

The Chartered Institute of Building (CIOB)

submission to

The Ministry of Housing, Communities & Local Government

on the consultation

Proposed reforms to the National Planning Policy Framework and other changes to the planning system

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David Parry
Senior Parliamentary & Public Affairs Officer
e: dparry@ciob.org.uk

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Introduction

The Chartered Institute of Building (CIOB) is the world's largest and most influential professional body for construction management and leadership.

We have a Royal Charter to promote the science and practice of building and construction for the benefit of society, and we have been doing that since 1834. Our members work worldwide in the development, conservation and improvement of the built environment.

We accredit university degrees, educational courses and training. Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets.

Full response

Local Plans

9. Do you agree with the role, purpose and content of local plans set out in policy PM2? - **Neither agree nor disagree.**

Whilst CIOB broadly agrees with the sentiment included in policy PM2, i.e. that local plans should set out a positive vision and spatial strategy to support the delivery of homes and infrastructure in their local area as well as improving the environment at a local level, we question some of the detail included in this policy.

Our primary concern derives from the three points outlined below. Whilst none of these are fundamental to the purpose of policy PM2, clarity on these points could help avoid confusion during the plan making process and set out a clearer strand of thought for why decisions on changing policy relating to local plans has been made.

1. Paragraph 1(a) sets out that the vision for a local plan should be supported by “no more than ten measurable outcomes”. The previous iteration of the NPPF did not provide a numerical limit to the number of measurable outcomes and no explanation has been provided as to why a limit of ten outcomes is being proposed. Greater clarity is needed on why this number has been chosen as well as any exceptions that could be made should more than ten measurable outcomes benefit a plan-making authority. It would also be useful to know if the limit of ten outcomes still applies in instances where joint local plans are being prepared by two or more local planning authorities or whether this limited is extended.
2. Paragraph 4 includes provisions for the Secretary of State to intervene in plan making where a local planning authority fails to make adequate progress. Whilst CIOB supports strategic intervention to ensure that relevant, sufficient and up-to-date local plans are in place, we feel that greater detail is needed on the circumstances in which intervention will take place. It is unclear if this paragraph only references those times in which a local planning authority falls behind on its statutory plan-making timetable or if this also refers to instances in which a local planning authority is well behind on providing adequate policies according to the criteria set out elsewhere in the proposed NPPF (such as provision for a five year housing land supply).

3. Greater clarity is needed on the contents of Paragraph 5 of the proposed NPPF. At present it sets out that joint local plans should be considered where this would allow two or more local planning authorities to enable planning matters to be dealt with more effectively. Again, whilst CIOB supports the principle here, more explanation is needed. Given the fragmented nature of local plans in recent years, it is unlikely that many neighbouring authorities are working on the same timeframes for creating new plans. The proposed NPPF should include details on how this is navigated should the best course of action be for a local planning authority to delay renewing its local plan for the sake of a future joint plan that better navigates housing and infrastructure delivery.

Additionally, we recommend considering the written evidence provided by the Royal Town Planning Institute (RTPI) on the capacity of local plan teams within local planning authorities. Their evidence highlights the constraints within those teams and the barriers it presents to having up-to-date local plans in place.

14. Do you agree with the approach to identifying land for development in PM9? - **Partly agree.**

Proposed policy PM9's wording broadly seems sensible as it sets out the basic criteria for an assessment of land availability and the assessment of sites that come forward during the evidence gathering stages of a local plan.

However, we note that the previous iteration of the NPPF contained similar, but more detailed provisions under the Identifying Land for Homes section (paragraphs 72-77). While slightly more fragmented, the previous iteration of the NPPF contains far greater detail in this section, including the need to include small and medium-sized sites in housing assessments, windfall site inclusion, community-led development, amongst others.

Whilst we understand that detail on these aspects is included within other policies in the proposed NPPF (notably HO3, L1 and HO10), given the significant change in drafting that has occurred here, it would be worth noting in this section that policies relating to specific types of land/sites are included elsewhere in the proposed NPPF. This would avoid confusion and assure readers that crucial policies, such as those relating to the provision of small sites, have not fallen out of the purview of the NPPF.

15. Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11? - **Strongly agree.**

CIOB strongly supported the decision to reinstate the need for local planning authorities to participate across boundaries in the previous NPPF consultation in September 2024.

However, the relationships across local authority boundaries can depend heavily on the political makeup of the local authorities in question. Effective, clear mechanisms for cooperation help to ensure that local authorities can strategically plan to take on more development from their neighbours where necessary, as well as cooperate on cross boundary growth opportunities and infrastructure.

Where Duty to Cooperate has failed in the past is that it has felt like a standoff between local authorities where those who pass on development to their neighbours are seen to have failed to plan or found excuses not to build more homes. This must be addressed in order to foster a more positive relationship between local authorities, such as in the case of Glasgow and Clyde Valley in the 90s and 00s where benefits were created for areas to plan for housing together where it was not possible for housing need to be met within a single local authority boundary.

In this instance, both Glasgow and Clyde Valley local authorities developed a series of common perspectives for cooperation in the wake of the termination of Strathclyde Regional Council. The two authorities created a combined structure plan which led to the creation of new local plans in tandem across boundaries. The result of this was that the authorities were able to strategically combine resources and targets to plan for strategic development together rather than bidding against each other or offsetting housing without cooperation. The benefits of this were realised with successful bids to Scottish Government for additional monies for local investment.¹

It is worth considering the language used in this draft NPPF. Paragraph 4 of policy PM10 states:

“Where there is uncertainty about the future direction of other parts of the development plan or the plans of infrastructure providers, such as due to misaligned timings, planmaking authorities should make pragmatic decisions on the basis of available information rather than waiting for a full set of evidence from other bodies.”

Given that many plan making authorities will be creating their plans at different times, alignment on cross boundary matters, especially those pertaining to the creation of new cross boundary infrastructure might be difficult to accommodate for. This should be considered through examination processes where intention to cooperate might hold greater weight than finalised plans for cooperation.

Housing Delivery

24. Do you agree with the principles set out in DM3? - **Partly agree.**

The principles set out in policy DM3 seem sensible and are laid out in a more constructive and concise manner than in the current iteration of the NPPF.

We are pleased to see the draft paragraph 1d. While we encourage cooperation and collaboration with statutory consultees where possible and relevant, we note significant criticism that has been fed back to us by members that delays in advice from statutory consultees has caused bottlenecks in the broader decision-making process, slowing down the planning system and often resulting in profit loss.

While we support the intention and principle of policy DM3, we do hold concerns about the wording of paragraph 1f. At present, we are concerned that the wording “Not refuse applications for development which should be approved” could be left open to significant interpretation. It is not clear if this is a broader intention that applications that already comply with other policies set out in this draft NPPF should be automatically set for approval or if it refers to applications which have been recommended for approval by planning officers that have subsequently been refused by politically elected members at local planning authorities.

Greater clarity is needed here to ensure that the intention to make the new NPPF more prescriptive is not lost through loose drafting.

30. Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? - **Partly disagree.**

While policy DM7 does, to a degree, clarify the relationship between some separate regulatory regimes, it could be far more explicit about the need to correctly consider the weight and importance of regulatory regimes such as the one led by the Building Safety Regulator (BSR).

¹ Royal Town Planning Institute (RTPI), [Strategic Planning: Effective Cooperation for Planning Across Boundaries](#), January 2015

CIOB has clarified the importance of the BSR and building safety regime throughout our thought leadership pieces, course content and through our mandatory CPD for all CIOB members in building safety. The need for buildings to be assured as safe is crucial to the success of the built environment and the BSR plays the most pivotal role as the stop-check for buildings above a certain height (7 storeys or 18 metres – although aspects of the BSR apply to all buildings).

With that in mind, we recommend that MHCLG amends the following wording under Paragraph 3 of DM7 – “The parallel processing of planning and other regulatory consents is encouraged where this can help to align and expedite the consenting of development”. This wording seems to suggest that the speed in approval should come at a priority, rather than thoroughness and due diligence.

