

# RIBBLE VALLEY BOROUGH COUNCIL

## REPORT TO PLANNING & DEVELOPMENT COMMITTEE

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Agenda Item No. 8

meeting date: THURSDAY, 26 OCTOBER 2017  
title: PLANNING FOR THE RIGHT HOMES IN THE RIGHT PLACES:  
CONSULTATION PROPOSALS  
submitted by: MARSHAL SCOTT – CHIEF EXECUTIVE  
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### 1 PURPOSE

1.1 To inform Members of the Department for Community and Local Government consultation, '*Planning for the right homes in the right places, consultation proposals*' and the likely implications of these proposals on the Authority.

1.2 Relevance to the Council's ambitions and priorities:

- Community Objectives – The outcomes of the consultation will feed into the revision of the NPPF, which has direct implications for delivering spatial policy, subsequently impacting on a range of issues relating to the objectives of a sustainable economy, thriving market towns and housing provision.
- Corporate Priorities - The consultation outcomes will impact upon the production of the Local Plan. The production of this is a priority of the Council and will provide up to date planning policy tools which will aid performance and consistency.
- Other Considerations – the Council has a duty to prepare spatial policy under the Development Plan system.

### 2 BACKGROUND

2.1 The government has issued a consultation paper "Planning for the Right Homes in the Right Places" (a copy of it has been placed in the level C Members Room for consideration). It provides further details on some of the proposals put forward in the Housing White Paper "Fixing our broken housing market" (February 2017) to facilitate the planning and delivery of the homes which are needed.

2.2 The main elements of the consultation are:

- a proposed approach to a standard method for calculating housing need (including data for every authority on how many homes would be needed as a result of the approach);
- improving how authorities work together in planning for housing (and other requirements) across boundaries;
- how the new approach can help authorities plan for needs of particular groups and support neighbourhood planning;
- proposals for improving use of section 106 agreements in making the use of viability assessments simpler, quicker and more transparent; and
- seeking further views on how homes can be built out more quickly.

- 2.3 The Government intends to incorporate any final outcomes in a draft revised National Planning Policy Framework (NPPF) early in 2018 and following further consultation, a revised updated NPPF in Spring 2018.
- 2.4 Views are also sought on a proposal that local planning authorities may be able to increase planning application fees by a further 20% where they are delivering homes needed. This is above the 20% increase confirmed in February 2017.
- 2.5 Responses to the consultation must be made by 23.45 on Thursday, 9 November 2017. These must be made in the form of a response to an on line questionnaire. The questions are reproduced at Appendix One for reference.
- 2.6 The Consultation is summarised in the next sections along with comments arising from consideration of the implications for this Council and its planning functions.

#### Proposed approach to calculating housing need

- 2.7 Perhaps the most anticipated element of the consultation is the proposed standard approach to assessment of housing need to inform plan making. This will be based on published data and should be simpler, quicker and more transparent than current approaches which are seen as complex.
- 2.8 The starting point of the approach is the latest household projections, currently published every two years by CLG. It takes average growth over a ten year period, regarded as the minimum local housing need figure.
- 2.9 Since the projections are trend based and do not take account of households currently unable to meet their needs (e.g. because of constrained supply or affordability issues), an adjustment factor is applied to the calculation. This is based on a local affordability ratio of work-based median house price to median earnings, published annually by ONS.
- 2.10 The formula works in such a way that where the affordability ratio is 4, the amount of housing required is equivalent to the household projections. In the case of Ribble Valley, the affordability ratio is 7.2<sup>1</sup> which gives rise to an uplift in the household projections of an average of about 144 dwellings per annum<sup>2</sup> to 172 dwellings per annum (dpa).
- 2.11 The guidance makes clear that that the method does not make specific adjustment to take account of anticipated economic growth. Therefore authorities are able to plan for higher numbers where there is a policy in place to substantially increase economic growth. However, there is no specific guidance on how to factor economic growth into a calculation of requirements. Without this, there is likely to be continued debate at examinations to establish the figure.
- 2.12 In recognition that the approach may lead to significant increases in some parts of the country, the consultation proposes to cap any level of increase to ensure that method is deliverable. This will depend up on the current status of the local plan. This council's situation is that there is an up to date adopted Core Strategy (i.e. adopted in the last five years), in which that new local housing requirement figure would be capped at 40%

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<sup>1</sup> Work place based median house prices: median earnings ONS 2017

<sup>2</sup> Annual average over the period 2016-2026, derived from the 2014 based Sub National Household Projections: ONS 2016

above the currently adopted requirement. However, notwithstanding that the figure of 172 dpa does not include any uplift for economic growth, it is significantly below the current Core Strategy requirement of 280 dpa (approx. 39% reduction).

