

Housing and planning delivery grant (HPDG)

Consultation on allocation mechanism for year 2
and year 3



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May 2009

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Summary of consultation

Scope of the consultation

Topic of this consultation:	<p>This consultation seeks views on changes to the allocation mechanism for years 2 and 3 of the housing and planning delivery grant (HPDG). This follows our commitment to monitor the housing market and the impact of the grant in year 1 and make any changes necessary to ensure it remains an effective incentive over the three year grant period.</p>
Scope of this consultation:	<p>This consultation sets out the details and rationale of the proposed allocation mechanism and how the reforms sit within the wider context of supporting economic recovery. It seeks views from interested parties on the proposals to inform the final allocation mechanism.</p>
Geographical scope:	<p>This consultation applies to England only.</p>
Impact Assessment:	<p>An impact assessment was undertaken on the original HPDG allocation mechanism. The consultation puts forward minor amendments to the existing mechanism and therefore would not materially affect the existing impact assessment. However, following consultation, if it is necessary to update the final impact assessment we will do so when we publish our response to the consultation.</p>

Basic Information

To:	Local authorities
Body/bodies responsible for the consultation:	Planning Delivery and Performance Division – CLG
Duration:	12 May 2009–23 June 2009
Enquiries:	Via Julian Wheeler Julian.wheeler@communities.gov.gsi.uk; 020 7944 5790 Eland House Bressenden Place London SW1E 5DU
How to respond:	Via Julian Wheeler at: julian.wheeler@communities.gsi.gov.uk Or by post to: Department for Communities and Local Government Eland House Bressenden Place London SW1E 5DU
Additional ways to become involved:	As this is a largely technical issue with specialist interests following discussions with those affected, this will be a purely written exercise.
After the consultation:	A response to the consultation setting out revised proposals will be published in summer 2009.

<p>Compliance with the Code of Practice on Consultation:</p>	<p>The Government has adopted a code of practice on consultations. The criteria below apply to all UK national public consultations on the basis of a document in electronic or printed form. They will often be relevant to other sorts of consultation.</p> <p>Though they have no legal force, and cannot prevail over statutory or other mandatory external requirements (e.g. under European Community Law), they should otherwise generally be regarded as binding on UK departments and their agencies, unless Ministers conclude that exceptional circumstances require a departure.</p> <ul style="list-style-type: none"> • Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy. • Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses. • Ensure that your consultation is clear, concise and widely accessible. • Give feedback regarding the responses received and how the consultation process influenced the policy. • Monitor your department's effectiveness at consultation, including through the use of a designated consultation co-ordinator. • Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate. <p>The full consultation code may be viewed at: www.cabinet-office.gov.uk/regulation/Consultation/Introduction.htm</p> <p>Are you satisfied that this consultation has followed these criteria? If not, or you have any other observations about ways of improving the consultation process please contact:</p> <p>Communities and Local Government Consultation Co-ordinator Zone 6/H10 Eland House London SW1E 5DU or by e-mail to consultationcoordinator@communities.gsi.gov.uk.</p>
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Background

<p>Getting to this stage:</p>	<p>A consultation on the allocation mechanism for HPDG was launched in October 2007 and the Government set out the detailed proposals and responses to the consultation on 16 July 2008. In November 2008 year 1 allocations totalling £101m for 2008-09 were finalised. This announcement can be found on the Department's website http://www.communities.gov.uk/statements/corporate/housingplanninggrant</p>
<p>Previous engagement:</p>	<p>There was a public consultation on both the principles and the allocation mechanism for HPDG prior to the launch of the grant scheme in 2008.</p>

Part A: Introduction

This part of the consultation document gives context for the proposed allocation mechanism in Part B. It recaps on the original rationale for the grant, the current allocation mechanism, and how the reforms sit within the wider context of supporting economic recovery.

Aim

1. The overall aim of the housing and planning delivery grant (HPDG) is to *incentivise local authorities to improve delivery of housing and other planning outcomes* as part of their strategic, place shaping role and to provide more support to communities and local councils who are doing their bit to deliver new homes. It supports the delivery of the national target of delivering 240,000 new homes per year by 2016.