In its place we recommend the following wording – “While the parallel processing of planning and other regulatory consents is favourable, separate regulatory regimes, especially those that govern building safety, should always be seen as a priority over expediting the consenting of development.”

We believe this new draft paragraph provides proper weight and importance to a building safety regime that assures the safety of those using the built environment.

It is worth noting that in the most recent State of Trade Survey, conducted by CIOB and the Federation of Master Builders (FMB), over half (51%) of respondents stated they had struggled to recruit candidates with knowledge of the building safety regime. The understanding of building safety remains a key skills gap in the construction sector, giving credence to the need for proper scrutiny and oversight of applications that require sign off by the BSR.

55. Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? - **Neither agree nor disagree.**

In May 2025 [CIOB responded](#) to the House of Lords Built Environment Committee inquiry into the practical delivery of new towns. In our written evidence to the inquiry, we outlined that the successful delivery of new towns would depend on policy interventions that cut across planning, skills, supply chains and materials.²

The construction industry faces several interconnected challenges in the delivery of new strategic developments. These include but are not limited to:

- Persistent skills shortages and large gaps in industry capacity being left by the large number of construction workers due to retire in the coming years.
- Materials shortages and price increases creating uncertainty in construction pipelines.
- Slim profit margins in construction hampering companies’ ability to invest in long-term projects and the R&D necessary to innovate on large projects.
- Uncertainty in the policy development that governs new homes including the Future Homes Standard and construction product regulation.

The complexity of some of the issues listed above must come into consideration while deciding on the policies that will prioritise new towns in the English planning system.

While we understand that policies set out in the NPPF govern decision making at a planning stage, large projects, such as new towns and settlements must have due consideration to the skills and materials impact that they will have on the construction sector. Not only is this in terms of the skills and materials that projects of this scale take away from other localised construction

² Chartered Institute of Building (CIOB), [CIOB Response – New Towns Practical Delivery](#), 22 May 2025

schemes, but also whether there are the necessary skills or components available in the first place to deliver within agreed timeframes.

We recommend that additional wording is included to express the need for a skills and materials plan to be put in place to demonstrate how new towns will be delivered, prioritising locally sourced skills and materials where possible.

146. Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? - **Neither agree nor disagree.**

CIOB is not best placed to comment on this aspect of the planning process. However, as an organisation we are proponents of good design and placemaking. With this in mind, we recommend that MHCLG consults with organisations like the Royal Institute of British Architects (RIBA) and the Architects Registration Board (ARB) for more advanced views on design during planning.

80. Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period? - **Neither agree nor disagree.**

CIOB were pleased to read that much of the negative language included in the Speeding Up Build Out Working Paper has not materialised within the draft version of the NPPF. At the time of consultation on the working paper, we established that while we were pleased to see a strong emphasis from the Government to build a collaborative partnership with housebuilders, we were concerned that the language used suggested a step in the other direction, instilling blame on the housebuilding sector for under-delivery and introducing punishments with consequences that could be far reaching and disproportionate to the issues at hand.

Our response detailed the various reasons why housing developments may be built out at a slower rate, including many which are unforeseeable and not a direct result of developer's actions. These include but are not limited to price fluctuations of materials and skills requiring reforecasting, delays in acquiring skills and materials, sign off processes from statutory consultees and the impact of extreme weather on construction work.

Ultimately, we felt that the consequences of the proposals within the working paper would require housebuilders to effectively bid for planning permission based on low estimations of how long it would take a scheme to be built out, further compounding the race to the bottom with speed being the primary success factor rather than quality. We also felt that the results of the then proposed penalty system would effectively ban housebuilders who fell behind on one scheme to ever build out again regardless of the location of another scheme.³

Our full written evidence can be found [here](#).

We are pleased that government has reconsidered its position and looked to foster a more positive environment for major housing delivery rather than default to mechanisms to penalise those who are not delivering fast enough, particularly in an industry that is so subject to external pressures.

