

**INSIGHT**  
JAN 2019

# Planned up and be counted

Local Plan-making since  
the NPPF 2012



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# Executive summary



**Our sixth annual review of Local Plan production under the original National Planning Policy Framework 2012 (NPPF 2012) shows that only half of Local Planning authorities have put in place a Local Plan under its auspices. Our review highlights that even those authorities with an adopted plan will quickly need to grapple with the Government's reforms in the updated framework.**

From its outset, the NPPF 2012 was expected to entail a "simpler, swifter system", with clear guidance on plan-making, a strong focus on the plan-led system, and a commitment to meeting the nation's housing need. And yet after six years, and an updated NPPF published, just half of all authorities benefit from a post-NPPF 2012 strategic plan. Indeed, as at 31 December 2018 almost a quarter of authorities we studied have plans under examination, and 22% of authorities have still yet to submit a post-NPPF 2012 Local Plan, the majority of which are areas constrained by Green Belt. Three quarters of plans submitted in 2016/17 took less than the 18 month average since 2012, suggesting a quickening in examination periods; however housing needs and the duty-to-cooperate remain stubborn issues.

To meet its manifesto ambition of building 300,000 homes annually by the mid 2020s, the Government is committed to increasing the supply of housing through a plan-led system. Following a reform process that began in 2015, the revised National Planning Policy Framework 2018 (NPPF 2018) and its accompanying documents aim to support this, by expediting and strengthening plan-making.

We've reviewed seven of the key policy changes, considering which ones are likely to improve the pace and quality of plan-making, and which ones may complicate and delay the process. Long standing areas of debate at examination, such as housing need and duty to cooperate, are set to be narrowed, with simpler methodologies and guidance. But the debate is likely to shift to testing the viability of site allocations and affordable housing policies at the plan-making stage, together with increased pressure on authorities to ensure 10% of allocations are on small sites.

Alongside the policy changes, the Government has introduced a statutory requirement to review, and if necessary update, the strategic policies of Local Plans every five years – or sooner subject to changes in local circumstances. This leaves over half of all the authorities with a post-NPPF 2012 plan needing to review their plans within the next two years. Over 60% of these plans are expected to see an increase in their Local Housing Need (LHN) compared to their existing housing targets due to the results of the Standard Methodology. Furthermore, one third of plans – those adopted under the NPPF 2012 – will be left with a target that is higher than their current adopted figure.

Given the inconsistent plan progress under the NPPF 2012, the Government's new framework and guidance reforms are clearly much needed in meeting both its housebuilding and plan-making goals. However, these increased expectations also bring increased challenges and workload for Local Planning Authorities keeping plans up to date. In evaluating progress under the first NPPF, and changes likely with the new framework, we assess the forces that will continue to shape plan-making in the foreseeable future.

# Key figures

221

Local Plans examined or submitted for examination since the introduction of the NPPF 2012

141

Local Plans found sound with 55% of LPAs boasting a post-2012 NPPF Local Plan

46%

of plans required an increase in their housing requirement at examination

18

months is the average time taken from submission to a plan being found sound under the NPPF 2012

15

months is the average time taken at examination for plans submitted in 2016/17, down from 22 months in 2014/15

53%

of adopted up-to-date plans will require a statutory review within the next 2 years

30

plans due for imminent review will see a 20% or more increase in Local Housing Need

# 01 Introduction

The Government has put plan-making firmly at the heart of land use planning, and the revised NPPF introduced in July 2018 seeks to implement the tools, sticks and carrots to achieve comprehensive Local Plan coverage for England.

In March 2012, Greg Clarke – the then Minister of State at Communities and Local Government – exclaimed that the planning system had become more complex, ground ever slower, and that despite Parliament requiring every Council to have a plan, eight years on from the 2004 act, only around a half had been able to adopt one. The Government’s answer was the introduction of the NPPF 2012, with intentions to provide a ‘*simpler, swifter system*’, that would help build the homes required.

So, after six years of plan-making under the NPPF 2012, has the NPPF 2012 entailed a ‘*simpler, and swifter system*’? Few now would make this claim. The Government has itself continually lamented the plan-making performance of Local Planning Authorities (LPAs), identifying the absence of wide-spread plan coverage as a ‘major problem’ in the Housing White Paper (2017).

To address this, Government has released a raft of changes to national planning policy; shifting the narrative from a “*simpler, swifter system*” to one that “*frankly, tolerates fewer excuses for failures to deliver*”.<sup>1</sup> This report is our sixth – and final under the NPPF of March 2012 (given the 24th January 2019 deadline for end of the transition period) – in an annual series of Insights produced by Lichfields looking at the progress and effectiveness of Local Plan preparation, provides an update on coverage and looks at how the statutory five-year Local Plan review requirement, revised NPPF (2018) (“NPPF 2018”), and its associated documents, might improve the plan preparation process. Using data up to the end of December 2018, we seek to answer some key questions:



- What has been the progress of local plan-making under the NPPF 2012, and how has this changed over the time and across the country?
- What will be the implications of the new NPPF for plan-making in terms of speed and efficiency?
- What will the next phase of plan-making look like in the context of new housing numbers and the requirement to review?

