

## Department for Communities and Local Government: Planning for the right homes in the right places

### Elmbridge Borough Council Draft Response

#### 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?**

No – The Council acknowledges that the current process of calculating Objectively Assessed Housing Needs (OAHN) leaves ample room for interpretation and is frequently an area of debate during both the preparation of the Local Plan and in the determination of planning applications (e.g. calculating housing land supply). The general principle of a standardised methodology which would remove these disputes and speed-up the planning system is therefore broadly supported.

However, as proposed it is considered that the standardised methodology is fundamentally flawed, over simplistic and relies upon a limited range of datasets that, by themselves, do not provide a complete assessment of housing need within an individual local authority area or across Housing Market Areas (HMAs). On the issue of data for example, we urge the Government to consider factors such as employment growth and other market signals such as land prices, rents, concealed households, and homelessness, as a more nuanced standard methodology would more accurately reflect actual housing need.

In regard to the proposed steps of the standardised methodology, Step 1 and the use of data relating to household projections is considered appropriate. This is consistent with the current approach as set out in Planning Practice Guidance (PPG). Nevertheless and notwithstanding the need to regularly review the Local Plan (every 5 years); the Council is concerned as to how it is expected to plan for a 15-year period on the basis of a 10-year model (2016 – 2026). This is particularly relevant to Elmbridge and other Green Belt authorities where boundaries may need to be amended to accommodate a level of housing need and yet as set out in paragraph 83 of the National Planning Policy Framework (NPPF), *'authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period'*. Should a local authority wish to plan beyond a 10-year period, Government must provide guidance on how this is undertaken e.g. extrapolate the 10 year annual requirement over a further five years (in the case of a 15-year plan) or alternatively, using the long-term household projection figures provided by the ONS.

A key concern is however Step 2 and the arbitrary use of the affordability ratio which when used within the overall calculation, excessively increases the number of new homes to be provided. Focusing on the affordability ratio and how this is calculated, the Council wishes to raise the following concerns:

1. The use of work-place earnings

Whilst the Government's rationale for this is understood i.e. seeking to ensure those who work in an area can afford to live there, this approach places on over reliance on the assumption that people wish to live and work in the same area. There appears to be no robust evidence that supports this assumption. The use of work-place earnings also completely ignores the reality that, in areas such as Elmbridge, resident earnings are higher due the accessibility of the London employment market. Finally, it is considered that the basis for any calculation should be average **household** earning as opposed to taking into account the earnings of an individual.

2. The use of median house prices

Within areas such as Elmbridge, the use of median house prices as the basis of the calculation is unfortunately overinflated by distinct areas where the house prices are not representative of the wider area. For example, between the period 1<sup>st</sup> January and 1<sup>st</sup> September 2017, the Land Registry Price Paid Data reveals 1,248 residential transactions in Elmbridge Borough. Of these, 373 transactions (30%) were for properties over the average household price (£851,884) with the highest being for £9.5 million. The data also shows that approximately 60% of the total value of transactions during this period is attributed to the 30% of properties as noted above. This data clearly shows a distortion of the market. In the case of Elmbridge, the actual 'average' property that would be accessible to the vast majority of the market would be well below this distorted average. It is therefore considered that the use of lower quartile property prices would be more appropriate, or a threshold is set where local authorities can remove the upper quartile value properties e.g. the highest 25%, and then recalculate the adjusted median average house price.

### 3. The application of affordability ratios at a local authority level

By calculating the affordability ratio at a local area and then applying this to the local authority area, disregard is given to the existence of wider HMAs and the acknowledgement of variation within them.

Focusing on the Government's aim to boost significantly the supply of housing, it is considered that through the proposed uplift, it has been incorrectly assumed via an unproven / outdated causality that simply boosting housing supply will improve affordability in the market.

Research for CLG by the University of Reading for example, concluded that *'it may be difficult, or impossible, to achieve affordability targets at sub-regional levels. This is because local authorities, for example, may be close substitutes in terms of location for many households, so that increasing construction in a small number of areas generates strong population inflows, offsetting any improvement in affordability'* (Meen, 2011, page 17)<sup>1</sup>. The report further noted that even at regional level, increases in construction produce only modest improvements in affordability and would need to be long-lasting. For an increase in housing supply to reduce prices, there would thus need to be a large uplift in supply rates across London and the South East. However, the required level of supply is unlikely to be realistic given land constraints.