On the specific language used in the draft NPPF, the following is the only reference to the speed that we can see:

“Consideration should be given to whether to impose a planning condition requiring that development begins within a timescale shorter than the relevant statutory default period,

³ CIOB, [CIOB Response to the Planning Reform Working Paper Speeding Up Build Out Consultation](#), 7 July 2025

where this would expedite the development without threatening its implementation or viability.”

In principle, we have no concerns with considering planning conditions that require development to begin within a shorter timeframe than the relevant statutory default period. However, these planning conditions must be carefully negotiated between the housebuilder in question and the relevant local planning authority.

82. Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? - **Yes**

See answer to Question 55.

Additionally, policy HO13 seems like the best opportunity to include additional wording about how skills and materials shortages would impact the delivery timeframe of large strategic sites including new towns.

SME Housebuilding & Site Size Thresholds

61. Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares? - **Strongly agree.**

In CIOB’s response to the previous round of changes to the NPPF in 2024, we advocated for a much stronger approach to earmarking land set aside for SME housebuilders. In fact, this is a position that we have consistently taken through policy positions, consultation responses and thought leadership pieces.

In our previous response we highlighted that, in recent years the housing development market has been dominated by a small number of large volume housebuilders whose resources and financial strength have allowed them to price out SME developers on materials and land values.

Through a number of reports, the [Federation of Master Builders \(FMB\)](#) has brought attention to the struggles faced by SME housebuilders including a lack of available land, the ongoing materials shortages, access to development finance, opportunities for small sites as well a lack of certainty over the outcome of planning applications.⁴ All of this has led to a serious decline in the percentage of homes that small housebuilders provide each year.

While we were pleased at the time with a greater emphasis on the need for a small sites policy in local plans, we were clear that more needed to be done to protect SMEs to ensure competitiveness. SME housebuilders are often grounded in local supply chains and make use of local skills which has significant benefits to both the outcome of projects but also to local economic structures.

To do this, we have consistently recommended that local plans should include an increased quota for sites to be provided by SME housebuilders. While our recommendations have focused on the size of the housebuilder rather than directly prescribing the size of the site, we are pleased to see that greater progress towards earmarking land for SME housebuilders is being pursued in this draft of the NPPF.

Sites between 1 and 2.5 hectares would fall under the new medium site category which will be subject to relaxed planning rules which will speed up the delivery of these sites and allow smaller

⁴ Federation of Master Builders (FMB), [Small Housebuilders Survey 2025](#), 15 December 2025

developers, those of which are more likely to build out on medium and small sites, a greater amount of certainty in planning decisions.

Whilst we would also be keen to see an increased percentage of homes required to be delivered on sites less than 1 hectare, we are very supportive of this move to secure a future role for SME housebuilders.

213. Do you agree that a 2.5 hectare threshold is appropriate? - **Partly agree.**

As noted in our response to the 2025 Site Size Thresholds consultation from MHCLG, CIOB is not best placed to comment on matters relating to the size threshold of the new medium site category. However, we noted positive feedback that we have received from our members about the introduction of a medium site category.

At the time, we advocated for the use of new innovative construction and building techniques in a reformed planning system. To meet the 1.5 million new homes target in this parliament, the construction industry will need to expand to deliver further alternative methods of housing delivery, including faster building techniques, such as off-site manufacturing (often referred to as Modern Methods of Construction or MMC). There are numerous benefits to modular off-site construction, not least the speed in which new homes can be delivered with some estimating a 20-40% faster completion rate.⁵

Our position remains that whilst there are drawbacks to MMC, which CIOB covered extensively in our response to the 2024 consultation on Invest 2035⁶, and it must not be seen as the silver bullet to solve slow build out rates, it is another mechanism that should be utilised to deliver housing. If the government is to create a new site size category which will be subject to some of the same reduced planning requirements as minor or small sites, then there is an opportunity to earmark these sites for new, innovative technologies or ways of delivering housing.

214. Do you agree that a unit threshold of between 10 and 49 units is appropriate? - **Partly agree.**

As above.