Background

2. HPDG derives from claims by local authorities that growth was inadequately recognised by the local government finance system, as set out by Kate Barker in her *Review of Housing Supply* (2004). The decision to accept Barker's recommendation for an incentive scheme to raise delivery was underscored by the Lyons Inquiry into Local Government (2007, Chapter 9), which identified the need for an incentive with enough weight to change local government behaviours and receive reward for allowing their area to develop and grow.
3. The principles of HPDG are to:
 - strengthen the incentive for local authorities to respond to local housing pressures by returning the benefits of growth to communities; and
 - incentivise efficient and effective planning procedures
4. A consultation on the allocation mechanism for HPDG was launched in October 2007 and the Government set out the detailed proposals and responses to the consultation on 16 July 2008. In November 2008 year 1 allocations totalling £101m for 2008-09 were finalised. This announcement can be found on the Department's website <http://www.communities.gov.uk/statements/corporate/housingplanninggrant>

Context

5. In recent years, the housebuilding industry has responded well to the challenge of increasing housing supply, with delivery in 2007-08 reaching 207,500 additional homes – an increase of 59 per cent compared with 130,000 in 2001-02. This is the highest rate of housing supply since 1977. However, in the short-term, there are undoubtedly challenges to overcome with global economic and credit supply conditions impacting on the UK market. These tough market conditions will affect housing supply; we are already seeing significant fall-offs in private sector start rates. The downturn is also having significant implications for the delivery of affordable housing. Government is responding to the short-term market conditions by introducing measures to help the wholesale market function smoothly again and to support those worst affected by the downturn.
6. But the fundamental need remains – to respond to the long-term increasing demand for homes. Despite falling house prices and sales long-term pressures on housing supply and affordability remain. Our population continues to grow and age; and people are increasingly choosing to live alone, as a result household numbers continue to increase. When access to credit returns a lack of supply will exacerbate the housing pressures.
7. Government is therefore pressing ahead with the reforms needed to focus on the long-term and condition the market and industry for growth, including re-packaging surplus public sector sites and ensuring better infrastructure co-ordination. We remain committed to influencing the planning system to ensure that it is responsive to our housing supply, and to using the local government performance framework and financial incentives to encourage local authorities to strive to achieve growth.
8. Local planning authorities have a crucial role in maintaining momentum on securing additional homes. Having a five year supply of **deliverable** land for housing is vital to securing as much house building as possible during the downturn, and ensuring that there is sufficient supply of land for housing development upon the upturn. Additionally, development plan documents make a vital contribution to both housing supply and economic recovery, ensuring local authorities and developers have the clarity and certainty needed to bring forward development.

Current allocation mechanism

9. The housing element currently goes to all local authorities with net additional housing completions above 0.75 per cent of their existing housing stock. The data is taken from a rolling average of the previous three years. For each net addition above the threshold, the local

authority receives one unit of housing grant. The amount per unit is calculated by the total amount of money for the year divided by the total number of units above the threshold.

10. The planning element of the grant is based upon the local authority completing a range of activities that support housing supply:
 - demonstrating sufficient land for housing in line with *Planning Policy Statement 3 (PPS3) Housing*
 - delivery of core strategies and development plan documents (DPDs) allocating more than 2,000 dwellings
 - joint working on the production of development plan documents
 - publication of a strategic housing market assessment (SHMA); and
 - development control performance
11. Full details of the current allocation mechanism are set out in *Housing and Planning Delivery Grant: Allocation Mechanism and Summary of Consultation Responses* (July 2008). This can be found on the Department's website <http://www.communities.gov.uk/publications/housing/allocationsummaryresponses>

HPDG review

12. In both the July consultation response, and the announcement of year 1 allocations in November, we announced our commitment to monitor both the housing market and the impact of HPDG and make any changes necessary to ensure it remains an effective incentive over the three year grant period.
13. The quantum of funding available for HPDG was set in the context of a very strong housing market. The trajectory announced as part of the 2007 spending review would see a steeply rising profile of funding in line with our expectation that net additional homes would continue to rise significantly year on year. Given the changed economic circumstances we have taken the opportunity to review the position and make some hard choices about our priorities. In conclusion, we have scaled back the increase in HPDG by £25m in year 2 and £50m in year 3 to reflect the decline in housing completions and the lower number of plans being submitted. The baseline of HPDG is still increasing significantly so the effect of this change is that HPDG funding will double from £100m in year 1 to £200m in year 3. We will continue to keep these issues under review.