If the Government is serious about increasing affordability, the focus should be shifted towards realistic methods of delivery as opposed to theoretical numerical modelling. For example, the Government could rescind recent restrictive actions in relation to the provision of affordable housing such as the Written Ministerial Statement ('small site exemptions', 28 November 2014) and subsequent amendments to PPG.

Commenting on the proposals included within Step 3, the Council would seek justification for the selection of the 0.4 cap. There appears to be no justification other than the resulting national calculation (after the cap has been applied to the relevant authorities) resulting in a projected housing need of 266,000 dwellings per annum, which conveniently falls between the identified need of 225,000 and 275,000 dwellings per annum.

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<sup>1</sup> See A long-run model of housing affordability, by Geoffrey Mean, University of Reading, School of Economics, published by the Department for Communities and Local Government, 2011. ISBN: 978 1 4098 3174 7

The Council also considers that the overall approach conflates preparing an OAHN assessment with the identification of a deliverable housing target. In the case of Elmbridge, the figure of 612 dpa does not reflect a level of housing provision that can realistically be achieved. The Council strongly believes that the proposed methodology introduces '*a numbers game*' and is a further step away from the very essence of a spatial planning system and the very nature of '*planning for the right homes in the right places*'.

The Council considers it vital that the constraints on new development are taken into account as part of the Government's proposed methodology. Elmbridge, like most of Surrey, is heavily constrained by the Green Belt and other nationally important designations. These designations impose severe limitations on our ability to meet local housing need. In the interests of transparency and consistency, it is essential that constraints on development are taken in account when determining housing need for each authority.

We note that the data table accompanying the consultation includes a figure for each local authority area of land that is constrained, but this figure plays no part in the standardised methodology. We believe that that the local housing need figure needs to be modified by the constraints in each authority e.g. applying a Local Constraint Factor (LCF). This would provide a mechanism that recognises the Government's dual goals of meeting housing demand wherever possible, while at the same time protecting the Green Belt and other important areas. Recognition of nationally important constraints in setting a housing need figure could replace the arbitrary 0.4 cap proposed in the consultation, and further speed up the local plan process by removing another area that is often subject to dispute at examination.

The Council recommends that the Government look more closely at the approach taken by the 2016 Kingston and North East Surrey Strategic Housing Market Assessment (SHMA). The Council contends that the methodology applied by that SHMA was robust (utilising the most up-to-date at the time of preparation) and provided a sound baseline assessment from which a deliverable housing target could be calculated by each of the four partner authorities. It is worth noting that the outputs from the original SHMA and recent recalculation based on the latest population projections are consistent.

## **b) How can information on local housing need be made more transparent?**

The Council agrees with the need to ensure that information on local housing need is transparent. The Council, in conjunction with its HMA partners, is already making great strides in making this process transparent to local residents and communities. We have taken positive steps to demonstrate how our OAHN figure has been calculated by publishing our SHMA. We are also in the process of preparing supporting evidence that demonstrates how any resulting housing target takes into account the local issues that impact upon availability, deliverability and developability.

Notwithstanding the Council's general concerns over the proposed standard methodology, if implemented, improved transparency could be achieved by including the ONS figures used for projecting household growth and affordability ratio within the adjoining data table.

In addition, with reference to paragraph 36 of the consultation paper, it is considered that Government should be responsible for updating and publishing the calculation of local housing need figures upon the release of up date household projections and affordability ratio. As set out in paragraph 36, the responsibility is currently proposed to be with that of LPAs: *'local planning authorities, when calculating their local housing needs, should always use the most up-to-date data available'*. However, to ensure consistency and timely up-dates across all Boroughs and Districts, the Council strongly recommends that this responsibility is left with CLG. This will provide a 'national snap-shot' of housing need as well as a single location from where the information can be accessed.

### **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?**

No – If the Government were minded to continue with the implementation of a standard methodology, the Council would welcome the opportunity to 'fix' their assessment of local housing need. However, it is not considered appropriate for this to apply from the date the plan is submitted. Rather, the period should apply from when a LPA consults on its proposals at Regulation 18. Otherwise there is the danger that, if updated needs information is published shortly prior to the submission date, many LPAs will fear a challenge to the housing needs numbers if they press on regardless with the "old" numbers. At the very least, councils should be able to "fix" the basic OAHN number once they have published the Regulation 19 pre-submission document for public representations, but ideally it should be

earlier than this in the process, to allow a smoother preparation of the Regulation 19 document.

