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Early Adopters and the Late Majority

A Review of Local Plan Progress and Housing Requirements

April 2016



Executive Summary

Four years on from the introduction of the National Planning Policy Framework (NPPF) Government is embarking upon further reshaping of the planning system, with one of the key objectives to streamline and quicken the pace of Local Plan production. The Housing and Planning Bill and the recommendations of the Government appointed Local Plans Expert Group (LPEG) both propose measures to address the slow progress in achieving nationwide coverage of up-to-date Local Plans.

Less than a third of Local Planning Authorities have an NPPF-compliant up-to-date plan. To address this, Government is setting a deadline of 'early 2017' for Local Planning Authorities to produce a plan, or face intervention, meaning the race is on for those at the back of the pack. Our research has identified 21 Local Planning Authorities who are most 'at risk' of intervention.

This is set against the backdrop of ongoing tensions in the Duty to Cooperate and continued complexities in producing the evidence base for Local Plans, particularly in relation to housing provision. In total 1 in 15 plans examined have been found to fail the Duty to Cooperate, whilst of those found sound 48% have had to increase their housing requirement in order to address objectively assessed housing needs (OAN).

To fix the system, LPEG recommends a streamlined prescriptive approach to OAN alongside proposals to give the Duty to Cooperate 'bite' to ensure housing needs are met. The overarching implication for those engaged in plan making is the debate will move from housing need to housing delivery, with evidence on spatial strategy, development capacity and housing supply likely to become centre stage. Under the NPPF our research shows that 16 plans have been found sound with a housing requirement explicitly acknowledged to be below OAN due to constraints, however, only one of those identified where the unmet needs might go.

Our research shows the NPPF is bringing about a "significant boost" in planned housing supply across England. Excluding London, up-to-date Local Plans are planning for 19% more housing than the equivalent household projections. It is this success Government is aiming to replicate through faster, more focussed, plan making which works with the grain of the existing architecture of the planning system



The Review in Figures

- 139** Local Plans examined or submitted for examination
- 86** Local Plans found sound
- 25** Local Plans withdrawn on the basis of soundness concerns
- 31%** of Local Planning Authorities have an up-to-date Local Plan
- 1 in 15** Local Plans fail the duty-to-cooperate
- 16** Plans found sound with a housing requirement below objectively assessed need
- 19%** amount by which planned supply exceeds household projections in aggregate within up-to-date Local Plans
- 21** Local Planning Authorities most 'at risk' of Government intervention

n.b. The review and our figures exclude London as well as single issue/focussed review Plans which do not address housing numbers

Introduction

Four years on from the introduction of the NPPF, Government is embarking on further reshaping of the planning system. The introduction of the Housing and Planning Bill, currently making its way through parliament, and the launch of the Local Plans Expert Group (LPEG), tasked with streamlining the local plan making progress, has set out the stall for how Government is seeking to achieve its ambitious plans for housebuilding.

Crucially, the Planning Minister has set a deadline of 'early 2017' for Local Planning Authorities to 'produce' a Local Plan, with the Housing and Planning Bill set to introduce measures allowing Government intervention if this deadline is not met.

This reform is intended to address the continued slow progress in the production and adoption of Local Plans in the post-NPPF system.

Figure 1 illustrates that over the four years of the NPPF plan-making activity has slowed as plans have been found sound, but not replenished by new plans coming forward for examination. Less than a third of Local Planning Authorities (LPAs) in England outside of London have an NPPF-compliant up-to-date adopted plan. Half of LPAs are yet to produce a local plan following the March 2012 introduction of the NPPF.

This report is the fourth in an annual series of studies produced by NLP that review the progress of Local Plan preparation and examine what has been happening with housing requirements. In this year's report we focus on what the reshaping of plan-making will mean for those engaged with plan preparation.

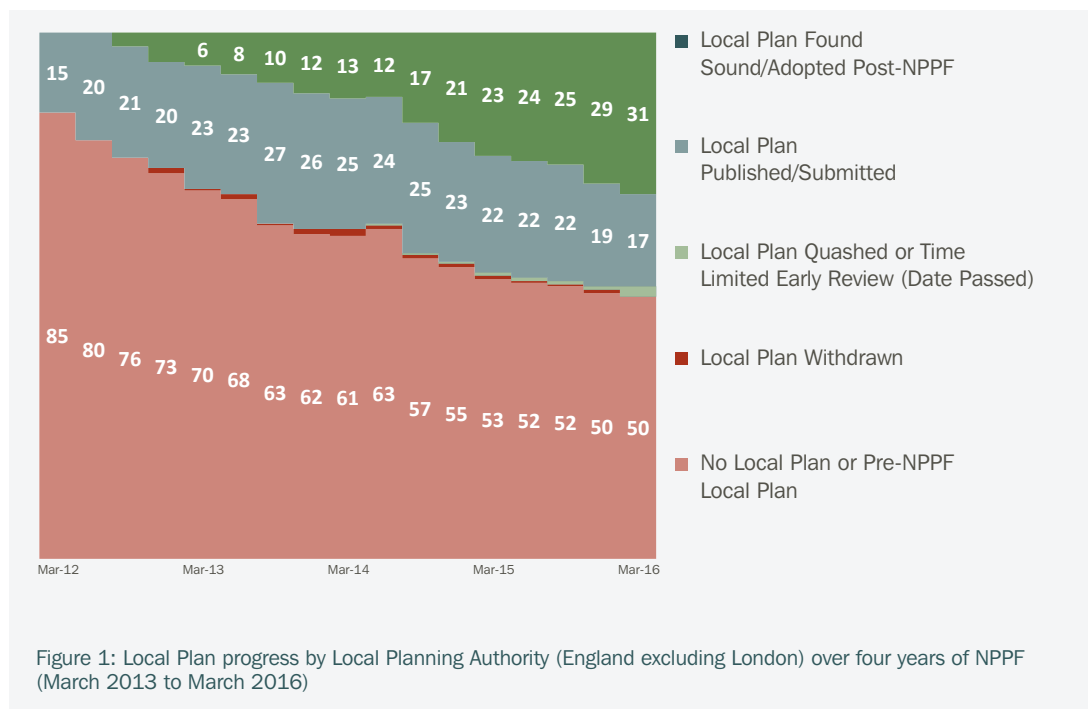


Figure 1: Local Plan progress by Local Planning Authority (England excluding London) over four years of NPPF (March 2013 to March 2016)