215. Do you foresee risks or operability issues anticipated with the proposed definition of medium development? - **Yes.**

There will always be risks associated with major changes to the planning system. While CIOB is not best placed to comment on these risks at this stage, we advise thorough consultation with bodies who have a better knowledge base in this area, like the RTPI and FMB.

We note that one area of concern from the original proposals for medium site size has been addressed in the proposed NPPF. In the original proposals, land under the medium site category would be capped at a 1-hectare area. This drew some criticism on the basis that this would be counteractive to Local Planning Authority density policies.⁷

In this consultation, the maximum cap has been lifted to 2.5 hectares which seems a more sensible area.

We would also like to highlight that, in CIOB and FMB's most recent State of Trade Survey, covering Q3 and Q4 of 2025, only 8% of respondents commenting on the impact of changes

⁵ Construction Management, [Why L&Q is pushing forward with MMC housing](#), 27 October 2022

⁶ CIOB, [Response to DBT consultation on Invest 2035: the UK's modern industrial strategy](#), 26 November 2024

⁷ Housing Executive, [SMEs need a 'Medium sized site' without area thresholds](#), 9 July 2025

proposed in the revised NPPF felt that the introduction of a new 'medium size' category would have a negative impact on the planning system.

217. Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?

Our position on extending current exemptions for small sites to other site categories remains consistent. We strongly encourage government to wait to understand how medium sites progress through the planning process and how well they can fulfil Biodiversity Net Gain (BNG) requirements in their own right before implementing any exemptions.

In CIOB and FMB's most recent State of Trade Survey which covers Q3 and Q4 of 2025, we asked respondents if they felt that key changes in the construction industry would have a positive, negative or neutral impact. It is worth noting that the relaxation of BNG requirements on small sites had the highest perceived positive impact (32%) when compared to other changes like the most recent Chancellor's Budget, changes to National Insurance contributions, Environmental Delivery Plans and changes to the NPPF. It is also worth highlighting that changes to the NPPF delivered a more neutral perspective than other responses and the second highest percentage of 'uncertain/don't know' responses.

36% of respondents also felt that changes to the application of the Building Safety Levy to remove charges for small sites would be a positive.

221. What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.

While exemption from certain levy payments will project a larger portion of profits and budgets for SME housebuilders, it is uncertain whether these exemptions are needed at this stage.

CIOB has previously supported calls for small sites to be exempt from Building Safety Levy requirements. The primary reason for this is that it would be very unlikely that those building in the small site category would partake in constructing buildings that would be classed as high-risk buildings (HRBs) so it would therefore be unfair for them to pay into the levy.

However, under the proposals for the new medium site category within this consultation, the government is asking for views on potential levy exemptions for sites up to 50 homes or fewer than 120 bedspaces in a purpose-built student accommodation.

On sites for fewer than 120 bedspaces in a purpose-built student accommodation, there are examples of these developments in the UK, such as the Duke Street Riverside accommodation for Norwich University of the Arts. This development is 8 storeys including 100 student bedrooms and a purpose-built lecture facility. This development being 8 storeys would mean that it is classified as an HRB so would be subject to scrutiny by the BSR.

CIOB would not support exemptions from the Building Safety Levy for sites that would be classified as HRBs. The same principle applies for non-student accommodation although examples of schemes fewer than 50 units that would be classed as HRBs are difficult to identify.

Therefore, we would advise considering Building Safety Levy exemptions on a case-by-case basis, rather than applying a blanket exemption. For example, if the scheme would be classed

as an HRB under the definition provided in the Building Safety Act 2022, then the levy should be applied. Where the scheme will not result in a new HRB, then the levy should not be applied.

Climate & Nature

42. Do you agree with the approach to planning for climate change in policy CC1? - **Partly agree.**

While CIOB is supportive of the intentions set out in policy CC1, we believe that this policy offers the opportunity to mandate rather than encourage. We advise strengthening some of the language used, replacing 'should' with 'must'.

CIOB also encourages government to go further, strengthening the wording in section CC1.1.c amending the wording to the following - "Setting local water efficiency standards for new development where these are justified in accordance with policy PM13 or go further than accordance with PM13 where it does not conflict with other policies; and" This would allow local authorities to go further and set more ambitious water efficiency standards should they not conflict with other policies included in the draft NPPF.

