

Appendix K: Options for reforming the planning systems: responses to the CMA planning working paper

Introduction

- K.1 In Section 5 of the final report, we set out our:
- (a) options for reforming the planning systems, meaning the overarching rules and framework that underpin planning decision-making;
 - (b) options for reforming the planning processes, meaning the administration and operation of the framework in place; and
 - (c) measures to support the effective implementation of our proposed reforms to planning systems and the planning processes.
- K.2 In determining our options, we have taken into account the feedback we received in response to our planning working paper, which was published on 3 November 2023. In this section, we summarise the responses we received to our planning work paper.

Options for reforming the planning systems

- K.3 We consider that the UK, Scottish, and Welsh governments could reform their planning systems by reference to one or more of the following options:
- (a) Option 2.1: More objective and effective use of targets.
 - (b) Option 2.2: Effective monitoring and enforcement of local plans.
 - (c) Option 2.3: Streamlining the planning systems.

More objective and effective use of targets

- K.4 In our planning working paper, we explained that the national housebuilding target could be set in a way that more accurately reflects housing need, and that this could be achieved by using a methodology that is easy to understand and uses reliable and up-to-date information. We explained further that whatever methodology is chosen, the target should be assessed at regular intervals to ensure it remains reflective of need, there should be limited discretion for the governments to adjust the original calculation, and local targets should be calculated so that they sum to the national target.

Responses to our planning working paper

General views

- K.5 Most respondents recognised the importance of establishing a national target that accurately reflects housing need.
- K.6 While respondents acknowledged that England had already implemented a national target, concerns were voiced regarding the Standard Method (SM), which serves as the baseline for local planning authority (LPA) housing targets. The primary critique centred around its reliance on outdated 2014 household projections. Respondents concurred with the CMA's proposal that an ideal method should be both easy to comprehend and based on reliable, up-to-date information.
- K.7 There was widespread support for the principles set out in the planning working paper, including the regular assessment of the target to ensure its ongoing alignment with housing needs; limited discretion for governments to adjust the original calculation; and the need for local targets to add up to the national target.
- K.8 Respondents also noted the absence of national targets in Scotland and Wales and called for improvements in the current approaches to target setting in those nations.

National target-setting

- K.9 Most respondents agreed that national governments should review their current methods for assessing housing need.
- K.10 Two respondents called for a national policy that required local plans to contribute to meeting the total housing requirement. This was supported by another respondent, who advocated for a compulsory national target supported by mandatory local plans that aligned local housing projections with the national target.
- K.11 One respondent proposed sanctions for failure to comply with the local plan or rewards in the form of grant planning approvals for those planning applications that were in line with the local plan.
- K.12 One respondent told us that the proposed national target should allow for fluctuations in delivery while aiming for an adequate overall supply to address relevant needs.
- K.13 One respondent proposed that an independent body should forecast housing need, which would be crucial for local planning and service providers to plan ahead for social, environmental, and economic provisions.

- K.14 One respondent stated that where local councils did not meet their target, the housing delivery test and presumption in favour of sustainable development should be retained to ensure targets were met.

Target setting across the GB nations

- K.15 One respondent told us that each national government should devise its own methodology for setting national housing targets, as differences in housing needs, size and range of services provided in an area and market demand between countries made a one-size-fits-all approach impractical. The respondent emphasised the significance of securing buy-in at a local level and ensuring that the methodology adopted was responsive to specific issues with the local housing market.
- K.16 One respondent expressed concern that England would persist in falling short of meeting housing needs unless the UK Government revised its approach to assessing housing requirements and prioritising constraints.
- K.17 One respondent raised concerns with Scotland's use of the current Housing Need and Demand Assessment (HNDA) and Minimum All-Tenure Housing Land Requirement (MATHLR) methods, which they considered consistently indicated numbers well below the actual housing needs in specific local areas.

The SM

- K.18 A number of respondents criticised the SM used in England to assess housing need. More specifically:
- (a) One respondent stated that the method required a comprehensive re-evaluation, focusing on the LPA's capacity to deliver housing within their constraints.
 - (b) One respondent told us that the method was incompatible and inconsistent with setting national and local targets, and that the appropriate methodology should fairly reflect housing need and be inclusive of migration and other population growth factors to ensure that it was future-proofed.
 - (c) One respondent told us that that unless the UK government changed its approach to assessing housing requirements and the way in which it prioritised constraints relative to the housing requirements identified, England would continue to deliver fewer houses than it needed.