Revised funding profile

14. The revised profile of funding is below:

Funding over the CSR07 period

Year	Planning	Housing	Total
1	£60m	£40m	£100m
2	£60m	£75m	£135m
3	£60m	£140m	£200m
Total	£180m	£255m	£435m

15. The Government remains committed to the short and long term objective of increased housing supply by continuing to reward local planning authorities for plan making and associated housing outputs.
16. In order to recover quickly from the current downturn, sufficient land needs to be in the planning pipeline so that the house building industry can respond to an increase in demand. Local authorities therefore have a key role to play in laying the foundations for recovery and improving the affordability of housing. This is vital because of growing pressures on the demand side. The number of households in England is expected to grow on average by 252,000 per annum up to 2031; and the housing stock has not been keeping pace, particularly during the downturn. These factors combined indicate that we need to plan for recovery now in order to meet rising demand for housing.

Evaluation and data checks

17. Once we have agreed the allocation mechanism we will publish provisional allocations for each local planning authority. These will detail what figures we have used to give authorities an opportunity to verify our data.
18. As part of the increased focus on land supply, CLG will build on checks undertaken in Year 1 of the grant to establish best practice. We are circulating with this consultation document the results of selective checks on 50 local authorities, which should be required reading for all authorities who want to secure money in Year 2 and 3. A copy of 'Land Supply Assessment Checks' can also be found on our website under the planning/PPS3 section. In particular, authorities will want to have regard to the findings on establishing the deliverability of sites in Chapter 6 of the report.

19. To support Year 2 payments, CLG intends to carry out further selective checks of local authorities' land supply information in line with the criteria set out in PPS3 and Appendix 4 of the report.
20. In both years, the Secretary of State reserves the right to withhold money if she has concerns about whether the information relating to a local authority is fraudulent, erroneous, inaccurate, incomplete or compiled in error.
21. We will continue to monitor the effectiveness of HPDG and remain alert to any unintended consequences.

Part B: The Grant

22. Allocations will continue to be paid to local planning authorities to which grant has been awarded. In two tier areas, counties will be eligible for some of the plan making element as related to minerals and waste core strategies. This is important in ensuring a strong and direct link between local authority housing delivery and the incentive grant. HPDG will also continue to be paid as a specific grant under section 31 of the Local Government Act (2003).

Summary of reforms

Fig. 1

Key reforms being proposed are:

- to retain the current allocation mechanism for the housing element of the grant in year 2 and to reduce the threshold of net additional homes from 0.75 to 0.65 in year 3
- to introduce additional eligibility requirements for demonstrating land for housing and to increase the percentage of the planning element awarded for demonstrating land for housing in year 2
- to reassign the funding for SHMAs to the land supply element in year 3.

Housing element

23. The housing element of the grant will continue to reward local authorities for net additional homes above the threshold. There are no reforms proposed for year 2 of the grant, but in recognition of the challenging circumstances in the current housing market we are proposing a minor tweak to the allocation mechanism in year 3.
24. Year 2 grants are calculated on the basis of average net additions from 2005-06 to 2007-08. During this period house building was largely sustained and the number of eligible authorities is expected to remain broadly the same. With this in mind the Government is not proposing to make any changes to the allocation mechanism in year 2.
25. Year 3 grants are calculated on the basis of average net additions from 2006-07 to 2008-09. Current estimates suggest that house supply numbers will be significantly less in 2008-09. In order to recognise the more challenging conditions in the housing market, the government is proposing to reduce the threshold from 0.75 to 0.65. This will go some way to ensuring fairness and equity across the board.

26. Despite the downturn, there is still a mismatch between housing supply and the expected growth in the number of households. We therefore remain committed to the short and long term objective of increased housing supply and maintaining the focus of the grant on outcomes.

Q1 Do you agree with the Government's decision not to make any changes to the scheme in year 2 and to reduce the threshold from 0.75 to 0.65 in year 3?

