

Title: The Levelling Up and Regeneration Bill RPC Reference No: RPC-DLUHC-5179(2) Lead department or agency: The Department for Levelling Up, Housing and Communities Other departments or agencies	Impact Assessment (IA)
	Date: 06/04/2022
	Stage: Final
	Source of intervention: Domestic
	Type of measure: Primary legislation
Summary: Intervention and Options	Contact for enquiries: LURB_IA@levellingup.gov.uk
	RPC Opinion: Green

Cost of Preferred (or more likely) Option (in 2019 prices, 2020 present value, £m)			
Total Net Present Social Value	Business Net Present Value	Net cost to business per year	Business Impact Target Status Qualifying provision
£1355.5	£1877.1	-£203.8	-£1018.8

What is the problem under consideration? Why is government action or intervention necessary?

The recent Levelling Up White Paper sets out a comprehensive analysis of and plan for addressing regional and local inequalities. The Executive Summary of that white paper describes the problem as follows:

“... not everyone shares equally in the UK’s success. While talent is spread equally across our country, opportunity is not. Levelling up is a mission to challenge, and change, that unfairness. Levelling up means giving everyone the opportunity to flourish. It means people everywhere living longer and more fulfilling lives and benefitting from sustained rises in living standards and well-being. This requires us to end the geographical inequality which is such a striking feature of the UK. It needs to begin by improving economic dynamism and innovation to drive growth across the whole country, unleashing the power of the private sector to unlock jobs and opportunity for all. While there are world-leading and enterprising businesses and innovators right across the UK, economic growth and the higher productivity which drives it has been over-concentrated in specific areas, particularly the South-East of England. A long tail of low-productivity businesses and places explain why UK productivity growth is too low compared to competitors. It is vital that we preserve and enhance the economic, academic and cultural success stories of the UK’s most productive counties, towns and cities. But it is equally critical that we improve productivity, boost economic growth, encourage innovation, create good jobs, enhance educational attainment and renovate the social and cultural fabric of those parts of the UK that have stalled and not – so far – shared equally in our nation’s success.”

Chapters 1 and 2 of the Levelling Up White Paper provide a comprehensive analysis of the causes and of the framework for the new policy regime, including around the missions and the Government’s ambitions to reform the way in which Government works. Chapter 3 then sets out the missions for change that comprise a policy programme for reform. The technical annexes then set out the detailed plan and potential metrics. These changes will be delivered through the systems change described in the White Paper, individual programmes and legislation. But alongside these, the Government is bringing forward a Levelling Up and Regeneration Bill to do three things:

- Set in place the frameworks for systems change for levelling up, placing an obligation on the Government to report on their progress each year;
- Devolve power, and to enable it to be done so more efficiently, giving local leaders the powers, they need to regenerate their communities; and
- Give local communities more tools to bring about regeneration including through a planning system that places beauty, infrastructure, democracy, the environment and neighbourhoods at its heart.

Planning in particular, fails to meet its potential in supporting the Government’s missions to level-up the country and regenerate left-behind places. Homes are being delivered, but not in the right numbers or to the right standard and quality. Housing affordability has worsened over recent decades (especially in London and the South-East) and house prices are now eight times average incomes, whilst private renters spend an average of 33% of their household incomes on housing costs¹. Inconsistency and uncertainty in the way planning works leads to dissatisfaction and unnecessary expenditure on the part of those seeking planning permission. Research suggests that c.3 years is the average time taken from outline decision notice to the first dwelling completion on sites of 500 homes². The Levelling Up and Regeneration Bill will make changes to local governance to boost economic regeneration, bolster local leadership and champion pride in place, alongside changes to the planning system to ensure it delivers better outcomes which reflect community aspirations, and operates in a more certain, efficient and transparent manner.

¹ English Housing Survey, Housing Costs and Affordability, 2018-19, p.3, <https://www.gov.uk/government/statistics/english-housing-survey-2018-to-2019-housing-costs-and-affordability>

² Lichfields, Start to Finish, What factors affect the build-out rates of large scale housing sites? (February 2020), https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf

What are the policy objectives of the action or intervention and the intended effects?

The primary policy objectives of the Levelling Up and Regeneration Bill are to deliver a well-functioning and productive economy in every part of the UK, which is essential to levelling up; and to strengthen local leadership to drive real change, raise living standards and improve public services in those areas that have been left behind. The Levelling Up and Regeneration Bill will devolve power across England and support strong local leadership by making it easier to adopt Mayors. Through planning and regeneration measures, local leaders will have greater powers to improve town centres, bring land and property into productive use and use the planning system to deliver the beautiful homes and better environment their communities want.

This regulatory impact assessment only covers those measures in the Levelling Up and Regeneration Bill and not the wider White Paper. Under the Better Regulation Framework, measures relating to taxation, duty, levy or other charge, public spending, or procurement are not covered in Regulatory Impact Assessments. Those are subject to other frameworks such as Business Cases. Many of the measures in the Levelling Up and Regeneration Bill related to levelling up, change governance and local leadership frameworks, and therefore do not have a direct effect on businesses. Many of the regeneration and planning measures, however, are within scope. Therefore, this document focuses on those measures, which can be grouped into plan making, decision taking, community incentives, and supporting delivery on the ground.

We will provide a fuller assessment of the impacts not in scope of this Regulatory IA, and the impacts beyond those on businesses and public sector alongside the Bill.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Local governance, regeneration and planning are existing statutory systems and therefore the Government needs to amend the existing body of law to deliver changes. The Government has considered whether legislation is needed to create the levelling up frameworks but, as set out in paragraph 4.3 of the White Paper, it has concluded that legislation would provide the strongest foundation for change. Similarly, the regeneration and planning measures, which are the focus of this assessment, require primary legislation to take hold and in some cases enable subsequent changes to regulations and national policy. Legislation will also remove ambiguity and provide certainty for businesses and public sector bodies.

One other option was also considered:

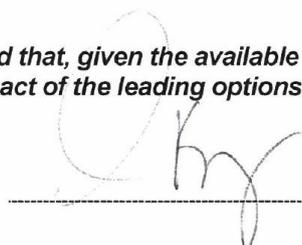
Non-legislative approaches: The Government could rely on the Levelling Up White Paper commitments to create the framework for levelling up without powers in legislation. However, as the White Paper explains, the history of the United Kingdom has involved less policy and institutional certainty than other experiences, and the Government considers that establishing a framework in law will create a more solid foundation. For planning and regeneration, experience has shown that policy changes have failed to comprehensively address persistent issues, given the limited influence it has over behaviours.

Will the policy be reviewed? If applicable, set review date: A full, multi-year evaluation of the core elements of the

Is this measure likely to impact on international trade and investment?		There may be an indirect impact on international investment. See section 9. Yes / No		
Are any of these organisations in scope?	MicroError! Bookmark not defined.	Small Yes/No	MediumError! Bookmark not defined.	LargeError! Bookmark not defined.
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)		Traded: Not	Non-traded: Not applicable	
Bill and subsequent policy will be undertaken. This will commence in Summer 2023, following a scoping study due to begin in Autumn 2022. More detail is in section 8.				

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible officer
SELECT SIGNATORY:

 Date: 12/12/22

Summary: Analysis & Evidence

Policy Option 1

Description: The Levelling Up and Regeneration Bill modernises the planning system, as well as introducing new levelling up measures designed to boost economic regeneration, bolster local leadership and champion pride of place.

FULL ECONOMIC ASSESSMENT

Price Base	PV Base	Time Period	Net Benefit (Present Value (PV)) (£m)		
2019	2024	10	Low: 1163.4	High: 1898.5	Best Estimate: 1555.5

COSTS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	13.7		102.0	898.8
High	34.6		317.0	2788.6
Best Estimate	17.4		199.9	1753.6

Description and scale of key monetised costs by 'main affected groups'

The main costs are to public sector bodies including local authorities who will incur costs to familiarise with the new legislation requirements (£7.4m) and the new requirement to produce local plans to specific timescales (£533m), heritage records (£10m) and design codes (£54m). There are also costs to businesses through adapting to the new system. The costs to business are most prominent in the build out measure (£166.9m). Other measures are expected to incur minimal costs to business, while there are anticipated impacts that will also arise from secondary legislation which will require further Impact Assessments where appropriate.

Other key non-monetised costs by 'main affected groups'

Non-monetised costs affect both local authorities and the Planning Inspectorate, which mainly includes local plans, strategic plans and alignment policy, neighbourhood plans and build-out and reflect the tighter timelines that will prevail as an impact of these measures. In addition, some of the measures in the Bill are powers (such as relief from enforcement of planning conditions measures) and they will create costs when regulations come forward that have not been monetised here as they are unforeseeable powers.

BENEFITS (£m)	Total Transition (Constant Price) Years		Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0.0		240.9	2062.3
High	0.0		547.6	4687.1
Best Estimate	0.0		386.5	3309.0

Description and scale of key monetised benefits by 'main affected groups'

There are some key monetised benefits to the public sector, many of which are the result of efficiency savings. These include savings from simplified evidence requirements for local plans (£256m) and reduced risk of plan failure and examination uncertainty from the infrastructure planning measure (between £6m and £43m) and increased certainty (£88.3m). For businesses, the benefits are likely to be greater. Measures that increase certainty in planning decisions are expected to have a total direct benefit to business of £2,276.6m. There will be further benefits for businesses and authorities that are not monetised or reflected in this document as they will be brought forward through secondary legislation or national policy and will where appropriate be subject to their own assessment.

Other key non-monetised benefits by 'main affected groups'

The assessment in the document shows that there are non-monetised benefits for the public sector and businesses. There will also be benefits that are direct, but not capable of being monetised, such as the delivery of more, higher quality homes, improving community engagement with planning which can lead to improved pride of place, improved decision making in local authorities based on evidence, which can help build trust in the planning system, and delivering improved environmental outcomes and mitigating effects for climate change.

Key assumptions/sensitivities/risks	Discount
	3.5%

The assessment includes estimates of initial impacts arising from primary legislation which have been monetised where possible. However, impacts arising from enabling powers are uncertain at this stage because it depends on take-up, and moreover there is no obligation to use them. Some totals that include quantified costs do not include some unquantified economic impacts which will be assessed at the secondary legalisation stage.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (2019 prices, 2024 present value) (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: 39.9	Benefits: 273.7	Net: -233.8	-1018.8

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1. Introduction

1. The Levelling Up and Regeneration Bill will create the conditions to support productive local economies, strengthen local leadership and devolve power, and modernise the planning system, providing a foundation for levelling up the country by building more and better homes, greener and beautiful places, supported by the right infrastructure and long-term sustainability.
2. To do this the Bill will:
 - Put in place the legal framework for setting the Government’s levelling up missions, placing an obligation on the Government to report on their progress each year;
 - Devolve power, and to enable it to be done so more efficiently, giving local leaders the powers they need to regenerate their communities; and
 - Give local communities more tools to bring about regeneration including through a planning system that places beauty, infrastructure, democracy, the environment and neighbourhoods at its heart.
3. These ambitions for the Bill will be monitored through a comprehensive monitoring and evaluation programme, set out in Section 8.
4. The Bill’s measures that create the framework for missions for levelling up and reform the devolution framework are ‘not a regulatory provision’ for the Business Impact Target under the Small Business Enterprise and Employment Act 2015. Some levelling up measures relate to taxation, which is also therefore ‘not a regulatory provision’.
5. The Bill measures on regeneration include changes to local plans, neighbourhood planning, development management, development corporations, environmental assessments, planning enforcement, infrastructure planning, compulsory purchase and other aspects of land use regulation and development. They also introduce new requirements on design and to establish a modern digital planning service. The reforms will be delivered in part through the Bill, but also through supporting regulations, new planning policies (the National Planning Policy Framework). In addition, many are enabling powers that equip local authorities and communities with powers to regenerate, and so the precise impact will depend on how the new powers are used. The regeneration measures support the ambitions set out in the Levelling Up White Paper, and many of the measures have been informed by more than 40,000 responses to the Government’s 2020 White Paper ‘Planning for the Future’, and the subsequent inquiry into planning reform by the Housing, Communities and Local Government Select Committee.
6. This document sets out the rationale for intervention for those measures that are in scope and presents the anticipated impacts of the primary legislation for each measure (Section 6), as well as impacts for the Bill as a whole. Further detail of the anticipated impact of specific measures is set out in a series of annexes.

2. The problem under consideration

7. The Bill is a key part of the Government's response to the challenge of levelling up the country. The Levelling Up White Paper set out six capital traps (physical, intangible, social, institutional, financial and human) that lead to poor outcomes for productivity, quality of life, places and leadership. These, it sets out, are geographically unequal with this inequality arising from market forces, which cause businesses and money to gravitate to where returns are highest. There is a risk that without government legislation and policy, structural changes in the economy can and have caused structural economic damage to the UK, leading to poor social outcomes. It is this that the Levelling Up and Regeneration Bill seeks to rectify.
8. Beyond this overarching problem, there are a number of more focused problems the regulatory provisions detailed in this Regulatory Impact Assessment consider and seek to address. Regeneration of our towns and cities remains a persistent challenge, and economic and social disparities are often reflected in places' built environment, with high vacancy rates and poor-quality housing sitting alongside deprivation and economic underperformance or decline. The inability to effectively bring vacant properties back into use, and to best utilise brownfield land¹, stymies the ability to overcome this problem. Whilst homes may be delivered on greenfield sites presently, the failure to deliver sufficient homes, infrastructure and subsequent local economic growth through the regeneration of town and city brownfield land must be halted. The low levels of investment and activity in brownfield regeneration found in many places are partly due to the costs of remediation (which can have a negative impact on the ability to provide infrastructure associated with development), and the fact that tools that support effective regeneration are limited. Where there are tools available, such as Compulsory Purchase Orders, their complexity creates barriers to uptake by local leaders.
9. Where regeneration does take place, it often does so in a way that isolates communities, who too often feel like they do not have a say in the changes that affect the built environment where they live. The demand for better quality homes and beautiful places is supported by survey results that show over a quarter of people think their local area has got worse over the last two years, against 10% who think their areas have improved². These sentiments can fuel lack of trust in local leadership, and the private sector partners who deliver the homes and regeneration in local areas, fuelling an us-against-them mentality. According to research, 81% of people believe their voice is not listened to by developers and only 73% by the Local Authority³. Communities have limited opportunities to take direct action in the regeneration of their areas and are not sufficiently informed of complex processes for change, which create further barriers to entry.
10. Local plans are critical to the above, setting spatial strategies for local areas to make clear where land may or may not be developed, areas for protection and policies to guide regeneration and the creation of high-quality places. However, many local plans are out of

¹ Housebuilder, Housing Market Intelligence, Report 2019, <https://www.house-builder.co.uk/publications/hmi>

² Community Life Survey 2019/2020 Technical Report: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962599/Community_Life_Online_and_Paper_Survey_Technical_Report_-_2019-20_V2.pdf

³ Civic Voice, Civic Voice says we need to move the conversation about building homes away from confrontation, <http://www.civicvoice.org.uk/news/civic-voice-says-we-need-to-move-the-conversation-about-building-homes-away-from-confrontation/>

date: fewer than 40% of local planning authorities currently have an up-to-date plan in place⁴. On average it takes seven years to produce a plan, and many are long, complex documents that are difficult to engage with. Where plans are out of date, they are more likely to be overridden by other 'material considerations', including national planning policy requirements to maintain a rolling supply of five years' worth of deliverable land for housing, which can undermine communities' confidence in the system.

11. By improving the preparation of plans, fostering regeneration, empowering communities and enabling better outcomes from development, the measures in the Bill, and those in scope of this Regulatory Impact Assessment, will provide a strong platform to counter economic decline, regional inequality and poor physical environments.

⁴ DLUHC figures.

3. The rationale for government intervention

12. Powers to decide on the functions of local government and its procedures, to manage land use and enable regeneration are inherently regulatory in nature, so in this respect reform requires government intervention. The measures being introduced by this Bill take a comprehensive approach to enable levelling up through improving local governance and new tools for regeneration and planning. For regeneration and planning, this involves addressing failings in the current regulatory framework, as well as tackling areas of market failure.

13. The Levelling Up White Paper discusses the cycles of capital traps – market failures – that can only be resolved through government intervention⁵:

- Physical capital trap: Low density of cities, people and jobs leads to less agglomeration and lower productivity, and firms and workers locating elsewhere. This worsens the initial problem of low density.
- Intangible capital trap: Low wage and low skill economies lead to the emigration of skills and firms elsewhere leading to low investment in innovation and research and development. This maintains the status quo of low wages and low skills.
- Social capital trap: Concentrated deprivation leads to social decline which leads to less attractive places to live (poor quality public spaces, higher crime, etc.). This worsens the concentration of deprivation.
- Institutional capital trap: Centralisation of governance reduces local capacity, which reduces the opportunity to build capability and therefore worsens local decision-making and quality of service. This then leads to more power / governance being centralised.
- Financial capital trap: Firms struggle to access finance, which leads to low investment in workers, which limits capital accumulation. This then leads to greater struggles to access capital.
- Human capital trap: Low-income areas tend to have poorer social capital, which leads to low human capital accumulation, which in turns maintains lower incomes.

14. The planning and regeneration measures which are the focus of this impact assessment attend to four key market failures which 'lock in' or worsen the capital traps above, leading to unfavourable outcomes.

- Equity considerations – access to homeownership is out of reach of many people due to high house prices. This partly stems from supply constraints, which stem partly from the planning system, which can make it more difficult to deliver homes where they are needed. This is also a demand issue – many people are unable to demand high quality housing, in part a result of the intangible (low wage-skill) and human capital (low income) traps set out above. Measures that relate to equity considerations are those which have an impact on housing supply, such as changes to local plans, planning certainty measures, changes to compulsory purchase orders and the Infrastructure Levy.

⁵ DLUHC, Levelling Up White Paper (2022) UK Government, <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>

- Negative externalities – poorly designed developments bring negative externalities, such as poor-quality environments, which are experienced by residents and visitors to a place. In the worst cases, these can limit investment into a place, worsening the physical (density) and social (deprivation) capital traps. Measures that relate to negative externalities are those which help create better places and deliver regeneration, such as the introduction of design codes and changes to heritage protections and enforcement mechanisms, high street rental auctions and changes to compulsory purchase orders.
- Asymmetrical market power – volume housebuilders currently dominate the market and have the resources to be able to navigate the planning system over and above others⁶. The larger margins volume house builders require may reinforce geographical inequality by focusing on the places of perceived higher return, such as the South East, which can further lock-in the physical (density) capital trap. The certainty measures in particular will help reduce barriers to entry for SME developers who are more likely to operate on smaller sites or outside areas of high return, as will measures that help with the diversification of sites. Throughout the document, an assessment is made of the specific impacts that will be felt by smaller players in the market.
- Imperfect information – often the planning system lacks transparency of information which can hinder effective decision-making by local authorities, developers and investors. This can worsen the institutional (local leadership) capital trap, and depending on the decisions being made, can have implications for further locking in all capital traps above, leading to poorer outcomes. Many of the measures include better information and accessibility to support their implementation, for example on local plans, environmental outcome reports and the Infrastructure Levy. The standardisation of data will also help with information accessibility, supporting more innovation in the market. This will be bolstered further with improved local leadership, enabled through the devolution measures included in the Bill.

⁶ Ball (2013) 'Planning Delay and the responsiveness of the English Housing Supply, Payne et al. (2019) 'How does the land supply system affect the business of UK speculative housebuilding? An evidence review'

4. The Bill's objectives and intended effects

15. The Levelling Up and Regeneration Bill has three main objectives:

- To **put in place the legal frameworks for setting the Government's levelling up missions, placing an obligation on the Government to report on their progress each year;**
- To devolve power, and to enable it to be done so more efficiently, giving local leaders the powers, they need to regenerate their communities; and
- To **give local communities more tools to bring about regeneration including through a planning system that places beauty, infrastructure, democracy, the environment and neighbourhoods at its heart.**

16. Through these the Bill will support the growth and regeneration of places that have suffered from historic underinvestment and regional inequality, as well as fostering better outcomes from development in all parts of the country.

17. The Bill will enshrine in law a duty on the Government to set Levelling Up missions, these are 'not a regulatory provision' and are set out in the Levelling Up White Paper. It will further mandate the Government to produce a report updating the country on the progress of these missions every year. This accountably framework will contribute to ensuring that Government focus and resources are shifted to our most forgotten communities throughout this decade. This will enable full systems change to deliver the Government's intended outcomes.

18. The Bill will enable every part of England that wants a devolution deal and mayor by 2030 to have one, supported by a new model of combined authority, brought forward by 'county deals', which are also 'not a regulatory provision'. The Bill will also deepen existing devolution, partly by creating a framework that empowers Metro Mayors, these are 'not a regulatory provision' and will shape the Business Rates in their area. With these powers, a Mayor could for example raise the rates large distribution warehouses serving international online retailers pay, to fund a cut in the rates small independent high street businesses pay — or another local priority — which will support local growth and high streets. The Bill will also introduce a permissive council tax premium on second and empty homes, which is 'not a regulatory provision' but authorities will be able to reinvest as they choose, simultaneously incentivising owners to fill empty homes, and boosting funding for local authorities.

19. The Bill will increase powers for local leaders so they can better regenerate their communities. Local authorities will be empowered to shape their high streets by gaining the power to require landlords to fill empty shops. Local leaders will also gain powers to assemble land more easily for regeneration, as the Bill speeds up the compulsory purchase order regime. A new generation of locally-led Urban Development Corporations will further empower local leaders to drive regeneration in their areas.

20. The Bill will modernise our complex and antiquated planning system and put local people firmly in charge of shaping their areas, dealing with the sense of disenfranchisement felt by many. The Bill will put local people and leaders firmly back in charge of local planning, rooted in the conviction that communities will welcome necessary development if they are able to truly shape it, whilst also ensuring the critical infrastructure and homes that are needed for positive social and economic outcomes can come forward, in part through a new approach to capturing land value.
21. A key aspect of these changes is to put local plans at the heart of the planning process. At present, local plans are too onerous to draw up. This Bill will strengthen the role local plans play, and make the production of them quicker, by making them simpler and more visual. The Bill will also support neighbourhood planning, in part by enabling 'Street Votes' to come forward. It will also enable much greater digitisation of the planning process, significantly expanding the scope for effective community engagement.
22. The Bill will ensure that locally developed design codes are used across the country: clear rules enabling beautiful development to become the norm supporting enhanced pride of place. It will also simplify but strengthen the over-complicated environmental assessment procedures, which plans and major developments must go through, whilst ensuring environmental outcomes are greater than at present.
23. The predicted impacts of the Bill measures in scope of this regulatory impact assessment are outlined in Section 6 and detailed in the relevant annexes.

5. Description of options

5.1 The baseline option

24. The 'do nothing' option would not be able to secure the Government's aim of levelling up the country and its vision for creating more and better homes, green and beautiful places supported by the right infrastructure, and long-term sustainability. Inaction would result in an increasingly outdated system that is incompatible with business needs, with insufficient homes of the right quality being built in the right places, and without the infrastructure and tools needed to support sustainable development and regeneration.

5.2 The non-legislative option

25. Given that the planning system is already regulated by primary and secondary legislation (the system is governed by more than 40 acts of Parliament), there was not a credible non-legislative option to consider to undertake the types of reforms that the Government wishes to pursue, or to meet the expectations of the Government major projects programme that planning reforms are part of. There may have been a case to progress only digital delivery and developments in capability and capacity (both of which are funded by the 1 year, and subsequent 3 year spending settlement), however whilst these would have offered some benefits, they would not have produced the scale of change required, for example to deliver the new suite of tools for regeneration, nor to enable plans and design codes to have greater legal force.

5.3 Description of the proposed measures

26. The Bill contains a number of reforms to support levelling up, which can be grouped into sets of measures, as set out under the following headings. The systems change and devolution measures are expected to play a powerful role in creating the conditions for stronger economic growth and improved social outcomes, especially in less prosperous parts of the country. It follows that they will have important business impacts over time, although those impacts will be indirect – for example by strengthened local governance arrangements for coordinating public services and investment – rather than direct. As these impacts will be diffuse, and cannot be monetised at this stage, the measures concerned do not fall within the scope of formal regulatory impact assessment, but nonetheless are summarised below to provide an overview of the Bill's scope and intended benefits.

