

The Chartered Institute of Building (CIOB)

submission to

Ministry of Housing, Communities & Local Government

on the consultation

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

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David Parry
Senior Parliamentary & Public Affairs Officer
e: dparry@ciob.org.uk
t: +44 (0)1344 630875

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Introduction

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

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

Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets.

Background

CIOB's position is that we are strongly in favour of initiatives and efforts to build more of the homes that are desperately needed in the UK. Alongside this, as a representative of the construction industry we are pleased to see the primacy that has been given to much needed reforms of the planning system since this government was elected. The construction sector and wider built environment has a significant role to play in economic growth and is an industry that has shown itself to be at the forefront of technological change and progression.

Consistent efforts in recent years to tweak the planning system rather than opting for wholesale change have resulted in stop-start policy making that has only served to further obscure the rules behind new housing and infrastructure rather than making them clearer. The built environment thrives on stability and assurance of investment, which has been something that has been long removed from the planning system. So, we welcome efforts to make the National Planning Policy Framework (NPPF) clearer and to assure that it serves the purpose of setting out clear guidelines to planning permission.

However, while we feel that the attempt that has been made in these revisions certainly bring about some positive changes, we do feel that it falls short of realistic and pragmatic reform in line with the overarching ambition to provide 1.5 million new homes in this parliament.

There is a real need to manage expectations here. Whilst we welcome the ambition to significantly scale up housebuilding. Implementing this level of change to the planning system while simultaneously unlocking large swaths of land for development and fundamentally changing the way that the planning system works at the same time as building 1.5 million new homes is unrealistic.

Many of the changes set out in this consultation, such as the defining and unlocking 'Grey Belt' land will take many years to come to fruition, therefore it should not be seen as the panacea to unlocking housebuilding in the short term. Additionally, implementing reforms to the NPPF alone will not be the solution to sustained economic growth in the UK as suggested in the supporting documentation. This is one of issue that needs to be addressed in combination with other fixes to the sector that will help to boost its productivity and output such as skills which we cover in our response to the consultation.

As alluded to, the Government must be acutely aware there is a significant ongoing skills crisis in the construction sector. Whilst more evidence of this will be provided throughout this

consultation, the ongoing skills gap presents a fundamental barrier to housebuilding in the UK. If we are to significantly increase the number of new homes built, then there will be a need to assure a long-term pipeline of new entrants into the industry while at the same time assuring that those currently in the industry are not leaving. At a time in which there is a lack of options for young people wanting to get into the industry a long-term pipeline of skilled, trained construction professionals will be hard to guarantee. This is something that government must look to address as soon as possible in tandem with industry representatives and professional bodies who have been working on solutions to the skills crisis.

Lastly, we hold concerns about the guiding principles of this reform to the NPPF. Whilst we understand the need to focus on speeding up the delivery of new homes in the UK, we are concerned with the lack of acknowledgement that these new homes must be high-quality and sustainable and that the delivery process needs to align with existing and emerging policies such as the Future Homes Standard and Building Safety Act 2022. The Future Homes Standard, as an example, is a policy that will improve the sustainability of new homes and is an effort to future-proof housing to assure that it will not need further remediation. However, this policy will make the construction process rightly more complex not simpler. It would be beneficial to provide clarity about how these proposals will work in tandem with policies other policies relating to new homes that have been put in place in recent years.

Overall, we recommend that Government:

- Use clear and concise language throughout the amendments to the NPPF to avoid interpretation and confusion.
- Aims for consistency as one of the primary aims to a reformed NPPF to bring confidence back into planning and stimulate the market.
- Ensure that the focus of new housing supply is on quality as well as quantity.
- Direct new resources into the planning system whilst simultaneously ensuring that the construction sector has the skills necessary to build new homes en-mass.
- Seeks to diversify housing supply by putting in place policies that will reinvigorate SMEs role in housing delivery.
- Carefully considers the definition of grey belt land to ensure that only appropriate land is released for development.
- Take this opportunity to reform the broken land value system.

Full response

Question 1. Do you agree that we should reverse the December 2023 changes made to paragraph 61?

1. Yes – we agree with the removal of previous unclear language, such as the reference to “exceptional circumstances” for the use of alternative methods for calculating housing need. Unclear language such as this leaves too many options open for disputes to be raised about the soundness of local plans as well as too many opportunities for housing commitments to be lessened without proper justification.
2. Removing this language might also lessen objections to the policy in its basic form on the basis that it is ‘unclear’. We also agree with the proposal to remove references to the outcome of the standard methodology being an “advisory starting-point” which has often been used as an excuse to provide less homes, further exacerbating the housing crisis.

3. However, we would also advise against replacing this language with equally unclear advice as has been done in the guidance associated with this consultation, such as the use of “all efforts to” and “strengthen expectations”. We recommend taking the time to make sure the language used is as clear as possible given how often unclear language has been used in the past to justify moves away from national planning policy.

Question 2. Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

4. Yes – removing the reference to alternative approaches to assessing housing need will remove additional confusion and possibly time-consuming unnecessary and costly work done by local authorities, in favour of a consistent means for calculating housing need and local plan creation processes.
5. However, it is worth noting that there is a widely held opinion from within the industry that the current method for calculating housing need is contributing to the slow delivery of new homes in the UK.
6. The alternative stock-based approach that has been suggested by government in this consultation has been advocated for by a number of reputable organisations including planning consultants [Turley](#). In a piece published in March 2024, Turley stated that a stock-based approach, generating housing need based on readily available data of the current number of homes in any given area, is “very simple, fairly assuming that every area makes an equal contribution towards meeting housing need by, for example, providing one home each year for every 100 that are currently occupied”.¹
7. This view is shared by the [Home Builders Federation](#) (HBF) and was advocated for in their November 2023 [Firmer Foundations](#) report where they stated that reforming the standard methodology so that the existing housing stock of an area is used as a baseline rather than household projections would help to “ensure that new housing is delivered in a proportionate way across the whole country”, alongside other changes.²
8. Broadly, we are pleased to see that government is looking to tackle one of the most criticised areas of housing delivery and acknowledge that the complicated means of determining housing need has been subject to much debate in recent years. We also understand that communities can often feel that the determination of housing need has been a ‘top-down’ process that has served to alienate communities from new housing and further lean into the idea that homes are being done to people rather than with them. Therefore, we hope that government takes this lesson and takes the time to correctly communicate this complex subject in an easy-to-understand manor to those without the necessary background in housing or construction. This will help to foster a collaborative

¹ Turley, [Where next for the substandard method of assessing housing need](#), 14 March 2024

² Home Builders Federation (HBF), [Firmer Foundations](#), November 2023

approach to housing rather than persist with the ‘them verses us’ approach that has developed in the UK.