Fig. 2 – Year 3
<p>How the housing element will be allocated <i>(figures illustrative only)</i></p>
<p>All authorities Number of homes applicable for grant = total delivery above floor = 40,000 Unit grant = £140m/40,000 = £3,500</p>
<p>Authority A Delivers 1000 net additional homes (or 1.00% of existing stock) Existing stock = 100,000 Delivery floor (0.65% of stock) = 650 Number of homes applicable for grant = total delivery above floor = 350 Grant = 350 x unit grant = £1,225,000</p>
<p>Authority B Delivers 350 net additional homes (or 0.88% of existing stock) Existing stock = 40,000 Delivery floor (0.65% of stock) = 260 Number of homes applicable for grant = total delivery above floor = 90 Grant = 90 x unit grant = £315,000</p>

Planning element

27. The planning element will continue to reward local authority performance in plan-making across the original four elements. However, we propose a number of minor reforms in year 2 to ensure the allocation mechanism provides incentives for actions which will enable local authorities to respond positively and effectively to the economic downturn. We are also putting in place the conditions which will enable housing supply to come back quicker and further when the upturn comes. In year 3 there will be further reforms to ensure continued progress.

Part 1 – Demonstrating sufficient land for housing in line with PPS3

28. The Government believes that the approach to land supply in Planning Policy Statement 3 (PPS3) remains vitally important and that local authorities must identify a supply of land that is (a) deliverable over the first five years, and (b) developable from years six to 15.
29. As PPS3 makes clear, local authorities have a key role to play in the delivery of housing and in planning for the recovery. The long-run demand for housing is very strong and, without sufficient land in the pipeline these demand pressures will soon translate into a further round of affordability problems. This means increasing the supply of land in response to changes in demand and considering the viability of sites under different economic conditions.
30. PPS3 sets out very clearly the need for LAs to identify 15 years of land for housing, via the strategic housing land availability assessment (SHLAA), of which five years should be deliverable. Deliverability is defined in terms of availability, suitability and achievability – the latter meaning there is a reasonable prospect that housing will be delivered on the site within five years. The policy says that local authorities also need to have regard to changing market conditions when assessing achievability.
31. PPS3 also makes clear that once identified, the supply of land should be managed to ensure that a continuous supply of deliverable sites is maintained. It specifically requires local authorities to undertake risk assessment, scenario planning and contingency planning in the event that delivery does not occur at the rate previously expected.
32. A programme of selective checks of five year land supply assessments in year one of HPDG commissioned by Communities and Local Government and due to be published shortly, raises concerns that the approach to assessing the deliverability of the five year supply in some places does not provide enough confidence in the land supply position. There seems to be a lack of engagement with developers, house builders and landowners – especially on the larger strategic sites – that is vital to providing the necessary confidence.
33. We therefore propose to focus the reward on the identification of a five year supply of deliverable sites, and partnership working through the SHLAAs, as the principal way of ensuring confidence in the land supply position.
34. Grant in year 2 will continue to reward identification of a deliverable five year supply of land, with an enhanced reward for completion of a SHLAA (1.5x the normal award), but with an additional bonus (1.75x the normal award) if the SHLAA is published and has the involvement of a housing market partnership (as set out in guidance).

35. Every authority claiming grant for their housing market partnership (HMP) must submit details and confirmation of the involvement of the partnership. We propose that, as a minimum, a senior employee of a developer who is active in the area must be part of the partnership.
36. In year 3, we propose that local authorities will only receive a reward for a published SHLAA and where they can maintain a five year supply of deliverable sites for housing – and only where the SHLAA and update of the five year land supply position has had the involvement of the HMP.
37. Local authorities have an important role to play, through the above, not only to identify and allocate land, but also to review the current supply and judge whether the release of additional sites, or other measures, may encourage building. We will therefore be allocating a proportion of the grant in year 3 to reward local authorities who have published an implementation strategy in line with PPS3, which sets out how the land supply will be reviewed on an ongoing basis.
38. For quality assurance we will audit a sample of authorities and those judged not to have applied the policy properly will lose their HPDG allocation for this element of the grant in year 3.

Fig 3 – Demonstrating land for housing	% of grant paid	
	2009	2010
Demonstration of 5 years supply of deliverable sites for housing	100%	0%
Publication of a SHLAA	150%	0%
Publication of a SHLAA with endorsement of HMP	175%	100%
Publication of a SHLAA with endorsement of HMP and implementation strategy	n/a	120%

Q2 Do you agree that the proposed changes to the land supply element will install a greater degree of transparency in the land supply position across the country?