Table 1: Summary of Bill measures

LURB Measure	Description of Measures	Public Sector Impacts	Assessment of total social NPV and EANDCB	Business Impacts: Direct/Indirect	Summary of impacts on small and micro businesses (SMBs)
Levelling Up Missions	The Bill introduces a new levelling up framework: missions and reporting, which is a power to set the missions by regulations introduced subsequently. It also creates a duty on the Government to report annually to Parliament on progress on the missions, as well as to amend them in light of any review outcomes.	Direct public sector impact on central government who will need to report annually.	This is 'not a regulatory provision' and is therefore out of scope for EANDCB and NPV as it is a central government process change only.	The measure does not have an impact on business. The impacts are wholly to the public monetizable. Meeting the missions set out in primary will likely depend on support and behaviours from the private sector as well as the public sector.	N/A
Upper tier combined authority	The Bill will include powers to create a new type of upper tier combined authority, to enable devolution arrangements to be more suitable for a wider range of areas across the country. These can only be formed in two tier local government areas; only the upper tier councils are full members.	The Bill does not do anything directly but includes enabling powers to establish new combined county authorities – a form of local authority.	This is 'not a regulatory provision' and is therefore out of scope for EANDCB and NPV because the powers to make secondary legislation establishing new types of local authorities or conferring new powers will have public sector impacts only.	The measure itself does not have an impact on business.	N/A
Alternative mayoral titles	The Bill will allow for directly elected leaders of combined authorities, combined county authorities and local authorities to be given alternative mayoral titles, this would enable authorities to choose a title that better reflects their local community.	The public sector impact may be that more areas seek devolution arrangements, though alone the impact is expected to be very small, and it is indirect as this is an enabling power.	This is 'not a regulatory provision' and is therefore out of scope for EANDCB and NPV because there are no impacts to business or public sector bodies.	The Bill measure does not have any impact on businesses.	N/A
Simplify establishing combined authorities	The Bill will simplify establishing combined authorities by changing the local consents needed, removing the need for authorities to undertake a governance review and scheme (replacing with a proposal) and changing the statutory tests that the Secretary of State must consider before new bodies can be established or powers can be conferred. It gives more flexibility on non-constituent and associate membership and remuneration of scrutiny committee members	Impacts are to the public sector only. The measure does not do anything directly but is likely to enable areas to benefit from devolution more quickly and areas will be able to benefit from deeper devolution.	This is 'not a regulatory provision' and is therefore out of scope for EANDCB and NPV because it is a measure to change the procedure for creating a combined authority or conferring new functions on it. There are no business or public sector impacts.	The measure itself does not have an impact on business.	N/A
Reduce time gaps for changing governance arrangements and locking in a directly elected model	The Bill will reduce time gaps for changing governance arrangements when adopting a directly elected model and will allow local authorities to change their governance model in a shorter timeframe than legislation currently provides. It will "lock in" mayoral governance to a devolution deal.	Impacts are to the public sector and will speed up processes should a local authority wish to change their governance model. It is not clear how many authorities will wish to do so, therefore the impacts cannot be monetised.	This is 'not a regulatory provision' and is therefore out of scope for EANDCB and NPV because the changes to the local authority governance model have no impacts on businesses or public sector bodies.	The measure itself does not have an impact on business.	N/A
De-hybridising the power for combined authorities and combined county authorities borrowing	De-hybridising the power to extend combined authorities borrowing is a new power in the Bill to extend the borrowing cap so it can be used in relation to single authorities without triggering 'hybrid' parliamentary procedure, which is a longer process and can only occur in a single area. This will reduce delays and make it easier to invest in regeneration.	The Bill does have any direct impacts but is likely to enable areas to benefit from devolution more quickly.	This is 'not a regulatory provision' and is therefore out of scope measure for EANDCB and NPV because the impacts do not impact on businesses or public bodies.	The measure does not have an impact on business. This will enable a new combined authority or combined county authority to access borrowing powers more quickly. In the long run, this should support regeneration of an area.	N/A
Local authority borrowing, capital and investment	The Bill will introduce new powers for central government to address excessive local authority borrowing, capital and investment thereby protecting the financial framework, while preserving local decisions making for delivering priorities, such as housing, infrastructure and schools. The measures set a trigger point for local authority borrowing risk, thereafter, the Secretary of State has the power to request information, a review, set a borrowing cap or require a local authority to reduce its risk.	Some of the actions to reduce risk, e.g., limiting further borrowing or requiring a local authority to reduce its commercial assets could have some impact on a local authority's ability to provide services (in the short term). Nevertheless, these measures will put local authorities on a more stable financial footing in the long term. They only affect the public sector.	This is 'not a regulatory provision' and is therefore out of scope for EANDCB and NPV because the measure does not affect businesses and only applies to local authority finance.	The measure does not have any impact on businesses and affects public sector finance only.	N/A

A new council tax premium on second homes	The Bill will introduce a new council tax premium on second homes. The premium, which will be discretionary, can be up to 100% of the standard council tax charge.	There may be a public sector impact as they seek to charge and collect a new council tax, though it is likely to have a limited difference to current council tax charging. It is also discretionary so may not be used by local authorities.	This is 'not a regulatory provision' and is therefore out of scope for EANDCB and NPV because this measure is a tax and therefore outside of the scope of the Impact Assessment.	Taxation is classed as a 'not a regulatory provision' for the Business Impact Target under the Small Business Enterprise and Employment Act 2015.	N/A
Council tax premium on empty homes	The Bill will reduce the period before the premium charge on empty homes applies from two years to one year. Local authorities will be able, but not required, to apply a premium of up to an addition of 100% on the council tax bill after one year.	There may be a public sector impact as they seek to charge and collect a new council tax, though it is likely to have a limited difference to current council tax charging. It is also discretionary so may not be used by local authorities.	This is 'not a regulatory provision' and is therefore out of scope for EANDCB and NPV because this measure is a tax and therefore outside of the Impact Assessment.	There may be a direct cost to businesses (e.g. landlords) who have empty homes as they may have to pay more tax. However, taxation is out of scope of the IA.	N/A
Street names	The Bill will create the ability to set regulations or statutory guidance to determine the process of securing consent on any proposed changes to street names.	Local authorities will be required to gain necessary local support (most likely through a consultation or referendum) should they wish to change a street name, which will have a cost. However, it is only required should they wish to change a street name – i.e., there is discretion for the authority.	This is 'not a regulatory provision' and is therefore out of scope for EANDCB and NPV because it does not impact on businesses or public sector bodies.	There will be no direct costs to businesses.	N/A
Local Plans	A new statutory 30-month timetable for plan-making will be introduced, with streamlined evidence requirements, a digital approach to production and more focused plan content. The Bill will introduce a new set of 'gateway tests' to check for any problems as plans emerge, and there will be improvements to the arrangements for examining draft plans. There will be a discretionary power for authorities to prepare 'supplementary plans' subject to expedited procedures, replacing current 'supplementary planning documents' which do not have full weight in the process of deciding planning application.	Local Planning Authorities and the Planning Inspectorate are already responsible and incur costs in preparing Local Plans and covering the costs of examination by the Planning Inspectorate. There will be a public sector impact because authorities and their personnel will have to familiarise themselves with these new reforms to the plan-making process.	This is in scope of NPV and EANDCB. There are no direct impacts on business monetised in this section which contribute to the EANDCB. Direct benefits to business associated with the increased certainty due to increased local plan coverage are instead picked up in annex 4 which contribute to the EANDCB for annex 4.	The monetised costs and benefits arising from these changes in the local plan preparation process only affect Local Planning Authorities and (in the case of the implementation of the 'gateway tests') the Planning Inspectorate (except for the ones captured in annex 4 – see previous column).	There are no direct impacts on SMBs that have been monetised from this measure. However, having up-to-date local plans in place will benefit all developers, including small or micro scale developers and planning consultancies.
Strategic Plans and Alignment Policy	The existing 'duty-to-cooperate' which applies when local plans are being prepared and which can prevent plans from being adopted at a late stage, will be abolished through the Bill and replaced with a new 'alignment policy' to be set out in a revised National Planning Policy Framework (NPPF) and not in legislation. This will operate in a more flexible way. Spatial Development Strategies, which can be prepared by some Mayoral authorities currently, will be re-focused on providing an overall spatial strategy and associated infrastructure requirements, while the power to prepare an SDS will be extended on a voluntary basis to all other authorities.	Production of a SDS will bear a direct cost to local authorities that choose to do one. This includes the cost of both writing the strategy and having it examined. However, as producing an SDS will be voluntary an overall impact has not been assessed. There will also be a cost to the Planning Inspectorate in examining SDSs, as well as to the Government due to the Secretary of State's role in the examination and adoption process. Again, as SDSs are voluntary the overall impact has not been assessed.	There are no direct or indirect impacts on businesses and the measure is a discretionary power and it depends if local authorities wanting to produce an SDS.	The monetised costs and benefits arising from this measure only affect local authorities and Mayoral Combined Authorities. Since these are public sector organisations, there are no direct costs and benefits to business that have been monetised.	We do not expect there to be any direct impacts on SMBs from the changes to strategic plans.
Neighbourhood Planning	Neighbourhood planning will be improved by introducing a new simpler 'neighbourhood priorities statement' (NPS) alongside the current ability of parish councils and specially constituted neighbourhood forums to prepare a formal neighbourhood plan. The priorities statements will allow communities to set out their priorities for the future of their areas, which local authorities will need to take into account when preparing their local plans for the areas concerned, enabling more communities to better engage in the plan-making process.	Local Planning Authorities are responsible for and incur costs with their responsibilities in making decisions during the preparation of neighbourhood plans, supporting groups in the preparation of their plans and examination of plans. There will be a public sector impact because authorities and their personnel will have to familiarise themselves with the introduction of a new aspect of the neighbourhood plan process.	NPV only but not EANDCB as these reforms have public sector impacts only, there are no direct business impacts.	There are no direct impacts on business. Indirect impacts on business are minor and cannot be monetised. The introduction of NPSs will lead to an increase in costs to LPAs owing to an increase in designation applications from neighbourhood groups to enable them to commence the production of an NPS We also expect authorities will incur additional setup and processing costs, e.g., internal processes to assess draft NPSs against the legislative requirements and publishing the statement online.	There are no direct impacts on SMBs and the indirect impacts do not disproportionately impact on SMBs.

Increased certainty in planning decisions	The Bill will increase certainty in planning decisions through two key mechanisms: first, giving more weight to adopted plans (local plans, strategic plans and neighbourhood plans) so that decisions must be made in line with the plan unless there are strong reasons to do otherwise; and second, by creating a suite of national development management policies (NDMP) which will have similar weight (so the overall requirement will be to make decisions in line with adopted plans, and with national development management policies, unless there are strong reasons to the contrary).	These changes will come with some familiarisation costs for local government and PINS. Increased certainty in planning decisions (due to greater statutory clarity between the weight of national policies and development plans, with reduced weight for material considerations) likely to see a reduction in unnecessary planning appeals to PINS.	NPV and EANDCB because this measure has direct impacts to businesses as it makes the planning process faster and simpler for them and measures are immediate and unavoidable. It is therefore in scope of the EANDCB and NPV. The measure also has impact on public bodies such as LPAs and the planning inspectorate, which is also captured in the NPV.	Yes - Impacts have been monetised in the Impact Assessment. As a result of these changes, there is expected to be a reduction in the cost of preparing planning applications (direct). Developers will also benefit from a reduction in the cost of holding capital, both due to a reduction in determination times (indirect) and appeals (direct). There is also expected to be a reduction in rejected applications (and subsequently appeals) and a reduction in applications that are not policy-compliant in the policy option (both direct).	The system will be simpler for SMBs: they will not need to navigate extensive local policies, and where their development proposals accord with the plan and national policy, permission should be granted in a timely manner, reducing uncertainty and delay, and benefiting small and micro business planning. Planners working in SMBs will be required to familiarise themselves with these changes, but this will easily offset by the benefits to SMBs from increased certainty.
Development Management Process Improvements	Much of the reform to the Development Management process will be done through subsequent regulation, however as part of the Bill we are seeking to provide a suite of primary powers which should promote a more proportionate approach to decision-taking, and speed-up decisions. These powers include: powers to further regulate planning information (in particular in digital formats); introduce a new process for making non-substantial changes to existing planning permissions to address recent case law judgements; and make permanent existing powers which allow the Secretary of State to regulate pre-application consultation between applicants, communities and statutory consultees prior to submission of planning applications.	When powers taken in the Bill are implemented, there will be transitional costs, in particular information requirements (content and form of planning applications and associated documents). However, these will only be assessed in secondary legislation.	EANDCB and NPV are zero because the primary powers are discretionary and will not result in direct costs for businesses. Other than the provisions for non-substantial amendments to planning applications, (which will not result in direct costs to business) the powers taken in primary legislation will be used to implement system changes through subsequent regulations. It is not possible to monetise impacts at this stage and further work will need to be undertaken, following the introduction of secondary legislation.	The public sector impacts cannot be monetised, and the overall, costs to businesses are expected to be none to minimal so are also not monetised.	Once secondary legislation is introduced, following ascension of the Bill, the package of proposals will benefit small businesses given that information requirements will be streamlined, and there will be a greater use of digital platforms for applicants to support them through the application process. Reducing the level of accompanying information required when submitting applications will benefit SMBs by reducing the burden of supporting information required.
Crown Developments	The Bill will take powers to speed up the process of dealing with applications for nationally important Crown developments.	These proposals will not impose direct public sector costs. The Planning Inspectorate may see a slight increase in cases coming to it for decision, through the non-urgent route but the number would be very few each year.	EANDCB and NPV are zero because there will be no direct or indirect impacts to businesses. The powers taken in the primary will introduce two new routes to seek planning permission on Crown development, businesses will not be affected by this.	There are no direct impacts to businesses or the public sector, and indirect impacts are very minor. Therefore, they cannot be monetised.	The new route to permission will only directly benefit the Crown and have no direct impact on small and micro businesses.
Planning Enforcement	The Bill provides new enforcement powers to local authorities for breaches of planning control.	There will be limited short-term upfront familiarisation costs for planning authorities to understand the new enforcement fines and process.	NPV but not EANDCB as these reforms have public sector impacts only, there are no direct business impacts.	There are no direct impacts to businesses, and indirect impacts are very minor and cannot be monetised.	We do not expect there to be any direct impacts on SMBs.

Digital	The Bill aims to take five overarching digital powers: a 'data standards power' that will apply to data produced and held by planning authorities; require local authorities through a 'publication power' to provide digital planning data that is in accordance with the data standards; a provision power' requiring data arising from participants in the planning system (including statutory consultees) to be provided digitally to planning authorities or the Secretary of State; to approve software procured by planning authorities through a 'approved planning data software power' to enable planning authorities to adapt towards working in a new digital planning system; and to provide protection against copyright infringement to planning authorities and software developers, when using copyright material to develop, maintain, upgrade or modify planning data software that is to be approved by the Secretary of State - 'a copyright infringement protection power'.	The government recognises the need to ensure local authorities are well equipped and supported to successfully deliver the digital elements of the planning reforms. There will be short-term upfront familiarisation costs for planning authorities, given the change to a data-driven way of working. To ensure local authorities are supported to deliver the reforms, we will continue to fund and run pathfinders and pilot projects to test and iterate the standards, tools, guidance and templates needed by local authorities to implement the new legislative requirements. DLUHC will continue to work with local authorities throughout the implementation phase, to ensure they have the required support to deliver the reforms. The digital reforms have adopted a co-creation approach to modernise the planning system. This has already been evidenced through work on the RIPA (Reducing Invalid Planning Applications) and BOPS (Back-Office Planning System) projects and through the local plans pathfinders.	EANDCB and NPV are zero because these measures have no direct or local authority impacts. The powers create a framework for subsequent legislation to be implemented.	These impacts cannot be monetised. Any impacts which may arise through subordinate legislation will be able to be calculated once the scope of data standardisation has been established.	Digital local plans will provide better information for SMB developers. They will be able to use digital services to easily identify sites and have better access to land constraint data to make investment decisions more swiftly. An in-depth analysis of the impact on SMBs can be undertaken once the scope of data standardisation has been established and will be conducted in subsequent IAs that accompany secondary legislation.
Design Standards	This Bill builds on the response to the <i>Building Better, Building Beautiful Commission</i> by requiring local planning authorities to produce a minimum of one design code for the entire local authority area.	There will be impacts for the public sector relating to familiarisation and training costs for LPA officers/members associated with understanding and determining design codes. LPAs will have clearer criteria to assess design quality, which could lead to increased refusal of poor-quality schemes, quicker determinations of, and fewer rejected, planning apps, saving staff costs and time for LPAs and PINs.	NPV and EANDCB as the measure has direct impacts on businesses via familiarisation costs with the new measure. The measure also has an impact on LPAs and is in scope of the NPV.	Yes - Impacts have been monetised in the Impact Assessment. There may be direct monetised and non-monetised benefits for developers through increased certainty and clarity on design expectations, saving time and costs for developers. The overall expected impact for developers through creating increased certainty in the planning system is estimated in Annex 4 to be a direct benefit to business of £2,276.6m (central scenario) over the 10-year appraisal period. The mandatory introduction of design codes is expected to contribute to the achievement of these benefits. There are direct monetised costs estimated at £1m (central scenario) to planners in the private sector who may need to familiarise themselves with new local design codes. This figure is included in the EANDCB. The use of design codes may lead to non-monetised additional design and build costs for developers, which may be offset by increases over time to the value of schemes that are well-designed.	There may be the following impacts to SMBs: - The certainty that design codes bring will save long case-by-case negotiations with local government. - An increase in competition between developers at all scales, unblocking barriers to land markets to SMB developers where previously dominated by volume housebuilders. - A greater need for planning consultancy services to assist design code production, which could create new opportunities for SMBs - Positive impacts from design codes on small businesses such as through encouraging a mix of uses/activities where appropriate. There may be costs to developers, including SMBs, due to the new requirements for higher design standards. However, these increased developer costs may be partly offset by increases in the value of schemes and adjustments to land values over time in most markets. There will be additional costs for developers, including SMBs, associated with familiarisation with the new design codes. However, SMBs are expected to be well-placed to deliver design codes, as they already typically rely on delivering premium products, with in house design skills. Subsequently there may be less costs associated with training/familiarisation.

Heritage and Historic Environmental Records	A new statutory requirement to maintain or have access to a Historic Environmental Record (HER), as a digital evidence base for plan and decision making, alongside other measures that provide further protections to historic environments.	There will be public sector impacts once the regulations enabled by the Bill measure for HERS are introduced, as local authorities will have to ensure HERs meet the minimum standards.	NPV but not EANDCB as the measures have indirect impacts on businesses and public sector.	The business costs from the proposed heritage reforms are expected to be negligible due to the small number of Building Preservation Notices issued each year. Businesses may benefit from small efficiency savings. These have not been monetised due to the small impact.	This measure does not place a disproportionate impact on SMBs. There are no direct impacts on SMBs from this measure.
Infrastructure Planning	The Bill introduces new infrastructure planning powers that will enable essential infrastructure to be delivered to support future development needs. It will require 'prescribed bodies' with public functions to engage with local planning authorities upon request. It will also require all Infrastructure Levy charging authorities to produce an Infrastructure Delivery Strategy to set out Levy spend prioritisation, and infrastructure identified through local plan.	Power where LA's choose to require assistance from other bodies: cost of operation. Direct familiarisation cost for LAs as we strongly expect them to use this. Where applied, infrastructure providers will have to respond: direct cost in complying and in familiarisation. Mandatory requirement to develop an Infrastructure Delivery Strategy, with familiarisation costs – direct cost to LAs.	NPV and EANDCB because there are direct impacts on businesses. There are also indirect impacts on businesses as the use of the power is discretionary, and public sector impacts which are captured in the NPV.	Yes - Impacts have been monetised in the Impact Assessment. Direct cost to business: Requirement to assist: Familiarisation and start-up/admin: Direct impact because compliance mandatory for providers. Indirect benefits to business: More accurate infrastructure demand information, supporting more efficient deployment of capital and resource. Gains from higher productivity from greater agglomeration and deeper labour markets.	Infrastructure providers likely to be subject to the power are large private e.g. utilities, or public. Therefore, we expect there will be no direct impact on SMBs.
Infrastructure Levy	The Bill includes measures to introduce a new Infrastructure Levy that will be locally set and raised by local authorities, for different types of land, with the funds used for affordable housing and infrastructure.	The Infrastructure Levy will be mandatory for local authorities to charge, locally set and locally raised. There are potential challenges for local authorities in terms of familiarisation costs for implementing and transitioning to a new developer contributions system, especially as Community Infrastructure Levy is currently only charged by around half of local authorities. However, in the long run this will be offset by the time and resources saved by not having to negotiate s106 agreements.	NPV but not EANDCB because, while there are direct impacts through familiarisation and start-up costs to businesses, as they relate to calculating tax contributions the RPC advised this is out of scope of the EANDCB as it is a non-qualifying measure. There are also public sector impacts through implementing the Levy.	Impacts have been monetised in the Impact Assessment despite the IL being a tax. It was deemed necessary to show impacts of transitioning to the new system (but not the tax itself). <ul style="list-style-type: none"> There are indirect impacts on businesses, who will benefit from the certainty of the new Levy; landowners who will need to incorporate their anticipated Levy liability into the prices they will pay for land which may lead to lower returns for their land; and developers, who will face familiarisation and start-up costs. 	Overall, the proposed Infrastructure Levy is expected to make the system of developer contributions clearer and more transparent, making it easier for small and micro businesses to navigate than the current system. It will simplify the negotiation system which has been considered unworkable for some SMBs; enable payments on completion which will support SMBs who tend to have fewer resources upfront, aiding cashflow. Familiarisation with the new system may be complex and have some additional costs for SMBs.
Environmental Outcomes Reports	Powers in the Bill will replace the existing EU-derived environment assessment mechanisms (strategic environmental assessment and environmental impact assessment) with a revised framework of Environmental Outcomes Reports. Through this, plan and project level assessments will be better integrated to minimise duplication and processes streamlined and made more digital whilst meeting our international obligations.	The Bill introduces an outcomes based model to assessment that will allow the government to create a more certain system that is easier to navigate. For public-sector participants, this will mean: Less scope for error, lower preparation costs, and savings through data standards There will be familiarisation costs – although public authorities already undertake these assessments, there will be a cost associated with adjusting to the new system once the regulations are implemented. However, any costs will be minimised in the process of designing the system.	EANDCB and NPV are zero because these measures have no direct or local authority impacts. The measures introduce a framework of powers rather than a specific system then there is no direct cost to business flowing from the legislation. The measure is therefore out of scope and will be assessed in secondary legislation.	Impacts are indirect as the Bill itself sets the framework for environmental outcomes reports.	Given that environmental assessment is for significant plans and projects, this is likely to have limited impact on SMEs as smaller scale development will not require assessment. However, by improving the process and reducing the overall burden / cost, this could remove a barrier to entry for SMBs and encourage SMB developers to engage with projects that meet the assessment threshold.
Compulsory Purchase Order	The Bill will amend the Compulsory Purchase Order regime to enable faster delivery of schemes and modernise the process through the introduction of digital requirements. The Compulsory Purchase Order changes will give authorities greater confidence in using compulsory purchase powers simultaneously to seeking planning consent and securing delivery funding. Further changes will increase the flexibility in the vesting date of	The changes will provide authorities with confidence in using Compulsory Purchase Orders to assemble land through greater confidence in positive and faster outcomes. Conditional confirmations will allow CPOs to be made earlier. Changes to the confirmation process will result in the appropriate procedure being used to consider the CPO.	EANDCB and NPV are zero because these measures have no direct, indirect or local authority impacts.	Indirect impacts: <ul style="list-style-type: none"> Businesses will benefit from an increase in support for regeneration through the greater use of Compulsory Purchase Orders where needed and flexibility in the date when property will vest in an acquiring authority where a general vesting declaration is used. 	There are not expected to be any changes in the impact for SMBs, the measures are generic changes to the process that will not disproportionately impact SMBs.

	property and provide for the future digitalisation of the regime.	Other changes will provide authorities with more flexibility in using the process.		<ul style="list-style-type: none"> There are not expected to be any costs to businesses that are additional to those already within the compulsory purchase process. <p>These impacts cannot be monetised.</p>	
High Street Rental Auctions	A priority of the Bill is to support the regeneration of town and high streets, which the Rental Auctions clauses will support. These will enable local authorities to intervene where high street commercial vacancy rates are high for extended periods by requiring a landlord to let their property for up to 5 years via an auction. This will help to counter empty premises and support wider revitalisation and local growth.	High Street Rental Auctions would provide a new tool for local authorities to support change in their town centres and local control to be exerted without the need for funding (national, local or private sector. Note that this is a permissive policy, so local authorities will weigh up whether it is to their benefit to make use of it. The policy does not impose any costs on authorities. Many local authorities may need to upskill to oversee rental auctions and there may be initial familiarisation costs for local authorities.	Familiarisation costs have been captured in the EANDCB and NPV. Otherwise, the measures have no direct impacts on businesses. This is also a permissive measure that give local authorities a choice if they chose to implement it.	Aside from familiarisation costs, the impacts on businesses are indirect as it is dependent on the local authority choosing the use the power. The impacts cannot be monetised because we do not yet know the extent of the use of the measure.	We expect the introduction of this measure to have a direct impact on SMBs from familiarisation costs. Any other impacts on SMBs are indirect where a local authority uses the powers the Bill grants them. The aim is to make town centre tenancies more accessible to SMBs by allowing for market rate bids at lower levels, so where used these are likely to have a positive impact on SMBs in the hospitality and retail sectors.
Urban Development Corporations	The Bill introduces new powers to create a locally-led Urban Development Corporation, which provides a new model that empowers local authorities to undertake and deliver regeneration programmes (see Annex 16). The Bill also amends powers so that all types of development corporation can access common plan-making and development management powers, amends the designation process for locally-led New Town Development Corporations, and removes the cap on the number of board members and the aggregate borrowing cap.	<p>These measures will not impose disproportionate costs on the public sector.</p> <p>The creation of locally-led Urban Development Corporations may result in additional costs for local authorities compared to other delivery vehicles for large scale housing development. It will be entirely for the local authority or authorities covering the area of the proposed regeneration/growth area to decide to request the establishment of a locally-led Urban Development Corporation, taking account of the benefits this may bring.</p>	No EANDCB and NPV because the measure is a discretionary power and impacts are only applied where a Development Corporation has been established.	There are no direct impacts as the measures in the Bill are discretionary. The reforms to the development corporation legal framework may have a positive indirect impact on businesses. Where used, it will allow a more co-ordinated, cohesive, efficient, and effective arrangements, including for interested investors and developers, and cost savings in comparison to the existing arrangements. However, as the effect is likely to be relatively minor and will vary dependent on individual circumstances, the impacts have not been monetised.	There are no direct impacts on SMBs from this measure.
Build Out	The Bill also includes measures that will support faster build out, including new commencement notices for developments which have permission, and making it easier for authorities to issue completion notices where there has been slow build-out.	<p>Completion notices will reduce planning information gathering burdens on LPA's.</p> <p>Currently, there is no requirement for developers to inform a LPA when a permission is going to be built out. This creates a monitoring burden for LPAs in order to find such information out. The commencement notice measure removes this burden, increases the LPAs knowledge of build out rates and makes the development of the site more transparent to LPAs, the PI and the general public. They therefore have an indirect impact.</p> <p>Completion notices will have an indirect impact, because the reforms will make it faster and easier for a local planning authority to serve notices.</p>	NPV and EANDCB because there are direct impacts to businesses through familiarisation costs and increased administrative costs. There are also public sector impacts through familiarisation.	<p>Yes - Impacts have been monetised in the Impact Assessment. Direct impacts on businesses through familiarisation costs and increased administrative costs have been monetised.</p> <p>Completion notices will have an indirect impact on businesses. Impacts have been monetised in the Impact Assessment.</p> <p>Commencement notices will have an indirect impact created by the need to complete and submit the information required by commencement notice in Regulations.</p>	<p>At present, completion notices are typically served on small, single dwelling developments. The indirect impacts of the reform will also apply to SMBs.</p> <p>In relation to SMBs, the need to submit a new commencement notice will have a minor indirect impact caused by having to complete a new notice process with information they already have available to them.</p>
Pavement Licencing	To further support high street regeneration, the Bill will make permanent the current temporary measures on pavement licencing. This will make it faster and cheaper to apply for a license to place furniture on the highway, with the consultation period streamlined.	This will make permanent temporary measures put in place during the pandemic which have shorter consultation and determination periods and lower fees. Here we are amending the fee cap to make it sustainable for local authorities, ensuring that they can recover their costs, and amending the consultation and determination periods while ensuring that the process remains cheaper and quicker than that under the Highways Act 1980. We are also giving local	NPV and EANDCB because there are direct cost savings to businesses through a streamlined system and familiarisation costs to public sector bodies.	<p>Yes - Impacts have been monetised in the Impact Assessment.</p> <p>There is a direct saving to business through making permanent the lower fee and quicker process.</p> <p>There is a direct familiarisation cost to businesses to re-read and understand the new application process.</p>	Will make it permanently cheaper and quicker for all businesses including SMBs to get a licence to place furniture on the highway.

		authorities new enforcement powers to tackle unauthorised placement of furniture.		Regulation reduces the price cap for applications. Regulation allows local authorities to grant licenses for up to 2 years, an increase from the previous limit of 1 year. This could lead to further cost savings for businesses.	
Relief from Enforcement of Planning Conditions	The Bill also introduces a new power to introduce greater flexibility in the planning system to enable it to adapt quickly in times of economic uncertainty. To do this, the Secretary of State will have a power to limit enforcement against specific planning conditions to support wider economic activity. This may include, but is not limited to, construction hours and delivery time.	When the power is exercised, this will have a direct impact on the ability of local planning authorities to take enforcement measures (or elements of) against non-compliance with specified conditions, for a specified period of time. This is likely to reduce pressure on LPA enforcement functions during these periods.	No EANDCB and NPV. Impacts will only be felt following secondary legislation and these are currently unknown.	No - These impacts cannot be monetised. However, the proposals will have a positive impact by giving businesses flexibility to adapt during periods of disruption, maintain productivity and support recovery.	There will be no disproportionate impact on SMBs. SMBs along with larger businesses will benefit from the increased certainty.
Land Transparency	Requires beneficiaries of arrangements that allow them to exercise control over land, short of ownership, e.g. options and conditional contracts, to note them on the Land Register and provided additional prescribed data. The additional data will be published online in bulk as Open Data which is accessible to all.	When the power is exercised, this will increase the data available to local authorities about the land ownership in their area to help them inform regeneration and make it easier for councils and local communities to understand the likely path of development in their areas.	No EANDCB and NPV because there are no direct impacts to businesses and the impacts will be assessed through secondary legislation.	No - These impacts cannot be monetised.	The positive indirect impacts will also be felt by SMBs as they have the potential to reduce potentially anti-competitive practices in an area that limit market access. Impacts of SMBs will be assessed with future IAs that accompany secondary legislation.
Street Votes (placeholder clause)	The Bill currently includes a placeholder clause for a "street votes" system which would allow for intensification of predominantly housing development on existing residential streets where support for that intensification was given through a referendum of residents.	There will be some impacts on the public sector who need to familiarise themselves with the new system. These will be assessed once the clauses are in the Bill.	Zero EANDCB and no NPV calculated because there are no impacts to business and very minor public sector impacts.	These impacts cannot be monetised. Our intention is to replace this clause with substantive provisions a later point in the passage of the Bill. We intend to provide an assessment of the impact of this measure as part of a separate submission.	The impacts on SMBs will be assessed once the clauses are entered into the Bill.
Vagrancy (placeholder clause)	The Bill will make provision for the replacement legislation for a begging offence falling out of the repeal of the Vagrancy Act 1824.	The legislation may empower local authorities to address begging via civil sanctions and enforcement notices. This will not be a duty conferred on LAs but will leave the option open to them to engage with individuals and create agreements to desist from begging or engage in support services. We will also likely be creating a new criminal offence, which police will be able to use their existing powers on. There is no creation of new police powers.	EANDCB and NPV of zero because there are no impacts to business or public sector bodies.	No - these impacts cannot be monetised. Our intention is to replace this clause with substantive provisions a later point in the passage of the Bill. We intend to provide an assessment of the impact of this measure as part of a separate submission.	We do not expect any direct impacts on SMBs.
RICS clause (Review of governance etc of RICS)	Power to introduce periodic reviews of the Royal Institution of Chartered Surveyors. The clause enables the SoS, from time to time, to appoint an independent person to review RICS and requires the SoS to publish the reviewer's report. When the power is exercised this will give government information about the governance and performance of RICS, in order to satisfy itself that RICS performs in the public interest.	The cost of this provision (appointing an independent reviewer and carrying out a review) is expected to be covered by Department spending. There may be some time/resource required from department officials for the appointment and during the review. The independent reviewer is expected to be appointed through Ministerial Appointment. Typically, reviewers volunteer their services.	EANDCB and NPV of zero because there are no impacts to business or public sector bodies.	N/A	We do not expect any direct impacts on SMBs.