Question 4. Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

9. We are concerned that deleting the paragraph in its entirety opens for the door for developments that promote an uplift in urban density to disregard character and design in favour of just meeting raw numbers.
10. We have been clear as an organisation that while it is important to deliver the number of homes needed to address the ongoing housing crisis, this should not come at the sake of design or quality.
11. If success or failure is measured based on the numbers of residential units being delivered without concurrently assessing the quality of what is being produced, there is the risk of creating societal burdens through planning policy. For example, research from the [Building Research Establishment](#) (BRE) has indicated that poor housing incurs significant health related costs. Investment to improve some of the worst quality homes could save on NHS spending which is estimated to be around £1bn a year on treating people affected by poor quality housing.³
12. There is a balance that can be struck between these two principles and Paragraph 130 of the existing NPPF creates an opportunity for that to be made clear. Instead of deleting the paragraph in its entirety we recommend altering it to make it clear that the current government supports plans that promote an uplift in density in urban areas, but weight should be given to those developments that take into account local character and design where possible and that quality should still be a guiding principle when it comes to urban uplift.
13. We are also concerned about the resource implications of local authorities having to prepare localised design codes, masterplans and guides for areas given the already stretched nature of local authority planning. Where no localised design codes are in place, preparing them from scratch could significantly slow down projects that promote a sensible amount of urban uplift and expose local authorities to having to accept projects that disregard localised character traits.

Question 6. Do you agree that the presumption in favour of sustainable development should be amended as proposed?

14. Yes – These seem like sensible changes to make to ensure that any housing development that does come forward when presumption is engaged considers key quality drivers such as locational and design policies. We support this proposal.

Question 7. Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

³ Building Research Establishment (BRE), [The Cost of Ignoring Poor Housing](#), 4 July 2023

15. Yes – The need to demonstrate that a local authority has sufficient deliverable sites for housing goes a long way in ensuring that targets set by central government are met and not ignored in favour of under-development where development is necessary.
16. Not only would this help to ensure that there is a sufficient pipeline of new housing available across the UK, but it would also help to establish a long-term pipeline of new work in the construction sector. A stable construction sector has numerous benefits for the UK economy such as the creation of new jobs, greater investment in research and development and inwards investment in the country.
17. Cyclicity is the root cause of many of the issues in the construction sector: productivity; the pool of labour and the ability to attract new talent; job stability; and working conditions all suffer as a direct result of the construction sector's perpetual boom-bust cycle. Cyclicity also negatively impacts the sector's ability to meet housing and infrastructure need during an economic downturn, as well as the sector's ability to respond and meet demand during an upturn.
18. By once again enshrining the need to provide a 5-year housing land supply, some of the issues around the cyclicity of the construction sector can begin to be addressed. There should also be due cause given to the need to define the types of housing and methods for deliver that could be used to fulfil a reinstated 5-year housing land supply. As an example, modern methods of construction (MMC) has the ability to deliver large number of high quality new homes.
19. A recent CIOB report on MMC in Ireland stated the benefits it could provide to the sector in that "Greater use of MMC offers many potential benefits to those working within the sector and to society at large. It provides opportunities for a more sustainable built environment, better working conditions, and a more productive construction sector that can deliver high-quality homes more quickly than conventional, onsite construction."⁴ However, a lack of interest and investment in a long-term strategy for MMC from government has led the sector to lose confidence in this mode of production. An assured land supply combined with signals from government that they will look to invest in alternative means of production could help the industry direct its investment into new technologies or innovative construction methods such as MMC.
20. It is also important to consider the fact that there are numerous stalled sites currently stuck in the planning system for various reasons, so consideration must be given to what level of housing supply those provide as a backlog as well as what can be done to unstick these.

Question 12. Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

⁴ Chartered Institute of Building (CIOB), [Modern Methods of Construction: barriers and benefits for Irish housing](#), 31 January 2024

21. Yes – the decision to reinstate the need for local authorities to participate across boundaries where they or their neighbouring authorities are not able to meet their housing need is a positive one.
22. However, the relationships across local authority boundaries can depend heavily on the political makeup of the local authorities in question. Effective, clear mechanisms for cooperation would help to ensure that local authorities can strategically plan to take on more development from their neighbours where necessary.
23. Where Duty to Cooperate has failed in the past is that it has felt like a standoff between local authorities where those who pass on development to their neighbours are seen to have failed to plan or found excuses not to build more homes. This must be addressed in order to foster a more positive relationship between local authorities, such as in the case of Glasgow and Clyde Valley in the 90s and 00s where benefits were created for areas to plan for housing together where it was not possible for housing need to be met within a single local authority boundary.
24. In this instance both Glasgow and Clyde Valley local authorities developed a series of common perspectives for cooperation in the wake of the termination of Strathclyde Regional Council. The two authorities created a combined structure plan which led to the creation of new local plans in tandem across boundaries. The result of this was that the authorities were able to strategically combine resources and targets to plan for strategic development together rather than bidding against each other or offsetting housing without cooperation. The benefits of this were realised with successful bids to Scottish Government for additional monies for local investment.⁵
25. As set out by other organisations, such as the [Landscape Institute](#) (LI), there is an opportunity here to set out other areas that need cross-boundary cooperation between local authorities, such as in the creation of Green Infrastructure Networks and Local Nature Recovery Strategies (LNRS).