A stock-based approach

- K.19 Some respondents were in favour of a stock-based approach, meaning an approach of setting a housing target by applying a percentage uplift to the total

housing stock to reflect the additional housing required with adjustments to reflect affordability or economic growth needs.

- K.20 One respondent proposed that while the stock-based method was designed for England, it could also apply to Scotland and Wales.
- K.21 One respondent suggested that once a target was established, there should be a five-year interval before adjustments could be made to provide certainty for local authorities and the development market.
- K.22 One respondent noted that a proposal for a stock-based method had been put forward, which suggested a target growth rate of 1.2% per year for existing stock, with the potential for upward adjustments.¹ The respondent further highlighted what they considered to be the following advantages of using a stock-based approach:
- (a) The approach was objective and easy to understand because the target had a direct relationship with the current size of the community.
 - (b) The number of new homes needed would adjust automatically based on the most up-to-date information without needing to be re-assessed in detail.
 - (c) There may be less scope for targets to vary based on other policy considerations and may provide local councillors with greater 'cover' to provide more planning permissions over time.
 - (d) New housing would be more evenly distributed around the country.

CMA criteria for determining an improved methodology for target-setting

- K.23 Most respondents agreed with the CMA's proposed criteria for an improved methodology for setting targets as outlined in the planning working paper.
- K.24 One respondent emphasised the need to have a national target that was not only deliverable but also enforceable.
- K.25 One respondent told us that if the target was enforced, this would establish a clearer and hopefully more widely accepted position among stakeholders. This respondent emphasised the importance of aligning local targets with national targets, advocating for its strict application to ensure both the national and local authorities delivered the required housing.
- K.26 One respondent suggested that a mandatory minimum requirement should be based on evidence, such as that published by the Office for National Statistics

¹ These adjustments hinged on local factors, such as availability of affordable housing and employment opportunities in the area, as well as substantial investment in infrastructure.

(ONS), and that adjustments should be made as necessary to align with policy objectives.

- K.27 One respondent suggested that the data used to determine the target should not only be comprehensive but also linked to housing need, as this would garner wider support. The respondent also told us that the methodology should seamlessly incorporate annual updates without significantly altering housing requirements, recognising the ongoing demand for housing and addressing historical shortages.
- K.28 One respondent explained that a stock-based approach, encompassing all of the CMA's features, would improve the target setting methodology.

Forecasting local and national housing need

- K.29 Many respondents agreed with the CMA's proposal for an appropriate method of forecasting local and national housing need.
- K.30 One respondent proposed a return to regionally derived targets, aligned with housing market areas, as a means to significantly expedite the preparation of local plans.
- K.31 One respondent suggested that a suitable method must integrate local and national estimates and that these estimates should incorporate projections of household numbers, measures of demand and make assessment of the need for affordable homes.
- K.32 One respondent endorsed fostering collaborations between housing and planning departments within local authorities, as such partnerships could enhance the awareness of planners of local housing needs.

Household projections

- K.33 One respondent suggested avoiding using household projections to set targets, as they relied on past delivery trends and may not serve as the accurate benchmark for future housing needs. The respondent explained that relying on past delivery trends for household projections had led to suppressed household information, imbalanced housing supply and demand, and a growing disparity between income and house prices.

Effective monitoring and enforcement of local plans

- K.34 In our planning working paper, we explained how the LPA's local plan is a key mechanism in determining which land is allocated for development and therefore more likely to be granted planning permission. Further, we explained that LPAs could be effectively monitored to ensure that their local plans are up-to-date and accurately reflect how they intend to meet local housing need and contribute

towards the national housebuilding target. This could be achieved by, for example, LPAs having in place their new plan upon expiry of the previous plan and ensuring that only those sites that are deliverable within the plan period are included in the plan. Where LPAs do not have up to date local plans in place, we explained that appropriate enforcement action could be taken to ensure that this is rectified as soon as feasible.

Responses to our planning working paper

General views

K.35 Respondents generally agreed with the need to effectively monitor and enforce local plans.

Reasons why local plans are not in place

K.36 Many respondents attributed the lack of local plans in place to insufficient LPAs resources and incentives to encourage timely production. More specifically:

- (a) One respondent suggested that funding needed to be prioritised in local council budgeting for the delivery of local plans.
- (b) One respondent suggested that there was a shortage of staff, highlighting the Local Government Chronicle in May 2023 that stated just one in 10 local council planning functions were 'fully staffed'.