Early Adopters and the Late Majority

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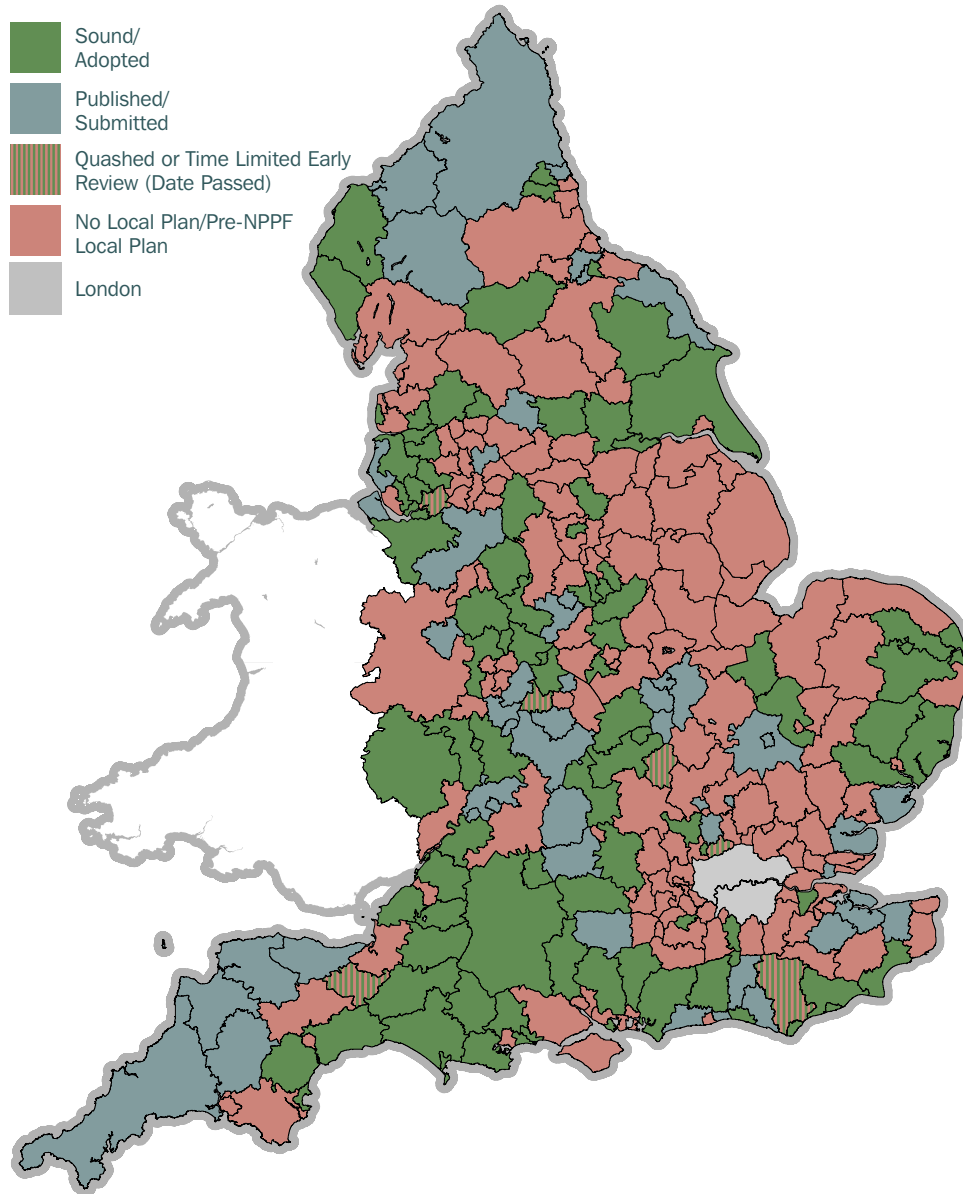


Figure 2: Local Plan status post-NPPF by Local Planning Authority (District) as at March 2016, based upon Planning Inspectorate monitoring and NLP analysis

n.b. Status is by reference to housing requirements contained within Plans and their examination against the policies of the NPPF through a 'strategic issue' plan. The analysis is based upon a high level review that has not looked in detail at the individual circumstances of every Local Planning Authority and the overall status of their planning policies. References to Plan status are made principally with regard to the position regarding the setting of the housing requirement as it is often the most difficult issue plan making has to address. Reference to the status of any local plan in this map does not represent advice on the weight that should be afforded to any specific policy in the Local Plan in decision-taking on planning applications, as circumstances will be different in every location.

This map was amended on 21st April 2016 and it supersedes earlier versions included within this report.

Local Plans

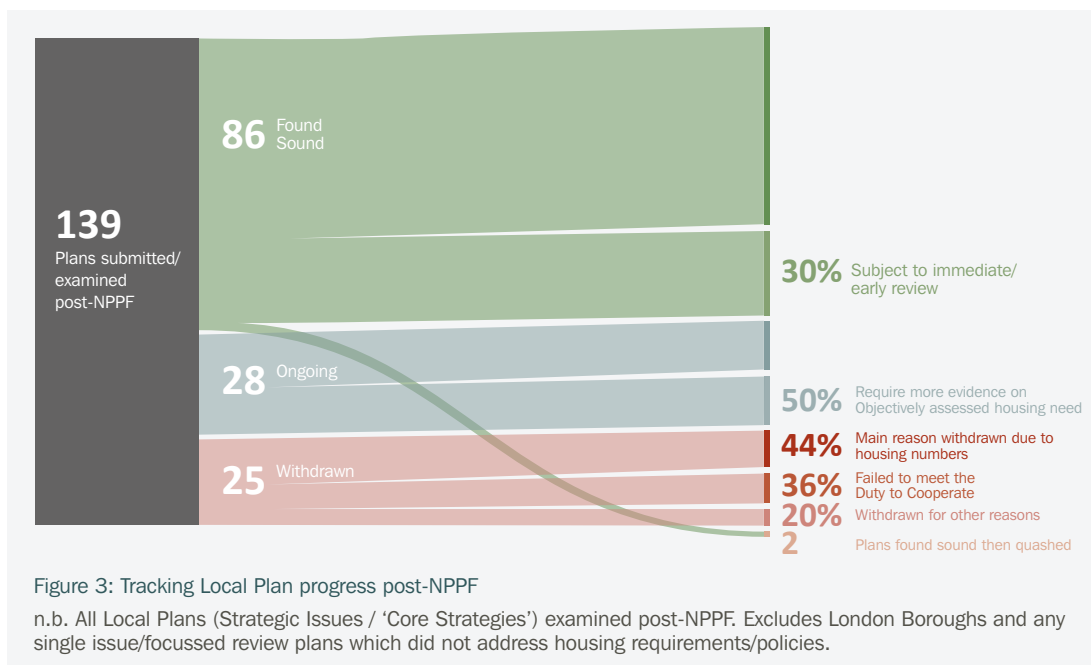
Four years under the NPPF

Summary of progress

Since the introduction of the NPPF a total of 139 plans have been examined or submitted for examination outside of London (Figure 3)¹. Of these, circa two thirds have been found sound, albeit almost a third have been found sound requiring an immediate or early review. Two Plans, Warrington and Solihull, were found sound but have since had their relevant housing policies quashed in the courts.

25 plans have been withdrawn, with the inadequate provision of housing continuing to be a main reason cited. Nine of those failed to meet the legal test of the duty to cooperate, with a key contributing factor in most of these relating to cross boundary housing issues.

The remaining 28 plans are currently 'in the system' having been submitted for examination but not yet found sound. Half of these require further evidence on objectively assessed housing need, highlighting the continued scrutiny of housing provision matters.



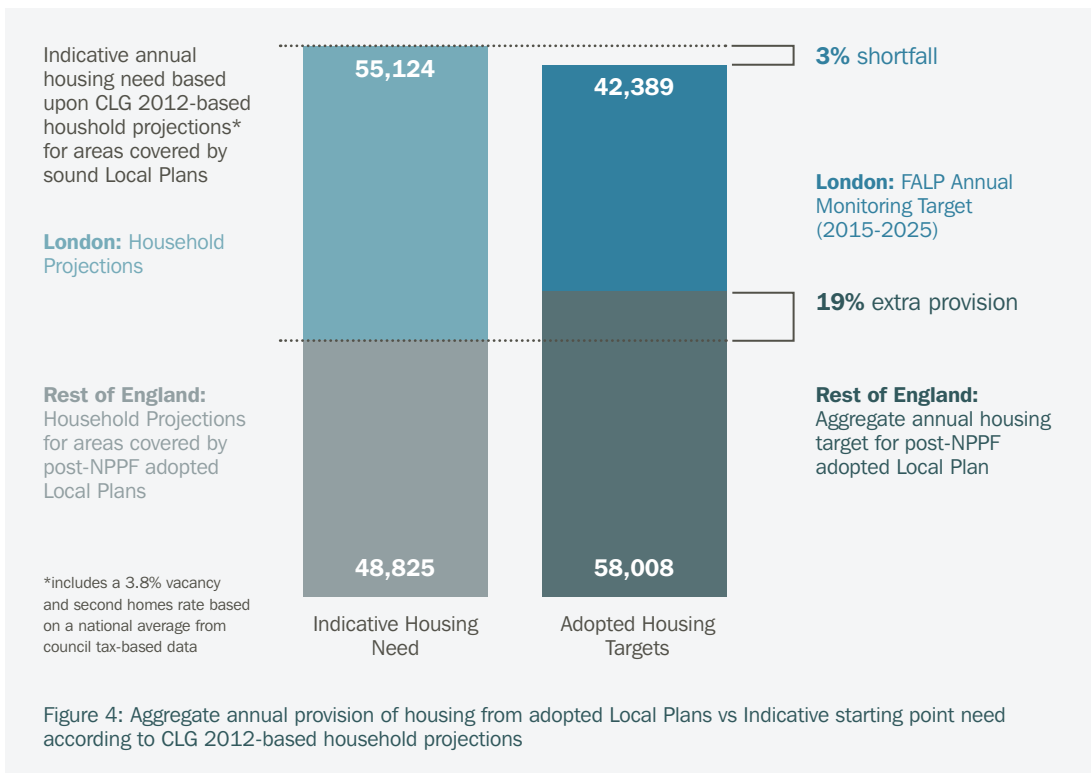
1 The review takes into account all 'strategic issue' Plans (outside London) that have been examined or submitted for examination since 27 March 2012 up to an including mid-March 2016. It is based on data collected by the Planning Inspectorate complemented by analysis by NLP. It excludes single issue or focussed reviews which did not deal with housing policies and excludes LPAs in London, where the London Plan provides the strategic policies.