Question 14. Do you have any other suggestions relating to the proposals in this chapter?

26. As we have highlighted throughout this consultation response, the capacity of the construction sector is a significant risk to housing delivery targets.
27. Additionally, there are also numerous other issues and risks that are negatively impacting on housing delivery that fall outside local authority control, such as the availability of the necessary associated infrastructure (sewage, broadband connectivity, etc.) that's required before homes can be built. There are also other well publicised issues such as 'land banking' that need to be understood and sought to correct before the most effective housing delivery can be unlocked. We urge for a better understanding and accounting of what issues do and do not

⁵ Royal Town Planning Institute (RTPI), [Strategic Planning: Effective Cooperation for Planning Across Boundaries](#), January 2015

fall within local authority control that need to be addressed as part of a push for greater housing delivery.

Question 20. Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

28. CIOB welcomes the proposed amendment to paragraph 124c of the current NPPF, reinforcing the expectation that development proposals on previously developed land (PDL) are viewed positively. This has the potential to speed up planning decisions and open opportunities for development at the same time as ensuring that previously developed land is prioritised for development ahead of areas of green space which may be either productive agricultural land, spaces for nature, or amenity spaces.
29. However, it must be acknowledged that brownfield sites and PDL can be more challenging to develop and on a profitable basis, are more likely to be constrained, and may contain known and unquantifiable risks for developers and contractors. So, consideration should be given to how these sites can be made more attractive to developers without compromising on standards.
30. According to [Pocket Living](#), small sites take an average of 60 weeks to gain a planning determination. Alongside this, the highly constrained nature of these sites often means they are subject to many more of the local and national planning requirements, meaning that around a quarter of all small sites now require two or three attempts to receive planning permission.⁶
31. One option to help make these sites more attractive could also help to reignite the role that SMEs have previously played in the planning process.
32. SMEs are often grounded in local supply chains and have specific local knowledge of their areas that may be useful in tackling some of the more constrained PDL sites in the UK. This local knowledge and grounding will not only help deliver on these sites but also help to diversify the supply of housing. In their recent 10-point plan to get SME's building again, Chair of Pocket Living, Marc Vlessing OBE put forward proposals for a new Small Sites Planning Policy through an amendment to Paragraph 70 of the NPPF to include a presumption in favour of sustainable development for small and medium sized sites where the levels of affordable housing of any tenure and mix is proposed in line with the affordable housing threshold target set by the relevant local authority and the site is brownfield land.⁷
33. This presumption could help unlock some of these more constrained sites and allow for de-risking of the planning process as some level of certainty will be in place for SMEs that more constrained smaller or medium sites might prove financially viable and worth the investment.

⁶ Pocket Living, [Get SMEs Building Again](#), 3 September 2024

⁷ Ibid

34. Whilst unlocking PDL is a good step forward to increasing housing supply, thought must be given to the constrained nature of these sites and ways that this can be addressed to ensure that they are brought forward when reclassified as brownfield land. At the same time thought could be given to how these sites can be earmarked for SME housebuilders to ensure that they continue to play a part in housing provision in the UK. Therefore, we recommend that government considers amendments to the NPPF in line with Pocket Living's small sites policy.
35. Additionally, to the points above and to avoid further confusion it would be worth clearly defining the exact parameters of what a brownfield passport would mean in practice.

Question 21. Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

36. In principle, the proposal to relax the restrictions that are currently applied to PDL and allow limited infilling in the Green Belt in paragraph 154g of the current NPPF, making clear that development is 'not inappropriate' where it would not cause substantial harm to the openness of the Green Belt and subject to the requirements of the golden rules, should be welcomed. Again, this has the potential to open opportunities for development at the same time as ensuring that previously developed land is prioritised for development ahead of areas of genuine green space.
37. However, while we welcome carefully targeted release of 'grey belt' land, the definition of grey belt must be carefully considered. If loosely identified as former airstrips, car parks, scrubland and former tips, this runs the risk of neglecting the habitat or community amenity value of some of these areas of land.
38. For example, scrubland can be highly beneficial for birds, reptiles and insects and the curtilage of many former airfields is now recognised as important 'open green space' by many Local Planning Authorities (LPAs) with increasing evidence from local nature and environmental surveys that they are important as a sanctuary for plants, insects and associated wildlife. The identification of grey belt land to release for development must therefore be carefully targeted with local consultation to avoid pitting local communities against development from the off and additional exclusions are likely to be necessary, such as areas identified in draft or published LNRS, that could be or have potential to be of particular importance for biodiversity.
39. Alongside this there must be careful consideration given to whether a parcel of land is suitable for development, including whether it is close to local amenities, transport networks, etc. These should be material considerations, alongside other areas to ensure that land is not just released for the sake of development and is instead targeted at areas that are both suitable for release and suitable as areas for meaningful, connected new housing.
40. We are also concerned about the implications of releasing mass swaths of Green Belt land for development on land values in the UK which are already very high and take up a disproportionate amount of finance in the development process.

We comment in further detail about the nature of the current land value system in our answer to question 38.

Question 23. Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

41. Green Belt land serves an important role within the built environment, not only to protect land of great areas of biodiversity but to ensure that urban sprawl is prevented. We are not best placed to comment on the type of land that is released from the Green Belt as part of this reform to the NPPF, however, we would like to make the point that the location of the land in question should be considered carefully alongside the value that it has from a biodiversity perspective. Additional protections are likely to be necessary to protect land that may be of particular importance to biodiversity despite having at least one of the five features identified. For example, areas identified in draft or published LNRS, that could be or have potential to be of particular importance for biodiversity, should be excluded.

42. Broadly we support the definition of grey belt as set out in the supporting documentation to this consultation, it appears restrictive enough in its reference to urban containment. However, we are still concerned with some of the vagueness of language such as "limited contribution" which is a prime example of the phraseology that has created confusion and various levels of interpretation in the planning system to date. We urge the government to ensure that the language used in defining the grey belt is limited in its interpretation and its criteria is prescriptive.