K.37 Respondents also indicated that there were a number of inherent issues in planning requirements which were contributing to the lack of local plans:

- (a) Plan production and adoption was considered complicated. This had been driven by an increase over time in the number of prescribed issues that local plans were required to cover.
- (b) The cost of producing a local plan was high. One respondent suggested that the average cost was between £6 million and £7 million.
- (c) Frequent alteration of the planning systems led to more delays to the delivery of local plans as it often took a number of years for local authorities to properly adapt to these revisions.

Reducing the barriers for LPAs to having local plans in place

K.38 Some respondents suggested that steps should be taken to reduce the barriers for LPAs to having local plans in place:

- (a) One respondent suggested that a simpler approach with greater standardisation would make the overall systems more efficient.
- (b) One respondent told us that local plans should formally separate immediate commitments, where resources need to be deployed imminently, and longer-term goals, and that this approach would reduce the time taken to prepare local plans.

K.39 One respondent suggested removing the requirement for LPAs to pay the Planning Inspectorate's costs in reviewing local plans.

Using rewards to get more local plans in place

K.40 Several respondents suggested that financial incentives could help to get more local plans in place:

- (a) One respondent told us that the ring-fencing of planning application fees would encourage LPAs to have local plans in place. However, another respondent suggested that this approach would have limitations, as planning fees did not fully cover the cost of running a planning department.
- (b) One respondent suggested that New Homes Bonuses² could also be increased to reward the faster delivery of local plans.

Using sanctions to get more local plans in place

K.41 Two respondents suggested that sanctions could help to get more local plans in place:

- (a) One respondent suggested that only those LPAs with an up-to-date local plan should be in receipt of infrastructure (or equivalent) funding.
- (b) The same respondent suggested amending the NPPF to the effect that the green belt is not afforded full protection by national policy until its boundaries have been confirmed by an up-to-date local plan adopted in the past five years.
- (c) Both respondents suggested that a restrengthening of the presumption in favour of sustainable development would make LPAs refocus on local plan preparation.

² New Homes Bonuses are grants paid to local authorities in England to incentivise the creation of homes. These grants are paid in accordance with the level of net additional housing created in the local authority's respective area.

Streamlining the planning systems

- K.42 In our planning working paper, we explained that the planning systems could be streamlined by moving towards rules-based systems and limiting the extent to which the planning systems are subject to discretionary decision-making.

Responses to our planning working paper

General views

- K.43 Respondents generally supported the objective of increasing certainty in the planning systems. Some respondents suggested that a rules-based system was a good way to achieve this objective.
- K.44 One respondent stated there were a variety of factors that could influence the speed of housing delivery, not all of which were the responsibility of local planning authorities (e.g. applications submitted with incomplete information or which do not adequately address the requirements of the local development plan; delays negotiating and awaiting sign-off on Section 106 Agreements (in England and Wales) and Section 75 Agreements (in Scotland)). The respondent also told us that moving to non-discretionary planning systems would not necessarily make those systems more streamlined.
- K.45 Several respondents explained that England, Scotland, and Wales already had elements of a zonal system, through the use of local plans. For example, one respondent noted that England already had Local Development Orders,³ although their uptake had been limited. The respondent also explained that the Planning (Scotland) Act 2019 introduced Masterplan Consent Areas which local authorities could designate for particular types of development or uses, and proposals that were in accordance with this scheme would not need to apply for separate planning approval.
- K.46 One respondent suggested that planning was more than a reactionary system delivered on an application-by application basis. The respondent explained that the role of each planning system in the UK was to help direct new housing to the right places at the right times, achieving the quality and diversity required to ensure that communities had access to the housing they need. The respondent argued that moving from a discretionary to a rules-based system could therefore impact on the quality of homes built and the wider built and natural environment.

³ Local Development Orders provide permitted development rights for specified types of development in defined locations beyond those that are set out in the Town and Country Planning (General Permitted Development) Order. Such orders effectively remove the requirement to submit a planning application for certain types of development where they apply and grant permission automatically if confirmed by the LPA.