LPAs should also be able to rely upon an assessment of housing need for a period of three years. This will ensure that there is greater certainty for all involved in the plan-making process as to the number of homes that are required, in case of unexpected delays in the plan-making process later. The need for a longer 'fixed' period will also be particularly relevant for those LPAs dealing with complex and often controversial issues such as the need to review and amend Green Belt boundaries and the need to ensure that the constraints to meeting development needs are fully explored.

**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?**

The Council welcomes the Government's proposed amendment to national planning policy. This should make the scrutiny of the Local Plan process more straightforward for stakeholders. However, the Council strongly believes that the methodology to be used should be left to the LPA / HMA partners rather than the standardised methodology being imposed.

**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?**

Yes - The Council agrees with this proposal. However, it is considered appropriate that where an alternative method is proposed, scope is allowed for the Planning Inspectorate to provide a level of challenge **before** the Local Plan is subject to the pre-submission representations period and submission itself. This is to minimise the potential for an inappropriately-justified methodology reaching the examination stage, with all the costs and delays that could be caused if significant further work is needed to deliver a "sound" Local Plan.

**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?**

Yes – the Secretary of State (SoS) should exercise discretion. The Council strongly disagrees with the proposal that, in the case of Elmbridge, no transitional arrangements are proposed and that after 31 March 2018, the new method for calculating the local housing need will apply as the baseline for the Local Plan and in the calculation for assessing the five year housing land supply.

This *'one-size fits all'* approach ignores the fact that the Elmbridge has taken strides to assess and plan for its development needs. It also ignores the fact that the Council's efforts have been significantly undermined by the amount of recent consultations (on the Housing White Paper, this current consultation, future CIL announcement in November 2017, the proposed draft revised NPPF to be published in spring 2018 etc.,) that have created uncertainty for both officers and Members and have subsequently led to delays in the plan-making process.

Furthermore, this blanket approach ignores the reality of plan-making in that, in some LPA areas, it may take longer to get a plan in place. This is particularly relevant for those Councils that have to balance high levels of housing needs with the complex and often controversial issue of needing to review and potentially amend Green Belt boundaries.

As such, it is considered that a later date is appropriate from the introduction of the Housing Delivery Test – at least one year following the publication of the revised NPPF as a baseline. After this time, SoS should also be able to take into account whether a local authority can demonstrate evidence that it is making timely progress with a Local Plan review (e.g. evidence of recent consultations and the completion of key evidence base studies) prior to the automatic use of any OAHN figure calculated using the standardised methodology.

**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?**

The Council is not preparing a joint local plan and therefore holds no opinion on the proposal.

**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?**

This is not applicable to the Borough Council.

**Question 6: Do you agree with the proposed transitional arrangements for introducing the standard approach for calculating local housing need?**

No – The Council agrees with the principle of the proposed transitional arrangements however, strongly disagrees with arrangements as proposed. Whilst a transitional approach is sensible, it also needs to enable a balance to be struck between using figures in existing adopted Local Plans / SHMAs and applying, up-to-date evidence of need (from the new standard methodology). This could have the effect of “penalising” those authorities where up-to-date evidence shows that “current” OAHN (not necessarily Local Plan housing numbers) is below “old” OAHN.

Furthermore, the consultation paper states that a number of plan makers have already made significant steps in their plan-preparation, and that the Government wants to encourage them to complete their plan whilst avoiding further delays that could undermine the delivery of new homes. Since it is not known when the revised NPPF shall be published, the transitional period is currently of an undetermined length. This means many authorities will not be clear on whether to proceed with their current OAHN or to change to the new figure proposed in this consultation. Until the revised NPPF is published, the Government should refrain from imposing a time limit on plan submission before the new figure must be used.

**Question 7:**

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

Yes - The Council agrees that the proposed statement of common ground should be based on the area defined by their HMA with the recognition that there will be other strategic planning matters which go beyond these areas where meaningful engagement will also be required.

The Council is already pursuing this form of sub-regional planning arrangement with its HMA partners. Interest has been expressed to CLG by the Council as to the potential for the Kingston, Elmbridge, Epsom & Ewell and Mole Valley HMA partners becoming a pilot study for the statement of common ground. We are awaiting a response.

**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?**

Elmbridge is not an area where there is a Mayor with strategic plan-making powers however, given that parts of the Borough are contiguous with the London Borough of Richmond upon Thames and the Royal Borough of Kingston upon Thames, the Duty to Co-operate and how it operates in areas where there is a Mayor is of concern. Currently there appears to be significant disparities in how the current Duty functions. Experiences of examinations demonstrate that the Greater London Authority (GLA) and London Borough's are treated differently from other LPAs when it comes to discharging the Duty to Co-operate in particular, when it comes to address needs and discussions beyond the boundary of the GLA.