5.4.1 Levelling up systems change (not a regulatory provision)

27. The Bill introduces a new levelling up framework: missions and reporting, which is a power to set the missions by regulations introduced subsequently. It also creates a duty on the Government to report annually to Parliament on progress on the missions, as well as to amend them in light of any review outcomes.

5.4.2 Devolution (not a regulatory provision)

28. The Bill will include powers to create a new type of upper tier combined authority, which does not require the consent of district councils but should enable devolution arrangements to be more suitable for a wider range of areas across the country. The Bill will also allow for directly elected leaders of combined authorities to be given alternative mayoral titles, this would enable non-metropolitan areas to choose a title that better reflects their local community.

29. The Bill will simplify establishing combined/unitary authorities by removing the need for authorities to undertake a governance review and scheme (replacing with a proposal) and changing the statutory tests that the Secretary of State must consider before new bodies can be established. The outcome of these changes will reduce the length of time to establish a combined authority (including mayoral combined authorities) that will help meet the Government's mission that every part of England that wants one will have a devolution deal with powers at the highest possible level of devolution, creating a simplified system and long-term funding settlement.

30. The Bill will reduce time gaps for changing governance arrangements when adopting a directly elected model and will allow local authorities to change their governance model in a shorter timeframe than legislation currently provides. This measure supports the Government's levelling up mission by preventing local authorities from being unable to take part in devolution deals, which will increase the use of devolution deals across the country.

31. De-hybridising the power to extend combined authorities borrowing is a new power in the Bill to extend the borrowing cap so it can be used in relation to single authorities without triggering 'hybrid' parliamentary procedure, which is a longer process and can only occur in a single area. This will reduce delays and make it easier to invest in regeneration.

32. The Bill will introduce new powers for central government to address excessive local authority borrowing, capital and investment thereby protecting the financial framework, while preserving local decisions making for delivering priorities, such as housing, infrastructure and schools. Powers granted to the Secretary of State to set a trigger point for local authority borrowing risk, thereafter, having the powers to request information, a review, set a borrowing cap or require a local authority to reduce its risk. This will help ensure local authorities are financially sustainable to meet their duties and policy objectives, as well as provide services. The Bill will also increase the transparency of local authority decision making by enabling remote local authority meetings to take place.

33. A new council tax premium on second homes will enable billing authorities to apply a discretionary premium of up to 100% on second homes in their area. They will be able to use any funding generated to help mitigate the impacts of second homes. The power for billing authorities to apply a council tax premium on long term empty homes will also be changed to reduce the period before the premium applies. Local authorities will be able, but not required, to apply a premium of up to an addition of 100% on the council tax bill after one year. This will provide an incentive to bring long-term empty homes back into use and supports local authorities by increasing the supply of housing.
34. The Bill will create the ability to set statutory guidance to determine the process of securing consent on any proposed changes to street names. This will prevent local authorities from changing street names without the consent of those who live on the street, which will require two thirds majority of council tax and rate payers before a street name can be changed. This empowers local communities by requiring their consent by a super-majority, preventing the erosion of local history against the wish of communities.

5.4.3 Planning and regeneration (mostly regulatory provisions)

Measures improving plan-making

35. The Bill aims to improve the process of making Local Plans, so it is simpler, faster and more visual, making the system easier to engage with. A new statutory 30-month timetable for plan-making will be introduced, with streamlined evidence requirements, a digital approach to production and more focused plan content (so they deal with matters of genuine local importance, rather than replicating things which are already set out in national policy). The Bill will introduce a new set of 'gateway tests' to check for any problems as plans emerge, and there will be improvements to the arrangements for examining draft plans. There will be a discretionary power for authorities to prepare 'supplementary plans' subject to expedited procedures, replacing current 'supplementary planning documents' which do not have full weight in the process of deciding planning applications. See Annex 1 for more information.
36. Strategic planning will be amended as well (see Annex 2). The existing 'duty-to-cooperate' which applies when local plans are being prepared and which can prevent plans from being adopted at a late stage, will be abolished through the Bill and replaced with a new 'alignment policy' to be set out in a revised National Planning Policy Framework (NPPF) and not in legislation. This will operate in a more flexible way. Spatial development strategies, which can be prepared by some Mayoral authorities currently, will be re-focused on providing an overall spatial strategy and associated infrastructure requirements (while the power to prepare an SDS will be extended on a voluntary basis to other groups of authorities).
37. Neighbourhood planning will be improved by introducing a new simpler 'neighbourhood priorities statement' alongside the current ability of parish councils and specially constituted neighbourhood forums to prepare a formal neighbourhood plan. The priorities statements will allow communities to set out their priorities for the future of their areas,

which local authorities will need to take into account when preparing their local plans for the areas concerned, enabling more communities to better engage in the plan-making process. Alongside this there will be improvements to the existing neighbourhood plan process in terms of streamlined content and digitisation. More information about these measures is provided in Annex 3.

Measures improving decision-making

38. The Bill will increase certainty in planning decisions through two key mechanisms: first, giving more weight to adopted plans (local plans, strategic plans and neighbourhood plans) so that decisions must be made in line with the plan unless there are strong reasons to do otherwise; and second, by creating a suite of national development management policies which will have similar weight (so the overall requirement will be to make decisions in line with adopted plans, and with national development management policies, unless there are strong reasons to the contrary). More information is in Annex 4. To support this, the law will also be changed to remove duplication between plans and national policy.
39. The Bill aims to enable a faster, simpler and fairer Development Management process for all users, which will encourage more applications for high quality development to come forward (see Annex 5). Much of the reform to the Development Management process will be done through subsequent regulation, however as part of the Bill we are seeking to provide a suite of primary powers which should promote a more proportionate approach to decision-taking, and speed-up decisions. These powers include: powers to further regulate planning information (in particular in digital formats); introduce a new process for making non-substantial changes to existing planning permissions to address recent case law judgements; and make permanent existing powers which allow the Secretary of State to regulate pre-application consultation between applicants, communities and statutory consultees prior to submission of planning applications.
40. The Bill will take powers to speed up the process of dealing with applications for nationally important Crown developments in the planning system (see Annex 6). The Government is keen to provide local planning authorities with the tools they need to carry out effective planning enforcement action and therefore, the Bill provides new enforcement powers to local authorities for breaches of planning control (see Annex 7).
41. The digital reforms will deliver a more efficient, faster, accessible and modern planning system (see Annex 8). To achieve this the Bill aims to take five overarching digital powers: a 'data standards power' that will apply to data produced and held by planning authorities; require local authorities through a 'publication power' to provide digital planning data that is in accordance with the data standards; a 'provision power' requiring data arising from participants in the planning system (including statutory consultees) to be provided digitally to planning authorities or the Secretary of State; to approve software procured by planning authorities through a 'approved planning data software power' to enable planning authorities to adapt towards working in a new digital planning system; and a 'copyright infringement protection power' to clarify in planning authorities openly publishing copyright planning data and software developers using this data for specific purposes, neither infringes upon copyright protections.

Measures to provide incentives and infrastructure

42. A priority of these reforms is to further improve design standards and quality of developments in the new planning system, to achieve beautiful, sustainable places and communities. This Bill builds on the response to the Building Better, Building Beautiful Commission by requiring local planning authorities to produce a minimum of one design code for the entire local authority area (see Annex 9).
43. The Bill will introduce new measures to further protect and enhance the historic environment through the planning system. A new statutory requirement to maintain or have access to a Historic Environmental Record (HER), as a digital evidence base for plan and decision making, alongside other measures that provide further protections to historic environments (see Annex 10 for more details).
44. To support the delivery of Nationally Significant Infrastructure Projects (NSIP) measures in the Bill will streamline the end-to-end process, including through digitisation, and apply the new Environmental Outcomes Reports (EOR) reform to NSIPs. Together, these will improve the performance of the NSIP regime, providing a more streamline process and help give investors and developers more certainty supporting regeneration and growth (See Annex 13).
45. The Bill introduces new infrastructure planning powers that will enable essential infrastructure to be delivered to support future development needs (see Annex 11). It will require 'prescribed bodies' to engage with local planning authorities upon request and require all Infrastructure Levy charging authorities to produce an Infrastructure Delivery Strategy.
46. The Bill includes measures to introduce a new Infrastructure Levy that will be locally set and raised by local authorities, for different types of land, with the funds used for affordable housing and infrastructure (see Annex 12 for further information). As the Infrastructure Levy is a tax, it is outside of the purview of the RPC. However, given the Levy will have a significant impact, we have included an explanation in this document.
47. Powers in the Bill will replace the existing EU-derived environment assessment mechanisms (strategic environmental assessment and environmental impact assessment) with a revised framework of Environmental Outcomes Reports. Through this, plan and project level assessments will be better integrated to minimise duplication and processes streamlined and made more digital whilst meeting our international obligations. The new framework will mean shorter, easier to read documents are produced. Changes will create an outcomes-based framework which a plan or project will be assessed against. This should lead to better outcomes without delays to development (for more information see Annex 13). This will also cover wider environmental assessment regimes beyond the planning system and nationally significant infrastructure projects such as marine, oil and gas and major transport projects.

48. The Bill currently includes a placeholder clause for street votes, which would allow for intensification of predominantly housing development on existing residential streets where support for that intensification was given through a referendum of residents. Our intention is to replace this clause with substantive provisions at a later point in the passage of the Bill. We intend to provide an assessment of the impact of this as part of a separate submission.

Reforms to support delivery

49. The Bill will amend the Compulsory Purchase Order regime to enable faster delivery of schemes and modernise the process through the introduction of digital requirements. The Compulsory Purchase Order changes will give authorities greater confidence in using compulsory purchase powers simultaneously to seeking planning consent and securing delivery funding. Further changes will increase the flexibility in the vesting date of property and provide for the future digitalisation of the regime (see Annex 14).

50. A priority of the Bill is to support the regeneration of town and high streets, which the High Street Rental Auctions clauses will support. These will enable local authorities to intervene where high street commercial vacancy rates are high for extended periods by requiring a landlord to let their property for up to 5 years via an auction. This will help to counter empty premises and support wider revitalisation and local growth (see Annex 15).

51. The Bill introduces new powers to create locally-led Urban Development Corporations, which provides a new model that empowers local authorities to undertake and deliver regeneration programmes (see Annex 16). The Bill also amends powers so that all types of development corporation can access common plan-making and development management powers. This will play an integral role in levelling-up by helping to boost the development or regeneration of areas that have in the past not shared fully in the country's economic growth.

52. The Bill also includes measures that will support faster build out, including new commencement notices for developments which have permission, and making it easier for authorities to issue completion notices where there has been slow build-out (see Annex 17). This should facilitate getting more homes in the right places more quickly.

53. To further support high street regeneration, the Bill will make permanent the current temporary measures on pavement licensing. This will make it faster and cheaper to apply for a license to place furniture on the highway, with the consultation period streamlined (see Annex 18)

54. The Bill also introduces a new power to introduce greater flexibility in the planning system to enable it to adapt quickly in times of economic uncertainty. To do this, the Secretary of State will have a power to limit enforcement against specific planning conditions to support wider economic activity. This may include, but is not limited to, construction hours and delivery times (see Annex 19).

55. The Bill includes measures that will improve land transparency by facilitating a better understanding of who ultimately owns or controls land in England and Wales. It implements the 2017 Housing White Paper commitment to publish data on arrangements used by developers and others to control land, short of ownership, to assist local communities in better understanding the likely path of development and identify anti-competitive behaviour. The measures will also support the identification of attempts to evade sanctions or the new disclosure requirements placed on overseas entities owning land and property.
56. The Bill also introduces a new power which will enable the Secretary of State, from time to time, to appoint someone to review the Royal Institution of Chartered Surveyors (RICS). The review will look at the governance of RICS and its effectiveness in achieving its objective, which is to “maintain and promote the usefulness of the [surveying] profession for the public advantage in the United Kingdom”, and any other matter specified in the appointment which is connected to the review purposes. This will give government information about the governance and performance of RICS, in order to satisfy itself that RICS performs in the public interest. The cost of this provision is expected to be covered by the Department. This discretionary power to review RICS will be used intermittently by the Secretary of State and will therefore have no direct impact on the Department and no expected impact on businesses and external bodies.
57. The Bill includes a placeholder clause to enable the replacement and subsequent repeal of the Vagrancy Act 1824. The nature and scope of replacement legislation is subject to the outcome of a consultation which closed in May 2022 and is currently being analysed. This will therefore be covered by a separate regulatory impact assessment as required.

6. Impacts by measures in the Bill

58. This section estimates both the qualitative and quantitative impacts of the regulatory provisions in the Bill (primarily regeneration and planning measures). Many of the measures will require supporting secondary legislation to set out more fully how they will operate, which will be subject to its own consultation, scrutiny and assessment. This imposes limits on how fully the potential impacts can be assessed at this stage, therefore, the analysis focuses on the impacts of primary legislation. However, where we have a knowledge of the regulations that will follow, we have described anticipated impacts that may occur. In addition, a number of the measures are enabling powers which will be discretionary to use, for example Compulsory Rental Auctions. In this case, an illustrative description of expected impacts based on an assumed usage of the powers has been included. For most of the measures there are uncertainties about the interactions and effects across different policy areas (particularly in the case of permissive powers), resulting in some challenges when assessing impacts upon the range of different stakeholders involved in the planning system. For measures in the Bill where evidence is very limited or there is high level uncertainty on future impacts, costs and benefits have not been formally quantified. In these cases, we have used the information available to describe the costs and benefits qualitatively.

59. Some of the monetised costs and benefits in this assessment, such as the familiarisation cost assumptions have been derived from the knowledge and expertise of planning professionals at DLUHC who have recent and/or extensive experience of working in local planning authorities, as well as discussions with representatives from authorities in the course of formulating the reforms.
60. Measures in the Bill that are regulatory provisions can broadly be categorised into four areas: 1) Improving plan making, 2) improving decision making, 3) improving incentives and infrastructure delivery, and 4) supporting regeneration and delivery. The categories group measures that work closely together or deliver similar outcomes. To support the understanding of how measures work together to create positive or negative impacts on businesses and the public sector, sections 6.1-6.4, provide a summary of costs and benefits for these categories, prior to the analysis of individual measures. This approach, which is aligned to the programme strategy gives a more accurate picture of the impacts, minimising the risk of double counting by ensuring there is a consistency and coherence in estimating impacts that are common across areas. Section 7 then brings together the analysis providing overall quantitative and qualitative summaries of the Bill's impacts.
61. A summary of the costs and benefits for the measures that have been quantified is presented in Table 2 below. These figures are in 2019 prices and 2024 present value.

Table 2: Overview of monetised Costs and Benefits

Measure	Annex number	Impacts felt through primary or secondary	Total Benefits (£m, PV terms)	Total Costs (£m, PV terms)	Total social NPV (£m)	EANDCB (£m)
Local Plans	1	Primary/ Refinement through secondary	256.4	536.1	-279.7	0
Strategic Plans and Alignment Policy	2	Primary/ Refinement through secondary	n/a	n/a	n/a	n/a
Neighbourhood Planning	3	Primary/ Refinement through secondary	0.0	4.0	-4.0	0
Increased certainty in planning decisions	4	Primary	2,932.2	3.6	2,928.5	-264.3
Development Management Process Improvements	5	Primary / Refinement through secondary	n/a	n/a	n/a	n/a
Crown Development	6	Primary and secondary	n/a	n/a	n/a	n/a
Planning Enforcement	7	Primary	0.0	0.1	-0.1	0
Digital	8	Secondary	n/a	n/a	n/a	n/a
Design Standards	9	Primary	0.0	56.2	-56.2	0.1
Heritage	10	Primary and secondary (the latter for HERs and enforcement)	0.0	10.2	-10.2	0
Infrastructure Planning	11	Primary	24.5	251.7	-227.2	21.3
Infrastructure Levy (non-taxation impacts) ¹	12	Primary / Refinement through secondary	16.7	724.4	-707.7	0
Environmental Outcomes Reports	13	Primary / Refinement through secondary	n/a	n/a	n/a	n/a
Compulsory Purchase Orders	14	Primary and Secondary	n/a	n/a	n/a	n/a

¹ In line with HMT Green Book guidance, Government's increased revenues from levies and taxation are not taken into account in NPV calculations, and therefore potential increased revenues have not been monetised below.

High Street Rental Auctions	15	Primary / Refinement through secondary	0.0	0.7	-0.7	0.7
Development Corporations	16	Primary and Secondary	n/a	n/a	n/a	n/a
Build Out	17	Primary and Secondary	0.0	166.9	-166.9	18.2
Pavement Licencing	18	Primary and Secondary	79.2	0.1	79.2	-9.2
Relief from Enforcement of Planning Conditions	19	Primary / Refinement through secondary	n/a	n/a	n/a	n/a
Total			3,309.0	1753.6	1555.5	-233.8

Table 2: Monetised total costs and benefits by measure (2019 Price Year, 2024 Present Value). Numbers might not sum due to rounding.

6.1 Improving plan-making

62. There are several measures that seek to improve plan-making so it is simpler, faster and more visual, making the system easier to engage with. To facilitate this change, the process of plan-making will be streamlined to make the system easier to navigate for all groups. Moving from a planning system that imposes changes on communities, to a new system where people shape and influence the planning system for their benefit.

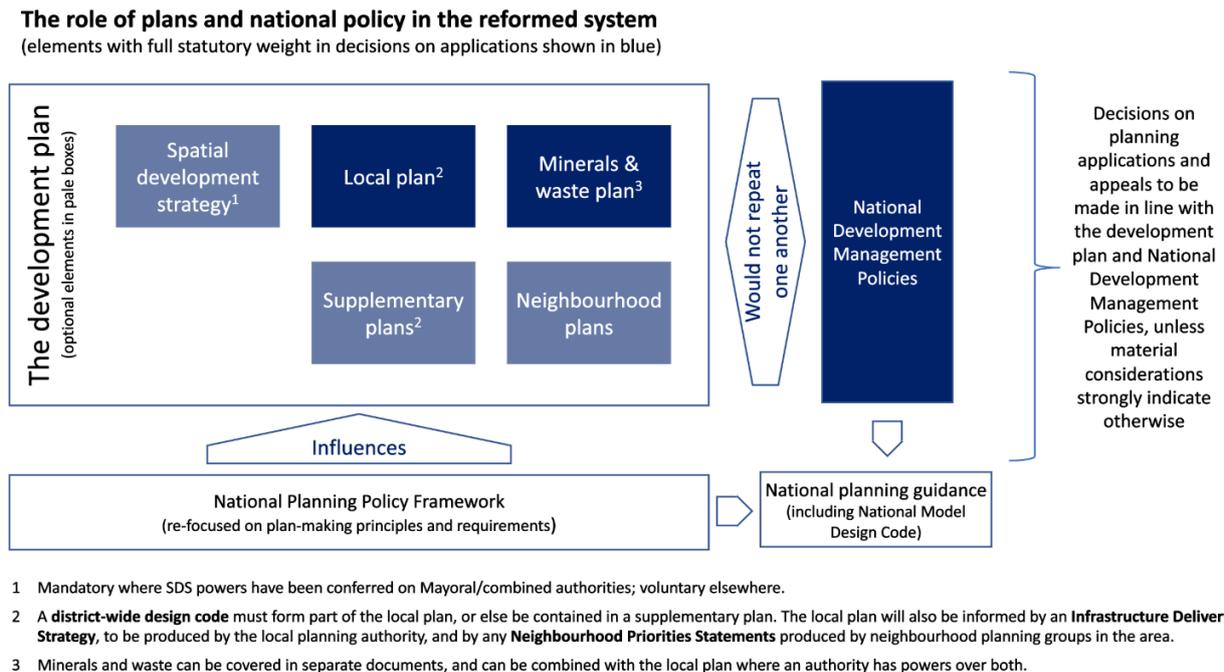
63. Table 3 below summarises the summary of impacts of the measures in this group (local plans, strategic plans and alignment policy and neighbourhood planning. Figure 1 illustrates the relationship between plans and decision making, for reference). Business impacts have not been monetised as they are felt indirectly. Costs and benefits of supplementary plans have not been included as they are down to local authority discretion, so do not impose specific impacts.

Table 3: Summary of Impacts arising from improving plan-making

	Business impacts	Public-sector impacts
Benefits	<p>More interactive local plans, strategic plans and neighbourhood plans will enable improved community and wider engagement in the plan making process, with increased certainty for businesses and landowners on investment decisions.</p> <p>Reforms to the plan-making system will create new investment opportunities for private sector consultancies and the private technology sectors involved in the process (e.g. they will drive innovation in the Property Technology sector).</p> <p>Improved alignment of local, strategic and neighbourhood plan priorities through the process of setting site allocations and bringing forward developments at various spatial scales will have positive benefits for business working on a range of sites.</p> <p>Developers will have increased certainty in the system with accessibility to key information sources and evidence, which improves business decision making, saves time and reduces costs. This</p>	<p>Early engagement in the local plan and strategic plan preparation process will reduce the amount of time spent by officials (authorities and PINS) at the examination stage and reduce the chances of plans failing.</p> <p>High quality digitised plans will result in more efficient and effective use of information in plans, and ultimately support better regulation of land and better-informed decision making.</p> <p>A more interactive plan and accessible information will result in improved buy-in from local communities and other interests during the plan making process, which should help to reduce misunderstandings about risks and opportunities (which can create opposition, uncertainty and delay).</p> <p>More accessible and integrated data sources will also enable improved spatial alignment between housing and infrastructure, local and strategic planning tiers and when working across boundaries, this will result in improved collaboration and delivery of site allocations.</p> <p>Strengthening the alignment between and across strategic and local plans will</p>

	will have particular benefits for SMEs who currently have limited access to key evidence bases.	improve the way that cross-boundary issues such as infrastructure provision are addressed.
Costs	There will be some (limited) disadvantages to businesses from streamlined evidence requirements for preparing plans that could potentially affect consultants that are commissioned by local authorities to provide specialised inputs. Equally, the new system is expected to create some new business opportunities, although it is not possible to monetise these.	<p>The combined cost to local authorities of producing new style local plans and the process of reviewing neighbourhood priority statements is around £540m combined.</p> <p>The cost of digitisation of local plans, spatial plans and neighbourhood plans has not been monetised at this stage. However, it will be analysed at the secondary legislation stage.</p> <p>Non-monetarised costs potentially include additional time for local planning authorities to take account of Neighbourhood Priorities Statements.</p>

Figure 1: An illustration of plans and national policy in the reformed system



6.1.1 Local Plans

Table 4: Impacts arising from Local Plans measures

	Business impacts	Public-sector impacts
Benefits	Reduced uncertainty for investors from increased speed of local plan adoption, enabling site allocations to come forward which can support more effective business decisions.	Early PINS engagement in the plan preparation process to identify issues will result in time and cost savings for local authorities by resolving problems before the local plan reaches the examination stage.

	Increasing the number of plans being updated in the 10-year appraisal period will indirectly benefit consultants through increased business opportunities.	The cost to a local authority of the new style local plan is estimated to be £2.23m (a 15% reduction on the current cost of £2.63m), so there will be savings over time. The total cost saving to local authorities is £256.4m.
Costs	There will be potentially less work for consultants in some areas where evidence is being streamlined, resulting in lower income for consultancy firms. This is an indirect impact.	<p>The costs to local authorities for preparing plans more frequently and where local authorities do not already have a plan in a new reformed system is £533.4m.</p> <p>The total familiarisation costs to planning staff is at local authorities is £2.7m.</p> <p>There will be significant costs to Planning Inspectorate that are not monetised, as they will need to adapt their ways of working to the new plan-making process and timescales.</p>

Business impacts

64. Having new style up-to-date plans in place, in combination with other changes in planning legislation - such as giving more weight to adopted plans so that decisions must be made in line with the plan unless there are strong reasons to do otherwise – is a contributing factor that will help to realise a number of monetised certainty benefits to business that are set out in Annex 4 (Increasing certainty in planning decisions). These benefits include a reduction in the cost of preparing planning applications for developers (direct impact), a reduction in refusals such as those that lead to appeal (direct impact) and a reduction in the time taken for LPAs to determine planning applications leading to a reduction in the cost of holding capital for developers (indirect impact) We have not included these monetised certainty benefits in this section to avoid double counting the impacts. Further detail of these impacts of increased certainty can be found in Annex 4.
65. Beyond the above certainty benefits, the increased adoption of local plans is also likely to reduce uncertainty for developers who under current arrangements lack clarity on when plans will come forward and how long they will take to produce, which can affect their investment decisions and forward planning. We were unable to monetise this impact due to a lack of information on the financial impacts of local plan delays on developers.
66. There may also be indirect impacts on consultants who assist with the production of local plans. For instance, if the evidence requirements are made less burdensome, there is potentially less work for consultants per plan in the long term, despite there being more plans in aggregate. This is an indirect impact as it relies on the Local Authority choosing not to hire consultants for this work. We were unable to monetise this impact due to a lack of information on the proportion of the cost of producing a local plan which is contracted to the private sector, and no clear policy decision on the detail associated with the evidence requirements.

Public-sector impacts

67. The creation of new style local plans that require all authorities to have an up-to-date local plan, creates extra costs to local authorities, where they do not have one already. However, there will be a saving in the cost of producing the new style plans. For example, the new evidence requirements are likely to be less burdensome compared to current local plans, and therefore authorities updating their plan will benefit from a saving. The costs of requiring local authorities to have a plan and update their plans more frequently is expected to be higher than the cost savings from moving to the new style plans.
68. Overall, there will be more plans updated per year in the policy option compared with the counterfactual. This is driven by two factors, the more frequent update requirement (every five years), and the legal requirement to have a plan produced within a set time period. Local authorities that do not have an up-to-date plan in place or do not have one at all, will be required to produce one. To address this new requirement, the Planning Inspectorate will have some additional resource requirements since more plans will have to go through examination. We have not monetised the impacts to the Planning Inspectorate. There will also be one-off familiarisation costs associated with planning staff understanding the new legislation.
69. The total benefit associated with a reduction in the cost of plan production is £256m. Additional costs for local authorities associated with the requirement to have a plan in place and update them more frequently is £533m. The total familiarisation costs to local authorities is £2.7m.

Risks and Assumptions

70. The estimates of potential costs and benefits of producing a new style local plan are not fully known until detailed secondary legislation and guidance becomes available. Therefore, modelling assumptions and ranges have been used to reflect this uncertainty.
71. We have used DLUHC forecasts to predict when local authorities will produce a new style local plan. However, exactly when each local authority will do this is unknown. While plans will be mandatory by law, in the past some authorities have not progressed local plans in spite of strong policy expectations that they do so.
72. Though the law will change, and this will require authorities to have up to date plans in place, it is still not certain that all authorities will be able to do so, and this will affect the benefits and costs felt, as set out above.