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<sup>1</sup> The RT Hon Sajid Javid MP. Available at <https://www.gov.uk/government/speeches/sajid-javids-speech-at-the-national-planning-policy-framework-conference>

# O2

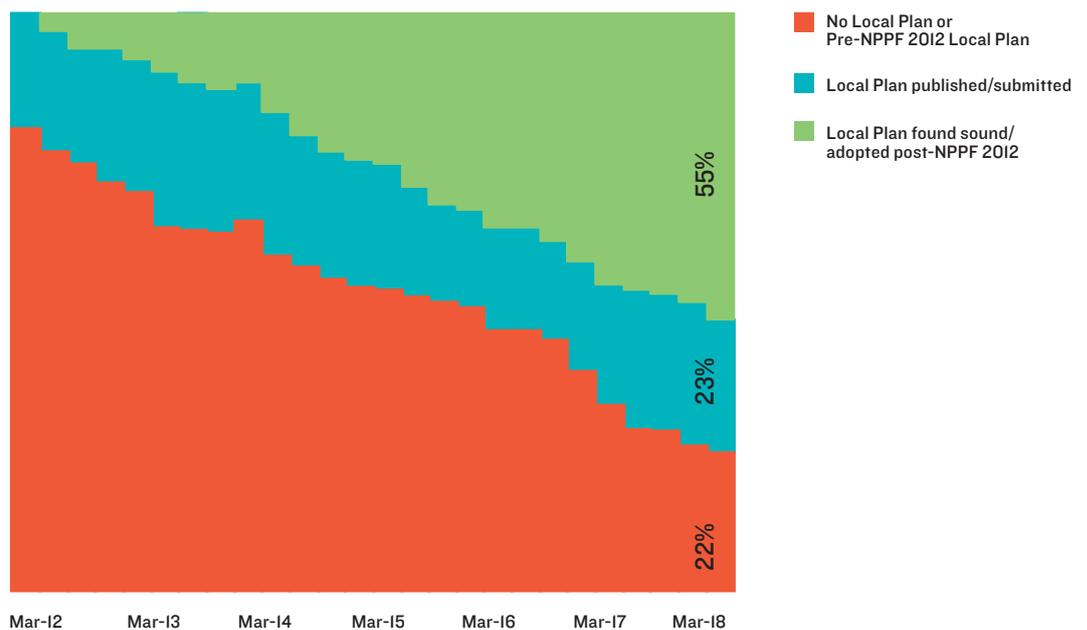
## Local Plan progress

Six and half years of NPPF 2012 did not result in the comprehensive Local Plan coverage that may have been envisaged in 2012. As the NPPF 2018 picks up the reins, just over half of LPAs benefit from a post-NPPF 2012 plan, and of the remainder, there is an almost even split between local authorities that have published or submitted a plan for examination (and will therefore see their Plan examined under NPPF 2012), and those authorities that have still yet to reach this stage (Figure 1). There has been a relative surge in plan-making activity in the past year (2017/18), likely in response to Government deadlines and threats of intervention but also, for some, in order to 'beat' the transitional arrangements for NPPF 2018 and perhaps 'duck' (at least for now) the implications of the standard method for local housing need.<sup>2</sup> However, this has slowed in recent months following the publication of the NPPF 2018, with just 13 plans submitted to the Planning Inspectorate in the second half of 2018, versus 38 submitted in the first half of the year.

Plan-making appears to have been more of a challenge in certain parts of the county and in areas with certain characteristics. A seemingly analogous spatial pattern persists, with clusters of Green Belt constrained authorities surrounding Manchester, Sheffield, Birmingham and London, struggling to produce a plan (Figure 2). The majority (63%) of the LPAs which benefit from an up-to-date plan are unconstrained by Green Belt, whereas by contrast, 59% of LPAs without a post-NPPF 2012 Local Plan are constrained by Green Belt, with these authorities twice as likely to not have a post-NPPF 2012 Plan as none Green Belt authorities.

The Government's early 2017 deadline for Local Plan submission has been and gone, and in March 2018 the Housing Minister announced an intention to intervene in three (Castle Point, Thanet and Wirral) of fifteen previously-named authorities who were being closely watched. With the Government's intervention threat still in play and the bite of NPPF 2018 in force from 24 January 2019, can we expect a new rush on Plan-making activity?