London in limbo

The Further Alterations to the London Plan (FALP) were adopted in March 2015, setting new housing requirements across London, but falling short of meeting need by at least 6,600 dwellings each year. The Planning Inspector examining the FALP indicated that London Boroughs do not have the same obligation via their Local Plans to assess and meet full objectively assessed needs for housing, in doing so directing the mayor to undertake an immediate full review of the London Plan exploring options beyond its “existing philosophy” in order to meet the need; a task for the new London Mayor. The GLA’s new Housing Supplementary Planning Guidance seeks to provide a framework for Boroughs, but Plan making in London is in limbo, with further changes on the horizon. Against this moving backdrop, **10** of the **34** LPAs in London (32 Boroughs, the City plus the London Legacy Development Corporation) have adopted post-NPPF Local Plans, albeit only **5** of these have followed the introduction of the FALP.

Successfully meeting needs?

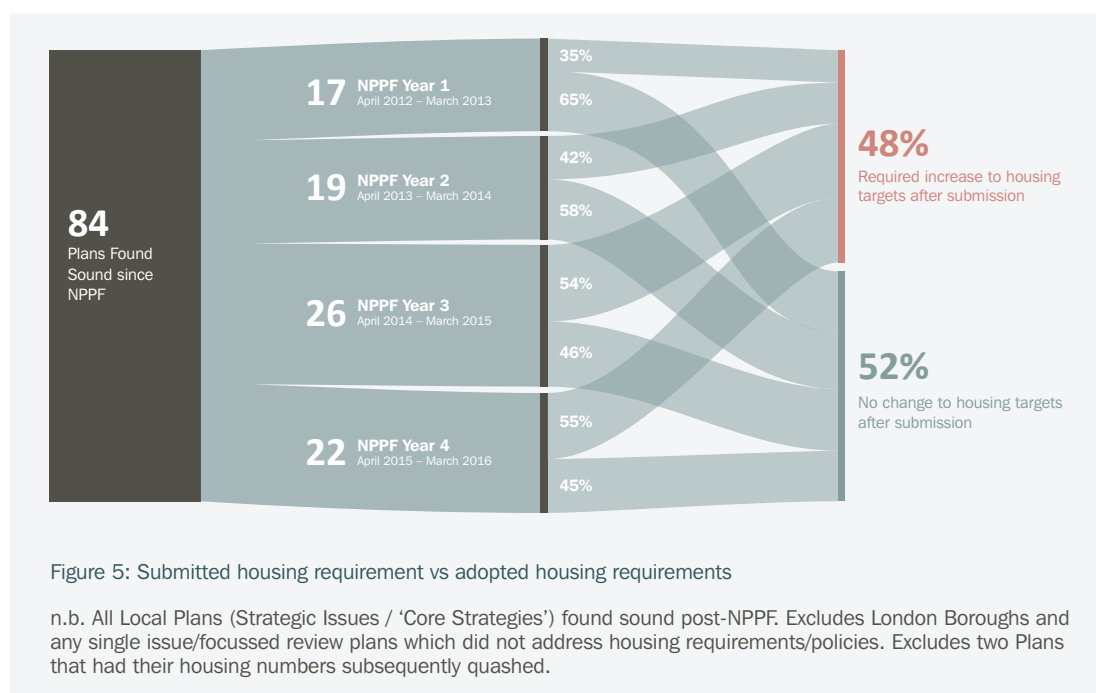
Although plan progress has been slow, it is clear that the Plan-led system under the NPPF is starting to deliver positive plans which can meet housing needs. As illustrated in Figure 4, based on the 84 adopted plans in place since the NPPF, in total housing requirements have exceeded the relevant 2012-based household projections (the starting point for considering objectively assessed housing needs) by 19%. This provides an overarching barometer that sound plans are likely to set housing targets that will help the country meet its housing needs. However, when the Further Alterations to the London Plan is taken into account this turns to a shortfall of 3% given the significant unmet needs across the Capital.



Planned supply increasing through examination

This relative success in meeting needs has, however, come through upwards attrition on housing numbers during the examination process. Many objectors to plans have argued for higher housing to meet objectively assessed needs, with almost half of plans having to increase their

housing targets to be found sound (Figure 5). This debate itself, whilst serving to achieve the important outcome of plans which meet housing needs, has undoubtedly led to many delays in getting plans in place. Such delays can be avoided if Strategic Housing Market Assessments (SHMAs) supporting plans correctly identify OAN.





An Impending Remedy

Local Plans Expert Group

The problems with Local Plans have been on the Government's radar and prompted Ministers to establish the Local Plans Expert Group (LPEG) in September 2015. LPEG gathered evidence from over 140 respondents and produced its report in March 2016. One of NLP's Senior Directors - Matthew Spry - was an advisor to LPEG, with a particular focus on the group's recommendations in respect of housing. LPEG identified a number of key barriers to plan-preparation and was tasked with simplifying the system "with the aim of slashing the amount of time it takes for local authorities to get them in place". The recommendations of LPEG are wide ranging, but include everything from stipulating a simplified approach to OAN and strengthening the duty to cooperate, through to a standardised approach to land supply, boiling the process of plan-making down to a defined two-year period, and strengthening mechanisms to compel plan preparation, potentially through DCLG intervention.

The LPEG report is out for consultation until 27th April 2016 and more details are available on its website www.lpeg.org. The Government will need to decide which of the LPEG's recommendations it will choose to accept, but the Group's recommendations run with the grain of Government policy, and its report was 'welcomed' as part of the Budget 2016 process.

LPEG's recommendations should remove some of the main blockages to plan preparation, and an increased volume and pace of plan-making activity can be expected over the next 18 months. However, local plans will continue to need to reconcile competing priorities, so a boost to the process, whilst importantly solving the existing causes of delay, will shift the focus of activity to addressing real planning conundrums, particularly in high growth, high constraint locations, but working to a tighter timescale. The table below highlights some of the shift in focus as a result of the LPEG recommendations:

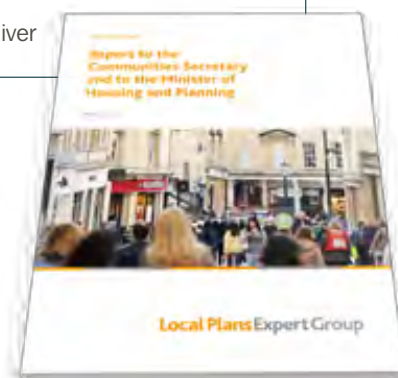
Simpler and/or faster

- Setting OAN without dispute
- Joint Plans and setting potential distribution of housing between LAs earlier
- Getting from Regulation 18 to 19 stages more rapidly
- Quicker more focused Examinations
- More straightforward tests of soundness
- Less need for 'early reviews'
- Shorter, more focused Plan documents

New challenges

- Local Plan intervention by CLG
- Responding to a Duty to Cooperate with more bite
- Evidencing environmental and development capacity
- Effective Green Belt reviews
- More effective land supply including 5YHLS and reserve sites
- Resourcing to deliver

Each of the new challenges is examined in the following pages.



Local Plan Intervention

Government has set out a commitment to take action to get plans in place and ensure plans have up-to-date policies. As part of this Government has set out that where local planning authorities have not produced a Local Plan by 'early 2017' then Government will intervene to arrange for a plan to be written. The February 2016 DCLG technical consultation on the implementation of planning changes, provides some insight on how Government will apply such powers, prioritising intervention where:

- The least progress in planning making has been made;
- Policies in plans have not been kept up-to-date;
- There is higher housing pressure (including poor performance on housing delivery); and
- Intervention will have the greatest impact in accelerating local plan production.