6.1.2 Strategic Plans and Alignment Policy

Table 5: Impacts arising from Strategic Plans and Alignment Policy measures

	Business impacts	Public-sector impacts
Benefits	There are no identified direct benefits to businesses.	<p>The replacement for the duty to cooperate will sit within a revised NPPF. The impacts of this will be assessed as part of the wider impacts of that.</p> <p>Setting clear development management policy nationally and stipulating more focused content for spatial development strategies will reduce their length and help to limit production costs.</p> <p>Spatial development strategies will help assist and support strategic cases by setting out an overarching strategy over a long-term period to identify and plan for infrastructure delivery. This will assist local and mayoral combined authorities when making bids to central government and for Treasury Green Book appraisals.</p>
Costs	There are not expected to be any direct costs to businesses.	<p>The replacement for the duty to cooperate will sit within a revised NPPF. Familiarisation costs for it will form part of wider familiarisation costs with that and have therefore not been assessed as part of this impact assessment.</p> <p>Given that they are voluntary, a familiarisation cost for spatial development strategies has not been assessed.</p> <p>There is likely to be a cost to the Planning Inspectorate in examining additional strategic plans, and to the Secretary of State in potentially making directions to modify plans. However, this is likely to be small, and was therefore not deemed proportionate to monetise the additional costs.</p>

Business impacts

73. These measures do not result in any direct impacts to business. There are anticipated to be indirect benefits to business from increased certainty in the system and improved alignment of strategic planning and infrastructure. Improved strategic planning arrangements may also help authorities to identify the most appropriate locations for housing and other uses, potentially increasing development capacity overall. These benefits to business cannot be monetised at this stage.

Public-sector impacts

74. For local authorities who choose to produce a spatial development strategy, we estimate it will cost £0.7m - £2.7m (central £1.7m) per plan, but this is discretionary so will depend on whether authorities opt to produce one.

75. The duty to cooperate will be replaced with a new policy that will sit within a revised National Planning Policy Framework. The impacts of this will be assessed separately in the future.

Risks and Assumptions

76. We do not have data on the time it would take for staff in local authorities or mayoral combined authorities to familiarise themselves with all the changes.

6.1.3 Neighbourhood Planning

Table 6: Impacts arising from Neighbourhood Planning measures

	Business impacts	Public-sector impacts
Benefits	The introduction of Neighbourhood Priorities Statements (NPSs) will provide developers with a greater understanding of what kinds of, and in some cases, in what locations, development would be supported by that community.	Many of the benefits concerning neighbourhood planning are around greater community involvement in the planning process. This will provide long-term benefits in terms of more awareness of development needs and opportunities, as well as a greater ability to specify what communities would like to see. However, it has not been possible to place a monetary value on this.
Costs	Priorities statements are not policy documents and as such, carry no weight in planning decisions, such as applications. There is no formal requirement for developers to familiarise themselves with this document when preparing an application. However, we would expect developers to consider the statements, alongside statutory development plans, in order to increase the likelihood of community support. However, this is indirect and we cannot predict the extent of this, so the familiarisation cost has not been monetised.	<p>We expect a modest increase in costs for local authorities due to an increase in the volume of designation applications from groups seeking to prepare a Neighbourhood Priorities Statement (NPS). In total the discounted cost to authorities is estimated to be between £0.04m and £0.11m (central £0.07m).</p> <p>We also expect authorities to incur additional setup and processing costs to assess draft NPSs against legislative requirements and publish statements online. This discounted cost is estimated to be between £0.06m and £0.27m (central £0.15m).</p> <p>We also assume a modest increase in costs due to increase in the number of neighbourhood plans being updated. Assuming that around 30% of neighbourhood plan updates commenced</p>

		<p>make it to examination and referendum the costs to authorities is estimated at £1.22m to £7.39m (central £3.71m).</p> <p>The total familiarisation costs to local planning authorities is £0.06m.</p> <p>Non-monetised costs include costs to the Planning Inspectorate that will need to understand the new legislation and how Priorities Statements will be considered at the Gateway Test and examination stages of the Local Plan process.</p>
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Business impacts

77. Neighbourhood Priorities Statements are unable to allocate sites, therefore no additional sites are expected to come forward directly from these changes. They will, however, give neighbourhood groups a greater say over where and what development takes place in their area, which will provide improved information for those seeking to develop. This is an indirect benefit as it is dependent on the new Statements being used, therefore it has not been possible to monetise this effect.

Public-sector impacts

78. The additional costs to the public sector, associated with neighbourhood planning reform are generated through costs of processing Neighbourhood Priorities Statements, as well as an increase in the number of Neighbourhood Development Plans being updated. These measures are expected to result in costs to neighbourhood planning groups and local planning authorities, but only where they are adopted.

79. The introduction of Neighbourhood Priorities Statements will lead to costs to local planning authorities from an increase in designations, which is estimated to be £35.9k-£107.86.7k (central £67.4k), as well as additional setup and processing costs, estimated to be £64.3k-£267.9k (central £146.0k). Furthermore, there will be a one-off familiarisation cost to local planning authorities to understand the changes to neighbourhood planning. This is estimated to be £42.9k-£85.8k (central £64.4k). The ongoing costs to local authorities due to examination of and organising referendums for additional neighbourhood plans is estimated to be £1.22m-£7.39m (central £3.71m).

Risks and Assumptions

80. Numerous assumptions have been made to calculate the cost and benefits from the neighbourhood planning measures in the Bill. For the number of new neighbourhood designations, the counterfactual is based on historic data but in the policy option we assume an uplift of 25%-75% (central 50%) on this historic figure. There is also uncertainty around the uptake of Neighbourhood Priorities Statements. We estimate an average number of Priorities Statements per local planning authority based on historical data on the number of inactive groups, number of active groups, completed neighbourhood plans

as well as the number of newly designated groups. From these, in the absence of evidence, we make modelling assumptions on the percentage uptake for each of these groups. This leads to a range of 3.3 - 6.8 Priorities Statement per local planning authority (central 5.0).

81. We assume that 20%-40% (central 30%) of the neighbourhood plan updates commenced make it to examination and referendum, and therefore represent a new burden to the LPA, based on the proportion of existing neighbourhood plans that reach this stage.

82. For local planning authorities, we estimate the time taken to familiarise with the new legislation it to be low, ranging from 2-4 hours. There are 321 authorities that will be required to familiarise, and we assume three officers per local planning authority will familiarise.

6.2 Improving decision-making

83. Table 6 below summarises the costs and benefits of the group of measures to improve the decision-making process (increasing certainty in planning decisions/decision taking duties, development management process improvements, crown developments, enforcement, and digital).

84. Development management process improvements are expected to have a limited impact so have not been monetised in this summary. Digital measures are also excluded from this summary because the digital powers to avoid double counting as they digital measures are analysed elsewhere in this document. The assessment of impacts on businesses and the public-sector can be undertaken once the scope of data standardisation is known, at the secondary legislation stage. Similarly, enforcement measures will only be impactful on businesses should they break conditions and are therefore excluded from this summary. Communities will benefit as they will be provided with an additional opportunity to feed into the local plan and develop a greater understanding of the planning system. This could help reduce adversary in the planning process, but more broadly can help people feel more connected to the place they live.

Table 7: Summary of Impacts arising from Improving decision-making

	Business impacts	Public-sector impacts
Benefits	<p>The key benefits of these measures will be a simpler, more certain, accessible process, generating significant cost savings.</p> <p>There will also be increased flexibility for those businesses seeking to vary existing permissions, which will reduce costs and save time if proposed developments need to change.</p>	<p>The standardisation of planning applications and the requirement to provide clear upfront information, will reduce validation disputes and result in overall process improvements. Associated with these changes are time and cost savings for local authorities by setting a clear framework for determining applications in the new system, which also includes reduced administration costs for processing applications.</p>

<p>Costs</p>	<p>There will be familiarisation costs to businesses of £3.1m (first year only), however some of these costs will be offset by wider efficiency savings through less time spent in the system to attain approvals of schemes.</p> <p>The costs of pre-application engagement have not been monetised, nonetheless it represents cost savings to business through resolving issues early in the application process, saving time.</p> <p>Enforcement costs will only be incurred where business is non-compliant so therefore do not constitute a business impact as any cost can be avoided by following the rules. More information on these rules provided through the Bill breaches should be less likely.</p>	<p>The cumulative costs to public sector bodies through these measures, include familiarisation costs of £1.5m for local authorities and £0.29m for PINS for these changes, see Table 8 below.</p> <p>Enforcement familiarisation costs include £0.07m (10 Year NPV).</p> <p>The cumulative familiarisation costs for local planning authorities is: £1.5m.</p>
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6.2.1 Increasing certainty in planning decisions / decision taking duties

Table 8: Impacts arising from increasing certainty in planning decisions, by giving increased weight to plans and national policy

	Business impacts	Public-sector impacts
<p>Benefits</p>	<p>Total benefits to business (direct and indirect) are estimated to be £2,843.9m over the ten-year appraisal period. As a result of these changes, there are expected to be direct business impacts including:</p> <ul style="list-style-type: none"> • Reduction in refused planning applications that would be followed by a resubmitted scheme in the counterfactual. • Reduction in refused planning applications that would not be followed by a resubmitted scheme in the counterfactual. • Reduction in refused planning applications that would lead to 	<p>The greater weight given by revised s38(6) to the development plan and national development management policy is expected to speed up decision-making by local planning authorities, as there will be a clearer framework to make decisions within.</p> <p>The proportion of applications that are refused is expected to drop. This is because the policies that apply will be clearer and have more weight when considered alongside any other material considerations.</p> <p>Over time this change is expected to reduce the proportion of schemes that go to appeal, with consequent cost savings for local planning authorities as well as the Planning Inspectorate.</p>

	<p>appeal in the counterfactual (i.e., reduced costs from not having to pursue appeals).</p> <ul style="list-style-type: none"> • Reduction in refused planning applications where no application would be submitted in the policy option (which would have been refused in the counterfactual), as it is clearer that the scheme would not be policy compliant. • Reduction in the cost of preparing planning applications. • Reduction in the cost of holding capital to developers (due to a reduction in determination times). • Reduction in the cost of holding capital for applications held up by appeals. <p>The total benefit accruing from the above direct business impacts is £2,276.6m</p> <p>There is expected to be an indirect benefit to business from a reduction in the cost of holding capital due to a reduction in local planning authority determination times which is estimated to be £567.4m. Further information is set out in Annex 4.</p>	
Costs	Planners in the private sector will need to familiarise themselves with these changes, with an estimated familiarisation cost of £1.8m in 2024.	<p>We estimate the familiarisation costs to local planning authorities to be £1.5m.</p> <p>Planning Inspectors working for the Planning Inspectorate will also be required to familiarise themselves with these changes, with an estimated cost of £0.3m.</p>

Business impacts

85. Applicants responding to sites and development opportunities identified in local plans will have more certainty that an application in line with the plan will be approved, because stronger reasons will be required to depart from the plan than at present. Where the applicant's scheme accords with the local plan, the need to incur expenditure on further justification of the proposal, and the risk of refusal, will both be diminished. This will reduce

the cost for applicants who submit applications in accordance with the local plan. At the same time, it should be quicker for a scheme in line with the plan to gain planning permission, and this should result in developments being realised more quickly, with earlier revenue benefits for the developer (from homes sold or floorspace let etc).

86. There will be a greater disincentive for developers to make applications for schemes that are contrary to the development plan because of the increased likelihood of refusal. There will also be a greater disincentive for local authorities to turn plan-compliant schemes down because of the increased likelihood of losing any subsequent appeal and, potentially, incurring the costs of the appeal as a result. Both impacts will result in developers not submitting applications that are contrary to the development plan which they would have submitted in a do-nothing scenario. The reduction in applications made that are contrary to the development plan and the reduction in plan-compliant applications that are rejected will also result in fewer appeals and thus reduced costs for applicants/appellants. The benefit will arise from a reduction in the costs of preparing for the appeals themselves.

- **The benefits to developers from a reduction in rejected planning applications that would otherwise have had to be resubmitted are estimated to be £26.9m - £121.1m (central £67.3m) over the appraisal period. This is a direct benefit to business.**
- **We also expect there to be a reduction in refused planning applications that developers would not have resubmitted in a do-nothing scenario, estimated to be £134.6m - £201.8m (central £168.2m) over the appraisal period. This is a direct benefit to business.**
- **Over the appraisal period, we estimate the benefit from a reduction in appeals to appellants to be £183.4m - £601.0m (central 365.0m). This is a direct benefit to business.**
- **The benefits to developers from not submitting applications that would likely be rejected under the policy option but otherwise would have been submitted is estimated to be £523.4m-£785.1m (central £654.3m) over the appraisal period. This is a direct benefit to business.**

87. Where applications come forward which do not relate to specific allocations of land for development, applicants will have more certainty about the rules which apply, reducing the costs involved in applying for permission. Where development plans are out of date, there will be more certainty than now about the national policies which apply, including the circumstances in which development is likely to be allowed. Again, this will reduce the cost of preparing and justifying a planning application. **The reduction in costs of preparing planning applications associated with greater clarity in the system and more streamlined information requirements is estimated to be £415.2m - £1,245.7m (central £830.5m) over the 10-year appraisal period. This is a direct benefit to business.**

88. Applicants face financing and opportunity costs in holding onto land and other assets whilst their applications are being determined by the local planning authority. The costs of holding capital are directly related to both the quantity and value of land. Developers will reduce these costs if they can commence development more quickly due to reduced determination times by local planning authorities. **A reduction in the time taken for local planning authorities to determine an application will mean that developers will benefit from a reduction in the cost of holding capital, estimated to be £331.6m - £863.9m (central £567.4m) over the appraisal period. This is an indirect benefit to business. In addition, developers will benefit from a reduction in the cost of holding capital from a reduction in appeals; this is estimated to be £153.0m - £229.6m (central £191.3m) over the appraisal period. This is a direct benefit to business.**
89. There will also be one-off familiarisation costs to planners in the private sector. **Familiarisation costs to planners in the private sector are estimated to be £1.8m in 2024 and is a direct cost to business.**
90. Classification of the above direct and indirect business impacts are found in further detail in Annex 4: Increased Certainty in Planning Decisions.
91. The total direct benefits to business are estimated to be £1,436.5m - £3,184.4m (central £2,276.6m). The total indirect benefits to business are estimated to be £331.6m - £863.9m (central £567.4m). The total benefits (both direct and indirect) to business are estimated to be £1,768.2m - £4,048.2m (central £2,843.9m).

Public-sector impacts

92. We expect that these reforms will lead to a reduction in the time taken for local planning authorities to determine planning applications, as the policies which apply will be clearer and have greater weight when set against any other material considerations which might apply. The estimated time savings to local authorities in determining planning applications is estimated to be £17.6m - £33.7m (central £25.6m) over the appraisal period.
93. There will be one-off familiarisation costs to local planning authorities. These are estimated to be £1.5m and will be incurred in 2024. There will also be one-off familiarisation costs incurred by the Planning Inspectorate, estimated to be £0.3m in 2024.
94. Both local planning authorities and the Planning Inspectorate will benefit from a reduction in appeals as a result of these changes. Over the 10-year appraisal period the benefit to local planning authorities is estimated to be £13.5m-£20.2m (central £16.9m). The benefit to the Planning Inspectorate is estimated to be £36.6m-£54.9m (central £45.8m) over the appraisal period.

Risks and Assumptions

95. The overarching assumption is that the greater weight given to the development plan and national development management policies, and the greater clarity in the policy framework, will result in:

- Better quality planning applications that comply with policy;
- More consistent planning authority decisions in line with the development plan and national policy; therefore:
- Fewer refusals of permission and fewer planning appeals.

96. The community and business will in consequence have greater confidence in the planning process.

97. In this analysis we have had to make some assumptions about the immediate response of users of the planning system to the legislation. The proposed changes will also rely on users of the planning system fully engaging with our proposed changes and for their impact on their professional duties to be understood. There is a risk that both local planning authorities and applicants will take time to adjust to the new, more rules-based system, and may seek to test it, potentially leading to more refusals and appeals in the short term. In this eventuality, costs savings will take longer to achieve, but it is anticipated that behaviours will shift as time goes on. Where possible we will continue to test these assumptions as the subsequent policy is developed and build up an evidence base as we go forward.

98. In addition to these overarching assumptions, there is a significant degree of uncertainty in the analysis due to the limited evidence available to the department for certain modelling assumptions. Ranges are adopted where appropriate to reflect these uncertainties. Where we do not hold data or evidence, modelling assumptions are informed by judgements made by those with significant industry experience. The policy officials who have inputted into this analysis have considerable experience of planning practice with senior roles across organisations in the public and private sector. These individuals are Chartered Town Planners having secured full accreditation by the Royal Town Planning Institute (RTPI).

99. The key assumptions in this analysis are:

- For the purpose of this analysis, we assume the total number of planning applications in both the counterfactual and policy option remains constant over the appraisal period. While it is likely that this measure may reduce overall applications by reducing the number of applications amended and resubmitted, the future number of applications received will also be impacted both positively and negatively by other measures and wider economic conditions. Therefore, given the significant uncertainty, the analysis assumes that the status quo continues and there is no change in the number of planning applications received throughout the appraisal period.
- We do not hold evidence on the likely reduction in the cost of preparing planning applications in the policy option compared to the counterfactual. There is, however, likely to be a significant reduction in the costs associated with preparing planning applications in the new system. In the absence of this evidence, we have made a modelling assumption that there is a 5%-15% (central 10%) reduction in the cost of preparing both minor and major residential/commercial applications.
- The percentage reduction in refusals for both minor and major applications. We don't hold data on this; therefore, we have made a modelling assumption of 40%-60% (central 50%) reduction for major applications and 20%-30% (central 25%) reduction for minor applications.

- A proportion of planning applications would be submitted and refused in the counterfactual but would not come forward as applications in the first place in the policy option, whilst a proportion of applications would be submitted and turned down in both the counterfactual and the policy option. We do not know the balance between these two scenarios.
- We do not hold data on the cost of resubmission of a planning application; therefore, we have made a modelling assumption that the average cost of resubmission is 10%-30% (central 20%) of the cost of preparing the original planning application, which reflects the amount of information that is likely to be required compared to a new application.
- We estimate a reduction in determination times of 10%-15% (central 12.5%) for major projects. For minor projects, we expect the reduction in determination times to be lower, and we therefore adopt a modelling assumption of a 2.5%-7.5% (central 5%) reduction in determination times.
- We do not hold detailed evidence on the cost of appeals to appellants, but we have ascertained a range of costs by discussion with an experienced Inspector with extensive sector experience who has also obtained information from other practitioners. This has provided the basis for illustrative assumptions to reflect the potential cost savings from a reduction in appeals. These assumptions have been sense tested internally, and the ranges adopted reflect the degree of uncertainty.
- We estimate the average costs to developer per day from holding capital to be £452 for major residential projects and £13 for minor residential projects over the ten-year appraisal period, although these costs vary depending on the year due to variation in the forecast base rate. For major and minor commercial projects, we estimate the average cost of holding capital per day over the ten-year appraisal period to be £99 and £14 respectively.

6.2.2 Development Management Process Improvements

Table 9: Impacts arising from Development Management process measures

	Business impacts	Public-sector impacts
Benefits	<p>Powers taken to vary permissions will result in a process which is cheaper and less time-consuming for applicants, providing for a single route to make changes to existing permissions and reducing the need for consultancy and legal advice to navigate the current options for doing so. However comprehensive data is not available and further work will be carried out.</p> <p>One of the main cost savings is the anticipated reduction in the significant cost of preparing</p>	<p>Benefits to local authorities, once secondary legislation is brought forward under these powers, include a simpler more streamlined and digitally accessible planning applications process, which potentially has the effect of encouraging more and better-quality applications being submitted.</p> <p>The changes in the Bill provide a simpler and more transparent framework for amending permissions. A new mechanism will provide for a clearer, more certain process for local planning authorities to determine proposals which seek to amend existing permissions. This will include a more proportionate fee and a broader scope</p>

	<p>planning applications for both major and minor residential and commercial developments. Businesses are less likely to incur unnecessary costs on abortive work and superfluous evidence-gathering in preparing planning applications, owing to greater clarity in the policy framework, greater weight given to the development plan and national policy, and more streamlined information requirements.</p> <p>Making existing regulation-making powers permanent for pre-application consultation between applicants, communities and statutory consultees is not likely to have an immediate benefit for business.</p>	<p>for changes, reducing the number of applications that might otherwise need to be submitted for consideration.</p> <p>For local planning authorities, the information requirements powers will allow secondary legislation to come forward which enables greater standardisation and use of digital tools to reduce validation disputes, and therefore processing of applications quicker and monitoring of performance more efficiently.</p> <p>Impacts on local planning authorities and statutory consultees will need to be considered at the regulation making stage for proposals seeking to make existing regulation-making powers permanent for pre-application consultation between applicants, communities and statutory consultees.</p>
Costs	<p>Overall, costs to businesses are expected to be none to minimal.</p> <p>There may be some familiarisation costs for businesses, in particular SMB's, associated with new information requirements, but these will be assessed as part of subsequent regulations.</p> <p>The case law for varying permissions is limited, so further impact assessment will be carried out.</p> <p>Making existing regulation-making powers permanent for pre-application consultation between applicants, communities and statutory consultees is not likely to have an immediate cost for business.</p>	<p>There will be transitional costs associated with adjusting to new information requirements, however it is not possible to determine this impact in monetary terms at this stage given that these changes are yet to be implemented. Subsequent regulations will include a monetised assessment.</p>

Business impacts

100. Overall, there should be no direct costs to businesses as a result of the Bill measures, as the regulation making powers we are proposing through the Bill are discretionary and will complement existing regulation-making powers to create a more proportionate and streamlined Development Management Framework. Any secondary legislation that come forward after the Bill's passage will be subject to their own assessment. Once secondary legislation is introduced, following ascension of the Bill, the package of proposals will benefit small businesses given that information requirements will be streamlined, and there

will be a greater use of digital platforms for applicants to support them through the application process. Reducing the level of accompanying information required when submitting applications will benefit SMEs by reducing the burden of supporting information required. As the majority of applications in the planning system (84% in year ending December 2021) are for either minor or householder development, there may be familiarisation costs associated with the new information requirements measure, in particular for SMEs.

101. Although regulation-making powers are being taken in the Bill to enable changes to the development management process, these will need to be used alongside existing powers in order to realise the objectives for reform. Further work will need to be carried out following assent of the Bill to determine the full extent of these changes. Thus, whilst we know the intended outcomes of the measure, we do not yet have the detail and therefore cannot assess the monetised full costs and benefits. These will be assessed as part of developing subsequent secondary legislation.
102. Introduction of a new mechanism to seek variations to planning permissions will help address the complex and often costly nature of the existing legislative framework for making such changes. This will negate the need for the submission of multiple applications under different sections of the Town and Country Planning Act 1990 (saving time and costs to applicants and simplifying the process), address issues associated with inconsistent or inappropriate use of existing mechanisms by applicants or local planning authorities (increasing certainty for all parties), help with the deliverability of schemes allowing flexibility where market conditions change making it easier to secure finance and attract occupiers (providing certainty to delivery), and provide clarity over the type and extent of changes that can be made in response to recent caselaw (making the system simpler for applicants and local authorities to understand). This will result in a process which is cheaper and less time-consuming for both applicants and local planning authorities and will also enable authorities to focus on securing better outcomes for development sites.
103. Making existing regulation-making powers permanent to regulate pre-application consultation between applicants, communities and statutory consultees is not likely to have an increased costs for business, many developers proposing larger scale developments already engage with interested parties in advance of submission in the current system and therefore the impact is not anticipated to be universal. This power has only been used to mandate pre-application consultation for development of onshore wind turbines meeting a certain threshold.

Public-sector impacts

104. For local planning authorities, the information requirements powers should, in time, enable greater standardisation and use of digital tools to reduce validation disputes, and therefore make processing of applications quicker and monitoring of performance more efficient. There will be transitional costs in shifting to new information requirements and collection of application data to prescribed standards, which can be assessed when the detail of these is considered in subsequent regulations.

105. Introduction of a new mechanism to vary permissions will result in a process which is less time-consuming and more cost-efficient for local planning authorities, providing for a single route to make changes to existing permissions, reducing the need for legal advice to navigate the current options for doing so, and with a proportionate application fee. Local planning authorities will be more confident about the extent of changes that can be made to existing planning permissions, without falling foul of recent case law.
106. The existing powers requiring pre-application consultation between applicants to consult and consider the views of communities and statutory consultees prior to submitting a planning application gives local communities and statutory consultees their opportunity to meaningfully engage and shape development at an early stage. The impacts of this will be assessed when setting subsequent regulations.

Risks and Assumptions

107. There is insufficient data available to the department to fully assess the likely impacts of the package of Development Management reforms being taken forward in the Bill given the limitations on how planning data is currently collected. For instance, comprehensive data on applications to amend planning permissions (under either sections 73 or 96A of the Town and Country Planning Act 1990) is not available, and it is therefore not possible to make an assessment of financial costs/savings likely to be realised across the development industry and public sector. The greater standardisation of information and use of digital tools should address this deficiency in the longer term. In addition, much of the reform will be taken forward through subsequent regulations, which will be subject to their own assessment.

6.2.3 Crown Development

Table 10: Impacts arising from Crown Development measures

	Business impacts	Public-sector impacts
Benefits	Businesses will not see direct benefits from these proposals, other than in the few cases where the powers are used and it allows for faster delivery of development for the firms involved in construction and related services. However, these impacts cannot be monetised.	There will be circumstances where development which is delivered through this route may help support wider society, and therefore delivery of public sector services. However, given how sparingly these powers are expected to be utilised it is not possible to monetise this.
Costs	There is not expected to be any direct costs to businesses.	This proposal would only result in minimal costs to the public sector.

Business impacts

108. The new routes to permission will only directly benefit the Crown, however development delivered from a reformed process for nationally important Crown development may

infrequently support businesses, depending on what developments are pursued. However, it is not possible to monetise this. There is not expected to be any direct cost to businesses.

Public-sector impacts

109. These proposals will result in minimal costs to the public sector. There will be circumstances where development delivered through this route will help support wider society, and therefore delivery of public sector services however given how sparingly these powers are expected to be utilised then a qualitative analysis is not possible. The Planning Inspectorate may see a slight increase in cases coming to it for decision, through the non-urgent route but the number would be very few each year.

Risks and Assumptions

110. Given the lack of any take up of the current Urgent Crown Land route, and few number of applications a year which would be eligible under these new routes it is not possible to carry out a quantitative assessment of the anticipated effects.

6.2.4 Planning Enforcement

Table 11: Impacts arising from Planning Enforcement measures

	Business impacts	Public-sector impacts
Benefits	There are no direct business benefits from introducing a new framework of planning enforcement measures.	The changes will reduce the number of appeals against enforcement notices on the ground a that planning permission ought to be granted, generating administrative savings to local authorities.
Costs	Businesses will face increased costs for non-compliance with planning legislation. However, these additional costs are avoidable if the businesses comply with planning requirements. The cost to businesses has not been monetised in this IA for this reason.	<p>There will be familiarisation costs to local authorities with the new legislation estimated to be £0.07m (10-year NPV).</p> <p>There will be some additional administrative costs to the local authorities of introducing the enforcement warning notices, although additional costs will be small as local authorities are already doing this on an informal basis.</p> <p>Increasing the time limit on taking enforcement action will enable the local authority to find and enforce more planning breaches. This change might result in administrative costs for local authorities. However, this will be dependent on the number of additional enforcement actions resulting from the increase in time limits and is not something which we have been able to monetise.</p>

Business impacts

111. Businesses will face increased costs for non-compliance with planning legislation. However, these additional costs are avoidable if the businesses comply with planning requirements. The cost to businesses are therefore indirect and have not been monetised in this IA for this reason. The increase in fine levels may also discourage businesses from breaching planning legislation in the first instance.

Public-sector impacts

112. The new legislation will require all local planning authorities to familiarise themselves with the new legislation, to be able to adequately implement the changes. The familiarisation costs are expected to be (10-year NPV) to be £0.07m. There will be some additional administrative costs to the local authorities of introducing the enforcement warning notices, although additional costs are likely to be relatively small as local authorities are already doing this on an informal basis. Furthermore, limiting the opportunities to obtain planning permission after an unauthorised development, will result in some administrative savings to local authorities, by limiting the potential number of planning appeals.

Risks and Assumptions

113. The main risk identified centres on the familiarisation cost to local authorities, resulting from the proposals. Several impacts have not been monetised due to lack of data available to inform analysis. Only familiarisation costs to local authorities have been monetised. However, these costs have been produced making some assumptions about the number of staff required to be familiar with the changes and the amount of time it would take to become familiar with the changes which are relatively uncertain.