43. We are aware that there is currently an ongoing inquiry from the House of Lords Built Environment Select Committee and would recommend that any decision on the definition of the grey belt draws from the evidence collected during that inquiry.

Question 24. Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

44. CIOB is not best placed to comment on additional measures to be introduced to protect high performing Green Belt land from being designated as Grey Belt land, however, it is important for government to listen to those with more expertise in this area. Therefore, we suggest ensuring that the Royal Town Planning Institute (RTPI), whose members stretch across a broader section of the planning system, are formally consulted on this question.

Question 25. Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

45. By not prescribing specific and quantifiable measures of terms, the guidance is left very open to interpretation which may result in geographic disparities in the application of the guidance.

46. While we agree that additional guidance will be beneficial in identifying land to release from the Green Belt, we are not best placed to say whether this guidance should be contained within the NPPF or in separate planning practice guidance.

Question 26. Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

47. Our understanding is that habitat value and biodiversity are not key considerations in the guidance. As indicated in our answers to questions 20, 21 and 23 this should be the case and is in need of review. While it may be implied in point “a” of the guidance, the wording should be more explicit to avoid interpretation.

48. We recommend including an additional point “v” with the wording “Land which does not provide important biodiversity value.” This would ensure, without a doubt, that land with high biodiversity value is not considered for release from the Green Belt.

Question 27. Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

49. Areas identified in draft or published LNRS, may have potential to be regenerated into high value habitat such as woodland or wetlands, and a landscape view should be taken to identify areas of Green Belt land that are suitable for habitat regeneration and enhancement with benefits for both wildlife and communities.

50. Whilst we are explicit in our support for new housing, a proportional view must be taken to make sure that the right land is being released.

Question 28. Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

51. The proposal has the potential to support the release of land in the right places and the sequential approach should ensure that brownfield sites and PDL in the Green Belt are prioritised. However, the proposal does require that higher performing Green Belt sites are considered in sequence if required to meet the development needs of the planning authority. This is likely to be contentious in local communities and will come at a cost to nature.

52. We must be clear that the delivery of 1.5 million homes, while also accelerating nature recovery, in what has been described as ‘one of the most nature depleted countries on earth’⁸ will be extremely challenging. While we support the necessary sequencing, acknowledgements must be given to the implications of certain land release.

⁸ State of Nature Partnership, [State of Nature](#), 2023

53. The language in this section could be clarified further. At present under Chapter 4 point 18 it states, "it is right that local planning authorities are empowered to make decisions that best support the development needs and sustainability objectives of their area through the plan-making process". It also states in the same point "however, we remain clear that the release of land should not be supported where doing so would fundamentally undermine the function of the Green Belt across the area of the plan as a whole".
54. Our concern is where a disagreement may occur between central government and a Local Planning Authority (LPA) on the release of a portion of Green Belt land. If the LPA is arguing that the land meets the accepted rules for release and aids in providing sustainable development within their local authority boundary, but central government or the Planning Inspectorate argue that it undermines the function of the Green Belt, which opinion takes precedence?
55. Greater clarity on enforcement against or in favour of land release would be beneficial, especially where disagreements over land release may fundamentally undermine the soundness of a newly prepared local plan which has significant time and resource implications.

Question 29. Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

56. Yes – this is important to continue to meet the purposes of the Green Belt, as detailed in the consultation.

Question 30. Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

57. In principle this seems to be a reasonable solution for those LPAs where a five-year housing land supply cannot be demonstrated. However, this must be very strictly controlled to ensure that LPAs are not being forced into releasing Green Belt sites that might provide some other value.
58. Further clarification should be provided in this section to limit interpretation being used as an excuse through planning appeals to have inappropriate schemes permitted. A tight definition of what 'grey belt' land is will help to avoid unsuitable sites being released from the Green Belt.

Question 31. Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

59. No – we support the proposals to allow the release of Green Belt land for commercial and other development need outside of residential development through plan making as long as it is proportionate and in line with the stringent criteria set out in deciding on Green Belt land to be released for residential development.

Question 34. Do you agree with our proposed approach to the affordable housing tenure mix?

60. Yes – this approach seems sensible.

Question 36. Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

61. The emphasis in point 25 of the document is on providing public access to green space. It is less clear how benefits will be unlocked for nature. New developments that are designed with good quality green infrastructure from the outset – for example with mosaics of new wetlands, grasslands, native shrublands and woods, connected to new housing with footpaths and cycle ways – would not only create good places to live but would also deliver other benefits such as maintenance of natural eco-system processes, reduction and treatment of stormwater at source and benefits to wildlife. However, green infrastructure does come at a cost (which could act as a deterrent) and therefore effort should be put in to ensure that green infrastructure is provided, where possible on sites released from the Green Belt.

62. The proposals should prioritise an ambitious and robust green infrastructure framework in local policy plans and design codes. Otherwise, there is a risk that outcomes will fail to deliver for both communities and nature. Consideration should also be given to models of funding to ensure development can remain profitable at the same time as making a strong contribution to nature recovery.

Question 37. Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

63. CIOB may not be the professional body best placed to comment on the principle and calculation of viability assessments.

64. Typically, the viability assessment system has been used to relax developer contributions towards necessary infrastructure and social housing and whilst it has a limited benefit to enable the delivery of some sites, it may be wise to seek to alter the system when it is used on sites that have been released from the Green Belt.

65. Given the often-crucial nature of the Green Belt, the release of this land, regardless of its previous use, should come at the cost of schemes that truly fulfil local community needs. Therefore, there may be an opportunity to severely limit the scope of viability assessments on land previously in the Green Belt to ensure that schemes on these parcels follow through on commitments to infrastructure or social/affordable housing contributions.

Question 38. How and at what level should Government set benchmark land values?