Using this as basis, NLP has undertaken some analysis to provide a snapshot of which local planning authorities might be most 'at risk' of intervention at the current point. Figure 6 presents a list of those which might fall foul of the above criteria based on applying some metrics as follows:

1. LPAs that have not yet published/submitted an up-to-date (i.e. post-NPPF) Local Plan (based on Planning Inspectorate monitoring data);
2. LPAs in areas of high housing pressure, using areas where the lower quartile affordability ratio is greater than 10, which represents the top 20% of LPAs (based on 2014 data on house prices from Land Registry price paid data and incomes from the Annual Survey of Hours and Earnings); and

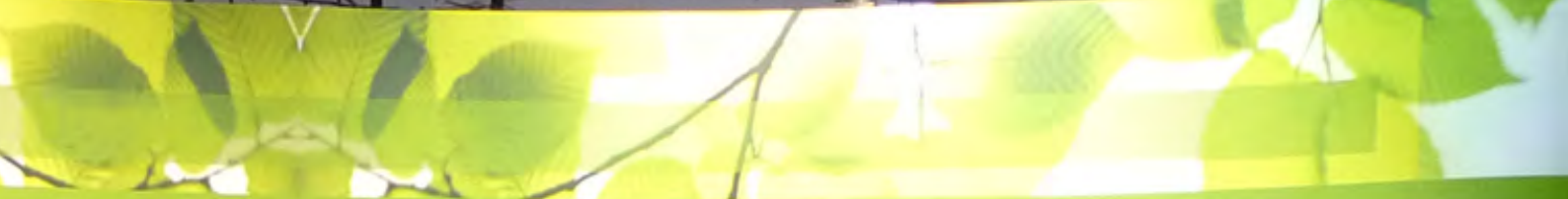
3. Areas where there has been under-delivery of housing based on comparing household projections with housing completions over the 5 years to 2014/15 (based on household projections in DCLG Live Table 406 plus a notional 3.8% for vacancy rate and permanent dwellings completed in DCLG Live Table 253).

Clearly this is a partial snapshot analysis. It does not take into consideration any wider planning context or exceptional circumstances, which are more subjective measures that the Government indicates it will take into consideration in exercising intervention powers. It also does not reflect the timescales those LPAs have set themselves within their local development schemes, which will be another indicator used. Notwithstanding, it does identify those LPAs that will need to speed progress in order to avoid risk of intervention. In this regard we are aware that many of the 21 authorities are currently working hard to prepare their evidence base with a view to publishing plans in 2017. There is a clear geographic clustering of these LPAs, with the majority being areas within the Metropolitan Green Belt around London. There are also a number of authorities where the indicators we have used do not flag them as obvious candidates for intervention, but where Government might have concerns about the need to make progress. This could include areas such as York who have never had an adopted Local Plan.

Local Authority	Plans Have Not Been Kept Up to Date: No 'Produced' Local Plan; Date of Last Local Plan	Area of High Housing Pressure: LQ Affordability Ratio (2014)	Underdelivery of Housing: 5 Year Delivery v. Household Projections (per annum deficit)
Brentwood	Jul-05	10.42	-163
Chelmsford	Feb-08	10.04	-368
Derbyshire Dales	Nov-05	12.91	-87
East Hertfordshire	Jan-07	10.79	-462
Epping Forest	Jan-98	11.82	-191
Epsom and Ewell	Jul-07	13.51	-125
Guildford	Jan-03	10.67	-232
Hart	Jun-06	10.96	-10
Mole Valley	Oct-09	11.18	-128
New Forest	Oct-09	10.01	-350
Oxford City	Mar-11	10.21	-248
Rochford	Dec-11	10.76	-65
Sevenoaks	Feb-11	11.71	-380
South Buckinghamshire	Feb-11	16.50	-131
Tandridge	Oct-08	14.12	-197
Three Rivers	Oct-11	11.26	-159
Tonbridge and Malling	Sep-07	10.25	-266
Uttlesford	Jan-05	11.43	-178
Waverley	Apr-02	13.87	-210
Windsor & Maidenhead	Jun-03	12.20	-273
Wycombe	Jul-08	10.24	-158

Figure 6: Local Planning Authorities that may be most 'at risk' of Local Plan intervention in March 2017

Whilst local plan intervention is a clear 'stick' the Government is intent on implementing to speed local plan progress, it is not yet clear how that intervention would take place and what it would involve. It could be that the Planning Inspectorate is drafted in to prepare plans (or discrete parts therein), or Government may look to the private sector to fill the void.



After the war the arfield was operated as the London Aero Club and acquired by Mr J.N. Barnes Esq of Haslemere's ownership in 1964.

By the 1980s there were problems at the site from gully and treefall incursions and most of the arfield was sold in 1985 and 1987 to Shire for housing, south of the remaining arfield.

Today the arfield is owned by Marjoss Investments Limited.



Core Strategy

Under the recently confirmed Local Plan, Welwyn Hatfield is identified as a key centre and change and will have 10,000 new homes in the next 10 years.

Welwyn Hatfield Borough Council has set out a number of aims in its Local Plan for the future housing development of Welwyn Hatfield. The aim is to create a sustainable community suitable for minor growth, in an housing location that is well served by public transport.

We believe that Parham is a good location to meet the housing needs for the future. It is adjacent to a local primary school, a GP surgery, a bus stop, a bus shelter and a bus stop.

It is also well served by public transport and is a good location for a bus stop. It is also well served by public transport and is a good location for a bus stop.

the site development and to ensure that the site is developed in a way that is sustainable and meets the needs of the community.

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Masterplan for the future



Next Steps

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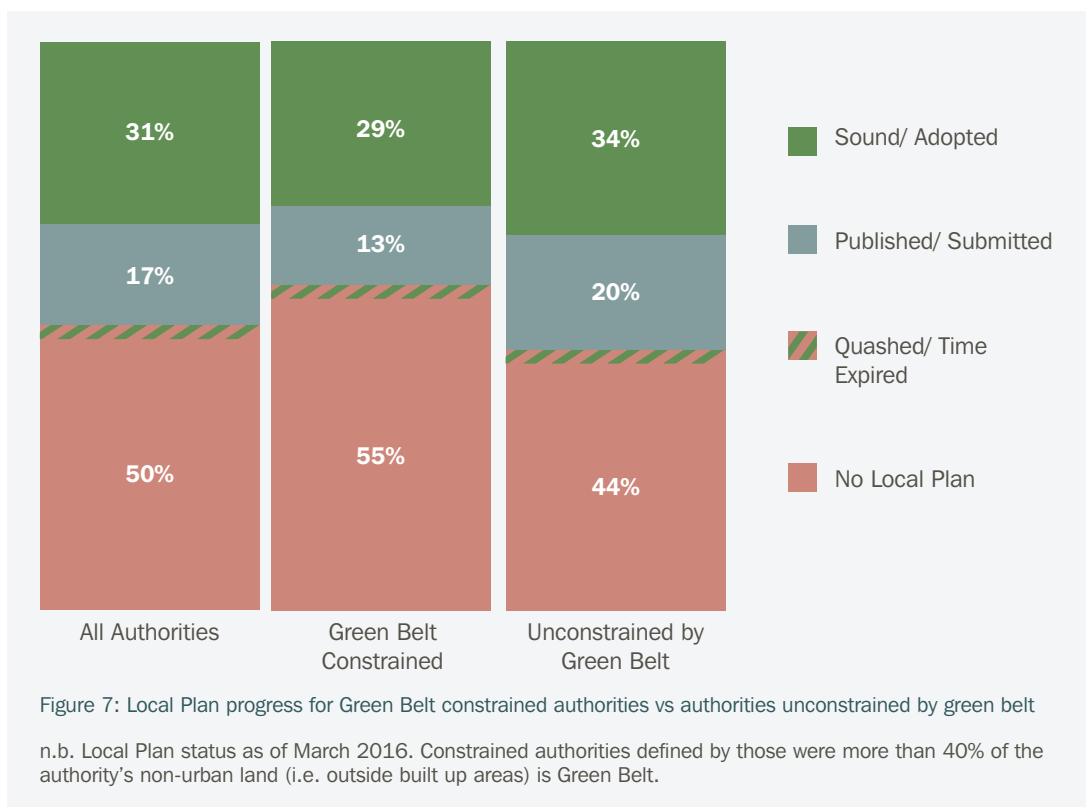
Design Team

Architect: [Name]
Landscape Architect: [Name]
Planning Consultant: [Name]
Ecologist: [Name]
Transport Planning: [Name]

Effective Green Belt Reviews

Perhaps unsurprisingly, plan-making has been markedly slower in authorities with significant areas of Green Belt. Current policy, arguably, created a disincentive to prepare Local Plans for those areas seeking to protect their Green Belt. Difficult choices around meeting development needs and Green Belt review mean that some LPAs have hit the buffers on plan production, instead relying on the

protection the NPPF affords to Green Belt to resist any unwanted development through the decision-taking process and at any subsequent planning appeals. Figure 7 illustrates this; 55% of Green Belt constrained LPAs are yet to even produce a plan, compared with only 44% in non-Green Belt areas.