- 2.13 Where authorities are working jointly to produce plans, it is expected that the proposed approach will produce a single assessment of housing need for the area as a whole, which will be the sum of the local housing need for each authority and then distributed across the area as agreed by the constituent authorities.

#### Implementing the new approach

- 2.14 The consultation sets out that NPPF will be amended to state that plans will be reviewed every five years using up to date data. Household projections are usually issued every two years and therefore, utilising the proposed formula, the housing need figure will change in the plan making process. It is proposed that the assessment of housing need should be able to be relied upon for two years from the date the plan is submitted so that it does not become out of date through the examination. The final figure will be determined through the examination process.
- 2.15 The current Core Strategy plan period is 20 years (2008-2028) and includes the commitment to review the housing requirement within five years from adoption. The publication of new projections every two years implies the figure of need could vary regularly. Some provision needs to be made in the revised NPPF to protect the longevity of plans and the certainty needed to guide development in a period whereby, at least theoretically, housing needs can change considerably and regularly.

#### Benefits of the new approach

- 2.16 The aim of the new approach is to enable plans to be put in place more quickly; reduce cost and uncertainty; and be more transparent. It is proposed to amend NPPF so that part of testing the soundness of a plan will include identifying local housing need using a clear and justified methodology, which the use of the standard test will satisfy.
- 2.17 The Government wants the Land Registry to register all publicly held land owned by all public bodies, not just Local Authorities, by 2025 (all Ribble Valley BC held land is already registered). This is to help plan makers find suitable future housing sites, alongside the other methods of site identification that are currently in use. The percentage of unregistered land within a Council's area, alongside a finalised standard methodology for housing need mentioned elsewhere in the consultation, will be used to identify "areas of greatest housing need" listed in a separate document within this consultation.

#### Deviation from the new method

- 2.18 The expectation is that local authorities will use the standard approach when assessing need. It allows plan makers to put forward higher figure such as: as a result of strategic infrastructure projects; increased employment (and therefore housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with the Government or through delivering the modern Industrial Strategy. Where this is the case, guidance will be amended so that Planning Inspectorate will work on the assumption the plan is sound unless there are compelling reasons to the contrary.

2.19 The consultation as written does not refer to circumstances in which the requirement for affordable housing might give rise to higher figures (e.g. as might be demonstrated through a Strategic Housing Market Assessment or Housing and Economic Development Needs Assessment (SHMA/HEDNA). This gives rise to two issues: firstly, clarification is needed in any revised guidance as to whether the inclusion of the affordability ratio within the adjustment factor is expected to cover the matter of affordability in its entirety or whether additional adjustments need to be made. Secondly, there is the need to align all guidance, such as NPPF, NPPG, SHMA/HEDNA's etc in relation to calculation of housing need/requirements and assessment of affordable housing.

Implications of a standardised approach for calculating the five year supply of housing and the Housing Delivery Test

2.20 The consultation proposes that the new method for calculating housing need would come into effect after 31 March 2018, although the Secretary of State will have discretion to give additional time before the baseline applies. Views are also sought regarding whether national policy should be changed to enable five year supply to be calculated across a joint working area where that is the case. This is not applicable for Ribble Valley as a single housing market area.

2.21 The consultation also proposes transitional arrangements setting out when the standard method for calculating local housing need would apply, depending on the stage reached in plan production. Where a plan has been adopted in the last five years, as with the Core Strategy, the new approach to calculating need will be applied at the review of the plan. Alternative arrangements apply where plans are not as advanced as follows:

<b>Plan Stage</b>	<b>Proposed transitional arrangement</b>
No plan, or plan	The new standardised method should be used, unless the plan will be submitted for examination on or before 31 March 2018, or before the revised Framework is published (whichever is later).
Plan has been published, but not yet submitted	If the plan will be submitted for examination on or before 31 March 2018 or before the revised Framework is published (whichever is later), continue with the current plan preparation – otherwise, use the new standardised method.
Plan is at examination stage	Progress with the examination using the current approach.
Plan adopted in last five years	Use the new standardised method when next reviewing or updating the plan.