Part 2 – Delivery of core strategies and development plan documents allocating more than 2,000 dwellings

39. The current allocation mechanism for HPDG makes the level of grant available for core strategies and DPDs dependent on delivery against the milestones laid out in the local development scheme (LDS) in effect in May 2007. This was in line with local authorities' request in December 2006 that these should become the definitive programme management documents for plan-making. We do not propose to make any changes to this element.

Q3 Do you agree that we should not make any changes to the allocation mechanism for delivery of priority development plan documents?

40. In recognition of the importance of land supply in supporting development, especially in the current economic context, we propose to increase the award for demonstrating land for housing to 50 per cent of the planning element, and decrease the award for delivery of priority DPDs to 40 per cent, in year 2. Getting a robust land supply evidence base in place is a vital step to ensuring sound core strategies and DPDs. The level of rewards will return to their original proportions of the planning element in year 3.

Q4 Do you agree with the proposals to change the proportions of the planning element available for demonstrating land for housing and delivering priority development plan documents in year 2?

Part 3 – Joint working

41. Working across boundaries including across tiers of local government remains important in unlocking housing delivery and exerting strategic local leadership. We will retain therefore the current reward for joint working under Section 28 and 29 of the Planning and Compulsory Purchase Act at 6 per cent of the planning element.

Part 4 – Strategic housing market assessments

42. By year 3, we assume that local authorities will have strategic housing market assessments (SHMAs) in place as part of the evidence base for their core strategies and development plan documents and will be rewarded accordingly for these. Therefore, we are reassigning the funding for SHMAs to the land supply element in year 3 in recognition of the vital importance of getting a supply of deliverable land for housing in place for the upturn.

Fig 5 Summary of planning element	% of planning element 2009/10	Funding 2009/10	% of planning element 2010/11	Funding 2010/11
Demonstrating sufficient land for housing	50%	£30m	44%	£26.4m
Delivery of core strategies and development plan documents	40%	£24m	50%	£30m
Joint working	6%	£3.6m	6%	£3.6m
Publication of strategic housing market assessment	4%	£2.4m	0%	£0m
Totals	100%	£60m	100%	£60m

Abatement

43. In the current climate, it is more important than ever that the planning system is not unnecessarily adding to the difficulties for development through delays in processing planning applications. Therefore, we will continue the current abatement mechanism on the plan making element of the grant where development control performances falls under any national planning standard included in NI 157 (processing of planning applications as measured against targets for major, minor and other application types).
44. The current target regime is currently being considered as part of the recommendations of the Killian Pretty review; we will be monitoring this process closely and make any changes to the abatement mechanism as necessary. However, it is worth noting the intention will be for any new approach to targets to come into place for the next revision of the local authority performance framework, which will take effect from April 2011 and thus be outside the scope of the current HPDG regime.

Local government reorganisation

45. We propose that in year 2 of the grant, new local authorities formed as a result of local government re-organisation will have grant based upon the total amount which would have been paid to the constituent authorities before re-organisation. In year 3 of the grant, authorities will receive grant based solely on the work undertaken by the new authority.

Part C: Additional issues

Affordable housing

46. HPDG is designed principally to support raised housing delivery in response to local need. However, in our July 2008 announcement we made a commitment to publish proposals for a third HPDG element in year 3 specifically to incentivise the delivery of affordable housing. We have identified two options for doing this.
47. The first option would be to use a simple formula which would allocate a fixed proportion of grant against delivery of affordable housing. £28m from the housing element of the grant would be allocated to this part of the scheme and local authorities would be rewarded for each additional affordable unit delivered. The reward will be based on delivery of affordable housing in 2009-10.
48. The Homes and Communities Agency (HCA) has a budget of £3.5bn to deliver affordable housing units in 2009–10. Local authorities will have a key role, working with the HCA and housing associations, in ensuring that land is identified quickly to enable the funds to be utilised effectively. The use of this element of HPDG would therefore reward local authorities who maximise the opportunities that the additional funding will provide in 2009-10.
49. The unit of grant would be calculated by dividing the £28m budget by the total number of additional affordable homes. We will use the information from the Department's statistical release on affordable housing supply, which will be available in December 2010, to calculate the total number of units. The grant will include new build units, conversions and change of use but, unlike the total housing supply figures, will be the gross rather than the net total. The intention is that the grant will apply to affordable units built within the local district (as opposed to those sponsored by the local district, which is used for the calculation of NI 155) because of the grant's link to infrastructure costs.
50. Although this would be simple to administer, affordable homes are already rewarded in the main housing allocation mechanism.
51. The second option for consideration is to use a portion of the element for affordable housing to help the mainly smaller district authorities to work with parish councils, with the aim to deliver more affordable housing in rural areas. Matthew Taylor's Review *Living Working Countryside* made a clear case about the problems of affordability in rural areas and the need for more affordable housing to address this. There is strong evidence from the rural housing sector that delivery