Green Belt policy is not set to change, with the provisions of the NPPF² and the test of 'exceptional circumstances' set to remain in place. The practical implication of this is that LPAs will continue to have to define Green Belt boundaries within Local Plans ensuring consistency with the local plan strategy to meet identified requirements for sustainable development. To demonstrate this LPAs will need to

undertake Green Belt reviews, assessing the extent to which alterations to Green Belt boundaries can meet development requirements. To this end, to aide LPAs, LPEG suggests advice should be made available to LPAs on how to undertake effective Green Belt reviews mindful of the fact that Green Belt is a "planning mechanism rather than an environmental designation."

2 Paragraphs 83-85 of the NPPF

Evidencing Environmental and Development Capacity

Para 14 of the NPPF sets out a clear test that objectively assessed housing needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or specific policies in the NPPF indicate development should be restricted. Since the introduction of the NPPF, just 16 Local Plans have been found sound where the Inspector explicitly cited that constraints or adverse impacts justified a housing requirement below OAN. Illustrated in Figure 8, these have predominantly been within areas subject to the types of constraints listed within NPPF footnote 9 and furthermore have mostly been in the south of England. NLP's experience is that the 'flex' in assessing OAN has meant some of the debate over housing need has been a proxy for discussions on environmental capacity, but this flex will end if LPEGs 'stipulated' approach is accepted. The debate will move to a proper discussion of the capacity for development.

Looking to a streamlined system, LPEG recommend all Local Plans should be submitted alongside evidence providing a proportionate Assessment of Environmental Capacity. Where LPAs seek to justify a housing requirement below housing need for their own area by reference to capacity constraints, they will need clear and coherent evidence demonstrating that an area could simply not carry the level of development necessary to meet housing needs. This may be through a more exhaustive search for unconstrained land supply, such as in Brighton and Hove, where the Inspector only found the plan sound having directed the Council during suspension of the examination to "leave no stone unturned" in trying to find additional suitable sites. Alternatively it may be through evidence on environmental impacts, landscape sensitivity, habitats regulation assessment or other constraints, brought together to clearly show why development cannot be accommodated. The NPPF sets the bar high in evidencing insurmountable constraints and, even where it is demonstrable, such approaches will need effective cooperation across the housing market area to ensure any unmet needs are met in less constrained areas.

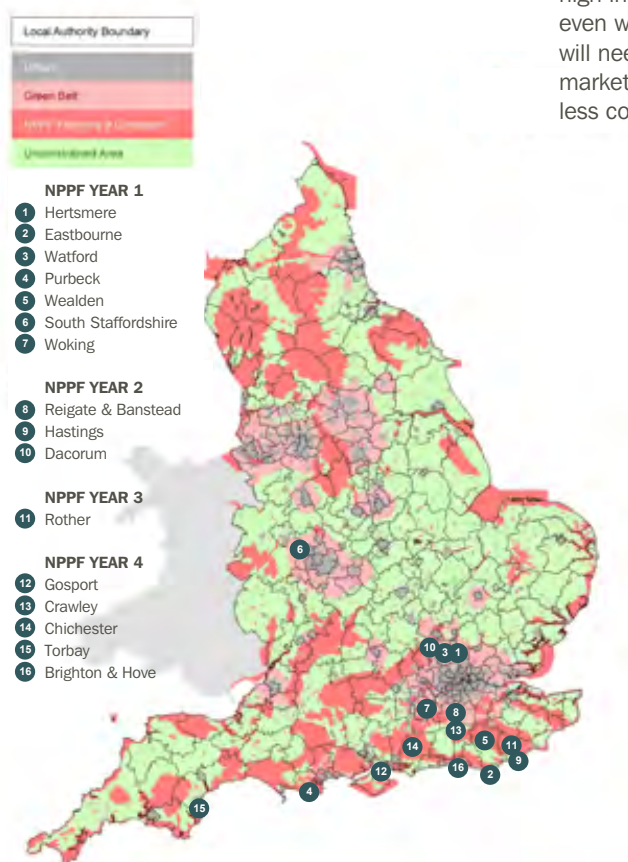
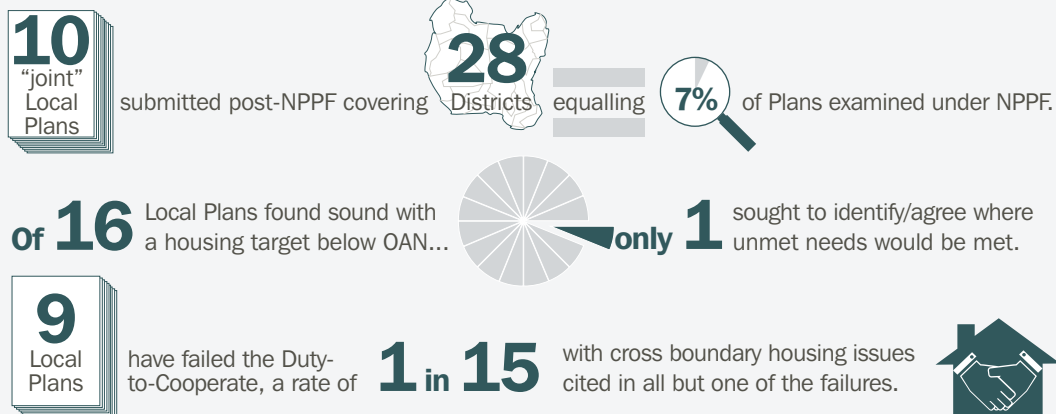


Figure 8: LPAs where Inspector concluded constraints to supply specifically justified a housing requirement below OAN

Effective Cooperation to Meet Needs

Cooperation by numbers



The duty-to-cooperate has never been applied as a duty-to-agree. However, it is this very characteristic which is a perceived weakness, with the duty insufficient in and of itself to generate strategic planning across housing market areas to ensure needs are met. As shown by the numbers on cooperation (see box above), numerous authorities have prepared successful joint local plans, but this is still the exception rather than the rule and there are still unmet needs being left unaddressed (see the Sussex Case Study box below).

LPEG recommend the duty can be given "bite" by requiring LPAs to enter into a memorandum of understanding which would agree the distribution of housing needs across HMAs or between HMAs, ensuring that any unmet needs are fully addressed.

Such a memorandum would need to be the output of cooperation, but would be informed by evidence on factors affecting distribution including environmental or infrastructure constraints, housing market geographies and spatial priorities. To this end, LPEG recommend SHMAs should be required to evidence where the unmet needs from one part of the HMA would be displaced to (e.g. based on migration or commuting patterns amongst other factors) and would introduce an obligation for authorities to challenge their neighbours where an inability to meet needs is disputed including between HMAs. The implication is that need is 'chased' through the system until it is met.

Case Study: Sussex

The whole of Sussex comprises 13 district/unitary Local Planning Authorities plus the South Downs National Park, arranged into several separate, but overlapping, housing market areas. Seven of the 13 districts have adopted a post-NPPF plan which does not meet OAN, however, very little of the unmet needs are being met in other parts of the HMAs or the Historic County as a whole. Facing clear constraints in particular parts of the area, the outcomes of the Duty-to-Cooperate in Sussex have not yet ensured housing needs are being met in full. It is precisely this, where objectively assessed needs fall down the gaps between individual district plans, which the LPEG recommendations are seeking to address.