66. Land values are a fundamental barrier to quality rooted in the private development model of housebuilding. Builders of all sizes – SMEs and larger developers – are clear that the most significant constraint on design and quality is not the absence of local design codes, but the high cost of land.
67. The high cost of land means housebuilders are required to dedicate a disproportionate amount of their budget to fund the initial land purchase in a highly competitive market. To fund this purchase, developers must drive down costs elsewhere in the process, typically on design and quality, thus negatively impacting the final product.
68. Whilst this question focuses on how land values could be calculated and benchmarked for land released from the Green Belt; changes to the NPPF could allow for an opportunity to reform the land valuation system entirely. If we keep the same system, that has helped to contribute to a reality in which sacrifices on quality have resulted from the price that housebuilders are having to pay for land for development, the same sacrifices could be made on developments being released from the Green Belt.
69. If land were available at a more reasonable rate – for example, existing use value plus a 25% premium – developers would be incentivised to compete on the design and quality of the final product, rather than their ability to fund the initial land purchase.
70. From a Local authority housebuilding perspective, the problem lies in the 1961 Land Compensation Act, which determines that the price paid for land must reflect any prospective use to which it could be put, colloquially known as ‘hope value’. This leads to a significant increase of the price for land intended for housing and limits the ability for strategic land assembly and management. If land prices were capped at 125% of existing use value, this would allow money sent on land purchase to be re-routed to quality and design of the final product.
71. A more proactive approach to the land market could capture the gains from development for the benefit of the community, and harness competitive forces, which are currently focused on the land market, to delivering better quality and design for consumers. This means shifting the focus of market competition in the development process downstream to the construction phase and away from the land purchase phase.

Question 46. Do you have any other suggestions relating to the proposals in this chapter?

72. We would like to take this opportunity to highlight the importance of soil resource management and ensuring development at all levels encourages safeguarding of healthy soil and maximises environmental gains through good soil management throughout the development process in design, planning and implementation stages (noting that air, land and water are all protected by existing regulation, but soil is not).

73. We believe that changes to the NPPF would be a good opportunity to emphasize this point.

74. As partners in the [Society for the Environment's Soils and Stones Project](#) we would recommend the following:

- Barriers to soil reuse should be removed by setting standards for surplus soils from development sites and by the establishment of soil depots.
- A soil hierarchy be adopted to protect and enhance soil health, and to promote a circular economy.
- That the carbon sequestration, biodiversity net gain and flood mitigation potential of soil be recognised in planning policy.

Question 58. Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

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

76. The [Federation of Master Builders](#) (FMB) annual House Builders' Survey 2023 highlighted some of the key issues currently facing SME housebuilders. These included, a lack of available land, the ongoing materials shortages, access to development finance, opportunities for small sites, a lack of interesting in custom and self-build homes as well a lack of certainty over the outcome of planning applications.⁹ This is evidenced by the fact that in the 1980s, SMEs built 40 per cent of new homes. This figure slowly reduced to 23 per cent in 2008 and then 12 per cent in 2021.¹⁰

77. While some of these aspects are addressed as part of the proposed NPPF changes, there are still concerns about the crucial role SMEs play in the development market. With this in mind, there must be due consideration in protecting SMEs to ensure competitiveness as diversification of the housing delivery market is crucial to maintaining a consistent stream of new home completions.

78. Having a small sites policy is essential to ensure that housing provision is not solely being provided by large sites championed by the small number of larger housebuilders. However, we are concerned that while it is important to have small sites policies in place, SME housebuilders are still struggling to access these sites.

79. To better diversify housing supply, we would recommend that local plans include a quota for sites to be provided by SME housebuilders rather than focussing on just the size of the site, where small sites are not available. This could initially be tested as a small percentage of sites allocated within local plans but could grow

⁹ Federation of Master Builders (FMB), [FMB House Builder' Survey 2023](#), 29 November 2023

¹⁰ Housing, Communities and Local Government Committee (HCLG), [The future of the planning system in England](#), 27 May 2021

to a more solid and consistent percentage depending on success and uptake. Small alterations to the NPPF combined with strategic advice from the Planning Inspectorate could help kickstart this process.

80. This could also help ensure that a reformed planning system that puts more emphasis on developing sites that are allocated in local plans does not disproportionately favour larger housebuilders who are able to pour more resources into influencing local plans.
81. It may, of course, not be possible for all local authorities to source local SME housebuilders within their boundaries, where this is not possible the definition of local could be extended until available housebuilders are identified at a county or regional level.
82. If the emphasis is to remain on the size of the site, mandating the commitment to provide 10% of small sites where it is not possible may only slow down the local plan making process rather than speeding it up as intended.
83. We are unable to comment on the definition distinguishing between small and medium sites, however, we are supportive of proposals from Pocket Living to make these sites easier to develop by SME housebuilders and have outlined these proposals in answer to Question 20.

Question 59. Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

84. Yes – we agree with both the proposal to retain references to well-designed buildings while also removing the ambiguous references to beauty and beautiful which caused much confusion and contention when included in the NPPF.
85. It is crucial to the cohesiveness of the built environment that creating well designed buildings and places is a top priority for planning policy and planning reform. In the Chartered Association of Building Engineers' (CABE) seminal 2002 report, [The Value of Good Design](#), it is set out that *"We cannot afford not to invest in good design. Good design is not just about the aesthetic improvement of our environment, it is as much about improved quality of life, equality of opportunity and economic growth. If we want to be a successful and sustainable society we have to overcome our ignorance about the importance of design and depart from our culturally-ingrained notion that a poor quality environment is the norm and all we can expect from British builders, developers, planners and politicians."*¹¹
86. The same principle should apply to housebuilding. However, it has sometimes been the case in recent years that new-build housing has strayed below both good design and below the expected bar on quality. The negative effects of poor-quality housebuilding have already been set out in the answer to Question 4, however, we would like to take this opportunity to touch on what good quality and good design means to the consumer.