Further comments on the proposed approach

2.22 Overall, the introduction of a standard approach to calculating housing requirements can be supported in principle as it should streamline a significant part of the plan making process. The use of ready published data is also welcomed as it will introduce transparency to the process. However further clarity is needed in relation to the issues of whether affordability issues are fully recognised and how economic aspirations might

be quantified within the overall need. Without this, there is still likely to be significant input in the plan making and examination processes to determine these levels.

- 2.23 Another significant matter on which the consultation is silent is the consideration of any backlog in within the calculation. This is included in current methodology and arises where completions lag behind overall requirements in the plan period to date. Whether or not a factor to reflect any backlog should be included in the calculation should be made explicit. It is understood that the intention is that the backlog is accounted for in the formula and therefore there is no need for a separate adjustment. However there is concern about how this is treated in practice in a transition period. Clarity has been sought from CLG during a recent CLG workshop and they indicated that the matter will be reflected in the response to the consultation. In addition, the methodology does not seem to take account of vacancy rates or hidden households which are common components of calculating housing requirements.
- 2.24 The use of an affordability factor in the calculation has the effect of reducing requirements to less than the household projections in areas where the affordability ratio is less than 4 and increasing them above the projections where it is greater than 4. For those areas with a ratio of less than 4, this may have the effect of masking wider issues, such as the need to diversify the housing stock. This in turn could put pressure on other areas for increased requirements or impacts on affordability. Thus the overall approach may be seen a widening the gap between more and less prosperous areas.
- 2.25 There is a concern that the approach does not adequately reflect affordability issues in the local housing market and that guidance addressing any uplift is necessary to avoid lengthy challenges to housing requirements. Similarly guidance is required in relation to calculating economic uplift.
- 2.26 In addition to the new approach to calculating local housing need, the consultation includes matters relating to the following topic areas:

#### Statement of Common Ground

- 2.27 Whilst the Duty to Co-operate has been a requirement of LPAs for a number of years now, failing this duty is cited as one of the regular reasons why Development Plans are not found sound. The consultation proposes more effective joint working where planning issues go beyond individual authorities through a statement of common ground, setting out how they intend to work together to meet housing needs that cut across authority boundaries. This requirement will be set out in the revised NPPF. It is proposed that LPAs should use agreed housing market areas as the geographical area over which to develop statements of common ground, and they should be in place within 12 months of publication of the revised NPPF with an outline statement in place within 6 months.
- 2.28 The consultation makes clear that the statement of common ground is not intended to replicate any stage of the plan making process and should not disrupt existing joint working arrangements where these are effective. When completed the statement will be a clear and concise record of how local authorities work together to resolve common strategic issues.
- 2.29 In relation to Ribble Valley the geographical Housing Market Area remains the Ribble Valley borough only, however strong working relationships have been forged between surrounding authorities where policy adjustments have previously been implemented

where required (for example with Preston City Council via the ‘Longridge Adjustment’, which considers housing numbers, set out within the adopted Core Strategy). The duty to co-operate has been satisfied during previous plan examinations, and it is considered that these existing relationships will continue and be strengthened where necessary in producing Ribble Valley’s statement of common ground.

#### Planning for a mix of housing needs

- 2.30 In preparing Local Plans it is important that LPAs plan for (by making evidence based judgements) the right type, tenure, sizes and range of housing that is required in the area as well as the right number of homes. Identification of such need is usually carried out through the SHMA, however due to the proposed new approach for assessing local housing need, updated planning guidance on how to plan for different types of homes will be published alongside a revised NPPF. As part of the DCLG consultation suggestions are being sought on how to streamline the process for identifying the housing need for individual groups and what evidence could be used to help do so.
- 2.31 In relation to planning for different housing needs, part of the consultation is reviewing whether the definition of older people needs to be amended as the population ages, although government considers that the current definition is still fit-for-purpose. This council’s approach based on the Core Strategy definition goes further by linking the definition of housing for older people with accommodation that meets Part M of the Building regulations (formerly Lifetime Homes) to ensure that older people could remain in their property.