If the Government is intent on making changes to national policy and associated legislation it is suggested that they use the opportunity to address the differences in the Duty between London and neighbouring areas, such as Elmbridge. Failure to do so is likely to undermine the ability for meaningful strategic planning to take place.

**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?**

This is not applicable to the Borough Council.

**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?**

Yes – The Council agrees in principle to the proposed timescale for statements of common Ground. However, the Borough Council requests that the Secretary of State notes that such agreement is given on the basis that work towards meeting this proposal is already underway in Epsom & Ewell. The Secretary of State should understand and acknowledge

that in other parts of the country such work will be less advanced and other authorities may need more time to meet this proposal.

**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?**

Yes - The Council generally agrees with this but there is a concern that delays agreeing the statement of common ground (particularly in circumstances where plan-making timescales are misaligned) could delay the overall plan-making process in other LPA areas. The Council also believes that irrespective of the statement of common ground and discussion on cross-boundary working, it may not always be possible for neighbouring authorities to agree on all cross boundary issues and in particular, meeting development needs in full across the wider HMA area. Subject to proper scrutiny of the degree of co-operation undertaken, the lack of agreement should not necessarily lead to a Local Plan being found unsound.

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

Yes - The Council supports the proposed transitional arrangements; the new tests of soundness cannot be applied until 12 months after the revision to the NPPF to allow for the 12 month period in which a statement of common ground is produced.

**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?**

The Council generally supports the need to streamline the process for identifying the housing needs for individual groups however, it is surprising that the Government has published a replacement method for calculating housing need, effectively making a SHMA redundant, without setting out in detail how the other useful evidence from this

document (types, size, tenure breakdowns and the specific needs of individual groups) will proceed. In consulting on suggestions to 'streamline the process for identifying the housing need for individual groups' without proposing how this might be done, the Government has shown it is premature in its actions. The Council therefore requests that the Government sets out in detail how this process will be streamlined, before asking interested parties to comment on their plans. As with the Council's previous comments regarding the proposed standardised methodology it is strongly urged that such assessment cannot, and should not be reduced to three part calculations.

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

No - The current definition of 'older people' is very broad in that it includes anyone above the age of retirement. This is inherently vague as depending on career and circumstances, one can retire early or may need to work until they are much older. Furthermore, for local plans currently being prepared, the minimum age to receive a state pension is set to increase twice (in 2020 and between 2026 and 2028).

The needs of retirees, therefore, can be vastly different for each individual. It would therefore be wise to update the definition to move away from 'retirement' and become more focused on the typical needs of older people, possibly above a threshold age, which include the need to downsize, the need for retirement or sheltered housing and those with support or care needs.

**Question 11:**

**a) Should a local plan set out the housing need for designated neighbourhood planning areas and parished areas within the area?**

In Elmbridge Borough there has been limited interest in bringing forward a neighbourhood development plan. One area has been designated however; the neighbourhood forum does not intend to draft policies relating to housing allocations.

**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?**

The Council has had limited involvement in neighbourhood planning to date however, generally considers this approach as too simplistic. It is considered that the rudimentary apportionment calculation based on the size of an existing population is flawed when applied to the more urbanised and compact neighbourhood plan areas. The principle could lead to a higher housing need figure in those areas which may have the least opportunities (i.e. developable and deliverable sites) due to the existence of constraints. The apportionment formula would in of itself be a strong deterrent to establishing a neighbourhood plan area.

**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?**

Yes - This approach is essentially the same as existing. However, in order to make it work as effectively as possible, detailed longer-term engagement from utilities providers will need to take place. Too often, near-complete certainty of costs can often only be provided 5+ years ahead, due to the nature of the legislative and regulatory regime. This can make it difficult for LPAs to understand what the infrastructure costs might be, especially on larger sites or those planned to come forward later in the Plan period. This raises viability concerns when some of these sites come forward as planning applications.

In addition, Government must lay out new guidelines and definition to ensure that developers cannot always claim a 'special case' to avoid their obligations. For example, developers should not be able to claim issues of viability where they are already benefitting from vacant building credit thus reducing affordable housing provision.

**Question 13: In reviewing guidance on testing plans and policies for viability, what amendments could be made to improve current practice?**

Yes – The Council strongly agrees with this statement

The Government should consider recommending a standardised methodology for calculating viability for plan making purposes, as this area of work is subject to the same level of dispute as that applying to housing demand forecasts. Set variables should also be considered taking into account regional / sub-regional variations.