Case Study: East Riding of Yorkshire and Hull

In examining the East Riding local plan, the Inspector noted that the two Councils had agreed an apportionment approach, whereby East Riding would provide less housing than OAN and Hull will make up the shortfall so overall needs across the HMA are met. The Inspector found merit in the approach concluding:

"While there may be no environmental constraints preventing the need identified in the East Riding being delivered within the district, both the East Riding and Hull City Councils regard an increased requirement in Hull to be desirable. Furthermore, the fact that the two Councils have reached an agreement under the Duty to Co-operate is an important factor in itself. I regard this to be an expression of localism and, in the absence of any compelling evidence to the contrary, it is one which should prevail."

More Effective Land Supply

Beyond housing needs, land supply issues continue to be a focus for Inspectors at examination as housing trajectories and the deliverability of sites are placed under the microscope. In the last two years, more than a third of sound Local Plans had supply issues explicitly flagged by the Inspector in their findings requiring modification to be made sound, with concerns ranging from deliverability of key sites, lead-in times, build out rates and the five year housing land supply position.

Addressing this, LPEG set out recommendations on how Local Plans and LPAs can ensure a more effective land supply, including allocating reserve sites as a 20% buffer to the housing trajectory and a new approach to five year land supply similar in nature to the Welsh system of Joint Housing Land Availability Studies. This new approach to five year land supply would involve a process for annual monitoring reports to be signed off by an independent examiner, with the result being treated as the definitive calculation for the following year.

Whilst not removing the debate from Local Plans entirely, it should give confidence that Plans can be more effective in maintaining a five year land supply across the plan period but it will necessitate proper engagement in the new process by all interested parties on an annual basis.

There will also be a need for land supply to get to grips with the patchwork of mechanisms for 'allocating' sites for development, with most LPAs expecting to have a mix of strategic allocations, sites on brownfield registers (benefitting from Permission in Principle), Neighbourhood Plans and, if required, Site Allocations Plans. Housing Implementation Strategies will play a more important role in piecing this all together.

Resourcing to Deliver

Local Authority budgets are being squeezed, with planning and development activities being hit disproportionately. Local Authority planning budgets have more than halved in real terms over the past six years (Figure 9), highlighting the resource challenges planning departments are facing in getting Local Plans adopted. LPEG's

recommendations for streamlined Local Plans, with more concise Plans and a more succinct and focussed evidence base, will help resource constrained planning teams to produce effective Local Plans in a period of budgetary constraints.

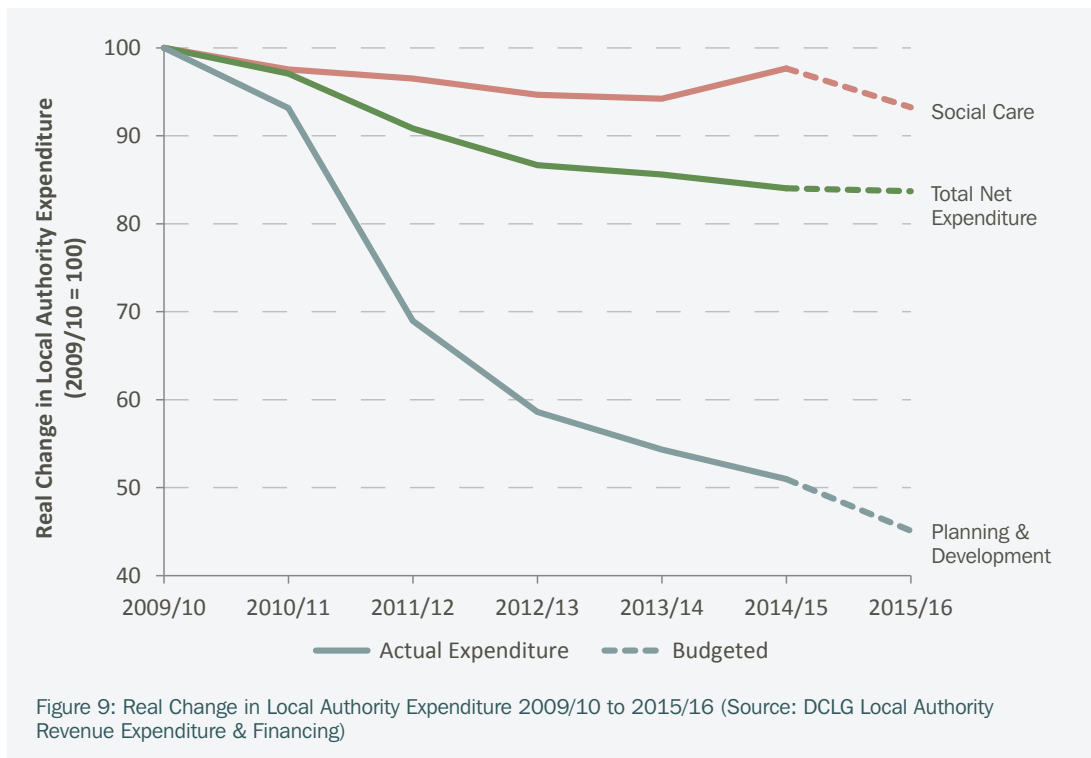


Figure 9: Real Change in Local Authority Expenditure 2009/10 to 2015/16 (Source: DCLG Local Authority Revenue Expenditure & Financing)

A streamlined evidence base

The implications of LPEG's recommendations will be a shifting of the debate and focus from need to delivery. Whilst there will still be a need for SHMAs, a streamlined and standardised OAN process mean new evidence will need to focus on if and how those housing needs are met. This means the new evidence typologies for planning for housing needs will include:

- **Geographies of Housing Need** - understanding functional market areas and where unmet needs will manifest itself across and beyond the HMA.
- **Development Constraints** - how much development can an area carry including analysis of NPPF footnote 9 constraints, environmental capacity, landscape constraints and other development constraints.
- **Infrastructure Capacity** - what infrastructure is needed to support growth.
- **Green Belt Reviews** - robustly reviewing green belt boundaries consistent with achieving sustainable development and meeting needs.
- **SHLAAs** - rigorous evidence which leaves no stone unturned in finding suitable sites, including informing brownfield registers.
- **Spatial Approach** - an evidenced strategy for where and why development is proposed justified against the NPPF through the Sustainability Appraisal (SA).
- **Agreed Strategy for Unmet Needs** - an agreed solution/strategy across an HMA to address any unmet needs arising. For example this might be best achieved through a joint or aligned plan or alternatively a memorandum of understanding on cross-boundary housing needs.

Where does it leave LPAs?

Local Planning Authorities will typically fall into one or more of a number of typologies, under two broad umbrellas; those who can meet housing needs in their area and those who cannot. For those who can, the main evidence required will be a deliverable strategy for meeting those needs. For those who believe they cannot, the evidence required to achieve sound local plans will relate primarily to the reasons why needs are unable to be met.

Figure 10 outlines some of these new typologies and the fundamental evidence that will be necessary. In reality many Local Plans will straddle numerous typologies, but clear evidence will be needed to demonstrate to neighbouring authorities why unmet needs exist and ultimately to ensure delivery of sound Local Plans that address any unmet needs through the Duty to Cooperate.



Figure 10: Local Plan typologies and the key evidence pieces.



Conclusions

Slow progress continues to be the defining characteristic of Local Plan production, with less than a third of LPAs boasting an up-to-date Local Plan adopted since the introduction of the NPPF four years ago. The reasons for such leisurely plan-making are numerous, but it is clear that planning for housing needs is adding to the time spent both producing and examining Local Plans.

To address this, Government is embarking on further reshaping of the planning system, with changes through the Housing and Planning Bill and the recommendations of the Local Plans Expert Group both firmly seeking to streamline processes and provide the motivation for LPAs to speed-up where they have fallen behind.

Whilst this reshaping will undoubtedly instigate a frantic period of plan-making activity in advance of a March 2017 deadline for LPAs to have produced an up-to-date plan, the recommendations of LPEG provide an insight into where the focus will need to be. With a streamlined and prescriptive approach to objectively assessing housing need, the areas for debate on Plans and their evidence base will shift from 'need' to 'delivery'.

Our review of Plan making progress, the issues being faced and the likely future changes to the system in a streamlined process has led us to conclude that all parties engaged in achieving sound Local Plans will need to get to grips with a different set of evidential hurdles focussed around:

- evidencing **development constraints**, including environmental and deliverability constraints and ensuring Green Belt reviews, where applicable, are undertaken more effectively;
- ensuring a **more robust and deliverable land supply**; and
- evidence on **spatial strategy and distributing unmet housing needs** as the duty-to-cooperate is given more bite.