Challenges with moving to a rules-based or zonal system

- K.47 Some respondents suggested that rules-based or zonal systems could be prone to being out of date when circumstances changed, and then need time-consuming amendments.
- K.48 Several respondents raised the uncertainty and transitional issues that could be caused by a move to a rules-based or zonal system:
- (a) Two respondents noted recent reforms to one or more nations and the disruption they considered this caused.
 - (b) One respondent told us that a move to a zonal system would be impractical following the enactment of the LURA.
- K.49 Some respondents told us that that while there were advantages and disadvantages to moving to zonal system, they did not think it would be a net improvement, as housebuilders would not want to commence construction if consent could be removed by the LPA at a later date.
- K.50 Some respondents were supportive of a democratic element to planning, although one of these respondents told us that this should take place at the plan level rather than on individual planning applications.

Implementation

- K.51 There was general support for permitting the presumption in favour of sustainable development and housebuilders only having to submit a high-level plan to the LPA rather than a full planning application where developments were within scope of the local plan and where the high-level plan complied with the LPA's rules.

Alternative proposals with a similar intent

- K.52 Many respondents suggested changes to the criteria determining which applications were considered by Planning Committees and Planning Officer, with several respondents suggesting raising the level of approval for those applications requiring consideration by Planning Committees.
- K.53 Several respondents told us that there could be benefits in reviewing local authorities' varied schemes of delegation to determine which applications are considered by Planning Committees. Another respondent proposed that only those applications that were objected to by 51% of the local population should be referred to Planning Committees.
- K.54 Some respondents suggested shifting political involvement away from the application phase to the plan-setting phase of the planning systems, which could

be achieved by planners under delegated powers where applications are in line with the local plan. Similarly, another respondent suggested land use allocations and development standards guidelines could become the focus of public engagement, allowing permissions to be managed by professional planning officers through a greater level of delegated approval.

- K.55 One respondent suggested more certainty could be granted in specific areas through the use of Local Development Orders, Neighbourhood Development Orders, and establishing in local plans that community-led development will be granted in certain cases.

Options for reforming the planning processes

- K.56 We consider that the UK, Scottish, and Welsh governments could improve their planning processes by reference to one or both of the following options:

- (a) Option 2.4: Clearly defining and rationalising statutory consultees.
- (b) Option 2.5: Effective monitoring and enforcement of deadlines for statutory consultees.

Clearly defining and rationalising statutory consultees

- K.57 In each nation, planning law requires LPAs to consult statutory consultees, certain organisations defined by statute, before a decision is made on a planning application. LPAs have reported issues in getting statutory consultees to respond. In our planning working paper, we explained that LPAs could only be required to consult with a clearly defined set of consultees, although this would not prevent LPAs from consulting with other stakeholders or other stakeholders from providing their views to LPAs.

Responses to our planning working paper

- K.58 Although there was general support for our proposals, respondents noted the following:

- (a) One respondent told us that it would be beneficial to provide LPAs and planning officers with greater discretion to approve certain planning applications where statutory consultees had already had the opportunity to comment on a scheme at the plan-making or outline planning application stages.
- (b) One respondent told us that the input of statutory consultees was not negotiable and that not consulting them would put planning systems in a difficult position if permissions were issued which did not take account of key

constraints. The respondent suggested that it would lead to fewer planning permissions being granted, as the only recourse for an LPA would be refusal of the application.

Effective monitoring and enforcement of deadlines for statutory consultees

K.59 We have found that LPAs reported difficulties with getting statutory consultees to respond within the 21-day statutory consultation period. In our planning working paper, we proposed that LPAs could only be required to take into account the views of statutory consultees if they provide their views within the statutory 21-day period. If statutory consultees did not respond within 21 days, we proposed that the LPA could deem them to have consented to the planning application.

Responses to our planning working paper

General views

K.60 Respondents agreed that it would be helpful if statutory consultees responded within the required timescale.

K.61 Some respondents noted that there was the potential for unintended consequences to occur if deadlines were enforced, as it could lead to delay and increased development risk if the enforcement measures were not clearly thought out.

K.62 Some respondents noted that statutory consultees were facing resource constraints which were adversely impacting their ability to respond within the mandatory timeframe.

Requiring responses within the statutory timeframe

K.63 One respondent told us that enforcing the statutory timeframe may place additional pressure on LPAs, result in an increase in planning applications being refused, thus add significant risks for housebuilders.

K.64 One respondent noted a number of risks with the proposed approach:

- (a) Consultees could obviate the deadline by sending a 'holding response'.
- (b) Consultees could request further information to provide them with more time to respond.
- (c) Consultees could attach additional conditions to the planning permission, which result in more uncertainty and extended delays later in the planning process.