#### Neighbourhood Planning

- 2.32 The Government proposes that Local Planning Authorities (LPAs) provide Neighbourhood Planning bodies such as local Parish Councils with a housing need figure to inform their plans for housing land. This need figure can be based on the settlement strategy and housing allocations in the LPA’s plans provided that the LPA’s plans are sufficiently up to date. We would consider that our adopted Core Strategy and the soon to be examined allocations DPD (Housing and Economic Development DPD (HED DPD)) are up to date within this context.
- 2.33 The Government also proposes that in the future LPAs should set out in their plans housing need figures for any designated Neighbourhood Plans and Parished areas. This would imply that in forthcoming reviews that will update the Core Strategy, the future Local Plan contains housing need figures for all the Borough’s Parishes, (i.e. all the Borough). This would require an overall Borough wide housing need figure to be disaggregated down to a Parish level.
- 2.34 In addition, where a plan is out of date then Government proposes that a Neighbourhood Plan group be given a housing need figure by the LPA based on a formula relating to the Parish’s population as a percentage of Borough’s overall population figure. Such figures will be a starting point and unmet need from elsewhere in the Borough or land constraints will still need to be considered “at a strategic level”, presumably meaning an LPA level.
- 2.35 It is considered appropriate that the LPA should support the Neighbourhood Plan groups in setting a housing need figure because we already do Parish- based Housing Need Surveys and these should in theory be up to date . This would be for Ribble Valley an enhancement of the existing role undertaken. However this relates to affordable

housing not market housing requirements. In addition the purpose of a Neighbourhood Plan is also to enable local communities to promote additional development where there is local support for it. The LPA should assist those areas seeking to establish a requirement figure rather than a general duty to provide housing requirements at Parish level.

- 2.36 The simple population percentage based needs figure proposed if the Local Plan becomes out of date (or indeed if the relevant Parish Needs Survey goes out of date) should not raise any concerns so long as it is seen as a minimum figure. The onus would of course be on the LPA to maintain an up to date requirements figure and thereby avoid a policy gap.
- 2.37 The issue of having to set out detailed Parish figures in the Local Plan could however become contentious as unmet need and land constraints one Neighbourhood Plan area (or Parish) may prohibit adequate provision of its need within its own area, but which would have to be met elsewhere in the overall Borough, including other Parishes. The consultation recognises that unmet need etc should remain a strategic issue though.

#### Proposed approach to viability assessment

##### a) Viability in Relation to Making Plans

- 2.38 The consultation recognises that the current system, especially at application level, is obscure, complex and subject to manipulation to reduce contributions. It proposes that LPAs set out the types and thresholds for affordable housing, infrastructure needed to deliver the plan and expectations for how these will be funded and developer contributions. In essence this has been the basis of the Community Infrastructure Levy (CIL) process. Whilst we do not have a CIL in place to address these points we do have other documents that, taken collectively, already do so. It would then be a matter of formally including relevant elements of them in a Local Plan review. However it remains unclear how, outside a CIL, the exact funding contribution towards infrastructure could be set out in terms of an individual developer contribution. The difficulty is that it remains unclear how this can be achieved in practice, and any clarity on this will need to await the outcome of the CIL review which is being undertaken at present by the government. Delivery on CIL is a particular challenge in areas that are two Tier where the LPA is not the authority responsible for Highways, Education and so on.
- 2.39 In addition the consultation seeks further views about how plans and their policies should be tested for their effects on development viability with a view to amending NPPG. Viability was a consideration in preparing the Core Strategy and evidence of it was tested through the plan's Examination.

##### b) Viability in Relation to Planning Applications

- 2.40 The consultation proposes to amend NPPF to make it clear that where policies in plans have already been successfully tested for viability this issue should not need to be revisited at application stage. The Government also wants earlier engagement with housing associations and infrastructure providers to better inform plan viability assessments. It is proposed to update Planning Guidance to make viability assessments presented at application stage to be more transparent. Views are sought on items such as, but not limited to, clearly defined terms, preferred (i.e. agreed, standardised) approaches to calculating costs and values and accessible viability report formats.

- 2.41 It is recognised that delays to securing planning permissions can be driven by arguments around viability. Measures that assist removing those delays and the opportunities to re visit proposals will improve the process and help avoid situations where a community has seen a planning consent (or allocation) considered on the basis of certain infrastructure or affordable housing improvements being faced with new proposals that will not deliver the infrastructure previously established and potentially accepted as a benefit to the community. Earlier engagement with providers is not harmful although this has to be balanced with the speed of the process. Similarly it will be helpful if guidance provides for greater transparency and should include provision that applicants should pay for the independent application viability assessment.
- 2.42 As a further transparency- related matter, it is proposed to update guidance to require LPAs to set out publicly how they will monitor, report and publicise all funding secured through Section 106 contributions and how this will be and is being spent. The Government also wants a standard approach for this.
- 2.43 As the S106s are public documents, it would in principle be good to show residents more clearly how much is gained and how it is being spent to public benefit. The Council has reflected this in the evidence supporting the Housing and Economic DPD through the Infrastructure