works best where local authorities work closely with parish councils in identifying housing need at a parish level.

52. We are proposing that there would be a £20,000 reward in year 3 only to local authorities which fall within the Rural 80, Rural 50 and Significant Rural definitions¹ which show through placing on their website, by the end of March 2010 a plan demonstrating how they are working with parish councils to:
- provide housing needs surveys of parishes and
 - use that information to identify sites for affordable housing to address the needs that the surveys have identified.
53. We would assess suitability for grant by checking that the plan is on the local authority website, and then carrying out a quality assessment of a number of plans to ensure that they are being carried out as set out on the website. This work will be undertaken at the end of 2010–2011.
54. The maximum amount that could be paid out for this element would be £3,560,000, which would reduce the total available for the first option to £24,440,000.

Q5 Do you think we should introduce an affordable housing element in year 3 and if so, which of the two options outlined or a combination of the two would you favour?

¹ Rural-50: districts with at least 50 per cent but less than 80 per cent of their population in rural settlements and larger market towns. Rural-80: districts with at least 80 per cent of their population in rural settlements and larger market towns. Significant Rural: districts with more than 37,000 people or more than 26 per cent of their population in rural settlements and larger market towns.

Part D: Empowerment

55. Meaningful community involvement is an integral part of the planning system. The white paper *Communities in control: real people real power* announced up to £4m additional funding for local planning authorities to promote community participation in planning. This funding is in addition to HPDG and does not come out of the totals set out in paragraph 16. However, we propose to use the HPDG mechanism to distribute this additional funding.
56. We propose to allocate this additional funding against specific criteria through housing and planning delivery grant. Our suggested criteria would reward authorities if they:
- have a target submission date for core strategies and development plan documents which allocate more than 2,000 dwellings in 2009-10 and
 - have selected either NI 3 (Civic participation in the local area) or NI 4 (% of people who feel they can influence decisions in their locality) as part of their local area agreement.
57. This focus would support those authorities whom we would expect to be undertaking significant community engagement work in developing their core strategy or delivering high levels of new housing, and who have already identified community empowerment as a priority for their overall performance.
58. As noted in the Government's response to the Killian Pretty review, we will be encouraging qualifying authorities to consider using the additional funding to promote community engagement in the planning application process, particularly at the pre-application stage, as well as in plan-making.
59. We also propose that qualifying authorities should be able to receive additional funding in 2009-10 if they are members of the network of empowerment authorities and their planning colleagues wish to take part in the initiative and if they are committed to proactive dissemination of good practice and lessons learned.
- Q6: Are you content with the criteria proposed for allocation of the additional empowerment funding? If not, could you propose an alternative approach?**

Summary of consultation questions

- Q1 Do you agree with the Government's decision not to make any changes to the housing element in year 2 and to reduce the threshold from 0.75 to 0.65 in year 3?
- Q2 Do you agree that the proposed changes to the land supply element will install a greater degree of transparency in the land supply position across the country?
- Q3 Do you agree that we should not make any changes to the allocation mechanism for delivery of priority development plan documents?
- Q4 Do you agree with the proposals to change the proportions of the planning element available for demonstrating land for housing and delivering priority development plan documents in year 2?
- Q5 Do you think we should introduce an affordable housing element in year 3 and if so, which of the two options or a combination of the two outlined would you favour?
- Q6: Are you content with the criteria proposed for allocation of the additional empowerment funding? If not, could you propose an alternative approach?

We invite responses to this consultation by 23 June 2009.

You can respond via Julian Wheeler at: julian.wheeler@communities.gsi.gov.uk

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