for local authorities.

Question 17(b) response

There were 556 responses to this open question. Points raised include:

- Some local authorities highlighted the impact this proposal could have on local authority resource pressures.
- Respondents also suggested that Government issue a standard form for monitoring.

Government response (question 17a and b)

We propose to consult on reforms to Community Infrastructure Levy (CIL) which would be implemented by amending the Community Infrastructure Levy Regulations 2010 (as amended, the ‘CIL regulations’) so that local authorities would be required to prepare an Infrastructure Funding Statement; to monitor funding received and spent via developer contributions; and to amend the CIL regulations to allow local authorities to seek planning obligations to secure a fee towards the cost of monitoring section 106 agreements.

Question 17(c) response

There were 556 responses to this open question. Points raised include:

- To publicise the contributions towards infrastructure secured from development, favoured approaches include using local authority websites, social media, site notices and monitoring reports.

Government response

As well as intending to introduce an expectation for local authorities to produce Infrastructure Funding Statements we intend to update guidance to encourage local authorities and applicants to work together to better promote and publicise the infrastructure secured through developer contributions.

Planning fees

Question 18

- a) Do you agree that a further 20 per cent fee increase should be applied to those local planning authorities who are delivering the homes their communities need? What should be the criteria to measure this?
- b) Do you think there are more appropriate circumstances when a local planning authority should be able to charge the further 20 per cent? If so, do you have views on how these circumstances could work in practice?
- c) Should any additional fee increase be applied nationally once all local planning authorities meeting the required criteria, or only to individual authorities who meet them?
- d) Are there any other issues we should consider in developing a framework for this additional fee increase?

Question 18(a) response

There were 747 responses to this question, and just over a third (37%) of the respondents agreed with the proposal. Points raised include:

- Many considered that this proposal would be illogical, as it could allow well performing local authorities to raise fees, while under-resourced local authorities could not.
- Amongst those that disagreed with the proposal, there was support for fees being applied uniformly to avoid uncertainty.

Question 18(b) response

There were 747 responses to this question, and under half (44%) agreed with the proposal. Of those respondents who considered there were more appropriate circumstances, the majority favoured a performance-related fee linked to factors within the control of the local authority such as the number of planning permissions granted, the speed and quality of decision-making, and the status of the local plan.

Question 18(c) response

There were 747 responses to this question. About half (45%) were unsure as to how the fees should be applied. 19% stated it should be applied nationally, whereas 36% believed it should be applied to individual local authorities, as and when they meet the criteria, rather than waiting for all authorities to reach that stage.

Question 18(d) response

In response to this open question, county councils and National Park authorities raised concerns that any measure that links an increase in planning fees to housing delivery would result in their exclusion from any increase. Other matters raised included the impact that any further fee increase would have on small and medium-sized developers, and the risk that an increase in the cost of planning applications would discourage development. The majority considered that any additional fee increase should apply individually to local authorities as and when they meet the criteria, rather than waiting for all authorities to reach that stage.

Government Response (question 18a - d)

In the housing White Paper the Government committed to introducing a 20% fee increase in advance of the further fee increase proposed in this consultation. The 20% fee increase was introduced on 17 January 2018. We will assess the impact of this fee increase on the resourcing and performance of local authorities when considering any further fee increase.

Other issues

Question 19

Having regard to the measures we have already identified in the housing White Paper, are there any other actions that could increase build out rates?

Question 19 response:

There were 807 responses to this open question. Key points from the consultation responses include:

- Tackling perceived land banking, increasing market diversification and supporting the prompt provision of site infrastructure were the most commonly cited areas respondents suggested might increase build-out rates. Greater Government intervention was also suggested.
- Local authorities were particularly interested in potential measures to ensure that developers build out after planning permission had been granted. A recurring theme was that the public sector should take a more proactive role in the construction of new homes.
- Developers and their representatives suggested that measures are needed to speed up the application process and to generate more permissions on larger sites.

Government response

We welcome the suggestions that have come forward through this consultation. Since the publication of the consultation paper, we have announced that an independent review of build-out will be undertaken. This review will be chaired by the Rt Hon Sir Oliver Letwin MP. The review has been tasked with explaining the significant gap between the number of new homes completed and the amount of land allocated or permissioned for new residential development. The review will make recommendations for closing this gap, and we look forward to its findings when published later this year.