6.2.5 Digital

Table 12: Impacts arising from Digital measures

	Business impacts	Public-sector impacts
Benefits	The digital powers will have a positive impact on small and micro businesses. With planning information currently locked away in PDFs and documents, it is difficult for all users of the planning system to use this information for planning related matters. A lack of access to raw data is limiting both digital innovation and creating significant information asymmetries. SMB property developers are put at a disadvantage as a result, as they do not hold the same resource as large-scale developers who are	Planning officers will benefit from having access to high quality, machine-readable data. This will ensure that authorities have the data needed to quickly make accurate site assessments, and planning decisions, improving operational efficiency. Modern, digital planning software will also deliver significant improvements in local authorities' working practises, by creating more streamlined and efficient processes (in combination with other policy measures taken in the bill) and services being interoperable, helping to speed up the planning system.

	<p>able to either commission a company to assess sites for them or have the human resource to conduct this themselves. Through the digital measures taken in the bill, planning authorities will create, process and openly publish standardised planning data, which can be reused free of charge by any interested parties.</p> <p>Property developers will benefit from new digital local plans that will provide clearer information about investment opportunities. They will be able to use digital services to easily identify sites and have better access to land constraint data to make investment decisions more swiftly.</p> <p>Improved planning data is likely to create a network of benefits beyond the planning system, with home buying and selling and financial services also being positively affected. Key information involved in a home sale is currently trapped in paper files and PDF documents, requiring conveyancers to manually gather information about a property from a diverse range of sources that are not yet digitised.</p> <p>Access to a backbone of standardised planning data will fuel the creation of innovative digital tools and services by the private sector. For example, the PropTech sector will be able to create services that better engage communities with the planning system, provide tools that allow planners to work more efficiently and benefit property developers to make better informed investment decisions</p>	<p>The programme has undertaken conservative estimates of the average time savings, which is based on three local authorities using modern, digital planning software:</p> <ul style="list-style-type: none"> • 20% in the validation process (checking that planning applications are valid), as a result of more applications being ‘right first time’. • 15% in the processing of applications post validation. <p>These time saving efficiencies will allow planning resources in local planning authorities to be diverted to value-add activities, such as assisting large, multi-site applications through the planning system.</p> <p>DLUHC will be increasing the evidence base collected from local authorities to 36 (around 10% of all local authorities) local authorities in 2022-23. This will help to build the evidence base on the exact costs and emerging benefits associated with Digital Planning. This will act as an important, early test of Value for Money and will allow programme adjustments if necessary. DLUHC will continue to monitor the evidence base as more local authorities adopt digital planning software over the years.</p>
Costs	<p>There are no direct costs to business that arise through these primary measures.</p>	<p>To ensure local authorities are supported to deliver the reforms, we will continue to fund and run pathfinders and pilot projects to co-create, test and iterate the standards, tools, guidance and templates needed by local authorities to implement the new legislative</p>

		<p>requirements. DLUHC will continue to work with local authorities throughout the implementation phase, to ensure they have the required support to deliver the reforms. This close working relationship with planning authorities from the start, will help address the up-front familiarisation cost that some authorities may face (that may arise through subsequent regulations), in adopting the data reforms. Therefore, the digital and data requirements arising from these measures will lead to be a net-zero new burden position for planning authorities, through medium-long term benefits accrued.</p>
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Businesses impacts

114. The primary powers we are taking in the Bill will not result in direct costs for businesses as they create a framework for subsequent regulations and are taken in relation to the activity of planning authorities rather than businesses.
115. There are several examples outside of the planning sector which demonstrate the potentially significant benefits associated with opening up data for shared use in a standardised format.
- A Deloitte study determined that Transport for London (TfL) free open data generates up to £130m a year in economic benefits and savings¹. These benefits accrue to multiple users, and are focused on time savings, improved provision information for decision making, commercial opportunities for private sector developers, and leveraging value and savings from partnerships with customer facing technology platform owners.
 - A McKinsey discussion paper looks at the benefits of open banking to both users and financial institutions². It sets out the significant benefits resulting from data sharing and standardisation of data within the financial sector. The benefits are far reaching, including operational efficiencies for institutions, increased innovation and competition in the FinTech sector, and a wider breadth of financial products available for consumers.
116. The Central Digital & Data Office guidance makes clear that digitisation is likely to reduce the risk of failed transactions. Therefore, reducing the cost to businesses of having to go through the same process multiple times, as well as reduce the cost of each transaction in comparison to when they are made face-to-face, by post, or by telephone. They have also found that digitisation of government services is good for economic growth as it reduces the cost to citizens of making these interactions. There are also numerous consequential benefits, such as environmental benefits from reduced travel, use of paper, from digitising the planning system. This contributes to the government's wider objective of Net Zero.

¹ Transport for London (TfL) TfL's free open data boosts London's economy (October 2017) <https://tfl.gov.uk/info-for/media/press-releases/2017/october/tfl-s-free-open-data-boosts-london-s-economy>

² McKinsey & Company, Financial data unbound: The value of open data for individuals and institutions (June 2021), Discussion Paper, <https://www.mckinsey.com/industries/financial-services/our-insights/financial-data-unbound-the-value-of-open-data-for-individuals-and-institutions>

117. The digital powers aim to make the planning system more efficient, faster and accessible for all its users. Therefore, there will be a wide array of positive impacts through our planned interventions. The full impacts will be known once the scope of data standardisation has been established, but some impacts to different user groups of the planning system are outlined below.
118. For property developers, the new style digital local plans will provide better information for SME developers. They will be able to use digital services to easily identify sites and have better access to land constraint data to make investment decisions more swiftly.
119. The housing and planning market will benefit from new types of planning data that is likely to create a network of benefits beyond the planning system, with home buying and selling, as well as financial services also being positively impacted. Key information involved in a home sale is currently trapped in paper files and PDF documents, requiring conveyancers to manually gather information about a property from a diverse range of sources that are not yet digitised.
120. Digital innovators will be able to access new streamlined and standardised planning data, which will fuel the creation of innovative digital tools and services by the private sector. For example, the PropTech sector will be able to create services that better engage communities with the planning system, provide tools that allow planners to work more efficiently and benefit property developers to make better informed investment decisions.
121. The regulations that will be produced following the Bill's passage, will govern the activities of planning authorities. These regulations will be subject to their own regulatory impact assessment as they are developed, and their impacts will be dependent on policy and implementation activity that prepares the market for digital transformation.

Public-sector impacts

122. The government recognises the need to ensure local authorities are well equipped and supported to successfully deliver the digital elements of the planning reforms. There will be short-term upfront familiarisation costs for planning authorities, given the change to a data-driven way of working. To ensure local authorities are supported to deliver the reforms, we will continue to fund and run pathfinders and pilot projects to test and iterate the standards, tools, guidance and templates needed by local authorities to implement the new legislative requirements. DLUHC will continue to work with local authorities throughout the implementation phase, to ensure they have the required support to deliver the reforms.
123. The digital reforms have adopted a co-creation approach to modernise the planning system. This has already been evidenced through work on the RIPA (Reducing Invalid Planning Applications) and BOPS (Back-Office Planning System) projects and through the local plans pathfinders. DLUHC will continue to work with local authorities to design the required standards, tools, guidance and templates which will be required to deliver the reforms. This will help to ensure the reforms, and the legislative requirements we are placing on local authorities are deliverable by them.

Risks and Assumptions

124. There is a risk that local authorities may not have the capabilities required to deliver the digital reforms. This will be mitigated through DLUHC developing the standards, tools and guidance needed by authorities to produce high quality planning data. Through pathfinder and piloting activities, the reforms are being tested and iterated with authorities to ensure they are deliverable ahead of the implementation phase. DLUHC will provide authorities with the necessary support to enable them to deliver the digital reforms.

6.3 Improving incentives, infrastructure and quality

125. There are several planning measures that seek to improve outcomes of planning and better reflect to the interests of communities across the country. The table below summarises costs and benefits of measures in this group (environmental outcomes reports, infrastructure planning, the Infrastructure Levy, design and heritage).

Table 13: Summary of impacts arising from Improving Incentives, infrastructure and Quality measures

	Business impacts	Public-sector impacts
Benefits	<p>The benefits to business from improving incentives, infrastructure and quality is an increased level of certainty in the application process that better informs and supports overall site viability.</p> <p>These incentives for business are complemented by better alignment of infrastructure providers and developers, an improved approach to assessing environmental impacts and clear design requirements.</p> <p>There will be opportunities for specialist firms to provide new services through changes to design, environmental assessment and infrastructure requirements.</p> <p>There are synergies between improving infrastructure provision and the agglomeration benefits this provides through better connecting development and infrastructure.</p>	<p>Public sector will benefit from these measures through increased confidence that plans will not be failed at the Examination stage, this being reinforced by the improvements to environmental assessment and early engagement with infrastructure providers.</p> <p>Local authorities will also benefit from a clearer decision-making framework for design and heritage planning, potentially reducing costs.</p> <p>Limiting the ability for applications to negotiate down developer contributions strengthens the position of local authorities when determining applications. There is also scope for flexibility on complex sites through the retention of section 106 negotiated agreements in these cases.</p>
Costs	<p>There will be costs to business incurred through familiarisation with these measures, however some of these costs will be offset</p>	<p>Over a ten-year period, the cost to local authorities through implementing Design Codes (£54.1m), maintaining Historic</p>

	<p>by new business opportunities. The bulk of the costs to business are generated through changes to infrastructure planning with increased engagement with infrastructure bodies.</p>	<p>Environmental Records (£10m), Infrastructure Planning (£30.4 - £92.7m).</p>
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6.3.1 Design Standards

Table 14: Impacts arising from Design Standards measures

	Business impacts	Public-sector impacts
Benefits	<p>Widespread use of local design codes will provide increased certainty about the design standards that proposed schemes are expected to meet.</p> <p>This should result in increased support for new development by communities and faster decision-making by local planning authorities, where proposed development schemes meet these design standards, and lead to fewer rejected planning applications, saving time and costs for developers in the planning and development process.</p>	<p>Widespread use of local design codes will enable communities to influence the design ambitions in their area and provide increased certainty about the design standards that proposed schemes are expected to meet.</p> <p>This will enable faster decision-making by local planning authorities and may reduce local opposition to development, where proposed schemes meet these design standards, and may lead to fewer rejected planning applications, saving time and costs for local planning authorities and the Planning Inspectorate in the planning and development process.</p>
Costs	<p>Increased use of design codes by local authorities will lead to some additional design and build costs for developers; although to some extent this is expected to be offset by increases in the value of schemes and, over time, these changes in costs and values should be partly reflected in adjustments to land values.</p> <p>There will also be a cost to developers in familiarising themselves with new local design codes, particularly as there is likely to be variation in design codes between authorities. Familiarisation costs are estimated at £1.0m for the first year of the appraisal period, associated with planners in the private sector familiarising themselves with the new design codes.</p>	<p>The cost to local authorities of preparing local design codes is on average £200k. The total discounted cost is estimated as £54.1m over the appraisal period.</p> <p>There will be familiarisation and training costs for local authority planning teams and elected Members who need to understand the design code process. Familiarisation costs are estimated at £0.3m in the central scenario which occur in the first year of the appraisal period.</p> <p>Training costs are estimated at £0.8m. These costs occur in the first year of the appraisal period.</p>

126. There will be benefits for businesses from a widespread use of codes in the reformed system. Developers will benefit from increased certainty in the system by having greater clarity in advance on the design expectations, set out in design codes, against which applications will be assessed. This will save long case-by-case negotiations with local government. It will particularly benefit small developers who lack the resources to engage with lengthy negotiations.
127. The expectations set by design codes may also increase competition between developers at all scales, which may reduce the permissibility of 'anywhere' house types and potentially unlock barriers to land markets to SMB developers where these were previously dominated by volume housebuilders.
128. The overall expected benefits for developers that could be achieved through creating increased certainty in the planning system and associated time and cost savings is set out in Annex 4. In the central scenario it is estimated that there will be a direct benefit to business of £2,276.6m over the 10-year appraisal period. The mandatory introduction of design codes is expected to contribute to the achievement of these benefits, as these codes will form part of the development plan which will have enhanced weight in the reformed system and will set out clearer standards (on design) so that applicants will have a better understanding of what is likely to be granted permission.
129. More broadly, well-designed places are more likely to encourage wider business investment, as well as property value uplifts in residential and retail sectors due to improvements in public realm, access to nature and open space, although it is not possible to monetise these indirect benefits given their diffuse and long-term nature.
130. There will be costs for businesses to adhere to the requirement for design codes, which may lead to an increase in design and build costs for developers who are required to adhere to the higher design standards set out within them. A recent study commissioned by the Department and undertaken by Knight Frank (2020)³ looked at a range of development projects which had aimed to achieve a high quality of design and placemaking. This study found increased costs to developers, ranging between 18% and 30%, associated with a well-designed scheme. However, it also found that the value of a well-designed scheme had a positive return to developers in the long-run and which could compensate for these higher development costs in all but the most price sensitive of markets. Over time, the costs, and the increase in quality this leads to, may be reflected in land values. Data gaps around the relative value of high-quality development and how many homes are built in the most price sensitive markets means it was not deemed robust or feasible to monetise these direct impacts that an increased use of design codes has on increasing costs to developers.
131. It has not been possible to monetise the impact of increased developer cost because the requirements of design codes for different areas will vary, and so too will the impact which they have on applicants' costs. It is not currently possible to forecast an average of these

³ Knight Frank, Cost and Value, Building Better, Building Beautiful Commission, February 2020, <https://content.knightfrank.com/research/1930/documents/en/building-better-building-beautiful-commission-cost-value-2020-7017.pdf>

impacts as design codes are yet to be fully developed at the authority wide scale as the Bill sets out a framework rather than detail. Once detail is designed, further analysis will be undertaken. The Knight Frank research was not used as a proxy because it uses a small sample size of developments where it was in developers' economic interests to apply higher levels of design. It was felt that this was not representative of the rest of the market, especially with the expected variation in requirements across authorities.

132. It is expected that there will also be costs to developers to familiarise staff on design codes (£1.0m in the central scenario). This is due to the mandatory nature of the codes. However, there may be greater costs for some developers who work across multiple local planning authorities due to local variations. This is detailed in Annex 9.

Public-sector impacts

133. There will be benefits for local planning authorities, who will have a greater ability to refuse poor quality schemes that do not reflect the standards set out in design codes. The preparation of mandatory authority wide design codes and subsequent detailed codes, which can come forward either through the local plan or as a supplementary plan, will provide certainty about the framework applications will be assessed against and, alongside other aspects of the reform, could result in quicker determination of applications that meet these design expectations.
134. The preparation of design codes by local planning authorities and the ability for them to be adopted as supplementary plans, which will have the weight of the local plan in decision making, will help ensure community interests are incorporated into the approach to development. Communities will have a much greater say on what their areas look like by working with local planning authorities to set clear design standards through design codes. This will increase engagement in the system by helping ensure that their preferences for quality, beauty and sustainability are at the heart of local decision-making.
135. The new legislation will require all authorities to have an up-to-date design code, covering the entire local authority. This will mean that authorities who do not update their design code in the counterfactual will incur an extra cost, as they will now be required to do so. The cost to local authorities of producing design codes is on average £200k. Based on an assumed profile of take-up we estimate the total discounted cost of producing design codes to be £54.1m over the 10-year appraisal period.
136. It is expected that there will also be costs to local planning authorities to familiarise staff and elected members on design codes (£0.3m in the central scenario), as well as more detailed training for planning policy and development management staff (£1.0m in the central scenario) These impacts are further detailed in Annex 9.

Risks and Assumptions

137. To illustrate the potential costs and benefits we use assumptions and ranges to reflect uncertainty. We made simplifying assumptions about when local authorities produce design codes, however exactly when each local authority will do this is unknown. While authority-wide design codes will be mandatory by law, we are unable to predict the rate of

non-compliance and therefore for the purpose of this assessment. As a basis for analysis, we have assumed all local authorities will comply with the new requirement over time and we will achieve 100% design code coverage across England.

6.3.2 Heritage

Table 15: Impacts arising from Heritage measures

	Business impacts	Public-sector impacts
Benefits	<p>Businesses will benefit through better information about the historic environment, which will make it easier to assess the potential suitability (or unsuitability) of land for development. Similarly, it should enable the process of preparing and submitting applications to be simpler, more efficient and effective, with associated cost savings.</p> <p>Better applications, plan and decision making will lead to greater understanding and better protection of the historic environment.</p>	<p>Local authorities and the Planning Inspectorate will benefit from legislative parity for all designated heritage assets, creating a simpler, more efficient and effective framework and associated cost savings.</p> <p>Improvements to heritage-related enforcement will lead to enforcement action being simpler and more streamlined, along with associated cost savings.</p>
Costs	<p>Removal of compensation liability related to Building Preservation Notices where the parallel application for listing is unsuccessful, will have a negligible cost to business.</p>	<p>Cost to local authorities to maintain Historic Environmental Records is estimated to be £10.1m (10-year NPV).</p>

Business impacts

138. Building Preservation Notices (BPN) protect an unlisted building for up to six months whilst it is the subject of a parallel application to the Secretary of State for DCMS for listing. They are important to prevent damage to, or demolition of, the building to thwart the listing process. Local Planning Authorities can be liable for compensation if the application to list the building is unsuccessful, which may deter them from serving BPNs. Removing the liability for compensation will affect a very small number of businesses. Given that there are only around 10 BPNs served per annum and not all of these result in a compensation claim, the overall cost to business is negligible.
139. Historic Environment Records (HERs) are an established system for accessing information relating to the historic environment. However, some are of varying scope and currency, and there is a need to ensure that they are all fit for purpose. The standardisation of digital HERs will streamline information and simplify the process for developers by allowing better

access to information about the historic environment. The reforms to heritage protection should make the heritage system easier for businesses to navigate leading to a small amount of efficiency savings.

Public-sector impacts

140. The new legislation will require local authorities to maintain Historic Environment Records (HERs) to a required new minimum standard. This will mean that local authorities who do not already meet this standard will face additional costs to upgrade their HERs. HERs generate some income through charged services and it is anticipated this will increase, which would offset some of the additional costs. The cost of upgrading the HERs to local authorities (10-year NPV) is estimated at £10m. This measure will support simpler, more efficient and effective plan and heritage-related decision making, with associated cost savings for local planning authorities and the Planning Inspectorate.

Risks and Assumptions

141. The risk identified is the HER costings. The costings are to bring the HERs up to a consistent standard, which may be enhanced and additional standards developed in the future. An additional risk is the digital upskilling required to develop the enhanced HERs.

6.3.4 Infrastructure Planning

Table 17: Impacts arising from Infrastructure Planning measures

	Business impacts	Public-sector impacts
Benefits	<p><i>Indirect benefits, as dependant on behavioural response</i> - The benefits to businesses from these measures are increased certainty of deliverability of infrastructure that benefits site viability and as a result landowners will experience an uplift in land values through better alignment of planning and infrastructure provision.</p> <p>Enabling build out of houses via improved infrastructure provision; and providing a better-connected labour pool can contribute to agglomeration productivity increases for local businesses.</p>	<p>Reduced risk of plan failure and examination uncertainty, which has benefits estimated to be between £0.6m and £4.3m per annum for local planning authorities. Total benefits over the 10-year appraisal period are estimated between £6m and £43m (discounted and in 2019 prices).</p> <p>Local Planning Authorities that adopt a Local Plan can lead to improved outcomes for local people and place due to a suite of benefits, including providing for local housing needs, adequate infrastructure, secondary employment, increased housing / infrastructure certainty and agglomeration benefits.</p>
Costs	<p><i>Direct costs, as compliance is mandatory for providers</i> - Infrastructure bodies will require new recruitment and upskilling to meet this new measure. It is estimated as an annual average</p>	<p>Local planning authorities new role in infrastructure plan-making requires recruitment and upskilling. The estimated annual average cost of this is £5.9m. Over the 10-year appraisal period,</p>

	<p>cost of £18.3m. Over the 10-year appraisal period costs total between £73m-£293m (discounted and in 2019 prices).</p> <p>Average annualised cost to infrastructure providers for familiarisation with the new regulation is estimated to be between £0.02m and £0.08m (year one only).</p>	<p>these costs total between £29m and £88m (discounted and in 2019 prices).</p> <p>Average annualised cost to local authorities for familiarisation with the new regulation is estimated to be between £0.6m and £1.2m (year one only).</p> <p>Preparation of an Infrastructure Delivery Strategy is estimated to cost £8.9m over the 10 years (discounted and in 2019 prices).</p>
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Business impacts

Indirect benefits (as dependant on behavioural response)

142. A new duty on infrastructure providers and other consultees to engage in plan-making (alongside the requirement on authorities to develop an Infrastructure Delivery Strategy) will increase certainty about the deliverability of infrastructure in site allocations. This increased certainty supports increased build out rates with less delays from waiting for infrastructure to be funded and delivered ahead of development. As a result, businesses (developers, landowners and investors) will experience benefits from land value uplift and communities benefit from increased housing delivery. Improved alignment of plans and infrastructure would lead to productivity benefits generated from agglomeration productivity gains where spatial concentration of economic activity increases the density of the labour market available to firms. These are indirect benefits, as they depend on behavioural responses we expect from others: in particular that local planning authorities will apply the duty to engage (which is discretionary though we strongly expect it to be used), and that developers will factor this into their decisions. The chain of causation is too complex to measure to be able to monetise.

Direct costs (as compliance is mandatory for providers)

143. Initially infrastructure providers are anticipated to experience some costs as a result of familiarising themselves with the new system. An average annual cost to providers, for pure familiarisation with the new regulation is estimated between £0.02m and £0.08m expected to fall on infrastructure providers (first year only). Whilst infrastructure providers are already required to engage in plan-making, this new duty is likely to increase the extent to which they need to respond to engagement requests. With this greater role in the plan-making process some of these organisations may need to upskill existing staff or recruit more to increase their resource capacity. Average annual costs are estimated at £18.3m for infrastructure bodies. Over the 10-year appraisal period, total costs to infrastructure bodies are estimated at circa £73m and £293m (discounted and in 2019 prices).

Public-sector impacts

144. This legislation is intended to increase the level of engagement that Local Planning Authorities undertake with the ‘prescribed bodies’, they will need to consider the views of those bodies that they engage with as part of the replacement of the Duty to Co-operate.

Costs will also be incurred from preparation of an Infrastructure Delivery Strategy. There is expected to be a familiarisation cost associated with current resource becoming familiar with these measures.

145. We anticipate that authorities will experience costs in familiarising themselves with the new regulation and guidance. With one-year pure familiarisation, estimated between £0.6m and £1.2m (discounted and 2019 prices) is dedicated to current resource upskilling to the new measure.
146. There are expected to be start up and admin costs of recruiting new resource and training/onboarding to provide further support on the 'requirement to assist' measure. Based on assumptions set out in Annex 11, total annual start-up/administrative costs for LPAs are estimated at £5.9m (discounted and in 2019 prices). Over the 10-year appraisal period, total costs are estimated between £29m and £88m (discounted and in 2019 prices). In addition,
147. There will be a public sector cost of preparing an infrastructure plan twice over the 10-year appraisal period. Some LPAs will find this much easier than others, however assumptions have been used to estimate the total public sector cost (see annex 11) at £8.9m (discounted and in 2019 prices) across the period.
148. These proposed changes reduce the risk of plan failure by boosting the ability of authorities to secure the information required when needed and presenting evidence of infrastructure provision in a consistent format, which will reduce risk of opposition or delay at examination and produce a more informed spatial strategy. Based on assumptions set out in Annex 11 this increased certainty has estimated benefits of between £0.6m and £4.3m per annum for Local Planning Authorities. Over the 10-year appraisal period, total benefits are estimated at £6m and £43m (discounted and in 2019 prices)

Risks and Assumptions

149. To illustrate the potential costs and benefits we have used ranges to reflect uncertainty. The assumptions are set out in Annex 11.

6.3.5 Infrastructure Levy

Table 18: Impacts arising from Infrastructure Levy measures (non-taxation impacts)

	Business impacts	Public-sector impacts
Benefits	Businesses, in particular small developers, will benefit from the Infrastructure Levy providing increased certainty about the rate at which developer contributions are charged, ensuring that protracted viability negotiations will no longer occur for all users.	A local rate-setting approach enables local authorities to establish Infrastructure Levy charging schedules to reflect local circumstances and best manage the impact a tax-like system would have on viability. The Infrastructure Levy will reduce the element of negotiation over the proportion of affordable homes on a development, and

	<p>A reduction in the time taken for local planning authorities to determine planning applications will also lead to cost savings to developers from a reduction in the cost of holding capital. Applicants face financing and opportunity costs in holding onto land and other assets whilst their applications are being determined by the local planning authority. The costs of holding capital are related to both the quantity and value of land. Developers will reduce these costs if they can commence development more quickly due to reduced determination times by authorities.</p>	<p>local authorities will have a greater say over the number of onsite affordable homes they can secure. Less negotiation – over this and other development contributions – will save money for authorities. This is estimated to be between £6.7m and £27m over the 10-year period (discounted and in 2019 prices).</p> <p>The retention of Section 106 will enable in-kind delivery on the largest and most complex sites where a negotiated approach is necessary to manage development impacts.</p> <p>By increasing the certainty and flexibility for local planning authorities to plan for and spend receipts where it is needed in the authority, independent of developer negotiations, there may be a more efficient and equitable use of resources compared to the counterfactual. This impact has not been monetised due to the difficulties of estimating efficiency and equity robustly. However, switching point analysis has been conducted which indicates that a 1.0% more efficient and equitable spend of resources would result in a NPV of 0 for the measure over the appraisal period. Under the ‘test and learn’ approach, it will be possible to collect data regarding efficiency impacts, which may allow for this to be taken into account in future calculations of NPV.</p> <p>In line with HMT Green Book guidance, Government's increased revenues from levies and taxation are not taken into account in NPV calculations, and therefore potential increased revenues have not been monetised.</p>
Costs	<p>Landowners will expect that developers will incorporate their anticipated Levy liability into the prices they will pay for land. As a result, if the Levy successfully captures more land value, landowners are likely to receive lower returns for their land; that is an indirect cost.</p> <p>The estimated familiarisation cost to developers would be £2.5m (discounted and in 2019 prices).</p>	<p>The Infrastructure Levy will be mandatory for local authorities to charge, locally set and locally raised. There are potential challenges for local authorities in terms of familiarisation costs for implementing and transitioning to a new developer contributions system, especially as Community Infrastructure Levy is currently only charged by around half of local authorities. However, in the long run this will be offset by the time and resources saved by not having to negotiate s106 agreements. The estimated familiarisation cost to local authorities is £0.8m (discounted and in 2019 prices).</p>

	<p>The expected start-up and administrative costs for the recruitment and initial and continuous training of new resource within private sector developers is expected to be between £276m and £551m over the 10-year appraisal period (discounted and in 2019 prices). While developers may incur similar continuous training costs within the existing system, this cannot be monetised as for some developers the cost may be offset by reduced developer contributions through negotiation.</p>	<p>The expected start-up and administrative costs for the recruitment and training of new resource in local authorities is expected to be between £147m and £440m over the 10-year appraisal period (discounted and in 2019 prices).</p> <p>Local authorities will be required to create an Infrastructure Levy charging schedule. The expected cost has been estimated to be between £12m and £18m over the 10-year appraisal period (discounted and in 2019 prices).</p> <p>Local planning authorities will also need to procure and deliver infrastructure which is currently secured and delivered by developers in the existing system. This could have significant potential for additional costs and burdens for local authorities, including the expertise and resourcing they may need to acquire.</p>
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150. New developments bring new demands upon public services and infrastructure. We can mitigate these impacts by securing contributions from developers. This approach captures increases in land value generated by planning decisions and uses the value to deliver new infrastructure and affordable housing provision, which are key for making development acceptable for both new and existing communities.
151. Currently, there are two routes to securing developer contributions: negotiated planning obligations, which are mainly delivered through s106 agreements, and the Community Infrastructure Levy (CIL), which local authorities can choose to charge, and which they set on the basis of 'X pounds per square metre of development'. CIL can be used to address the cumulative impact of development within an area.
152. Recent research commissioned by the Department investigated reasons for delays in the planning process. On average, agreeing the legal terms of a s106 agreement caused 4 or 5 months of delay although in some cases complex issues led to a much longer delay of up to 9 months⁴. Although viability challenges related to the s106 agreement were less common, affecting 3% of the sampled applications, these caused delays of 3 months on average.
153. We intend to amalgamate these two elements of developer contributions into a new Infrastructure Levy (IL), which would be a mandatory, non-negotiable charge on development and can be used to secure both affordable housing and infrastructure. The Levy would provide certainty about the rate at which developer contributions are charged, ensuring that protracted viability negotiations, which can last up to many months, will no

⁴ DLUHC, Delays and barriers experienced in the planning applications process, final report, May 2022

longer occur. The reforms aim to give local authorities greater flexibility to determine how developer contributions are used, including expanding the scope of the Levy to cover affordable housing provision.