¹¹ Chartered Association of Building Engineers (CABE), [The value of good design](#), 2002

87. It is important to set out that, by and large, the quality of housebuilding has increased. Findings from the most recent national new home customer satisfaction survey (2023) by the [National House Building Council](#) (NHBC) and the HBF indicate that 90% of respondents (those who have purchased a new-build home in the previous 12 months) said they would buy a new-build home again and 88% were either very or fairly satisfied with the quality of their new home.¹²
88. However, the same survey found that 95% of respondents reported problems with their home to their builder since moving in, while 32% had reported 16 or more defects to their builder. This 32% represents a seven-percentage point increase from the number of people reporting 16 or more defects in 2021.¹³
89. When focusing on the language around new-build housing, we agree with proposals to remove references to “beauty” and “beautiful” as these terms were too open to interpretation and created more uncertainty in the development market given how different “beautiful” can mean depending on where the development is taking place. We also agree with proposals to retain references to well-designed buildings and places.
90. We would also like to suggest that the department explore options to include other additional wording, perhaps exploring assuring the quality of the development by including reference to “high-quality development” within the NPPF.
91. Whilst the surveys highlighted above indicate that a significant percentage of new-build home owners feel that their properties are high-quality, it should not be the case that there are some that have made such a significant financial commitment and been provided with a product that is not high-quality as has been seen in the many case studies in local and national media in recent years.

Question 60. Do you agree with proposed changes to policy for upwards extensions?

92. CIOB has been supportive of the role that ‘upwards extensions’ has to play in providing the homes we need in the UK. However, we have consistently urged caution when considering these schemes under Permitted Development Rights (PDR).
93. We understand the motivation behind PDRs and agree that there is a need to have flexibility in buildings, rejuvenate town centres, and deliver more housing in the right locations. However, flexibility should not extend to the quality of residential buildings. While there are issues that need to be addressed on PDR from planning, design and architecture perspectives, CIOB’s focus is on the quality of buildings that PDRs produce.

¹² National House Building Council (NHBC) and Home Builders Federation (HBF), [National New Home Customer Satisfaction Survey](#), March 2023

¹³ NHBC and HBF, [National New Home Customer Satisfaction Survey](#), March 2021

94. Research funded by the then Ministry of Housing, Communities and Local Government (MHCLG) into the quality standard of homes delivered through change of use PDR found that '*...permitted development conversions do seem to be more likely to create worse quality residential environments than planning permission conversions in relation to a number of factors vital to the health, wellbeing and quality of life of future occupiers. These aspects are primarily related to the internal configuration and immediate neighbouring uses of schemes...*'.¹⁴ With that in mind, if the intention is to push ahead with upwards extension as a means of providing more housing in urban areas, then measures will need to be put in place to understand that quality of what is produced through this system.
95. Post Occupancy Evaluation (POE) methods associated with regulated predicted performance requirements could be used to assess the quality of housing delivered through upwards extension. The evaluation of key areas of PDR extensions such as the analysis of occupation patterns, examination of building fabric, analysis of light levels, thermal comfort, indoor air quality, heat loss, etc. will help to pull together a full picture of whether what has been produced through upwards extension and PDR has resulted in good quality, well designed new spaces.¹⁵
96. POE of units delivered in the initial phase of new upward extensions could create a positive feedback loop whereby information gathered could inform any changes that need to be made to the policy to ensure quality output in perpetuity. Without checking how units delivered through PDR perform, the policy is relying on unverified predictions of performance.

Question 62. Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

97. We support changes to the NPPF to ensure that the planning system meets the needs of a modern economy by making it easier to build laboratories, gigafactories, data centres and digital infrastructure. However, there is an acute skills gap in construction as well as ongoing issues with upskilling existing employees into specific skills gaps areas. The Construction Industry Training Board's (CITB) latest Construction Skills Network report has estimated that an additional 251,000 new entrants into the industry will be needed by 2028 to meet expected demand.¹⁶
98. Given the complex nature of some of the projects listed above, we recommend that the Government undertakes a skills audit of industry capacity to understand whether it has the capability to deliver both now, and in the future, modern projects such as gigafactories or whether new training and development is required in these areas.

¹⁴ Clifford, B, Canelas, P. Ferm, J. Livingstone, N. Lord, A. Dunning, R., [Research into the quality standard of homes delivered through change of use permitted development rights](#), July 2020

¹⁵ Royal Institute of British Architects (RIBA), [Post Occupancy Evaluation and Building Performance Evaluation](#), 03 December 2019

¹⁶ Construction Industry Training Board (CITB), [CSN Industry Outlook – 2024 – 2028](#), 15 May 2024

Question 67. Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

99. The associated local infrastructure to accommodate new development is very important in creating cohesive communities and ensuring that local development does not meet excessive local opposition from those already inhabiting an area who may feel that schools, local roads and other infrastructure cannot cope with an increase in inhabitants.

100. We agree with the weight that is being placed on the provision of new, expanded, or upgraded public service infrastructure when considering proposals for development. However, we urge caution as some large infrastructure upgrades, such as improvements to criminal justice facilities can be extremely time consuming and may take many years for upgrades to come to fruition.

101. In those instances, we recommend that the Government seek alternative avenues to decrease the burden that is current being placed on some forms of infrastructure. For instance, with criminal justice facilities, one of the biggest contributors to increased prison populations is re-offenders.