Alternative proposals

- K.65 One respondent suggested two alternative proposals:
- (a) The 21-day window could be the initial period for statutory consultees to signal if they wanted to make a substantive submission. They could then be granted a further period of time to provide their views, after which they could be deemed to have agreed to a scheme.
 - (b) Governments could develop a national accreditation scheme that certified third parties to make submissions on planning issues. If such a programme were adopted, they expected uptake to be strong, which would significantly reduce the burden on the statutory consultees.
- K.66 One respondent told us that statutory consultees should adhere to the same decision-making timeframes as LPAs, and that this could be achieved by including statutory consultees within Planning Performance Agreements (PPAs) or introducing performance targets.

Increased resources for statutory consultees

- K.67 One respondent told us that the enforcement of statutory timeframes should be coupled with some investment from central governments to boost capacity or direct resources where they are most needed.
- K.68 One respondent told us that statutory consultees would benefit from significant investment in their resources, skills, and training in planning matters, as they were not currently equipped to deal with the complexity of the planning systems and regulations that they were being consulted on.

Measures to support the effective implementation of our planning systems and processes options

- K.69 We consider that implementation of the options we have set out above could significantly improve the planning systems and the planning processes. However, we consider another two options are necessary to support the effective implementation of our planning systems and processes options.
- (a) Option 2.6: Raising planning fees to a cost-reflective level and ringfencing those fees.
 - (b) Option 2.7: Additional support for SME housebuilders.

Raising planning fees to a cost-reflective level and ringfencing those fees

K.70 In our planning working paper, we suggested that it may be appropriate to set planning fees at a level that covers the LPA's costs and hypothecate them for LPAs such that their funding is ringfenced from the wider funding available to the local authority.

Responses to our working paper

General views

K.71 Most respondents considered that resources were a significant issue for LPAs across England, Scotland, and Wales and that this option could have benefits if it could ease this constraint.

K.72 There was widespread support for ringfencing fees to ensure they were used for planning purposes. One respondent noted, however, that governments do not generally wish to micromanage local councils. Another respondent noted that this may require potential changes to the Local Government Finance Act (1981), which gave local governments more freedom to decide how to spend funding.

K.73 One respondent told us that they were not in favour of increased fees, as they had not seen a better or more resourced planning system when fees had been increased in the past.

K.74 One respondent told us that local authorities should be able to set their own fees and for these fees to cover the full cost of the determination of planning applications.

Link between increased fees and improved system performance

K.75 One respondent told us that any increase in funding from fees would only make a difference in so far as it led to improved service and decision-making.

K.76 One respondent suggested that increased fees should go hand-in-hand with a lowering of the evidence burden that must accompany both local plans and planning applications, as otherwise, there remained a risk that such additional funding was simply absorbed by the ever-increasing burden of evidence gathering and did not result in quicker local plan-making or decision-making.

K.77 One respondent told us that there was evidence of local authorities turning around their performance by adopting new ways of managing the planning process, including forms of lean management.

Impact of increased planning fees on viability

- K.78 Several respondents suggested that increased planning fees would be unlikely to impact on the viability of developments. One respondent explained that planning fees were a relatively small proportion of the costs of preparing a planning application and were not usually a significant determinate of viability.
- K.79 Many respondents noted, however, that increased planning fees could have a more significant impact on some smaller projects and SME housebuilders. For example, one respondent noted that there could be a negative impact for a few locations where land values were low and/or regeneration costs for brownfield sites were particularly high.

Additional support for SME housebuilders

- K.80 In our planning working paper, we proposed that that the UK, Scottish and Welsh governments and local authorities could provide greater support to SME housebuilders to help them more effectively navigate the planning process.

Responses to our planning working paper

General views

- K.81 Most respondents told us that improving the functioning of the planning systems would be the most appropriate way to help SME housebuilders.
- K.82 One respondent recognised that there were already some measures in place to support SME housebuilders, such as local authorities setting up special support systems for SME housebuilders to provide support and information for throughout the planning process. However, the respondent told us that more measures must be implemented to achieve a desired outcome, for example, through better funding of planning services.

Measures relating to direct policy amendments

- K.83 Respondents suggested the following measures relating to direct policy amendments:
- (a) Clearer policy in the NPPF, or potentially a National Development Management Policy setting standardised expectations around community-led development on windfall sites, or amendments to require a proportion of every allocated strategic site of more than 500 units to be sold to an SME housebuilder (subject to viability).
 - (b) The evidence required at the outline permission stage should be simplified and scaled back, which would lower potentially abortive costs for SME

housebuilders, given that planning permission is often the key to securing development finance for a project.