Business impacts

154. The new Infrastructure Levy will be mandatory for local planning authorities to charge, and so developers will have to apply the new Levy calculations to their developments. This may impact developers who operate in areas that do not currently charge CIL disproportionately, in comparison to those who operate in CIL-charging authorities. We expect to introduce an Infrastructure Levy calculator tool, which will enable local planning authorities and developers to establish Levy liabilities and affordable housing requirements quickly.
155. One of the most crucial benefits of the Infrastructure Levy is the reduced or eliminated negotiation time spent on each development. This is a saving for both developers and local planning authorities, however, sometimes it is considered a worthy expenditure for a developer in light of a stronger negotiated position. For the purpose of this analysis, the reduction in negotiation time is considered a beneficial time-saving exercise for local planning authorities.
156. A reduction in the time taken for authorities to determine planning applications will also lead to cost savings to developers from a reduction in the cost of holding capital. Applicants face financing and opportunity costs in holding onto land and other assets whilst their applications are being determined by the authority. The costs of holding capital are related to both the quantity and value of land. Developers will reduce these costs if they can commence development more quickly due to reduced determination times by authorities. This is considered an indirect benefit to business as it is contingent on the reduction in authority determination times. The benefits will only be realised when there is a reduction in authority determination times therefore the impact is not immediate.
157. We expect that developers will incorporate their anticipated Levy liability into the prices they will pay for land. As a result, if the Levy successfully captures more land value, landowners are likely to receive less money for land. Whilst this does risk increasing landowner reluctance to sell land, such a risk is managed by enabling local authorities to account for local existing use values through their setting of local Levy rates and minimum thresholds, which can also be varied by development type and area.
158. The existing system of developer contributions theoretically allows local authorities to negotiate contributions up to the margin of viability, enabling less viable development to come forward. The shift to a tax-like system reduces flexibility in the system that could otherwise maintain development viability. However, this means it is more likely that costs will be incorporated into land values, and LPAs will be able to set differential rates and allowances for different typologies of land, which will be subject to an examination in public, to ensure that development is not made broadly unviable within the area. Moreover, it will be possible through regulations to introduce reduced rates and exemptions to reflect those in the existing system. We will be consulting on whether such thresholds should be

introduced. In the new IL system, developers cannot rely on re-negotiating their s106 where unexpected costs occur, and so developers will need to manage this risk by incorporating these costs into the prices they pay for land instead. Tax-like systems tend to be simpler and can capture the uplift in land value as cash. A centralised national rate-setting process would exacerbate the impact of the IL on development viability. That is why a local rate-setting approach is preferred, enabling local authorities to establish IL charging schedules to reflect local circumstances and best manage the impact a tax-like system would have on viability.

159. The new system is expected to create costs for business in the form of familiarisation cost for current resource (£2.5m discounted and in 2019 prices, see annex 12) and an estimate of between £276m and £551m (discounted and in 2019 prices) for start-up cost and administrative burden in the form of new recruitment and upskilling over the 10-year appraisal period (see annex 12).
160. There are risks of a reduction in affordable housing provision in the shift to be a new system for securing affordable housing. However, the IL has been designed such that local authorities can deliver at least as much onsite affordable housing as the current system prior to spending the IL on other priorities. Affordable housing will no longer be decided via negotiation between local authorities and developers. The IL enables local authorities to secure in-kind, onsite affordable housing contributions through the new 'right to require', along with the 'grant pot' model, where they will be able to top up registered providers to the open market value of homes for additional onsite units. As such, the IL will reduce the element of negotiation over the proportion of affordable homes on a development, and local authorities will have a greater say over the number of onsite affordable homes they can secure. The Levy will be implemented through a test and learn approach, introducing the Levy in some local authorities first, before being rolled out nationally, enabling the government to monitor and evaluate the Levy's performance.

Public-sector impacts

161. The IL will be mandatory for local authorities to charge, locally set and locally raised. There are potential challenges for local authorities for implementing and transitioning to a novel developer contributions system, as the Levy will impose mandatory costs (such as the costs associated with producing an IL charging schedule). This may produce new burdens on local authorities, especially as CIL is currently only charged by around half of local authorities. Local authorities will also need to procure and deliver infrastructure which is largely secured and delivered by developers in the existing system. This could have significant potential for additional costs and burdens for local authorities, including the expertise and resourcing they may need to acquire. There will also be the new requirement for charging authorities to produce an Infrastructure Delivery Strategy, which may also incur a new burden for authorities that don't currently prepare an Infrastructure Delivery Plan.
162. The retention of s106 to enable in-kind delivery on the largest and most complex sites will help alleviate these impacts and the use of narrowly targeted 'delivery agreements' will see infrastructure that's integral to the functioning of a site delivered by a developer as

now. Moreover, guidance will be provided to support both the transition and implementation of the new system of developer contributions, which will happen over several years. There will be associated familiarisation costs for local authorities to train and understand the new Infrastructure Levy system. As with CIL and s106, a portion of the Levy would be used to meet administrative costs.

163. The new system will also require LPA's creating an Infrastructure Levy charging schedule. This has been estimated to cost between £12m and £18m (discounted and in 2019 prices), see Annex 12 for more details. As with CIL and s106, a portion of the Levy would be used to meet administrative costs.

Risks and Assumptions

164. Initial modelling from the University of Liverpool, commissioned by DLUHC but not yet published, indicates that potential exists to raise significantly more revenue than the current system of S106 and CIL, particularly on greenfield sites. Giving confidence that the IL will raise no less than the existing system and that it could raise substantially more. Subject to detailed design, which appropriately takes into account site variation, this suggests that more value could be captured through the Levy than the existing system. The degree to which additional revenues would be realised would depend not just on the Levy rates and thresholds chosen but on the extent of exemptions, and the reaction of market participants such as landowners, land promoters and developers, and when payments of the Levy are made, and the approaches taken by local authorities in borrowing against Levy income.
165. The expectation of a new fixed Levy is that the charge will to some extent pass through into the cost of land. However, this process may take several years, and setting rates high in the initial phase risks potential land strikes. To mitigate this risk, local authorities will be able to set stepped Levy rates, which can increase incrementally over time, in their Levy charging schedules. Stepped rates will be subject to viability assessment and examination in public. This means local authorities will be able to embed the Levy into land prices at a slower rate, thereby increasing the potential for long-term increased land value capture, particularly in areas with high land values.
166. The shift to a tax-like system will reduce flexibility in the system that could otherwise maintain development viability. As explained above, this is in part why local authorities will be able to set their own local rates. It is also why implementation of the Infrastructure Levy through a phased 'test and learn' rollout across several local authorities initially, whereby the Department will monitor and evaluate the operation of the Levy and seek to understand the most effective means to mitigate impacts on brownfield site viability where reduced flexibility is most acute.
167. By applying these measures, we aim to mitigate the risk of a negative impact on market investment.

6.3.6 Environmental Outcomes Reports (EOR)

Table 19: Impacts arising from EOR measures

	Business impacts	Public-sector impacts
Benefits	<p>Businesses will benefit from a simplified process of environmental assessment that better aligns strategic decision making and project level assessment, providing more certainty and reducing costs associated with unnecessary over-precautionary assessment.</p> <p>Upfront information on evidence requirements, more prescription on the scope of assessments and better guidance on how to monitor effects will ensure funds are targeted in the most effective way.</p> <p>Improved strategic decision making will lead to greater understanding of environmental effects, and in turn improve decision making, reducing complex issues arising at application stage. This can often halt progress under the current system, which incurs additional costs.</p>	<p>Upfront information at the strategic level will improve plan-making, particularly in terms of strategic avoidance and mitigation. This will reduce the burden at planning application stage and avoid significant environmental effects being dealt with in a piecemeal manner, potentially saving costs.</p> <p>A more streamlined system, supported by effective guidance and better use of data, will reduce the overall cost of assessment.</p> <p>When making decisions, public authorities will benefit from more navigable assessments which will support decision-makers and reduce the likelihood of error or challenge.</p>
Costs	<p>There may a reduced demand for some consultancy services, for example the coordinating role often provided by the private sector for EIAs currently. However, this will be rebalanced by an increased role for consultancies in the monitoring and evaluations stages of assessment, shifting the focus to environmental protection and management.</p> <p>It is expected that businesses will incur familiarisation costs through these changes to environmental assessment, however we have been unable to monetise these costs at this stage.</p>	<p>Local authorities will need to familiarise themselves with the new system which will incur some cost. Nonetheless, we cannot monetise these costs at this early stage and would aim to minimise these costs through effective transitional arrangements.</p>

168. Leaving the EU provides the opportunity to create a more streamlined and effective approach to environmental assessment at both a strategic and project level. Founded upon the UK’s international obligations, the new system will allow the government to introduce an efficient process, securing high standards of environmental outcomes, tailored to the UK context.

169. We intend to introduce an outcomes-based approach to assessment, with increased emphasis on avoiding adverse effects at the design stage, and better monitoring processes. This will mean that the effects of plans and development will be assessed against government objectives, such as those set out in the 25 Year Environment Plan.
170. As implementation will be delivered through secondary legislation, it would not be appropriate to provide an assessment of impact at this stage. However, the information in annex 13 explains how the current system operates and where reforms might seek to realise savings and deliver improvements.

Business impacts

171. It has not been possible to monetise the costs and benefits at this stage due to the significant uncertainty in the detail of the secondary legislation. Once the detail of the secondary legislation is confirmed, the impacts will be assessed in a subsequent impact assessment.
172. A key driver of reform is the desire to reduce the administrative burden associated with environmental assessment. In considering reforms, the Government is hoping to realise savings through reducing duplication and developing a more streamlined and proportionate approach to assessment. While the individual cost to projects will vary depending on the scale and complexity, there is significant potential to realise savings through administrative rationalisation. An EU study⁵ found that the cost of environmental assessment could be as high as 2.37% of total project costs.
173. Businesses including developers and consultants will have to familiarise themselves with the new system of environmental protection, which will result in costs. It has not been possible at this stage to estimate familiarisation costs due to the significant uncertainty over the detail of the secondary legislation.

Public-sector impacts

174. As with business impacts, the public sector impacts will flow from the better functioning of the assessment process with cost savings where the public sector is conducting the assessment and time and costs savings for public bodies when receiving / considering assessments.
175. There will be associated familiarisation costs for local authorities to understand and implement the new framework of environmental assessment, however it has not been possible to monetise the costs at this stage.

Risks and Assumptions

⁵ GHK, Collection of information and data to support the Impact Assessment study of the review of the EIA Directive, https://ec.europa.eu/environment/eia/pdf/collection_data.pdf

176. In securing powers to develop a new framework for environmental assessment, we will need to work closely with the sector to co-design the new system in order to realise the benefits of reform both in terms of time and cost savings, but also in respect of securing better, more targeted environmental outcomes.

6.4 Supporting regeneration and delivery

177. There are several planning measures that will support regeneration and delivery, to help level-up the country, regenerate left-behind places and make better use of brownfield land in towns and cities.

178. The table below summarises costs and benefits of measures in this group (compulsory purchase and land compensation, compulsory rental auctions, development corporations, build out, , pavement licencing and temporary relief from enforcement of planning conditions).

Table 20: Summary of Impacts arising from supporting regeneration and delivery

	Business impacts	Public-sector impacts
Benefits	<p>The benefits to business from supporting regeneration and delivery include greater opportunity for businesses to acquire vacant spaces on the high street and in town centres to create new business opportunities. This is complemented by measures such as pavement licencing that increases the scope of existing business to expand.</p> <p>Measures focusing on build out provide greater certainty in the planning system that schemes will be completed as scheduled. Build out alongside other measures supporting regeneration and delivery is assisted by measures such as temporary relief from enforcement of planning conditions that enables greater flexibility and ability for business to respond and recover during times of disruption (for example by relaxing delivery times, opening hours and construction times).</p>	<p>Local authorities will benefit from new powers and controls through measures such as amended compulsory purchase powers and compulsory rental auctions. The combination of these powers and other measures such as build-out to support regeneration and delivery will result in better outcomes for high streets and towns centres.</p> <p>In particular, the use of compulsory purchase orders and high street rental auctions provide two separate options for local authorities to help regenerate areas but can also be used in combination that has wider benefits. For instance, where a compulsory rental auction could provide a short-term use of a building while a long-term compulsory purchase order was being prepared.</p>
Costs	<p>The costs to business are predominantly impacts arising from</p>	<p>There are anticipated familiarisation and setup costs to local authorities for the range</p>

	measures concerning build out through familiarisation.	of measures. However, some of these costs cannot be monetarised.
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179. Planning and land use are critical to our ability to level up the country through regeneration. To both deliver the homes we need and regenerate places that have suffered from underinvestment. Measures in this bill will support this, by giving local authorities new tools and powers to support compulsory purchase of land, fill high street vacancies, and enable faster build out. Other measures such as changes to the advertising regime, pavement licensing rules and permitted construction hours will support businesses to grow, helping overall economic output. Some of the measures in this section tweak existing regimes, and others are new opportunities for local authorities to be even more active in enabling regeneration in their local areas.

180. Many of the measures in this section are permissive powers, which means that in the individual analysis, where monetised they are done so illustratively. For this reason, figures on permissive powers are not included in the summary table.

6.4.1 Compulsory Purchase Orders and land compensation

Table 21: Impacts arising from changes to the Compulsory Purchase Order process measures

	Business impacts	Public-sector impacts
Benefits	<p>Businesses will benefit from an increase in support for regeneration through greater use of Compulsory Purchase Orders where needed.</p> <p>Businesses will further benefit from the flexibility in the vesting date in the use of compulsory purchase powers and in the modernisation of the Compulsory Purchase Order regime.</p>	<p>Authorities will benefit from greater certainty in the use of compulsory purchase powers, knowing that where necessary conditions may be imposed before the exercise of compulsory purchase powers rather than Compulsory Purchase Orders not being confirmed. They will additionally have more confidence in running Compulsory Purchase Orders alongside other consenting or funding processes saving considerable delivery time for schemes.</p> <p>Further changes to the process will increase the flexibility of authorities in using confirmed compulsory purchase powers, empower confirming authorities to choose the appropriate procedure and allow the regime to be brought into the modern digital world.</p> <p>Local authorities will have more certainty in the use of their compulsory purchase powers where regeneration is required.</p>
Costs	There are not expected to be any costs to businesses that are additional to those already present	Familiarisation costs for acquiring authorities to the changes may be required, however familiarisation costs of the Compulsory

	<p>in the compulsory purchase process.</p>	<p>Purchase Order process will be incurred where any acquiring authority is considering use of compulsory purchase powers.</p> <p>The introduction of data standards to the Compulsory Purchase Order process may involve advance familiarisation costs but are expected to result in more efficient processes over time.</p> <p>Requirements to provide information electronically to affected parties and the public, on top of existing methods of communication, may potentially increase resource costs for authorities. However, many authorities already provide information electronically in addition to the current statutory requirements.</p> <p>Familiarisation of the changes will be necessary at relevant government departments and the Planning Inspectorate. The introduction of a procedure to discharge conditions imposed on confirmation of a CPO may result in some additional administrative cost although these may be offset by cost savings made in the delivery of a scheme as a result of the introduction of conditional CPOs.</p> <p>It has not been possible to monetise the familiarisation costs to the Planning Inspectorate at this point but we expect to be able to do so when secondary legislation is introduced, giving a more detailed picture of the operational implications.</p>
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Business impacts

- 181. We expect the process changes to the Compulsory Purchase Order regime to have a positive impact on business through greater confidence from authorities in the use of their compulsory purchase powers and therefore of undertaking significant regeneration projects.
- 182. The modernisation of the process and the increased flexibility in the vesting date on acquisition will also assist business affected by any scheme.
- 183. No additional costs are expected to arise for businesses following the changes above those that are already present in the compulsory purchase process.

Public-sector impacts

184. We expect the introduction of the ability for the confirming authority to impose conditions prior to the exercise of a Compulsory Purchase Order will give authorities more confidence in bringing forward Compulsory Purchase Orders at an earlier stage of scheme development. Authorities will have confidence that if a particular impediment has not been overcome (for example planning) at the point a decision is made on confirmation, then a condition could be made rather than the Compulsory Purchase Order not being confirmed. Running the Compulsory Purchase Order process in parallel with other consenting and funding processes, rather than sequentially, could significantly speed up land assembly and scheme delivery.
185. We expect the possibility of a longer period over which compulsory purchase powers could be exercised to provide authorities delivering complex schemes or those with longer lead-in times with more confidence in using CPOs as a means of assembling the necessary land.
186. Introduction of the flexibility to agree a vesting date with a landowner will assist authorities in matching the vesting date to the requirements of the scheme and the landowner.
187. Providing more power to confirming authorities to choose the appropriate procedure in considering confirmation of a CPO will make the process more efficient and produce a faster and more cost-efficient outcome for authorities.
188. Modernisation and digitalisation of the regime will benefit authorities in the streamlining of the process and allowing more efficient communication with affected parties.
189. Familiarisation of the changes at the Planning Inspectorate and at relevant government departments will be necessary. The changes will result in applications to discharge conditions where conditional CPOs are made. It has not been possible to monetise the familiarisation costs to the Inspectorate at this point, however we expect to be able to do so when secondary legislation is introduced, giving a more detailed picture of the operational implications.

Risks and Assumptions

190. There has been no analysis done to understand the monetised costs and benefits, therefore there are no risks and assumptions in line with the analysis. However, there is a risk that, despite the measures, authorities continue to take a risk averse approach and run their consenting and Compulsory Purchase Order processes sequentially.

6.4.2 High Street Rental Auctions

Table 22: Impacts arising from High Street Rental Auctions measures

	Business impacts	Public-sector impacts
Benefits	High Street Rental Auctions provide new opportunities for businesses to access empty space	The policy would support local authorities by reducing the blight of vacant buildings in

	<p>in high streets and town centres. Running auctions for vacant space may lead to lower rents for those units.</p> <p>This supports businesses being able to enter the market that previously they would not have been able to. By removing the barrier to entry, lease costs may be lessened. This should lead to a more diverse range of uses of space or to more innovation.</p>	<p>high streets and town centres, supporting regeneration and local economies.</p> <p>High Street Rental Auctions would provide a new tool for local authorities to support change in their town centres and local control to be exerted without the need for funding (national, local or private sector).</p> <p>It would allow local authorities to instigate a rental auction on a vacant property and intervene briefly to facilitate finding a tenant, without the financial liability that they would incur if they used alternatives such as buying the unit or compulsory purchase. Where a local authority does decide to use the compulsory purchase order (CPO) process, a High Street Rental Auctions could complement this and provide a short-term use for that building while the CPO process is ongoing.</p>
Costs	<p>High Street Rental Auctions may lead to lower rental values, which may have an impact on commercial property investors. Of the commercial property stock in the UK, 70% is owned by UK entities. The largest share of this is owned by 'pooled investment vehicles,' with 16% and UK Real Estate Investment Trusts (REITs) owning 15%.</p> <p>There may also be familiarisation costs to landlords. An illustrative assumption of 1 hour of labour per landlord (and one landlord per eligible vacant unit) according to the modelling would incur familiarisation costs of £0.7m.</p>	<p>Note that this is a permissive policy, so local authorities will weigh up whether it is to their benefit to make use of it. The policy does not impose any costs on authorities.</p> <p>Many local authorities may need to upskill to oversee rental auctions and there may be initial familiarisation costs for local authorities. We would expect that local authorities would likely contract a managing agent to run the process for them, rather than run it themselves in house. Auction costs will be paid for by the tenant, however if a local authority wanted to run an optional pre-auction survey, then this would be paid for by the authority.</p>

191. The policy of High Street Rental Auctions (HSRAs) aims to tackle the persistent problem of vacant property on high streets and in town centres and the blight they create and knock-on effects on the social and economic prosperity of places across the country. The policy would give local authorities the power to hold a rental auction for a 1-5 year lease of a unit that has been empty for over six months.
192. The desired outcome is an attractive and lively high street with footfall and activity that attracts people and businesses, increases pride in place, and avoids long-term presence of vacancy.

Business impacts

193. We expect the introduction of this policy to have a direct impact on businesses from familiarisation costs. We expect the policy to have a positive impact on businesses looking for property, as HSRAs will remove barriers to entry for businesses and community groups looking to fill vacant property. The policy may lead to lower rental prices, which in turn may make high street and town centre sites accessible to a wider range of businesses.
194. This could have an impact on landlord and investor businesses; however, this impact cannot be monetised at this stage and is indirect, as would only be felt where a local authority uses the power the Bill grants them.
195. On the demand side, we would expect small and micro businesses to benefit through access to space at a lower price than they may pay through the current market.
196. Small units of around 50 square metres make up the majority of eligible vacancies, intuitively these may be better suited and more attractive to micro businesses with a small number of employees (if we assumed space demanded is some function of employees). So, there could be disproportionate benefits for these enterprises.

Public-sector impacts

197. The power to run rental auctions will be discretionary for authorities, so does not impose any costs. Where they choose to use it, the policy will require authorities to gain the knowledge and skills to oversee rental auctions and so take up of the policy will be partly dependent on the capacity of Local Authorities.
198. We would expect that authorities would likely contract a managing agent to run the process for them, rather than run it themselves in house. However, this would still require management from the authority and would likely incur a cost. Some local authorities may be better placed to use these new powers than others due to the differing capacity and capability among local authorities. Some of the public sector may be impacted as landowners.

Risks and Assumptions

199. Principal risks surround the level of take up of use of HSRAs, which may therefore limit their ability to meet the intended regeneration outcome. There is also a small risk of town centre displacement, as existing high street tenants seek to move to units undergoing auction to save money. The transaction costs are likely to offset this risk, however.

6.4.3 Development Corporations

Table 23: Impacts arising from Development Corporations measures

	Business impacts	Public-sector impacts
Benefits	The reforms to the development corporation legal framework may have a positive indirect impact on	Reforming the development corporation legislative framework will create the opportunity for local areas to have access to

	businesses. Where a development corporation is established, there will be a consolidation of the public bodies working to deliver regeneration in an area. This will allow a more co-ordinated, cohesive, efficient and effective arrangements, including for interested investors and developers, and cost savings in comparison to the existing arrangements.	appropriate delivery vehicles to support local growth and regeneration. Locally-led Urban Development Corporations will create clearer lines of accountability for local authorities outside of mayoral areas and will be overseen by the democratically elected local authorities as opposed to central government to support local growth and regeneration.
Costs	There are no direct costs to business.	The creation of locally-led Urban Development Corporations may result in additional costs for local authorities compared to other delivery vehicles for large scale housing development. It will though be entirely for the local authority or authorities covering the area of the proposed regeneration/growth to decide to request the establishment of a locally-led Urban Development Corporation, taking account of the benefits this may bring.

Business impacts

200. We do not consider that the reforms to the development corporation legal framework will have a direct impact on businesses. The reforms proposed relate to ensuring the appropriate powers to support transformational regeneration and growth are up to date. The reforms to the development corporation legal framework are discretionary and may have an indirect positive impact where a development corporation is established.

Public-sector impacts

201. The creation of locally-led Urban Development Corporations is a discretionary policy and the precise impact will therefore depend on the take-up by local authorities. They could bring the benefits of geographic focus, strong land assembly powers, and the ability to attract investment, as well as harness private sector expertise. Where used, they may result in additional costs for local authorities compared to other delivery vehicles for large scale housing development. It will though be entirely for the local authority or authorities covering the area of the proposed regeneration/growth to decide to request the establishment of a locally-led Urban Development Corporation, taking account of the benefits this may bring.

Risks and Assumptions

202. We are unable to consider the implications in terms of risks and assumptions as take up is discretionary and particular to the circumstances of a given area.

6.4.4 Build Out

Table 24: Impacts arising from Build Out measures

	Business impacts	Public-sector impacts
Benefits	<p>This is a measure intended to galvanise the completion of unfinished development. There are not expected to be direct benefits to businesses.</p>	<p>These reforms are expected to reduce the time delays associated with the serving of a completion notice and will allow local authorities to serve a notice sooner where they believe that a development will not be completed in a reasonable period. Incomplete development can impact on the visual amenity of areas and is often a complaint of local communities where planning permissions are partially developed but left unfinished. A simpler and quicker process for serving a completion notice will help ensure fewer developments remain unfinished.</p>
Costs	<p>Development Commencement Notices will result in a small, direct cost to business from familiarisation costs and increased administrative burden.</p> <p>Where a completion notice takes effect, the developer will need to complete the scheme to the timetable set or leave the development unfinished. Both scenarios could result in indirect costs to business - either increased build costs or loss site value from lost planning permission. These costs will only be incurred where build out has been unreasonably slow: there are time limits set for completion when planning permission is granted, and completion notices would not apply before these limits are up.</p> <p>The direct costs to business of these measures over the 10-year appraisal period is estimated to be between £39.8m and £331.4m (central £156.5m). Total costs, including indirect costs to business, would be between £39.9m and £365.5m (central £166.9m).</p>	<p>There may be a small familiarisation cost to local planning authorities £0.03m in the first year and some additional employee resource required to take responsibility for any new work created by this measure. For example, hosting the Development Commencement Notice form and placing the Commencement Notice form on the statutory register.</p> <p>These reforms will make it simpler for local authorities to issue a Completion Notice and quicker for that notice to take effect. In terms of administrative impacts, we do not anticipate any material impact on LPAs above the existing process for serving a Completion Notice.</p>

203. We will be introducing two measures that relate to the build out of development. The first of these provisions is a new requirement that, prior to the commencement of any

development granted planning permission, a Development Commencement Notice (DCN) must be submitted to the local planning authority. This DCN will include information on when the development is going to commence, when it is expected to be completed, any phases of development, and the projected rate of delivery over the course of the development's construction lifespan. This information will help provide for a body of information on the build out of planning permissions and help improve transparency about the delivery of new development.

204. The second measure is the reform of completion notices. The proposed changes will help to speed-up, simplify, and modernise the procedure for issuing a completion notice on planning permissions which are not anticipated to be completed in a reasonable period. These reforms will make completion notices a discretionary power, a more attractive and accessible tool for local planning authorities to help galvanise completion of development progressing at an unreasonable pace or to remove unwanted planning permissions.

Business impacts

205. In relation to DCNs impact on business, there is no information required that would not already be available to the developer building out a scheme. Consequently, there is no additional information burden. The only additional burden DCNs would add are those involved in filling and sending in a simple electronic form. Total direct costs to business comprising of familiarisation costs and increased administrative burden, under the preferred option are estimated to be between £39.8m and £331.4m (central £156.5) over the 10-year appraisal period.
206. For completion notices, the indirect costs to developers and/or landowners from a loss of planning permission if development remains unfinished following a completion notice is estimated to be between £0 and £31.1m (central £10.26m) over 10 years. These costs will only be incurred if the developers are not incentivised to change their undesirable behaviour and developments are not completed within the time limits set for the schemes, i.e., they do not comply with the legislation; it is not the intention of the policy to place additional burden on business, and so these costs are not counted as a direct cost to business. There are no predicted monetary benefits on business as part of the completion notice reforms.

Public-sector impacts

207. The cost implications for local planning authorities are expected to be minimal. In the case of DCNs, it is anticipated that there will be a small, one-off familiarisation cost, estimated at £0.1m in the first year. In addition, local planning authorities will be expected to collect, record, and store the notices. Initially, this is anticipated to be through paper-based submissions, although we hope to have something ready digitally by Autumn 2023 at the latest. They may also seek to use DCN information when assessing if a scheme's build out rate is acceptable. There is significant uncertainty regarding any additional resource that may be required for these purposes, hence these costs have not been monetised.