NLP has already been involved in producing such evidence for both Local Planning Authorities and developers looking to engage in Local Plan making processes, however, the level of scrutiny these will come under in a streamlined system will undoubtedly be intensified as debate is steered away from SHMAs and housing requirements. We hope this will achieve the Government's aims of better, more timely, Local Plans which can deliver the significant boost in housing supply needed across the Country.

Data Annex – Tables of Local Plans Submitted for Examination Against NPPF

Year 4 of NPPF		Plan Status			Housing Requirement Outcomes			DTC
Plan / Local Planning Authority	Date Submitted	Status/ Outcome	Date Found Sound	Examination Period (Months)	Submission Target	Adopted Target	Change After Submission	Failed Duty-to-Cooperate?
Yorkshire Dales National Park	Jan-16	Ongoing	~	~	55	~	~	~
Eden District Council	Dec-15	Ongoing	~	~	200	~	~	~
Derby City Council	Dec-15	Ongoing	~	~	647	~	~	~
Ipswich Borough Council	Dec-15	Ongoing	~	~	677	~	~	~
Sefton Metropolitan Borough Council	Aug-15	Ongoing	~	~	615	~	~	~
North Northamptonshire JCS (East Northamptonshire, Kettering, Wellingborough & Corby)	Jul-15	Ongoing	~	~	2,000	~	~	~
West Somerset District Council	Jul-15	Ongoing	~	~	145	~	~	~
West Oxfordshire District Council	Jul-15	Ongoing	~	~	525	~	~	~
Carlisle City Council	Jun-15	Ongoing	~	~	565	~	~	~
Swale Borough Council	Apr-15	Ongoing	~	~	540	~	~	~
Vale of White Horse District Council	Mar-15	Ongoing	~	~	1,028	~	~	~
Cornwall Council	Feb-15	Ongoing	~	~	2,375	~	~	~

Year 3 of NPPF		Plan Status			Housing Requirement Outcomes			DTC
Plan / Local Planning Authority	Date Submitted	Status/ Outcome	Failed Duty-to-Cooperate?	Examination Period (Months)	Submission Target	Adopted Target	Change After Submission	Failed Duty-to-Cooperate?
Tamworth Borough Council	Feb-15	Sound	Feb-16	11.9	170	177	+7	No
Arun District Council	Jan-15	Ongoing	~	~	580	~	~	~
Warwick District Council	Jan-15	Ongoing	~	~	714	~	~	~
Pendle Borough Council	Dec-14	Sound	Oct-15	10.2	298	298	+0	No
Blackpool Council	Dec-14	Sound	Nov-15	11.2	280	280	+0	No
Bradford District Council	Dec-14	Ongoing	~	~	2,159	~	~	~
North Dorset District Council	Dec-14	Sound	Jan-16	12.9	280	285	+5	No
Gosport Borough Council	Nov-14	Sound	Sep-15	9.3	170	170	+0	No
Crawley Borough Council	Nov-14	Sound	Nov-15	11.2	326	326	+0	No
Canterbury City Council	Nov-14	Ongoing	~	~	780	800	+20	~
Central Bedfordshire Council	Oct-14	Withdrawn	~	~	1,550	~	~	Yes
Stratford on Avon District Council	Sep-14	Ongoing	~	~	540	~	~	~
Herefordshire District Council	Sep-14	Sound	Sep-15	12.2	825	825	+0	No
Lewes District Council	Sep-14	Ongoing	~	~	280	~	~	~
High Peak Borough Council	Aug-14	Ongoing	~	~	360	~	~	~
Horsham District Council	Aug-14	Sound	Oct-15	14.0	650	650	+0	No
South Derbyshire District Council	Aug-14	Ongoing	~	~	673	~	~	~
Test Valley Borough Council	Jul-14	Sound	Dec-15	16.5	588	588	+0	No
Torbay Council	Jul-14	Sound	Oct-15	14.4	450	480	+30	No
Eastleigh Borough Council	Jul-14	Withdrawn	~	~	564	~	~	~

Year 3 of NPPF

Plan / Local Planning Authority	Plan Status			Housing Requirement Outcomes				DTC
	Date Submitted	Status/ Outcome	Failed Duty-to-Cooperate?	Examination Period (Months)	Submission Target	Adopted Target	Change After Submission	
Utterlesford District Council	Jul-14	Withdrawn	~	~	523	~	~	~
Birmingham City Council	Jul-14	Ongoing	~	~	2,555	~	~	~
Derbyshire Dales	May-14	Withdrawn	~	~	~	~	~	Yes
Chichester District Council	May-14	Sound	May-15	11.7	410	435	+25	No
Cheshire East Council	May-14	Ongoing	~	~	1,350	~	~	~
East Riding of Yorkshire Council	Apr-14	Sound	Jan-16	20.9	1,400	1,400	+0	No
Durham Council	Apr-14	Withdrawn	~	~	1,653	~	~	~
Maldon District Council	Apr-14	Ongoing	~	~	294	~	~	No
East Staffordshire Borough Council	Apr-14	Sound	Oct-15	17.9	613	613	+0	No
Great Yarmouth Borough Council	Mar-14	Sound	Nov-15	20.0	380	420	+40	No
Cambridge City Council	Mar-14	Ongoing	~	~	700	~	~	~
South Cambridgeshire District Council	Mar-14	Ongoing	~	~	950	~	~	~

Year 2 of NPPF

Plan / Local Planning Authority	Plan Status			Housing Requirement Outcomes				DTC
	Date Submitted	Status/ Outcome	Date Found Sound	Examination Period (Months)	Submission Target	Adopted Target	Change After Submission	
Middlesbrough Borough Council	Mar-14	Sound	Oct-14	7.4	410	410	+0	No
Bromsgrove Council	Mar-14	Ongoing	~	~	368	~	~	~
Redditch Borough Council	Mar-14	Ongoing	~	~	158	~	~	~
Gateshead & Newcastle Core Strategy	Feb-14	Sound	Feb-15	12.0	1,275	1,275	+0	No
Cherwell District Council	Jan-14	Sound	Jun-15	16.2	670	1,140	+470	No
Runnymede Borough Council	Jan-14	Withdrawn	~	~	220	~	~	Yes
Amber Valley Borough Council	Dec-13	Withdrawn	~	~	470	~	~	~
Cheshire West and Chester Council	Dec-13	Sound	Dec-14	11.7	1,100	1,100	+0	No
Charnwood Borough Council	Dec-13	Sound	Sep-15	21.0	790	840	+50	No
Stroud District Council	Dec-13	Sound	Nov-15	22.5	380	456	+76	No
Ashfield District Council	Dec-13	Withdrawn	~	~	482	~	~	~
Bolsover District Council	Dec-13	Withdrawn	~	~	300	~	~	Yes
Mendip District Council	Dec-13	Sound	Oct-14	9.8	415	420	+5	No
Bury Metropolitan Borough Council	Dec-13	Withdrawn	~	~	~	~	~	~
Doncaster Borough Council	Dec-13	Withdrawn	~	~	1,085	~	~	~
Allerdale District Council	Oct-13	Sound	Jul-14	8.3	304	304	+0	No
Central Lincolnshire JCS (Lincoln, North Kesteven & West Lindsey)	Oct-13	Withdrawn	~	~	2,253	~	~	~
Fenland District Council	Sep-13	Sound	Apr-14	7.1	550	578	+28	No
East Cambridgeshire District Council	Aug-13	Sound	Mar-15	18.3	495	575	+80	No
Stafford Borough Council	Aug-13	Sound	Jun-14	9.7	500	500	+0	No
Aylesbury Vale District Council	Aug-13	Withdrawn	~	~	675	~	~	Yes
East Devon District Council	Aug-13	Sound	Jan-16	29.9	749	950	+201	No