- (c) Ensure that an updated national housing target is aligned with, and reflected in, LPAs' local plan policy and plan-making.
- (d) Add 'medium sized sites' policies to the NPPF, defined as those below an appropriate threshold.
- (e) Create a 'permissive' policy regime for 'medium sized' sites, especially where affordable housing delivery is in line with local policy and includes social rent.
- (f) Develop 'exception site' policies for sites between 10 and 25 dwellings for self and custom build consents.
- (g) Allow sites where Registered Providers are looking to use Affordable Housing Program funding to deliver a 100% scheme to be viewed as 'affordable exception sites'.
- (h) Paragraph 70 of the NPPF could be strengthened to set out an expectation that LPAs must be able to demonstrate the land that will accommodate at least 10% of a housing requirement on small and, importantly, medium-sized sites (of up to 100 homes).

K.84 Supplementary Planning Documents offer the potential to create a more supportive policy environment.

Measures relating to LPAs

K.85 Respondents suggested the following measures relating to LPAs:

- (a) SMEs to receive guidance from the LPA at the pre-application stage.
- (b) Measures to increase delegation and streamline decision-making by LPAs (eg greater powers of delegation for certain sites, such as allocated sites under a certain threshold).
- (c) Direct lines of engagement with the planning authority.
- (d) Assigning specialist case officers across a number of LPAs as a shared service to improve the availability of qualified planners to address barriers experienced by SMEs.
- (e) Standardising elements of policy across LPAs with the aim of reducing the length and cost of the process (e.g. Section 106 agreements and local lettings plans for rural exception sites).

- (f) LPAs to plan for a wide range of site types to offer the market better choice and access to land supply.
- (g) Certain proportion of local plans to be delivered by small sites.

Measures relating to specific types of planning applications

K.86 Respondents suggested the following measures relating to specific types of planning applications:

- (a) Streamlined processes and timelines for smaller planning applications. Two respondents suggested that brownfield sites should benefit from a firmer presumption in favour of sustainable development.
- (b) Permission for large developments should require incorporation of a range of small sites where SME housebuilders are invited to participate in the development, which could involve PIP (permissions in principle).
- (c) Most large allocations should include a requirement for self-build and custom build plots which could also be acquired by an SME housebuilder.
- (d) Council-led development as a way in which land/work opportunities could be made available to SME housebuilders. This could involve councils purchasing land, installing infrastructure, and then selling plots to a variety of builders, which is common in parts of Europe.
- (e) Accelerating build-out on land which originates in the public sector by making sure that sales are made on condition that build-out objectives are realised. This could be through site splitting and directly contracting builders to complete homes either for low-cost market sale, full market sale or other tenures, including self- and custom build.
- (f) Greater use of brownfield registers.⁴

Measures relating to increased funding

K.87 Respondents suggested the following measures relating to increased funding:

- (a) Financial support from governments to reduce the level of risk associated with meeting the increasing costs required during the planning process.

⁴ Brownfield land registers are defined as registers of previously developed land that LPA considers to be appropriate for residential development, having regard to criteria set out in the Town and Country Planning (Brownfield Land Registers) Regulations 2017 (NPPF Annex 2 Glossary).

- (b) Encouraging Housing Associations to play a greater role to maximise their ability to unlock funding.
- (c) SME housebuilders should have access to specific funding for the planning application process underwritten by Homes England and repaid out of receipts when the houses are sold, or when full development funding is attained from conventional sources.

Measures specific to Scotland

K.88 Respondents suggested the following measures specific to Scotland:

- (a) The production of clear and specific guidance from the Scottish Government to mandate public agencies to focus on assisting SME housebuilders.
- (b) Simplify/shorten the existing systems from the allocation of sites to the detailed planning permission.
- (c) Ensure allocated sites are deliverable and shorten the onward planning application process.
- (d) Introduce a tiered structure of Section 75 contributions, waived completely for very small sites (i.e. less than 12 homes).
- (e) Staged planning application fees for SME housebuilders.

Measures specific to Wales

K.89 In Wales, RTPI told us that a new report published by RTPI Cymru, “Building Capacity through Collaboration and Change”, sets out the work of a number of pro-active LPAs in Wales in supporting effective site identification in Local Development Plans and supporting agents and applicants to understand planning application requirements in Wales.