102. The Ministry of Justice (MoJ) reports that people leaving prison that find work are less likely to reoffend, to the benefit of the individual, their community, and the wider economy.¹⁷ However, people with an unspent conviction face substantial barriers to employment following, and usually before, their sentence. In England and Wales, the prison population is at a record level of over 88,000 people in custody, with this number increasing recently in the wake of recent events.¹⁸ Around 12,000 of these individuals are released every quarter.¹⁹ Though there have been recent improvements in the number of people that find employment shortly after their time in custody, only 30% of prison leavers are employed six months after their release.²⁰ The outlook for individuals who receive a community sentence is also discouraging, with only 42% of these individuals employed six months post-disposal.²¹

103. A prime driver of this struggle for people with an unspent criminal conviction is the considerable reluctance and stigma held by employers towards people with a criminal record, with a survey conducted by YouGov finding that 50% of employers in the UK would not consider hiring someone with a known criminal conviction.²² Beyond stigma, there are a range of practical barriers holding people with convictions back from securing employment following their sentence, including issues finding permanent accommodation when leaving custody and a frequent lack of prior qualifications. The overall level of

¹⁷ Ministry of Justice (MoJ), [Employing prisoners and ex-offenders](#), March 2023

¹⁸ House of Commons, [What is the Government doing to reduce pressure on prison capacity?](#), October 2023

¹⁹ MoJ, [Justice Data](#), February 2024

²⁰ MoJ and HM Prison and Probation Service, [Employment Rates following Release from Custody - Ad Hoc](#), May 2023

²¹ MoJ, [Justice Data](#), July 2023

²² HM Prison and Probation Service & MoJ, [Barrier to employment lifted for thousands of ex-offenders](#), October 2023

educational attainment of this group is notably low, with 47% of people entering prison holding no prior formal qualifications.²³

104. Despite the difficulty for people with a criminal conviction to find employment, there are many sectors of the economy that are currently facing skills shortages, including construction. With this ongoing skills gap, but also a reputation for being a more accessible sector for employing people with a criminal record in the UK, it is beneficial to understand what barriers exist to employing those with a criminal record and what can be done to remove those barriers.
105. CIOB has done this analysis within a report that we published in March 2024, titled "[Employing People with Criminal Convictions in Construction](#)".
106. Whilst there has been a range of changes from government that have started to improve access to employment for people with a criminal conviction, there is still significant work to be done to ensure people with criminal convictions are prepared for work and supported to access skilled careers in construction.
107. Access to accredited qualifications and training in construction is limited in too many prisons. Facilities to work towards and be assessed for accredited construction qualifications are not consistently available across the prison service. Where training centres are in place, they are often oversubscribed and do not have the capacity to offer opportunities to everyone that would like to learn during their time in custody.
108. There are key steps that the Government can take to ensure people who have left prison are ready and able to work in careers such as construction, with greater wrap-around support needed in the initial months after their release from custody. The Government should continue to work on improving access to appropriate accommodation that is essential to prison leavers being able to start a job. It should also consider supporting prison leavers with the financial barriers they face in starting work, particularly the cost of commuting.

Question 68. Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

109. Yes - the suggested changes to paragraph 99 help make it explicit that both early years and post-16 places are important factors for providing education and skills for future generations.

Question 73. Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

110. Yes – The built environment alone already commits a significant proportion of UK carbon emissions and efforts to reduce the emissions of both

²³ Prison Learning Alliance (PLA), [Prisoner Learning Alliance \(PLA\) submission to Education Committee Inquiry on Adult Skills and Lifelong Learning](#), July 2020

construction and operation are welcomed by CIOB. It is also important to, where possible, diversify energy generation and storage through alternative means (onshore wind) to avoid over reliance on a single means of energy generation.

111. While this consultation is not the space to talk about some of the efforts that CIOB has made to reduce the carbon output of the construction sector we would encourage the department to review our previous submission to the then Department for Business, Energy, and Industrial Strategy (BEIS) review of net zero which can be [found here](#).

Question 78. In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

112. The NPPF must increase the priority placed on addressing climate change mitigation and adaptation through the planning system. An effective carbon forecasting method for local plans is vital to delivering on statutory climate targets.
113. Greater priority must be given to addressing climate risks, such as overheating, flooding and water scarcity. This must include assessing the risk of climate change on proposed physical assets and infrastructure through future scenario modelling and risk assessments that consider the lifespan of an asset, prioritising the implementation of sustainable infrastructure such as drainage and storm-water runoff solutions at city scale, ensuring green and blue infrastructure are integrated into municipal urban planning, implementing strategic protection measures, favouring nature-based solutions where possible, and ensuring investment in sewerage and water systems.
114. There is also more than can be said about the need for national planning policy to emphasise the importance of sustainable development in terms of location to existing resources/infrastructure where no proposals arise for new associated infrastructure.
115. Much new housing development tends to be located on the fringes of existing settlements, far from existing amenities and transport hubs. This further locks in unsustainable behaviours, such as the over-reliance on cars, which in turn locks in higher emissions over time. Not only does this have a detrimental effect on those occupying the new homes in terms of increased financial outputs but can also lead to isolated new communities out of reach of existing communities which could benefit from further investment but also has an impact on public health from higher emissions output.
116. Planning policy should do more to ensure that new development is sustainable as regards to its location.

Question 79. What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

117. Whilst this question predominantly refers to actions to measure carbon accounting during the local plan making process, there is one point about technological readiness that we would like to highlight when it comes to new housing - the capacity of the electrical grid.
118. There are potential unintended consequences for homebuilders building more technologically capable homes, such as potential problems over the electricity grid, particularly since the scaling back of some of the UK's net zero ambitions in 2023 from the then Prime Minister for heat pumps and electric cars which was expected to lead to a 50% increase in electric demand by 2035 and 100% by 2050.
119. This has been seen in three west London boroughs (Hillingdon, Ealing and Hounslow) in 2022 where the Greater London Authority (GLA) wrote to developers warning them that it might take more than a decade to bulk up grid capacity and get developments under way.²⁴
120. The three boroughs accounted for almost 5,000 homes in 2019-20, equivalent to 11% of London's housing supply. Further stalling in areas that have grid capacity issues further damages the risk of vital new housing being built. Therefore, we feel that it is necessary for the Government to undertake a separate consultation on the preparedness of the grid for the significant increase in new housing.

Question 81. Do you have any other comments on actions that can be taken through planning to address climate change?