208. For completion notices, these will remain a discretionary tool available to local planning authorities and would likely still be used as a last resort once other options to incentivise site delivery have been exhausted. Across all local planning authorities, we do not expect a significant increase in their use on an annual basis, and in terms of process, the issuing of a completion notice is not anticipated to have a monetisable impact. Given that completion notices already exist, we do not expect there will be a familiarisation cost.

Risks and Assumptions

209. There are no major risks associated with the DCN measures. This is in large part due to the successful implementation of similar measures in Scotland. We have made certain assumptions with respect to the amount of time we would expect a commencement notice to take to complete. However, analysis in Annex 20 provides for a range of cost estimates within which we are confident the total costs to business of DCNs will fall.

210. The main risk identified as a result of the reforms to completion notices (in particularly removing the need to secure Secretary of State confirmation before the notices take effect) is that local planning authorities may become overzealous in their use. However, we anticipate that the introduction of an appeals process will ensure that notices are only issued as appropriate and where justified.

6.4.5 Pavement Licencing

Table 25: Impacts arising from Pavement Licencing measures

	Business impacts	Public-sector impacts
Benefits	<p>This measure is intended to support hospitality businesses through a streamlined and cheaper process to gaining a pavement license.</p> <p>Over the 10-year appraisal period, the benefits from the reduced fee cap are estimated to be between £63.4m and £95.0m (central £79.2m).</p> <p>This will encourage existing and new businesses to expand their outdoor dining offer, which will support the viability of both the businesses themselves and have knock-on benefits for the vitality of the areas they are situated within (such as high streets and town centres).</p>	<p>This will make permanent the simplified and clearer process for local authorities, giving clarity over the process. It will also encourage vitality of local high streets.</p>
Costs	<p>Total familiarisation costs are estimated to be between £41,600 and £62,400 based on businesses</p>	<p>The temporary measures created a new burden for lower tier authorities (previously pavement licensing implemented through</p>

	<p>taking time to understand changes to the permanent system.</p>	<p>the Highways Act 1980 was ran by upper tier county councils). We have fully funded new burdens in the temporary process. The permanent process will introduce a higher fee cap of £500 for new applications and £350 for repeat applications. This will allow local authorities to fully recover costs through the fee. We also expect that repeat applications should lead to less officer time to consider applications leading to reduced costs. We have previously funded set-up costs through new burdens funding in FY21/22 for the temporary streamlined process which this makes permanent. Local authorities will have small familiarisation costs associated with reviewing the changes to the system (mainly fee cap and consultation periods) and updating their websites accordingly.</p>
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Business impacts

211. Under our preferred approach, businesses will only be charged up to £500 for a new pavement license application and the application process will be shortened to a maximum of 28 days, with 14 days for consultation and a further 14 days for the local authority to determine (or for a deemed consent to be granted if the application is not determined in these timescales). Licences will be granted for a duration of up to two years.
212. Familiarisation costs to businesses will be minimal given the measures have already been in place. Businesses will need to spend a short amount of time re-familiarising themselves with the process through reading the statutory guidance published online which will set out the differences between the temporary and permanent processes (fee change and determination timescales change). Total familiarisation costs are estimated to be between £41,600 and £62,400.
213. Beyond this there will be no additional costs to business, and this will provide two key benefits:
- Reduced fee paid per application (monetised).
 - Faster decisions reached (non-monetised).
214. Businesses will experience a monetary benefit per application in the form of the saving they make on the application fee compared to the previous permanent route to gain a pavement license. This is a direct impact on business as it will save them money every 2 years on pavement licence applications when compared to the previous permanent route.
215. Businesses will experience a monetary cost per application in the first year, as they will need to re-read the application form to familiarise themselves with the changes, the total of which is estimated to be between £41,600 and £62,400.

Public-sector impacts

216. It is assumed that there will be no additional public sector costs or benefits. Under the counter-factual, authorities set their fees at a level to cover the costs to process and monitor applications. Under the preferred approach, this will remain the case as the fees cap should cover the costs of local authorities from this more streamlined process, and any potential issue with larger urban authorities wishing to charge higher fees we expect will be offset by the fact that most applications will be repeats, leading to less officer time needed to consider them, and a reduction in officer time and therefore cost of processing the applications as considerations for determination are set out in statutory guidance.
217. Local authorities will be subject to small familiarisation costs associated with reviewing the revised guidance/regulations and updating their websites with the new fee caps and timescales for consultation/determination. We expect that this would not take longer than an hour per local authority.

Risks and Assumptions

218. It is assumed that all authorities will charge the maximum fee cap for all applications (£500 for new applications and £350 for renewals). Many applications will incur lower processing costs than this, as they cost less to process and monitor. It is possible some applications may require more work than others, and so would cost authorities more to process, monitor and enforce however it is expected that this would balance with those that require less time.
219. It is assumed that all applications in year 1 will be new applications, and thereafter will be renewals (with a maximum fee cap of £350).
220. The analysis assumes that the preferred approach will lead to no significant shift in behaviour from businesses, the number of applications over in each of the 10 years will remain uniform.
221. Our data source is a survey based upon local authority response rate of only 15%. This is a small sample size, however in the absence of more suitable evidence we have assumed this to be representative of authorities, which may not be accurate.

6.4.6 Relief from Enforcement of Planning Conditions

Table 26: Impacts arising from Relief from Enforcement of Planning Conditions measure

	Business impacts	Public-sector impacts
Benefits	The measure will provide certainty to businesses that enforcement action cannot be taken against non-compliance with certain conditions attached to existing planning permissions for a specific period. This is expected to involve conditions which govern the	It is not possible to assess any direct public sector benefits at this stage as the Bill only proposes a regulation-making power. These will be analysed as secondary legislation comes forward.

	operative use of a development. This will give firms more flexibility in how they operate, although it is not possible to monetise the benefits at this stage.	
Costs	There are not expected to be any direct costs to business. There are not anticipated to be any familiarisation costs associated with this primary legislation, as the measures will apply as regulations are brought forward. Any costs will be assessed when bringing forward secondary legislation.	There may be some loss of revenue from not being able to levy fines against unauthorised activity, although this should at least partially be offset by a reduction in the cost of taking enforcement action. It has not been possible to monetise these impacts, though there are no anticipated familiarisation costs for LPAs as these will provide a longer-term solution to measures that have already been introduced by several Written Ministerial Statements.

222. We will be introducing a general statutory constraint on local planning authorities which would limit enforcement action against non-compliance of prescribed classes of conditions. We intend that this power will be used in specific circumstances, such as periods of uncertainty, and could apply to, for example, operative conditions, such as delivery times/opening hours, and construction hours, which have been subject to recent relaxations under various Written Ministerial Statements among other classes of conditions.

Business impacts

223. The measures, once secondary legislation is brought forward, will provide businesses with greater flexibility in their operations in specific circumstances such as periods of uncertainty, which will bring economic benefits, for example if they are able to trade longer via a relaxation on enforcement action against conditions governing opening hours. As regulations are brought forward, this will have a direct impact on business as they receive a relaxation of certain planning restrictions for a specified period.

224. Businesses will also already be familiar with the measures as similar provision was made through the introduction of Written Ministerial Statements since March 2020. Given the details of the policy are to be confirmed in secondary legislation on a case-by-case basis, it is not possible to assess any impacts (including familiarisation costs) at this time, and these will be assessed as part of secondary legislation.

Public-sector impacts

225. As regulations are introduced, the measures will directly restrict the ability of local planning authorities to take enforcement action against non-compliance with planning conditions. This raises the possibility of local authorities suffering lost revenue from fines related to breaches of planning control. However, it is envisioned that this will be at least partially offset by a reduction in the resources required for enforcement and should be noted that enforcement is discretionary in any event.

226. As the measures will apply only in specific circumstances (and following the introduction of regulations), it is not possible to assess the familiarisation costs for local planning authorities associated with the proposal at this time, however these will be assessed as part of secondary legislation. Local planning authorities will also already be familiar with the measures as similar provision was made through the introduction of Written Ministerial Statements since March 2020.

Risks and Assumptions

227. Given that the details of the policy are to be confirmed in further legislation, it is not possible to estimate the impacts of the policy at this stage. The impacts will, however, be analysed as the specifics of the policy are confirmed in the secondary legislation that comes forward.

6.5 Housing Supply Impacts

228. The reforms covered by this impact assessment are intended to improve the planning system and through that improve the outcomes within the housing market. The Government's approach is, therefore, to create a more positive framework within which high quality development which meets communities' needs and ambitions can come forward. This is partly by giving local leaders better tools to lead regeneration and growth in their areas, and partly by creating incentives through the planning system for communities to support development. Those incentives will operate by ensuring that future development is beautiful, comes with the required infrastructure, is democratically decided, protects and enhances the environment, and engages neighbourhoods in the decisions which affect them. There is of course uncertainty around what increased engagement will mean for the overall amount of development that comes forward, with the evidence on which side of the line this may fall unclear. However, this approach rejects the speculative development model that relies on Inspectors approving planning applications on appeal, in favour of a community-focused, plan-led approach. In the long-run the Government believes this will achieve a more sustainable supply of homes in the right places than alternatives.

229. In addition, internal analysis suggests that those local authorities with up-to-date local plans have higher levels of housing supply compared to authorities with an out-of-date local plan, or no plan at all. This appears to be true even after controlling for important aspects of local market conditions that are known to affect housing supply (median house price changes, transactions as a proportion of dwelling stock and region). The analysis suggests that on average, authorities without an up-to-date Local Plan would have 14% higher housing supply if their housing supply (as a proportion of existing housing stock) were as much as those with an up-to-date plan. Care should be taken about assuming an entirely causal relationship as there are likely to be unobserved factors associated with having an up-to-date local plan, such as how well-resourced a planning department the authority has and whether it has a favourable attitude towards supply. But overall, the analysis points to the possibility of increased Local Plan coverage helping deliver more homes.

230. This IA makes no overall aggregate assessment of the supply impact since this will depend on application by individual local authorities, market conditions and demand, wider changes in the mortgage and regulatory markets and so on.

7. Summary of impacts of the overall Bill

As in Section 6, Table 27 below summarises the total costs and benefits of the Bill in both qualitative and quantitative terms, where this is possible.

Table 27: Summary of the main impacts arising from primary legislation from the whole Bill, all figures presented are based on central scenarios.

	Improving plan-making	Improving decision-making	Improving incentives infrastructure and quality	Supporting regeneration and delivery
Benefits	<p>Local Plans Reduced uncertainty for investors and increased speed of development.</p> <p>Cost saving to local planning authorities from simplified evidence requirements, £256.4m over the appraisal period.</p> <p>Strategic Plans and Alignment Policy A dedicated strategic planning system to help authorities better address cross-boundary issues. A flexible policy test to ensure alignment between local plans reduce local plan failures.</p> <p>Neighbourhood Plans Neighbourhood Priority Statements provide an opportunity for communities to have a role in the preparation of a local plan, where submitted at the appropriate stage of local plan preparation. In addition, they may provide developers with a greater understanding of what kind of development and in some circumstances what locations will be supported by that community.</p>	<p>Increased certainty in planning decisions Benefits to business (both direct and indirect) are estimated to be £2,843.9m over the 10-year appraisal period. As a result of these changes, there is expected to be a reduction in the cost of preparing planning applications. Developers will also benefit from a reduction in the cost of holding capital, both due to a reduction in determination times and appeals. There is also expected to be a reduction in rejected applications (and subsequently appeals) and a reduction in applications that are not policy-compliant in the policy option.</p> <p>Greater weight given by revised s38(6) to the development plan is expected to speed up decision-making by local authorities.</p> <p>The estimated time savings to local authorities in determining planning applications is £25.6m over the appraisal period.</p> <p>The estimated savings to the Planning Inspectorate and local planning authorities from a reduction in appeals over the appraisal period are £45.8m and £16.9m respectively.</p> <p>Development Management Process Improvements Local authorities, businesses and SMBs will all benefit from powers to vary permission that will result in a more certain system, a reduction in supporting information required for applications, reducing the need for consultancy and legal advice to navigate the system, as well as reducing the cost of preparing applications.</p> <p>Crown Developments These measures will be used infrequently so the benefits from faster delivery will be limited to benefit the Crown.</p> <p>Planning Enforcement There are no direct benefits to business through introducing a new framework of planning enforcement measures.</p> <p>Digital Property developers, digital innovators, SMBs, local authorities and the housing and planning market will all benefit from a more efficient, faster and accessible system.</p>	<p>Design Standards Local authorities will be able to make faster decisions, with greater scope to refuse applications that do not meet design standards.</p> <p>Heritage The standardisation of Historic Environment Registers and heritage planning reforms will make the system easier for businesses to navigate.</p> <p>Infrastructure Planning Reduced risk of plan failure and examination uncertainty, which has annual benefits estimated to be between £0.6m and £4.3m for local planning authorities. Total benefits over the 10-year appraisal period are estimated between £6m and £43m (present value). Non-monetizable public benefits in productivity gains from density and greater agglomeration. Non-monetizable business benefits through wider/deeper pool of skills and agglomeration benefits.</p> <p>Infrastructure Levy Businesses will benefit from greater certainty of the rate developer contributions are charged. Local authorities have greater flexibility and ability to establish local rates that does not involve protracted negotiations with developers. Time saving benefits estimated be between £6.7m and £26.7m over the 10-year period (discounted and in 2019 prices).</p> <p>Environmental Outcomes Reports Business and local authorities will benefit from a simplified process of environmental assessment that includes upfront information on evidence requirements and better guidance for scoping and monitoring.</p>	<p>Compulsory Purchase Orders and land compensation Greater certainty for businesses and local authorities on how compulsory purchase orders can support regeneration, particularly with new measures for conditional confirmations of Compulsory Purchase Orders.</p> <p>High Street Rental Auctions Are a new tool for local authorities that creates new opportunities for business to regenerate vacant spaces on the high street and in town centres.</p> <p>Development Corporations There will be indirect benefits derived from better co-ordination of public-bodies to direct investment to deliver regeneration objectives.</p> <p>Build-out Reduce the time delays associated with issuing a completion notice for local authorities and quicker for the notice to take effect.</p> <p>Pavement Licencing Streamlining the process of getting a pavement license will support the hospitality businesses through a simpler route to permission, providing a clearer process for local authorities. Over the 10-year appraisal period, the benefits from the reduced fee cap are estimated to be between £63.4m and £95.0m (central £79.2m).</p> <p>Temporary Relief from Enforcement of Planning Conditions From this measure once secondary legislation is brought forward, businesses will gain from greater flexibility in their operations.</p>
Costs	<p>Local Plans £533.4m additional costs local planning authorities associated with more Plans being updated, one-off £2.7m familiarisation costs associated with understanding the new</p>	<p>Increased certainty in planning decisions Familiarisation costs to private sector planners £1.8m, local planning authorities £1.5m and the Planning Inspectorate £0.3m.</p>	<p>Design Standards The total discounted cost of producing design codes to local authorities is estimated to be £54.1m, one-off familiarisation cost £0.3m (first year only) and training costs £0.8m (first</p>	<p>Compulsory Purchase Orders and land compensation No additional familiarisation costs are anticipated for those affected by compulsory purchase including businesses. Acquiring authorities could have additional resource implications for providing Compulsory Purchase Order</p>

<p>requirements and resource cost to PINS given increased volume of Plans.</p> <p>Strategic Plans and Alignment Policy For local authorities who choose to produce a spatial development strategy, we estimate it will cost £0.7m - £2.7m (central £1.7m) per plan, but this is discretionary.</p> <p>Neighbourhood Plans £0.06m (central) is the expected familiarisation costs to local authorities.</p> <p>£0.07m cost associated with the volume NPSs for local planning authorities and a £0.15m (central) cost in set up and processing costs.</p> <p>A £3.71m (central) cost related to the increase in the number of plans being updated.</p>	<p>Development Management Process Improvements Overall costs to business are expected to be none to minimal or offset by wider reforms to the end-to-end development management. Local authority transitional costs cannot be monetised at this stage. Impacts are indirect.</p> <p>Crown Developments These is not expected to be any direct costs to business and these proposals will have minimal public sector costs.</p> <p>Planning Enforcement There will be familiarisation costs to local authorities with the new legislation estimated to be £0.07m (10-year NPV).</p> <p>Digital There are no direct costs to businesses that will arise through these primary measures. A funded pathfinder and pilot scheme will continue to support and enable local authorities to implement these reforms.</p>	<p>year only). Developers will also face one off familiarisation costs, estimated to be £1.0m (first year only).</p> <p>Heritage Cost to local authorities to maintain Historic Environmental Records is estimated to be £10.1m.</p> <p>Removal of compensation measures for unsuccessful Building Preservation Notices, will have a small cost to business.</p> <p>Infrastructure Planning All business impacts are direct costs as LAs are highly likely to use this and infrastructure providers are obliged to comply. Average annualised cost to infrastructure bodies for familiarisation with the new regulation is estimated to be between £0.02m and £0.08m (year one only). Local authorities' familiarisation costs are estimated between £0.6m and £1.2m (first year only).</p> <p>Infrastructure bodies' new role in plan-making requiring recruitment and upskilling is estimated as an annual average cost of £18.3m. Over the 10-year appraisal period costs total £73m - £293m.</p> <p>Increasing the level of engagement between local planning authorities and infrastructure providers, is estimated to be £5.9m for average start-up costs. Over a ten-year period, total costs are estimated to be £29m and £88m (present value).</p> <p>Preparation of an Infrastructure Delivery Strategy is estimated to cost local authorities £8.9m over the 10 years</p> <p>Infrastructure Levy Average annualised cost to developers for familiarisation with the new regulation is estimated to be £2.5m (first year only).</p> <p>Local authorities' familiarisation costs are estimated between £0.8m (first year only).</p> <p>Developers will be requiring recruitment and upskilling at an estimated annual average cost of £276m - £551m over the 10 year period.</p> <p>Local planning will be requiring recruitment and upskilling at an estimated annual average cost of £147m - £440m over the 10 year period.</p> <p>The cost of developing an Infrastructure Levy charging schedule for Local Authorities is expected to be £12m and £18m over the 10-year appraisal period</p> <p>Environmental Outcomes Reports Potentially reduced role for consultancy services but this will be offset by greater opportunities in monitoring and evaluation stage assessments.</p>	<p>information electronically although many authorities already do this. We do not expect there to be additional familiarisation costs for authorities arising from the changes. Familiarisation costs will arise at the Planning Inspectorate and at relevant government departments, but such changes should result in an overall reduction in costs in determining Compulsory Purchase Orders.</p> <p>High Street Rental Auctions A challenge for local authorities is to upskill staff and oversee the delivery of rental auctions, but this is a discretionary power so impacts are indirect.</p> <p>There may also be familiarisation costs to landlords. An illustrative assumption of 1 hour of labour per landlord (and one landlord per eligible vacant unit) according to the modelling would incur familiarisation costs of £0.7m</p> <p>Development Corporations It is the decision of the local authority to create a development corporation, which is a discretionary power that includes factoring in any additional costs.</p> <p>Build-out Familiarisation costs to local authorities are estimated to be around £0.03m in the first year.</p> <p>Familiarisation costs together with administrative costs to business are estimated to be £156.5m over the 10-year appraisal period. For completion notices, the indirect costs to developers and/or landowners from a loss of planning permission if development remains unfinished following a completion notice are estimated to be £10.26m over 10 years.</p> <p>Pavement Licencing Total familiarisation costs estimated to be between £41,600 and £62,400 based on businesses taking time to understand changes to the permanent system. Local authorities will receive a fee from businesses that will cover processing, monitoring and enforcement costs.</p> <p>Temporary Relief from Enforcement of Planning Conditions Costs will be set out in a subsequent secondary legislation IA.</p>	
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8. Monitoring and Evaluation

231. The programme theory of change sets out six long term outcomes for the Levelling Up and Regeneration Bill, and associated policy and transformation work to deliver. These are that:
- New and existing developments are better designed ('beautiful') places that support better living
 - Built and natural environments have more sustainable environmental impacts, are in better environmental condition
 - Communities are more positive about development, which is better shaped to suit community needs.
 - Development is accompanied by increased access to infrastructure and affordable housing (as locally required).
 - More development, in the places and for the uses local economies & leaders need, helping to raise living standards.
 - The planning system and wider public services have more capability and capacity, works faster and delivers outcomes more effectively.
232. To meet these long term outcomes, a wide-ranging programme of reform is being taken forward, of which the Bill is just a part. Identifying the economic effect of these reforms in a complex system is a challenging exercise. This makes measuring the impact of specific reforms (or the aggregate effect) difficult, especially since the counterfactual position in the absence of those reforms cannot easily be established. However, using the theory of change, an externally procured scoping study will examine options for establishing a counterfactual such as modelling, in addition to options which can infer causality in the absence of a suitable counterfactual, for example theory-based approaches such as contribution analysis. Data will be drawn from published departmental statistics¹² including survey data (e.g. EHS, British Social Attitudes Survey) and MI data (e.g. Land Registry). It may be necessary to collect additional data to establish a baseline using bespoke surveys, interviews or user research.
233. Experience from previous large reform programmes, in particular, where there is a planning element, suggests that even once there is substantial compliance with the reformed system, which itself often takes some years, the full effect of those reforms will take between five and seven years to be observed. We can assume that the greater the scale of the reforms, the longer the duration of this reform lag as the time it takes for the reforms to be fully embedded and for this to influence decisions and market behaviour increases. Accordingly, it is expected that full evaluation of the programme's success will not be possible until the five to seven years have elapsed as none of the outcomes are going to change in a meaningful and measurable way until then.

¹ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics>

² <https://www.gov.uk/government/organisations/department-for-levelling-up-housing-and-communities/about/statistics>

234. DLUHC are planning to commission an evaluation scoping study for the planning reforms, prior to commissioning a full evaluation. The procurement for the scoping study will begin in July 2022, with commissioning of the full impact, process and VFM evaluation expected to begin in January 2023 and to continue to 2030 and beyond. The total budget for the evaluation is £2.8 million over the life of the programme. The scoping study will enable the department to develop detailed proposals for the monitoring and evaluation to provide formative evidence about the effectiveness of delivery mechanisms (process evaluation) and summative evidence demonstrating delivery against the intended outcomes and impact (impact evaluation). It will set out the recommended methodologies, metrics and indicators and other data requirements. The evaluation will provide a holistic evaluation of all the planning reforms combined as well as the individual elements that we intend to evaluate and assess impact against and will take place over a number of years. We expect the scoping study to address the suitability and feasibility of methodologies and data requirements to be able to address three groups of research questions that will be assessed by the evaluation:

1. Process evaluation and the effectiveness of implementation and delivery.
 - For example, how effective the process of designing policy and implementing the Bill has been
2. Impact evaluation and the assessment of impact (individual and/or cumulative)
 - For example, whether or not the measures lead to the long term outcomes in the programmes agreed theory of change
3. Value for money evaluation and the fiscal implications of the reforms
 - For example, whether the money that has been committed by HMT creates economic growth, as alluded to in the programme business case.

235. As we prepare for the evaluation, we welcome dialogue with academics, social researchers, and economists on the most effective approaches we should take in monitoring and evaluating.

236. DLUHC will monitor progress on the reforms using a combination of: metrics already gathered by the department; new metrics that are being created; and robust proxy measures. Based on the theory of change, key measures that will be monitored are likely to be:

- impacts of up-to-date and new style local plans on housing supply and growth
- impacts of digitalisation
- effects of increased certainty in plan making and decision taking
- land value capture
- development management process improvements
- increases in the level and diversity of engagement in the planning system and the community benefits
- use of discretionary regeneration and governance tools

237. Regular reports on progress will be submitted to senior officials on the individual and combined impacts.

238. We are developing research questions linked to key outcomes in the Theory of Change. The scoping study will explore appropriate and feasible methodologies to address these research questions.
239. For those measures which are outside of planning and regeneration, and therefore outside of the Government Major Projects Portfolio, a detailed evaluation has been planned by DLUHC as part of the development of the Levelling Up White Paper, which set out a transformative data and analysis strategy. The twelve Levelling-Up missions are underpinned by a suite of metrics to track and evaluate the impact of Levelling Up interventions. Within this, we will publish an annual report, taking stock of progress made in meeting our missions. The obligation to publish this report will be put into law. Metrics will also be used to monitor and evaluate levelling up policies and programmes.
240. It is the Department's objective to publish both the full evaluation report and any interim reports.

9. Potential trade implications

241. The built environment and construction sectors are crucial to the UK economy, employing over two million people and generating around 9% of the country's GDP; with construction alone employing 3.1 million people – 9% of the country's workforce. For this reason, it is critical that the sector is supported to grow domestically and become more productive, supported by trade and investment from overseas.
242. Many of the planning and regeneration measures contained in the Bill will help support a more effective trading environment. In particular, measures such as changes to local plans, faster and more predictable decision making, and increased transparency of land value capture will provide international investors, property developers or construction companies with increased certainty throughout the different stages of the planning process, making investing in UK land and development more attractive. We have understood anecdotally from international investors that the opacity of the English planning system – particularly when compared with more rules-based planning systems elsewhere – has affected their investment decisions, and so these changes which provide for clearer, simpler and more transparent procedures we expect to be welcomed. We do not expect the measures on the levelling up framework or devolution to have trade implications.
243. There are no measures in the Bill that we expect to have an adverse impact on international businesses when compared with domestic businesses.

10. Potential innovation implications

244. The planning system has yet to evolve and innovate into 21st century ways of working and grasp the concept of 'data as a public good'. The lack of raw data being easily accessible costs the whole system, from applicants (e.g., knowing what land constraints exist on their land) all the way through to the private sector (e.g., property developers not easily able to identify what can be built where). Our measures in the bill and wider data infrastructure work underpins the digital reforms, and by standardising and openly publishing this data

at source (e.g., through local authorities), we will be able to create data flows through the planning, housing and land ecosystems that will increase productivity and create more efficient processes.

245. We do not yet know the full extent of the benefits that high quality, open data can deliver across the private sector, however we expect that the changes we are making can go some way in supporting innovation and growth in an emerging market. The private technology sector has the capability to radically transform how citizens, businesses and government interact with services across housing, planning and land. The government's focus on interventions to ensure there is high-quality, accessible open data for reuse will result in a significant reduction in cost to businesses. For example, companies across the PropTech sector would no longer be reliant upon scraping data off local authorities websites, rather focusing their resources on delivering value-add modern, digital services to modernise the sector.
246. Access to open data will fuel the creation of a more diverse and resilient market offering which will lead to a number of benefits across the public and private sectors. More information on innovation benefits can be found in the digital sections of the impact assessment.

11. Small and micro business assessment

247. As set out earlier in this document, the measures that are likely to have direct business impacts (small, micro or otherwise) are those that change the planning regulatory framework or enable regeneration. Many of the measures in the bill have no direct impact on business as the impacts fall on the public sector (e.g., Local Planning Authorities). Furthermore, for some measures impacts are not felt until secondary legislation is delivered, and therefore, where necessary an assessment of the impacts of the measures to SMBs will be carried out at the secondary legislation stage through further impact assessments.

11.1 SMB sectors affected and number of SMBs in scope

248. There are many small and micro businesses (SMBs) who engage with the planning system at all stages from consultants to small builders, and it is highly likely that they will benefit from the reforms included in the Bill. The different types of SMBs involved in the planning system is not exclusive to but includes small builders, planning consultants, surveyors, architects, engineers and specialist consultants. The range of services these SMBs provide includes consultancies providing bespoke environmental, transport and engineering expertise, which takes the form of surveys, technical drawings and assessments, legal documents and others bespoke services that are used to support the preparation of planning applications. Our digital measures are broader and will affect property technology 'Prop Tech' firms; a new and growing market and sector in the UK. Many of the impacts on these different types of SMBs will be indirect due to the fact that much of this activity is sub-contracted (for example by developers) or will only bite once the secondary legislation is introduced following the Bill's passage.