**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?**

Yes. We can see the attraction of knowing that policy requirements, such as the delivery of affordable housing, are being met in full from the outset and agree that it is important that developers recognise their responsibilities and do not challenge the viability of a development at the planning application stage where the policy requirements have already been tested. However, recognising that in the real world, market conditions can change quicker than the local plan review process allows for, there may need to be flexibility on this.

As Michael Beaman<sup>2</sup> said in 2013, *'if developers tend to make optimistic assumptions when buying land, then the logical approach to dealing with many viability issues affecting individual sites is to ensure that sensibly gauged contributions policies are not flexible but explicitly and widely known to be non-negotiable, because the benefits of any flexibility will in many cases simply flow back to the seller of the land'*.

More recently, research published in January 2017<sup>3</sup> for various London Boroughs found widespread support for a fixed, single or scaled, non-negotiable affordable housing contribution.

**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?**

The Duty to Co-operate continues to fail in this regard. The Government should place a legal / mandatory requirement upon providers to engage. In the Council's experience, often the utility providers are the most difficult to engage; asset management planning periods often fail to align with local plan periods and are significantly shorter. Providers can appear reluctant to identify potential capacity deficits due to commercial sensitivities.

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<sup>2</sup> <http://www.regenerate.co.uk/Development%20Freakonomics%202.pdf>

<sup>3</sup>

[https://www.rau.ac.uk/sites/files/rau/field/field\\_document/Viability%20and%20the%20Planning%20System%20Research%20January%202017.pdf](https://www.rau.ac.uk/sites/files/rau/field/field_document/Viability%20and%20the%20Planning%20System%20Research%20January%202017.pdf)

**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?**

The Council would strongly encourage the requirement for developers to use a commercially sound standardised toolkit model such as the HCA development appraisal tool. Uniformity across viability assessments would be welcomed for improved transparency and simplicity. A preferred approach to calculating costs as well as the use of standard terms, pre-defined in a glossary, would make assessments easier to understand and therefore more transparent.

**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?**

No – The Council already does this on an annual basis through the publication of the Authority's Monitoring Report.

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

The Council has no comment to make.

**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?**

The Council has no comment to make.

**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?**

No – The Council considers that all LPAs should benefit from an additional 20% fee. The increase should not be considered as a reward but as a necessity to ensure planning departments are able to increase both capacity and capability. The increase in fee should be a driver for increased deliverability, allowing LPAs to invest in their planning offices. Alternatively, LPAs should be able to set their own fees which reflect actual costs.

**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?**

Yes - All LPA's should be able to charge the further 20% provided the fee increase income was ring fenced for Planning Services.

If the Government were minded to only agree a 20% increase to those authorities who are delivering the homes their communities need, then they must look beyond the delivery of housing numbers alone. As set out in previous responses to this consultation, for reasons such as environmental and other policy / physical constraints some LPAs are unlikely to meet the identified OAHN. The Government must therefore consider other aspects of delivery such as ensuring the provision of homes for older persons; the provision of affordable homes; and an appropriate mix (size) of homes in accordance with the latest assessment of need.

**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?**

The Council considers that the further 20% should be applied nationally without being linked to the delivery of homes their communities need. LPAs countrywide need additional funding to improve efficiency and to enable them to manage workloads; the additional fee increase should be applied nationally rather than rewarding those authorities that are able to deliver a higher number of houses.

If the Government were minded to continue with its proposal to link the increase to the delivery of homes then, this should be applied to individual local authorities who meet

the set criteria. LPAs meeting the criteria should not have the additional 20% fee increase withheld because other LPAs are not meeting the criteria. It is unlikely that every LPA will meet the criteria at the same time. Withholding the increase in fees will place financial burden on the LPAs who come first.

**d) Are there any other issues we should consider in developing a framework for this additional fee increase?**

As per the pilot study a few years ago, the fees payable should reflect the time taken to process an application of that type (along the lines that a private consultant would set out a fee proposal to a client for a particular job).

**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?**

The Government should consider introducing time limit (completion) conditions along similar lines to those imposed on the proposed larger home extensions under Schedule 2, Part 1 (Class A) of the T&CP (General Permitted Development) (England) Order 2015. Also build out rates could be increased by introducing legislation to prevent housebuilders / developers to landbank as this would cause developers to concentrate their efforts on current deliverable sites rather than future uncertainties.