#### Planning fees

- 2.44 The government has already set out an intention in the White Paper to increase planning fees by 20% where authorities commit to invest this increase in improving productivity of planning departments (e.g. ensuring the right skills and capacity). Further to this suggestion, the current consultation suggests that a further 20% increase may apply to authorities who are delivering homes needed by the community and views are sought on appropriate criteria to enable the fee increase to be applied.
- 2.45 The principle of a further increase, if ring fenced to the planning service, is acceptable. Consideration needs to be given to how this relates specifically to delivery of housing. The Council's main role is in plan making and through the Development Management process, including pre-application advice and these are areas that should be considered. The Council cannot actually ensure the construction as this is in the hands of developers so the ability to generate additional fees should relate to the Council's roles (e.g. the granting of permissions) and not the actual completions. Furthermore, it should be applied to individual authorities who meet the criteria rather than nationally when all have met it.

#### Other issues

- 2.46 The consultation also seeks views on whether other measures can be identified to increase build out rates. In addition it proposes to set out in NPPF circumstances where applications may be refused on grounds of prematurity. The amendments are awaited.

### 3 ISSUES

- 3.1 The issues relevant to this Council and its planning functions are set out in the body of the report as above.



### 3.2 Next Stages

Consultation responses must be submitted by 23.45 on 9 November 2017. CLG's current intention as set out in the consultation paper is to publish a revised National Planning Policy Framework in early 2018 and following further consultation, issue a revised NPPF in Spring 2018. If this timetable is adhered to, any revised final NPPF will guide the review of the Core Strategy, the timescale for which will be set out in a revised LDS, which will be the subject of a separate report to Committee.

## 4 RISK ASSESSMENT

4.1 The approval of this report may have the following implications:

- Resources – None arising from this consultation.
- Technical, Environmental and Legal – The Council has to follow the statutory regulations in preparing the statutory Development Plan, of which the revised NPPF will form part.
- Political – There is public interest in the NPPF and its implications on the spatial policy development for Ribble Valley.
- Reputation – Decisions taken in connection with the revision of the NPPF (following the outcomes of this consultation) will help demonstrate the Council's obligations to fulfil its statutory duties and meet its objective of being a well-run Council.
- Equality & Diversity – No implications identified.

## 5 **RECOMMENDED THAT COMMITTEE**

5.1 Consider the matters raised in the report and authorise the Chief Executive in consultation with the Chair of Planning and Development Committee to respond to the online consultation questionnaire to reflect the issues raised above and any further matters raised by Members of this Committee.

JOANNE MACHOLC  
SENIOR PLANNING OFFICER

MARSHAL SCOTT  
CHIEF EXECUTIVE

### BACKGROUND PAPERS

Planning for the right homes in the right places: consultation proposals (CLG: 2017) and associated consultation documents (available at <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>)

For further information please ask for Joanne Macholc, extension 3200.

## APPENDIX ONE: CONSULTATION QUESTIONS

The consultation seeks a response in the form of a questionnaire as shown below. Responses are sought generally in the form of yes, no or not sure/don't know with additional space for comment.

### Proposed approach to calculating the 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?

#### Question 1(b)

How can information on local housing need be made more transparent?

#### 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 3

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

#### 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 the Planning Inspectors?

#### 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?

#### Question 5(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?

#### Question 5 (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 6

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

## Statement of Common Ground

### Question 7(a)

Do you agree with the proposed administrative arrangements for preparing the statement of common ground?

### Question 7(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?

### Question 7(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 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 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?

### Question 9(b)

Do you agree to the proposed transitional arrangements for amending the tests of soundness to ensure effective co-operation?

## Planning for a mix of housing needs

### Question 10(a)

Do you have any 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?

### Question 10(b)

Do you agree that the current definition of older people within the National Planning Policy Framework is still fit-for-purpose?

## 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?

**Question 11(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?

**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 13**

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

**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 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 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 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?

**Question 17(b)**

What factors should we take into account in preparing guidance on a standard approach to monitoring and reporting planning obligations?

**Question 17(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?

**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?

**Question 18(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?

**Question 18(c)**

Should any additional fee increase be applied nationally once all local planning authorities meet the required criteria, or only to individual authorities who meet them?

**Question 18(d)**

Are there any other issues we should consider in developing a framework for this additional 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?