Year 2 of NPPF

Plan / Local Planning Authority	Plan Status		Housing Requirement Outcomes				DTC	
	Date Submitted	Status/ Outcome	Date Found Sound	Examination Period (Months)	Submission Target	Adopted Target		Change After Submission
Mid Sussex District Council	Jul-13	Withdrawn	~	~	411	~	~	Yes
Knowsley Metropolitan Borough Council	Jul-13	Sound	Nov-15	28.2	450	450	+0	No
Swindon Borough Council	Jun-13	Sound	Feb-15	19.6	1,467	1,467	+0	No
Brighton & Hove Council	Jun-13	Sound	Feb-16	31.2	565	660	+95	No
North West Leicestershire District Council	Jun-13	Withdrawn	~	~	510	~	~	~
Joint West Dorset, Weymouth & Portland Plan	Jun-13	Sound	Aug-15	25.7	661	775	+114	No
Teignbridge District Council	Jun-13	Sound	Apr-14	9.6	620	620	+0	No
North Somerset Council	Jun-13	Sound	Mar-15	20.8	700	1,049	+349	No
Nottingham, Broxtowe & Gedling Aligned Core Strategy	Jun-13	Sound	Jul-14	13.5	1,797	1,797	+0	No
Rotherham Metropolitan Borough Council	Jun-13	Sound	Jun-14	11.8	850	850	+0	No
Cannock Chase District Council	May-13	Sound	Feb-14	8.5	241	264	+23	No
Rochdale Metropolitan Borough Council	May-13	Ongoing	~	~	400	~	~	~
South Worcestershire Development Plan (Malvern Hills, Worcester & Wychavon)	May-13	Sound	Feb-16	32.3	966	1,183	+217	No
Gravesham Borough Council	May-13	Sound	Jul-14	14.0	274	363	+89	No
Leeds City Council	Apr-13	Sound	Sep-14	16.4	4,375	4,375	+0	No
Kirklees Metropolitan Borough Council	Apr-13	Withdrawn	~	~	1,545	~	~	Yes

Year 1 of NPPF

Plan / Local Planning Authority	Plan Status		Housing Requirement Outcomes				DTC	
	Date Submitted	Status/ Outcome	Date Found Sound	Examination Period (Months)	Submission Target	Adopted Target		Change After Submission
Hart District Council	Mar-13	Withdrawn	~	~	236	~	~	Yes
Lichfield District Council	Mar-13	Sound	Jan-15	21.9	435	478	+43	No
Christchurch & East Dorset JCS	Mar-13	Sound	Mar-14	12.2	519	566	+47	No
Richmondshire District Council	Feb-13	Sound	Oct-14	20.5	180	180	+0	No
North Warwickshire Borough Council	Feb-13	Sound	Sep-14	19.6	164	175	+11	No
GNDP Joint Core Strategy (Norwich, Broadland & South Norfolk)	Feb-13	Sound	Nov-13	9.3	2,045	2,045	+0	No
Waverley Borough Council	Jan-13	Withdrawn	~	~	230	~	~	~
South Somerset District Council	Jan-13	Sound	Jan-15	23.6	725	725	+0	No
West Northants JCS (Daventry, Northampton, South Northamptonshire)	Dec-12	Sound	Oct-14	21.0	2,253	2,369	+116	No
Erewash Borough Council	Nov-12	Sound	Jan-14	13.5	368	368	+0	No
Tamworth Borough Council	Nov-12	Withdrawn	~	~	~	~	~	~
Babergh District Council	Nov-12	Sound	Jan-14	14.3	300	300	+0	No
Copeland District Council	Oct-12	Sound	Sep-13	10.9	230	230	+0	No
Hastings Borough Council	Oct-12	Sound	Oct-13	11.7	200	214	+14	No
Rushcliffe Borough Council	Oct-12	Sound	Dec-14	25.2	553	640	+87	No
West Lancashire District Council	Oct-12	Sound	Sep-13	10.9	310	310	+0	No

Year 1 of NPPF

Plan / Local Planning Authority	Plan Status				Housing Requirement Outcomes				DTC
	Date Submitted	Status/ Outcome	Date Found Sound	Examination Period (Months)	Submission Target	Adopted Target	Change After Submission	Failed Duty-to-Cooperate?	
Coventry City Council	Oct-12	Withdrawn	~	~	669	~	~	Yes	
Chesterfield Borough Council	Sep-12	Sound	Jun-13	8.7	380	380	+0	No	
Melton Borough Council	Sep-12	Withdrawn	~	~	170	~	~	~	
Ribble Valley Borough Council	Sep-12	Sound	Nov-14	25.9	200	280	+80	No	
Warrington Borough Council	Sep-12	Quashed	May-14	19.7	500	500	+0	No	
Solihull Metropolitan Borough Council	Sep-12	Quashed	Nov-13	14.0	500	500	+0	No	
Staffordshire Moorlands District Council	Sep-12	Sound	Jan-14	15.7	275	300	+25	No	
Rother District Council	Jul-12	Sound	Jul-14	23.9	218	335	+117	No	
Wiltshire Council	Jul-12	Sound	Dec-14	28.7	1,850	2,100	+250	No	
Hartlepool Borough Council	Jun-12	Withdrawn	~	~	320	~	~	~	
Decorum Borough Council	Jun-12	Sound	Jul-13	12.6	430	430	+0	No	
Winchester City Council	Jun-12	Sound	Feb-13	7.8	550	625	+75	No	
Blaby District Council	Jun-12	Sound	Feb-13	8.2	365	380	+15	No	
East Hampshire District Council	May-12	Sound	Apr-14	22.7	442	592	+150	No	
Salford Council	May-12	Withdrawn	~	~	1,300	~	~	~	
Reigate & Banstead District Council	May-12	Sound	Jan-14	20.4	460	460	+0	No	
Ryedale District Council	May-12	Sound	Aug-13	14.8	200	200	+0	No	
Suffolk Coastal District Council	May-12	Sound	Jun-13	13.0	446	465	+19	No	
Mid Suffolk District Council	Mar-12	Sound	Sep-12	6.2	415	415	+0	No	
Watford Borough Council	Feb-12	Sound	Nov-12	8.7	260	260	+0	No	
Hertsmere Borough Council	Feb-12	Sound	Dec-12	9.8	237	260	+23	No	
Medway Council	Feb-12	Withdrawn	~	~	815	~	~	~	
Eastbourne Borough Council	Jan-12	Sound	Nov-12	9.7	240	240	+0	No	
Shepway District Council	Jan-12	Sound	Jun-13	16.3	350	400	+50	No	
Purbeck District Council	Jan-12	Sound	Oct-12	9.2	120	120	+0	No	
Kingston upon Hull City Council	Jan-12	Withdrawn	~	~	1,088	~	~	~	
Woking Borough Council	Dec-11	Sound	Jul-12	7.2	292	292	+0	No	
Bournemouth Borough Council	Nov-11	Sound	Aug-12	9.5	730	730	+0	No	
Taunton Deane Borough Council	Nov-11	Sound	Jul-12	7.6	850	850	+0	No	
Halton Borough Council	Sep-11	Sound	Oct-12	12.7	500	552	+52	No	
South Staffordshire District Council	Sep-11	Sound	Oct-12	13.3	175	175	+0	No	
Wigan Metropolitan Borough Council	Sep-11	Sound	Aug-13	23.4	1,000	1,000	+0	No	
Wealden District Council	Aug-11	Sound	Oct-12	14.9	410	450	+40	No	
St Helens Metropolitan Borough Council	May-11	Sound	Oct-12	16.1	570	570	+0	No	
Selby District Council	May-11	Sound	Jun-13	25.5	440	450	+10	No	
Bath & North East Somerset Council	May-11	Sound	Jun-14	37.7	575	850	+275	No	
Central Lancashire JCS (Preston, Chorley, South Ribble)	Mar-11	Sound	Jun-12	15.1	1,074	1,385	+311	No	
South Oxfordshire District Council	Mar-11	Sound	Oct-12	19.2	547	547	+0	No	
South Gloucestershire Council	Mar-11	Sound	Nov-13	31.6	1,610	1,692	+82	No	
Milton Keynes Council	Mar-11	Sound	May-13	27.0	1,750	1,750	+0	No	
West Berkshire District Council	Apr-10	Sound	Jul-12	26.8	525	525	+0	No	



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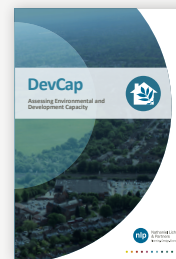
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