We would encourage greater detail about how the planning system aims to mitigate many of the risks listed in policy CC1.

43. Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? - **Partly agree.**

- a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

As with our response to Question 42, we feel that the wording on policy CC2 is not strong enough and should do more to mandate approaches to mitigate climate change rather than just encourage them.

CIOB is not best placed to feedback on approaches to mitigating climate change through planning decisions. However, we advise MHCLG takes into consideration the points raised by the Low Energy Transformation Initiative (LETI) in their response to this consultation. Specifically, we advise being aware of the points raised in point 2 of their response "PM13 conflicts with Local Authorities' statutory climate change duties".

44. Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? - **Partly agree.**

- a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

CIOB is pleased that policy CC3 goes further than the current version of the NPPF by requiring development proposals to consider both current and future climate impacts over the lifetime of the development. We also welcome the increased emphasis on wildfire risks.

Whilst we are supportive, of changes through policy CC3, we are aware that some concerns have been raised amongst industry experts to references made in accordance with CC3.1.a and further changes to the sequential test for flooding. We advise reviewing the response submitted by the Chartered Institution of Water and Environmental Management (CIWEM) on this issue.

96. Do you agree with the approach to planning for energy and water infrastructure in policy W1? - **Partly agree.**

- a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

CIOB is supportive of this policy.

179. Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? - **Partly agree.**

Whilst CIOB clearly supports 10% Biodiversity Net Gain as a universal minimum, we would suggest the NPPF to include wording to encourage and empower local planning authorities to go above and beyond their statutory requirements where possible. While we understand that this may be challenging given the variation of local issues, land availability and other factors, there is a balance that can be drawn out in the wording that ensures that 'going further' is only encouraged for those able to rather than seen as an expectation.

Adaptable Housing

57. Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? - **Strongly agree.**

There is a plethora of evidence highlighting that disabled residents across England do not currently have acceptable housing standards to help them live independently. Figures from the latest Census indicate 29.5% of households include one disabled member and 8.4% have two or more disabled people within the household.⁸ However, when we look at the quality of these homes, a total of 15% of the population who have a long-term illness or disability lived in a non-decent home between 2022 and 2023, equating to 1.4 million households.⁹

In early 2024, the then Levelling Up, Housing & Communities Committee consulted on disabled people in housing. At the time, CIOB responded to this consultation stating that there was still a considerable amount of confusion around the planning requirements for accessible housing in England, partly due to local authorities having their own standards being applied. This was amended with reforms to the NPPF; however, those reforms still left too much flexibility for each council to set their own requirements for the use of M4(2) housing standards on new-build properties, often resulting in inconsistencies in delivery.

At the time, we called on government to strengthen the NPPF and require local authorities to meet the identified need of disabled people, particularly as we know the demand for accessible accommodation exceeds current supply.¹⁰

We are pleased that this is being taken forward into the revised version of the NPPF.

58. Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? – **Partly agree.**

⁸ Office for National Statistics (ONS), [Disability, England and Wales: Census 2021](#), 19 January 2023

⁹ Ministry of Housing, Communities & Local Government (MHCLG), [English Housing Survey 2022 to 2023: housing quality and condition](#), 18 July 2024

¹⁰ Chartered Institute of Building (CIOB), [LUHC Committee Inquiry into Disabled People in the Housing Sector](#), 2 February 2024

While we will leave it to those organisations responsible for the delivery of adaptable housing to comment on the exact percentage required over a plan period, we do support the enshrinement of a specific target that can be measured against delivery.

Other

67. Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? – **neither agree nor disagree.**

While CIOB does not have a defined position on the on or off-site contribution of affordable housing, we strongly recommend consulting the view provided by the Chartered Institute of Housing (CIH) in their written evidence. We recommend considering their view that cash payments in lieu of on-site delivery will likely result in developments with no integrated affordable housing and the view that local authorities do not have the capacity to be the main mechanism to deliver more affordable housing.