249. In terms of SMBs, the Bill is expected to have the most significant direct impacts on SMB developers that submit planning applications, both for residential and non-residential developments. ONS data suggests that in England there are 39,340 developers of which 38,075 (97%) are 'micro' businesses (defined as having less than 10 employees) and 1,200 (3%) 'small' businesses (defined as having 10-49 employees)³. There are only 65 developers that can be classed as medium or large businesses. Not all these businesses would be putting in planning applications each year or be the main developer of a site as they may be sub-contractors or consultants. Where there are impacts on sub-contractors or consultants, these are indirect in most instances. These estimates can therefore be considered an upper range for the number of small and micro developers affected.
250. The latest planning data from DLUHC shows that for residential developments, small sites make up 89% of applications (where we class a small site as 1-9 units). For non-residential major/minor developments, minor applications which are also likely to be small sites make up 91% of applications⁴. We do not hold data on the number of units on non-residential applications.
251. Based on the above we can conclude that a high proportion of all planning applications (major/minor developments) are for small sites. Analysis of data from Glenigan suggests that small builders build out a high proportion of smaller sites for residential dwellings and therefore small builders are more likely to put in planning applications that are classified as minor residential⁵, and we would expect a similar pattern for non-residential developments. However, as noted above we have limited evidence on who the developers are for 'minor' and 'major' applications, meaning we are unable to robustly attribute the proportion of the benefits of these changes to small and micro businesses as defined by the Better Regulation Framework.
252. Whilst we are unable to estimate the market share of SMB developers according to definition using the number of employees set out in the Better Regulation Framework, for the residential sector it is possible to provide an estimated market share based on the number of completions per year, which is the commonly adopted definition used in the housebuilding industry. An alternative way to estimate the market share of SMBs is to make some simplifying assumptions on applications by SMBs for residential developments. For example, given that small developers tend to build out small sites, we could assume for simplicity that applications for sites 9 units and below are just by SMBs. Combining these two ways of estimating market share, our best estimate of the market share of small and micro developers that will be impacted by measures is around 9%-10%. This estimate of the market share of SMBs is subject to significant uncertainty but is our best estimate considering the evidence available. Further detail in estimating the market share of SMBs is explained below:
- For the 9% estimate, analysis of recent planning application data from Glenigan suggests that in the financial year 20/21, small sites (1-9 units) covered 79% of

³ ONS data on number of enterprises by employment size band. Developers defined by the Standard Industrial Classification (Revised 2007) 41110: 'Development of building projects'. 2021 data, <https://www.nomisweb.co.uk/>

⁴ Here we define a small site as "where the floorspace to be created is less than 1,000 square metres or where the site area is less than one hectare".

⁵ In the case of residential 1-9 units

permissioned residential sites, but only 9% of permissioned residential units. For this estimate we assume an equal drop out rate across developer size, meaning we assume a unit permissioned on a small site is as likely as one on a large site to result in construction rather than that permission lapsing. A key caveat with this approach is that not all small sites will be developed by SMBs. However, some sites above 9 units may also be developed by SMBs which are not captured in this estimate.

- For the 10% estimate, the Home Builders Federation estimates that around 10% of homes delivered are by small developers⁶ although as mentioned previously the definitions used here do not align with the definitions for small and micro businesses used by the Better Regulation Framework⁷.

253. The above range has been estimated for residential developments. We expect the market share for non-residential developments (e.g., commercial applications) to be similar as for residential development, although we do not have data to estimate the market share separately for non-residential developments. Therefore, the market share estimates for non-residential developments are subject to more uncertainty.

254. The pavement licensing measure will also impact SMBs in the food and beverage service activities sector (SIC 56), primarily; licensed restaurants, unlicensed restaurants and cafes, public houses and bars. For licensed restaurants, 97% of the 25,395 businesses are SMBs. For Unlicensed restaurants and cafes, 98% of the 20,645 businesses are SMBs. For Public houses and bars, 99% of the 25,275 businesses are SMBs.⁸

255. As for small or micro scale planning consultancies, this sector of the planning consultancy industry mostly works at a local level, providing consultancy services to developers assisting them to secure planning permission from authorities for their clients. We do not have data on the number of SMB planning consultancies as the ONS data doesn't go into this level of granularity. Impacts on planning consultancies are also considered to be indirect in many cases, for example where they are subcontracted by developers to provide planning related advice. Although in some cases there are direct familiarisation costs for planners working in consultancies in the private sector.

10.2 Impact on small and micro businesses

256. In this section the impact on SMBs is summarised for each measure. The annex to the impact assessment considers in more detail the potential impacts on SMBs for each measure.

257. The main impacts will be on SMB developers that submit planning applications. Most of the impacts from the bill are expected to have a positive impact on SMB developers. For example, we understand through user research that many users of the planning system experience (including small businesses and householders making applications) is

⁶ Home Builders Federation, State of Play Challenges and Opportunities Facing SME Home Builders, https://www.hbf.co.uk/documents/10553/HBF_Report_-_State_of_Play_Final.pdf HBF define small companies as those building 1-100 homes per year as explained in https://www.hbf.co.uk/documents/6879/HBF_SME_Report_2017_Web.pdf

⁷ The Better Regulation Framework defines small business as 10-49 employees and micro-business as 1-9 employees.

⁸ ONS: UK business: activity, size and location

accessing information for planning related matters. This affects SMBs much more than larger firms, as SMBs are less likely to have the resources to research and find the information they need. SMBs will benefit from proposals that will give them easier access to information, including clearer local plans (see below), wider use of design codes setting out design expectation and providing certainty, digital reforms and a revised Infrastructure Levy process meaning SMBs will no longer be disadvantaged in comparison to larger developers who have greater resource to assess and negotiate infrastructure contributions.

258. In this section we provide a summary of the impact on SMBs for each measure. Further details can be found in the annex.

Local Plans (Annex 1)

259. There are no direct impacts on SMBs that have been monetised from this measure. However, having up-to-date local plans in place will benefit all developers, including small or micro scale developers and planning consultancies, in part dealing with the barriers referenced by the HBF and FMB above.

1. The increased certainty to business (which includes SMBs) from increased Local Plan coverage is partly captured in Annex 4. A separate small and micro business assessment has been carried out in Annex 4 to capture this.
2. Having an up to date local plan provides small and micro scale developers with clarity, providing the planning policy framework so that they can bring forward developments (to enter the development market), because they will have more confidence that if they bring forward an appropriate development on sites identified, for example in Site Allocations set out in the plan, their proposed development should be granted planning permission and their application for development should move through the development management process smoothly.
3. As for the indirect impact on small or micro scale planning consultancies, this sector of the planning consultancy industry mostly works at a local level, providing consultancy services to small or micro developers assisting them to secure planning permission from authorities for their clients. So, in principle the benefits as illustrated which could accrue to small or micro scale developers would accrue to small and micro scale planning consultants who work with them. But at this moment in time, it is difficult to provide any evidence which could underpin this hypothesis.

Strategic Plans and Alignment Policy (Annex 2)

260. We do not expect there to be any direct impact on small and micro businesses from the changes to strategic plans. The impacts of these measures will only directly be felt by local authorities, mayoral combined authorities and the Planning Inspectorate which are all public sector organisations.

Neighbourhood Plans (Annex 3)

261. There is no direct impact on small and micro businesses. The parties involved in preparing a neighbourhood plan or priorities statement are the local planning authority and parish

and town councils or community groups. The indirect impacts mentioned above do not disproportionately impact on small and micro businesses. Where community groups seek to procure support to develop neighbourhood plans or priorities statements, these may be small or micro planning consultancies. However, we know that consultancies have offered their services pro bono for neighbourhood planning, so there may not be an income benefit.

Increased Certainty (Annex 4)

262. The reform of section 38(6) of the PCPA to include national development management policy and to give increased weight to both local and national policy will make the system simpler for small and micro businesses: they will not need to navigate extensive local policies, and where their development proposals accord with the plan and national policy, permission should be granted in a timely manner, reducing uncertainty and delay, and benefiting small and micro business planning. Planners working in SMBs will be required to familiarise themselves with these changes, but this will easily offset by the benefits to SMBs from increased certainty.
263. SMBs will benefit from all of the different monetised benefits to business outlined in Annex 4. These include a reduction in the cost of preparing planning applications for SMBs. There will also be a reduction in refusals from applications submitted by SMBs, which for example may lead to appeal under the counterfactual. Furthermore, the reduction in determination times by LPAs will benefit SMBs by reducing their cost of holding capital.
264. We expect small and microbusinesses to disproportionately benefit from these changes. To illustrate this, we estimate that of the £2,276.6m direct benefit to business, £1,266.2m of the benefits from this measure will be for minor residential/commercial development. Using the same simplifying assumption above where we assume that minor applications are just submitted by SMBs, we can estimate that 56% of the direct benefits are for SMBs. Since this estimate is higher than the estimated market share for SMBs (9%-10%), we can therefore conclude that SMBs disproportionately benefit from this measure. When considering all benefits from this measure (direct and indirect), 46% of the benefits are estimated to be for minor developments (and therefore for SMBs using the same simplifying assumption). Whilst we haven't been able to estimate the share of familiarisation costs to SMBs from this measure due to limited data availability, the estimated benefits to SMBs far outweigh any familiarisation costs to SMBs. Having regard to the RPC guidance for Small and Micro Business Assessment, there would therefore be no proportionate burdens on small and micro businesses, and therefore mitigation will not be required.

Development Management Process Improvements (Annex 5)

265. National planning policy will continue to inform the preparation of plans and the development management process. A clear set of national development management policies, coupled with reformed and more up-to-date local plans which focus on site and locally specific considerations will create a clearer and more certain framework for SMBs to develop. Aside from the improved information these changes will bring, SMBs will have more confidence that if they bring forward an appropriate development on sites identified

in the plan, their proposed development should be granted planning permission. The exact impacts on SMBs will be determined as part of secondary legislation and the development of national development management policy.

266. The development management reforms, enabled in the Bill, will benefit SMB developers and householders primarily through the introduction of digital platforms for applicants. For example, the digital powers and information powers will enable more proportionate requirements for information to accompany applications, simplifying the process, and enable more certain determination timeframes. In addition, the proposals for national development management policies will limit duplication in plans creating a more streamlined list of policies and expectations for applicants to understand. This will save both the time and cost involved with submitting a planning application.

Crown Developments (Annex 6)

267. The new route to permission will only directly benefit the Crown and have no direct impact on small and micro businesses.

Planning Enforcement (Annex 7)

268. We do not expect there to be any direct impacts on SMBs. Businesses will face increased costs for non-compliance with planning legislation. However, these additional costs are avoidable if businesses comply with planning rules.
269. Where a small or micro business has intentionally undertaken unauthorised development, they could have avoided any impact by going through the proper planning process and therefore, exemptions or mitigations would not be appropriate.

Digital (Annex 8)

270. Reforms to increase the use of digital technology in the planning system will have a particularly beneficial impact for small and micro businesses in the technology space. According to Future Markets Insight research, the 2019 UK PropTech sector is worth an estimated £6 billion, with 10% of global investment made in the UK market⁹. These SMBs bolster wider economic output and business activity as more than 70% of them operate business to business (B2B)¹⁰. With planning information currently locked away in PDFs and documents, a lack of access to raw data is limiting both digital innovation and fuelling information asymmetries. New rules on data should also help create a diverse digital market offering a range of data-driven tools and services, such as those provided by the PropTech sector. Secondary legislation will follow the primary, and this will set out in more detail the expectations on organisations with regard to the data here may be some effects of secondary legislation that follows. We will assess the impacts of this secondary legislation on SMBs prior to its introduction, when the scope of data standardisation is known.

⁹ <https://www.forbes.com/sites/garybarker/2019/12/16/is-proptech-about-to-have-its-man-on-the-moon-moment/>

¹⁰ <https://www.unissu.com/proptech-resources/proptech-in-the-uk>

Design Standards (Annex 9)

271. SMB developers may benefit from greater clarity and certainty about design expectations and potential savings of time and cost in the planning and development process. There may be costs to developers, including SMBs, because of the new requirements for higher design standards. However, previous studies have explored the value that well-designed schemes can bring to developers and that increased developer costs may be partly offset by increases in the value of schemes and adjustments to land values over time in most markets.
272. SMBs are expected to benefit from being well-placed to deliver design quality through design codes, as many already typically rely on delivering premium products informed by local views. Although there will be additional costs associated with the familiarisation of staff on design codes, there may therefore be a disproportionate benefit for SMB housebuilders in terms of these costs, due to the expected focus of SMBs on delivering locally driven premium products, and already have in place in-house design skills.
273. Increasing place-making policy requirements may reduce the permissibility of standard 'anywhere' house types and place products and may therefore potentially unlock barriers to the land markets to SMB developers previously dominated by the larger firms by creating more competition in the market.
274. SMB consultants may benefit from the greater need for the services of planning consultancies to assist local planning authorities to produce local design codes, but this is a second round or indirect impact.
275. SMB businesses also may benefit from the greater certainty about the approach to commercial development, such as through encouraging a mix of uses/activities where appropriate.
276. We therefore expect that whilst there may be increased costs, it will likely be proportionally less for SMBs than large developers for the reasons stated above. There may also be benefits for MBs as the increased and widespread use of design codes may open up new land markets for SMB developers, increase the need for planning consultancy services to assist in the production of local codes and provide greater certainty to SMBs about the approach to commercial development.

Heritage (Annex 10)

277. SMBs will not be disproportionately impacted by the standardisation of Historic Environment Registers and wider heritage planning reforms. SMBs will benefit through better information on the historic environment leading to simpler or more efficient planning applications. The overall benefit is likely to be relatively small per business and not disproportionately benefit SMBs. Given that only c.10 Building Preservation Notices (BPNs) are served each year, the removal of the liability for compensation is unlikely to impact SMBs. Temporary Stop Notices and Urgent Work Notices are avoidable to all

businesses, including SMBs, by following the requirements of the established planning system.

Infrastructure Planning (Annex 11)

278. We do not expect there to be direct impacts on SMBs from this measure. Bodies likely to be subject to the power are either publicly owner, or large private businesses e.g. utilities.

Infrastructure Levy (Annex 12)

279. Overall, the proposed Infrastructure Levy is expected to make the system of developer contributions clearer and more transparent, making it easier for SMBs to navigate than the current s106/CIL system by removing the need for negotiations and requiring contributions upon completion rather than commencement. As well as that, all developers within a particular area will be subject to the same Levy rates and thresholds that are not subject to negotiation.

280. The Infrastructure Levy may cause additional burdens for SMBs working within areas where CIL is currently not charged (~50% of Local Authorities) in terms of new resources and skills required when transitioning to the new Levy system. However, such SMBs would likely be familiar with the existing s106 process, which is a system that can create delay, cost, and inconsistency to the planning process, and the transition to a more streamlined system that removes the negotiation associated with s106 should mitigate against this concern.

Environmental Outcomes Reports (Annex 13)

281. Given that environmental assessment is for significant plans and projects, this is likely to have limited impact on SMBs as smaller scale development will not usually require assessment. A key aspiration is to improve the uncertainty associated with the screening stage of the process by providing clearer parameters on what requires assessment and what does not. This will have a positive impact, particularly for borderline smaller scale schemes that are often unnecessarily screened-in for assessment due to over precautionary decision making. This will improve the overall burden and cost for SMB schemes that currently are screened into the assessment process unnecessarily.

282. The impacts on SMBs will be formally assessed when the details of the proposal set out in secondary legislation are confirmed and when there is more certainty as to which schemes will be in scope.

Compulsory Purchase Orders (Annex 14)

283. There are not expected to be any changes in the impact for SMBs, the measures are generic changes to the process that will not disproportionately impact SMBs

284. Compulsory purchase can indirectly affect any SMBs but equally can benefit SMBs through regeneration and the creation of opportunities. The changes that are being made to compulsory purchase mainly relate to the process of determining whether a compulsory

purchase order should be confirmed and that is a process which applies universally to all affected parties in order to protect affected parties' interests and ensure that the case for compulsory purchase is justified. As the process is built to protect affected parties there is no case for exemptions for SMBs arising from these changes.

High Street Rental Auctions (Annex 15)

285. We expect the introduction of this measure to have a direct impact on SMBs from familiarisation costs. There would be indirect impacts where a local authority uses the powers the Bill grants them. The aim is to make town centre tenancies more accessible to SMBs by allowing for market rate bids at lower levels.

Urban Development Corporations (Annex 16)

286. We do not consider that the reforms to the development corporation legal framework will have a direct impact on SMBs. The reforms proposed relate to ensuring the appropriate powers to support transformational regeneration and growth are up to date. Any indirect impact is expected to be positive and minor, similar to general business impact.

Build-out (Annex 17)

287. Data from the UK Housebuilders Directory estimate that 2,280 business will be affected by this measure. However, slow build out is usually an issue associated with large or volume developers rather than small builders, who need to break ground quickly given their limited resources, therefore the measure is much more likely to impact large businesses¹¹.

Development Commencement Notices

288. DCNs would create a small additional burden on SMBs to provide additional information to LPAs. There is no information required that would not already be available to the developer building out a scheme and therefore no additional information burden. Consequently, the only additional burden it would add are those involved in filling and sending in a simple electronic form. This is not considered to have a materially detrimental impact on SMBs.

Completion Notices

289. Completion notices are expected to be rarely used and remain a last resort for incentivising delivery of permission once all other alternatives have been exhausted. However, completion notices are mainly issued on small sites. Therefore, small scale developers and landowners are likely to be affected more than large scale developers despite completion notices remaining a last resort for Local Planning Authorities.

Pavement Licences (Annex 18)

290. This is a deregulatory measure which is expected to make it simpler and cheaper for all businesses, including SMBs, to get a licence to place furniture on a relevant highway for

¹¹ Federation of Master Builders, Small sites and small builders will build homes faster, March 2018, <https://www.fmb.org.uk/resource/small-sites-and-small-builders-will-build-homes-faster.html>

outdoor dining and drinking. SMBs will the same benefit as other businesses, which are cost savings in reduced application fee and decisions in faster timescales.

291. Small and micro businesses (SMBs) who will be impacted by this measure are within the food and beverage service activities sector (SIC 56), primarily; licensed restaurants, unlicensed restaurants and cafes, public houses and bars.
292. For licensed restaurants, 97% of the 25,395 businesses are SMBs. For Unlicensed restaurants and cafes, 98% of the 20,645 businesses are SMBs. For Public houses and bars, 99% of the 25,275 businesses are SMBs.

Relief from Enforcement of Planning Conditions (Annex 19)

293. There will be no disproportionate impact on SMBs. These measures will apply to all planning permissions with relevant planning conditions, which will include SMBs. This will mean that SMBs will also benefit from increased certainty that enforcement measures will not be taken for breaches of relevant planning conditions during a specified period of relief.
294. These measures will provide greater certainty to SMBs and support how they can respond to periods of disruption and also help address issues of an asymmetrical market, where larger businesses may be better able to respond to periods of disruption without these additional planning flexibilities.

Summary of impacts on SMBs

295. The reforms will increase certainty and reduce costs for SMBs in planning decisions. The planning system will be made simpler and SMBs will not be required to navigate the current complex policy framework and carry the same high risk of refusal (with associated costs).
296. Overall, the regeneration reforms will make the planning system simpler and easier for SMBs to navigate, giving them access to more information that is currently only attainable by larger developers who have greater resources. Where possible negative impacts on SMBs have been identified, and government policy is to mitigate these impacts where possible. These mitigations have been set out in the respective annexes of this impact assessment.

10.3 Mitigating the impact on small and micro businesses

297. Based on the burdens on SMBs set out above, there are mitigations that DLUHC will be taking to help ease the pressure on all those affected, including SMBs. This section focuses on measures where there are direct impacts on business. Further details are set out in the annex to the impact assessment for individual measures.

Increased certainty in planning decisions (Annex 4)

298. As set out above, the increased certainty measures have no disproportionate burdens on small and micro businesses. Rather the impact is expected to be positive for business, and we expect the impacts to be even more significant to small and micro businesses who

suffer more from delays in the current system because they do not have the resources to withstand longer timeframes, according to the Home Builders Federation and the Federation of Master Builders. Therefore, no mitigation is required.

Design Standards (Annex 9)

299. The Department are undertaking design code pilots to help gain further insight into how Local Planning Authorities engage with developers and SMBs in creating design codes. Further engagement with sector is ongoing, with a series of workshops on specific issues and 25 pilot programmes arranged, which will help identify impacts and help mitigate any future potential impacts on SMBs.

Infrastructure Planning (Annex 11)

300. There are no mitigations for this measure as the impacts are primarily on large scale infrastructure provides (public and private) and these bodies are not SMBs. Moreover, any minor possible impacts arising from wider impacts are likely to be positive.

Infrastructure Levy (Annex 12)

301. Through regulations, it will be possible to introduce reduced rates and exemptions reflecting those in the existing system (such as the small sites threshold) to support SMB housebuilders which will act as a significant mitigation. We intend to consult on whether such thresholds should be introduced, but if SMBs are found to be disproportionately impacted by the IL then reduced rates or exemptions could be applied to mitigate this risk.

302. We will also introduce the Infrastructure Levy through a phased 'test and learn' approach across several local authorities. This will be used to understand, monitor, and evaluate the Levy's overall operational impacts on affected stakeholders and users of the system, including on small and micro businesses.

Build Out (Annex 17)

303. Guidance will be issued to support the use of completion notices to make sure that they are only employed where appropriate, recognising the challenges that small builders face relative to larger developers and that commencement notices are typically used on smaller sites.

Pavement licensing (Annex 18)

304. The pavement licences policy is a deregulatory measure which will support both SMBs and other businesses so mitigation is not required. In designing the policy DLUHC considered reducing the fee cap for SMBs and offsetting this by setting a higher fee cap for other businesses. However, applying lower fixed caps for SMBs and higher for other businesses would likely generate additional costs to some local authorities where there are high numbers of SMBs. Therefore, it was not considered a viable mitigation.

305. The department has taken into consideration potential mitigations according to RPC guidance on Small and Micro Business Assessment guidance¹². The mitigations that are detailed in the above are further supported by wider changes below which will affect all affected stakeholders - not just SMBs. These include:

- **Transition period** – DLUHC will provide businesses with an appropriate period to adjust into the new measures prescribed in this bill. Timings are not fixed the implementation of this legislation is likely to commence no earlier than one year after royal ascent. The bill has been introduced to parliament and during this period business will be able to review the legislation itself.
- **Information** – DLUHC have produced multiple publications in the form of the Levelling Up White Paper and the Government's 2020 White Paper 'Planning for the Future', which received 40,000 responses. This has provided the opportunity for Small and Micro Businesses to engage and consult in these proposals, as well as provide the information to regarding the proposals. Further detailed information of these measures will be provided to Local Authorities and the Planning Inspectorate, for implementation of these measures that will enable them to comply with these legislative changes.

306. It should be noted that the analysis provided in this Small and Micro Businesses included in this Impact Assessment is indicative, it will be updated and amended accordingly in subsequent publications and secondary legislation. The list of mitigation measures detailed above are not final. DLUHC will ensure that any mitigations, commensurate to any disproportionate impacts on Small and Micro Businesses by this legislation will be considered in subsequent Impact Assessment processes, before any of the measures are implemented.

10.4 Rationale for non-exclusion of small and micro businesses

307. As stated above, our best estimate of the market share of small and micro developers that will be impacted by the measures in the bill is 9%-10%. These small and micro businesses are critical to delivery of homes and development in areas where land value is lower, or on smaller sites, including brownfield land in town centres. They are more nimble, tend to be more innovative and these things enable them to deliver on sites that are overlooked. However, they typically do not have the resources to ride out delays in planning processes; small developers delivered around 40% of new homes in 1988 compared to around 10% in 2020¹³.

308. The Bill has a range of impacts, as set out in this assessment, though repeated throughout are impacts on certainty and information accessibility. These two impacts are of particular benefit to SMBs developers: The Home Builders Federation site delays in planning as a major barrier to SMBs¹⁴, whilst the Federation of Master Builders found that 61% of SME

12 Regulatory Policy Committee, Small and Micro Business Assessments: guidance for departments, with case history examples, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/827960/RPC_Small_and_Micro_Business_Assessment_SaMBA_August_2019.pdf

13 Home Builders Federation, State of Play, Challenges and Opportunities Facing SME Home Builders, https://www.hbf.co.uk/documents/10555/HBF_Report_State_of_Play_FINAL_V2.pdf

14 Home Builders Federation, State of Play: Challenges and Opportunities Facing SME Home Builders, https://www.hbf.co.uk/documents/10553/HBF_Report_State_of_Play_Final.pdf

housebuilders said the planning system (overall) was their main barrier to building more homes in 2021 and has been in the top three concerns in every year since 2013¹⁵. In addition, when considering the overall impacts from the measures in the bill, the combination of measures applied to different planning and regeneration processes will support SMBs. Whilst there will be familiarisation costs for small and micro businesses, government will ensure that these risks are mitigated through the publication of planning guidance and other supporting documentation as part of the implementation of the system.

309. The main monetised benefit to SMBs is from increased certainty (Annex 4). As discussed above, after making some simplifying assumptions we estimate that 56% of the direct benefits to business from Annex 4 will go to SMBs, which means in total an estimated direct benefit to SMBs of £1,266.2m. We can therefore conclude that a significant proportion of the benefits to business from the bill go to SMBs. Whilst some measures will impose direct costs on SMBs (e.g., familiarisation costs), we expect that there will be net positive impacts on SMBs due to the significant benefits to SMBs expected.
310. In addition, there are two further measures that we expect to have a positive impact on SMBs: digital reforms, which will support the making of a market based on new and better access to data, supporting innovation in Property Technology (see Chapter 11 on innovation effects), and High Street Rental Auctions, which if used, will enable small businesses (including retailers, hospitality and a range of other high street businesses) to have greater access to commercial space that may have otherwise been out of reach for them.
311. Therefore, the overall rationale for non-exclusion of SMBs is based on the interconnectivity of the various measures in this bill and the combination of benefits they provide for SMBs.

15 Federation of Master Builders, House Builders' Survey 2021, <https://www.fmb.org.uk/resource/house-builders-survey-2021.html>

11. Conclusion

312. This Impact Assessment provides an overview of the anticipated quantitative and qualitative impacts of relevant Bill measures. The impacts of the Bill are quantified through measures implemented through primary legislation only, and only to the extent that it is possible and proportionate to do so at this stage. Many of the measures in the Bill require supporting secondary legislation to set out more fully how they will operate, which imposes limits on how fully the potential impacts can be assessed at this stage.
313. The total benefits from the Bill are estimated at £3309.0m, whilst the total costs £1753.6m over the ten year appraisal period, which implies an overall positive impact on society equivalent to £1,555.5m (2024 PV, 2019 prices). The majority of the measures set out in this Bill mainly affect the powers given to local planning authorities, although some of the measures have an impact on businesses.
314. The total monetised benefits from all measures is split between £2,923.1m for businesses and £385.9m to the public sector. The total monetised costs are split approximately between £769.1m to business and £984.5m to public sector. This implies there is a net benefit of £2154.0m for businesses and a £598.6m net cost to the public sector (2019 prices, 2024 present value).

12. List of Annexes

Improving plan-making:

Annex 1: Statement of Impacts - Local Plans

Annex 2: Statement of Impacts - Strategic Plans and Alignment Policy

Annex 3: Statement of Impacts - Neighbourhood Plans

Improving decision-making:

Annex 4: Statement of Impacts - Increasing certainty in planning decisions /Decision taking duties

Annex 5: Statement of Impacts - Development Management Process Improvements

Annex 6: Statement of Impacts - Urgent Crown Developments

Annex 7: Statement of Impacts - Planning Enforcement

Annex 8: Statement of Impacts - Digital

Improving incentives, infrastructure and quality:

Annex 9: Statement of Impacts - Design Standards

Annex 10: Statement of Impacts - Heritage

Annex 11: Statement of Impacts - Infrastructure Planning

Annex 12: Statement of Impacts - Infrastructure Levy (non-taxation impacts)

Annex 13 Statement of Impacts - Environmental Outcomes Reports

Supporting regeneration and delivery:

Annex 14: Statement of Impacts - Compulsory Purchase Orders

Annex 15: Statement of Impacts - High Street Rental Auctions

Annex 16: Statement of Impacts - Urban Development Corporations

Annex 17: Statement of Impacts - Build-out

Annex 18: Statement of Impacts - Pavement Licencing

Annex 19: Statement of Impacts - Relief from Enforcement of Planning Conditions