121. Buildings and construction form a substantial portion of UK carbon emissions, contributing both operational carbon emissions (due to energy and water use) and embodied carbon emissions (due to the use of construction materials). The sum of this operational carbon has reduced in recent years due to the decarbonisation of the grid, a trend set to continue with further decarbonisation alongside transitioning to electric heating.
122. As such, the embodied carbon emissions in construction contribute an increasing proportion of the whole life carbon emissions for most buildings, with one study indicating that over two-thirds of a low energy new building's emissions are embodied.²⁵ Operational carbon emissions are directly linked to operational energy use, which are limited by Part L of the Building Regulations. There is no such parallel legislation limiting embodied carbon emissions.
123. Across the construction industry, firms are already calculating and reporting the whole life carbon emissions of their projects. However, this is typically done either voluntarily, or in response to client requirements. To address this, several industry figures have created a proof of concept for the creation of a [Part Z](#) and Approved Document Z amendment to the Building

²⁴ City A.M., Developers warned: [House-building in three West London boroughs stalled until 2030 over lack of power](#), 29 July 2022

²⁵ Gaspar, P.L. and Santos, A.L., [Embodied energy on refurbishment vs. demolition: A southern Europe case study, Energy and Buildings](#), 2015

Regulations. This would outline requirements on the assessment of whole life carbon emissions and limiting of embodied carbon emissions, for all major building projects. CIOB is a listed supporter alongside over 140 other organisations.

124. Part Z is written with proposed dates that are deemed to be achievable whilst remaining ambitious, requiring the whole life carbon assessment and reporting of all projects of more than 1000m² (or 10 dwellings) from 2024 for non-domestic buildings, and 2026 for domestic; and the introduction of legal carbon limits on embodied carbon emissions from 2028, giving a period of time during which robust limits can be set. This proposed timescale follows the precedent set by other European countries such as the Netherlands and France that have already started progressing this topic.²⁶
125. We recommend that government takes the time to understand the proposed Part Z with a view of including it within the Building Regulations.
126. Additionally, amending the NPPF presents an opportunity to pursue retrofitting in a limited capacity.
127. Whilst we understand that retrofit predominantly applies to the improvement of existing buildings, its social, environmental and economic value cannot be understated. Therefore, incentives should be sought through changes to the rules for planning permission to promote the reuse of existing buildings to a high standard or incentivise the refurbishment of existing buildings rather than their demolition.
128. Environmental consultancy [Greengauge](#), has echoed work undertaken by CIOB to argue that the carbon cost of demolishing a building can often outweigh any potential benefits. Greengauge has repeatedly argued that there are alternative options, which release a fraction of the carbon of a new build when combined with the carbon output of demolishing an existing building.²⁷
129. This approach may bring labour efficiencies and simplify management. But there is growing evidence that suggests extending the lifecycle of buildings by refurbishment is in many cases preferable to demolition in terms of improved environmental, social, and economic impacts. We encourage Government to examine evidence from campaign group Don't Waste Buildings which can be [found here](#).
130. Despite the well-evidenced benefits of retrofit over demolition, as it stands, the UK's current VAT structure financially incentivises demolition and rebuild over renovation and retrofit projects. Under the current structure, 20% VAT is applied on most repair and maintenance projects. In contrast, most demolition and new build projects are not charged VAT at all, creating a perverse environment where the replacement, rather than the repair and restoration, of

²⁶ [Part Z](#)

²⁷ Greengauge, [To Demolish or Not to Demolish](#)

the built environment is financially incentivised.

131. In the absence of tax reform, there are policy options available to help redress this imbalance. The CIOB has previously argued that the implementation of a demolition levy could support incentivising retrofit projects, with the added benefit of generating a new revenue stream. As outlined in our 'Levelling the Playing Field' report,²⁸ regulatory measures have been proven effective in undergirding similar types of sectoral culture shifts. Landfill taxes and the application of an aggregate levy facilitated a 70% decline in the amount of Construction and Demolition Waste (CDW) disposed to landfills in the UK.²⁹ Further, international studies concluded that levies were more effective at CDW mitigation than financial incentives, achieving the targeted 30% reduction in CDW two years sooner and have the co-benefit of generating a new revenue stream.³⁰ We recommend that Government to consider the value a demolition levy could bring to the sustainability of our built environment, the economy, and the construction sector writ large.

Question 84. Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

132. While we agree that there is a need to improve the current water infrastructure provisions in the Planning Act 2008 and would support the inclusion of a wider range of water projects being brought into the definition of Nationally Significant Infrastructure Project (NSIP), we are not best placed to advise on this in detail. However, it is important for government to listen to those with more expertise in this area.
133. Therefore, we would recommend engagement with the likes of the [Institution of Civil Engineers](#) (ICE), [The Water Institute](#) (IWater), the [Chartered Institution of Water and Environmental Management](#) (CIWEM) and the [Future Water Association](#) on this topic.

Question 86. Do you have any other suggestions relating to the proposals in this chapter?

134. We would like to take this opportunity to highlight that an integrated approach to managing water scarcity is required and this must include strong efforts to reduce demand.
135. The UK Government was due to introduce a Mandatory Water Efficiency Labelling Scheme in 2025, linked to minimum fittings standards; to drive reductions in water use and we hope this is still a priority. The recent publication of the [Future Homes Hub 'Water Ready' Report](#), which calls on Government to

²⁸ CIOB, '[Levelling the playing field, not Scotland's built environment](#)', 2022

²⁹ Lesniewska, F., [Adding value to construction and demolition waste to achieve sustainable development](#), 3 February 2022.

³⁰ Calvo, N., Varela-Candamio, L. and Novo-Corti, I., [A dynamic model for construction and demolition \(C&D\) waste management in Spain: Driving policies based on economic incentives and tax penalties](#), [Sustainability](#), 2017

publish a 10-year roadmap setting out increasing water efficiency targets implemented through Building Regulations in 2025, 2030 and 2035, also provides a welcome focus on this issue.

136. Reducing demand for water is not just the responsibility of one sector, but the construction industry does have a significant role to play in increasing the water efficiency of new and existing homes and other buildings. Increased ambition by policymakers and water efficiency standards for new development, collaboration between authorities, developers and wholesale water companies, incentive schemes that encourage developers to go further on water efficiency, and innovation to reduce costs and increase the quality of water-using products will all be critical.