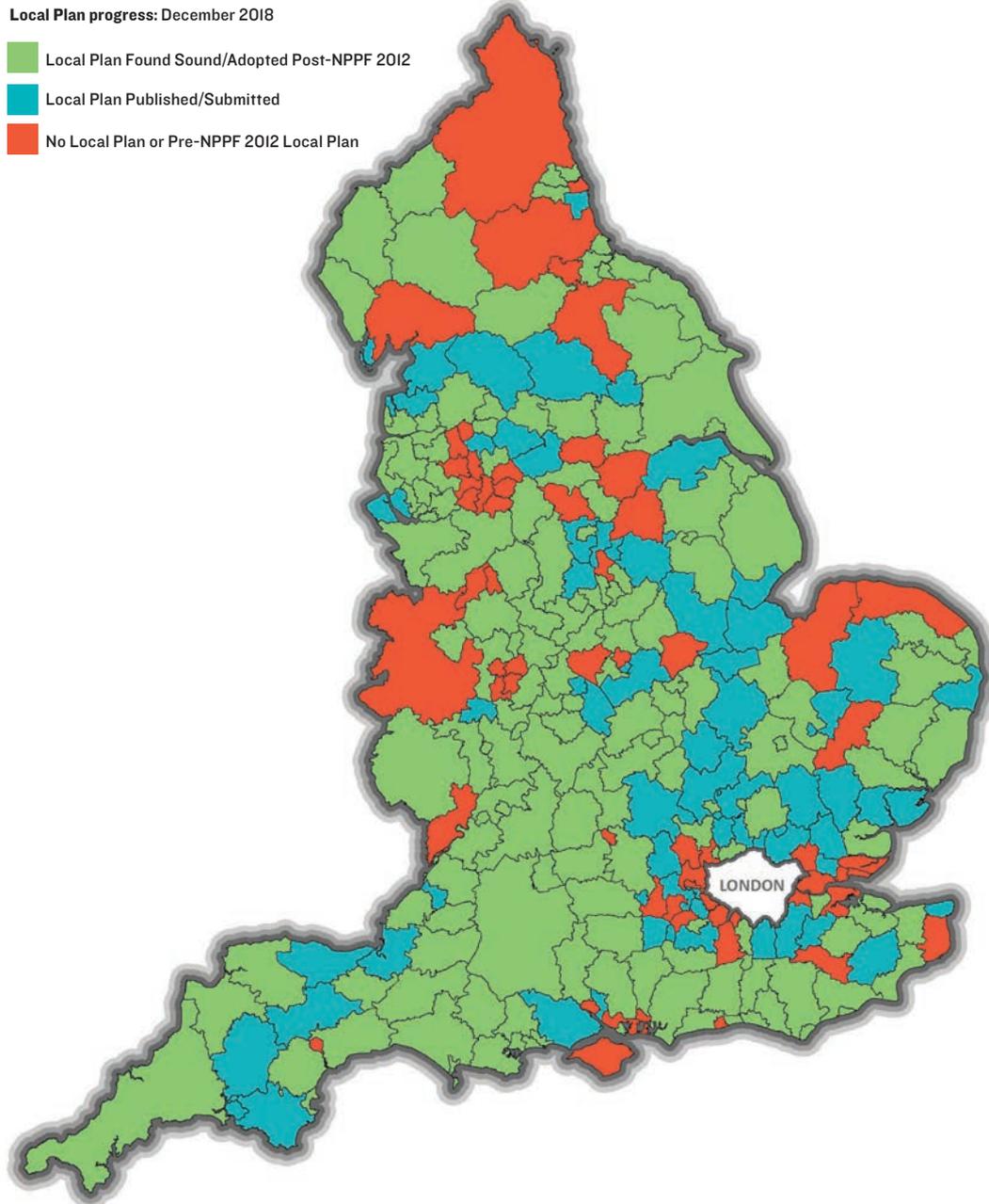
Figure 1: Local Plan progress by Local Planning Authority (England excluding London, National Parks and Mayoral Development Corporations) over c.7 years of the NPPF 2012



Source: Lichfields analysis

<sup>2</sup> In an article of 27th April 2018, Planning Magazine report that "Central Beds submits local plan ahead of new NPPF to avoid housing numbers hike"

Figure 2 Local Plan Status post-NPPF 2012 by LPA (District) as at 31 December, 2018<sup>3</sup>



Source: Lichfields analysis

<sup>3</sup> Status is by reference to housing requirements contained within Plans and their examination against the policies of the NPPF 2012 through a 'strategic issue' plan. Analysis is based upon a high-level review that has not looked in detail at the individual circumstances of every LPA and constituent plan policies. This approach is utilised as 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

**141**

plans submitted  
have been  
found sound

**39%**

of plans have been  
withdrawn due to  
inadequate housing  
provision and/or DtC

### Tracking plan progress

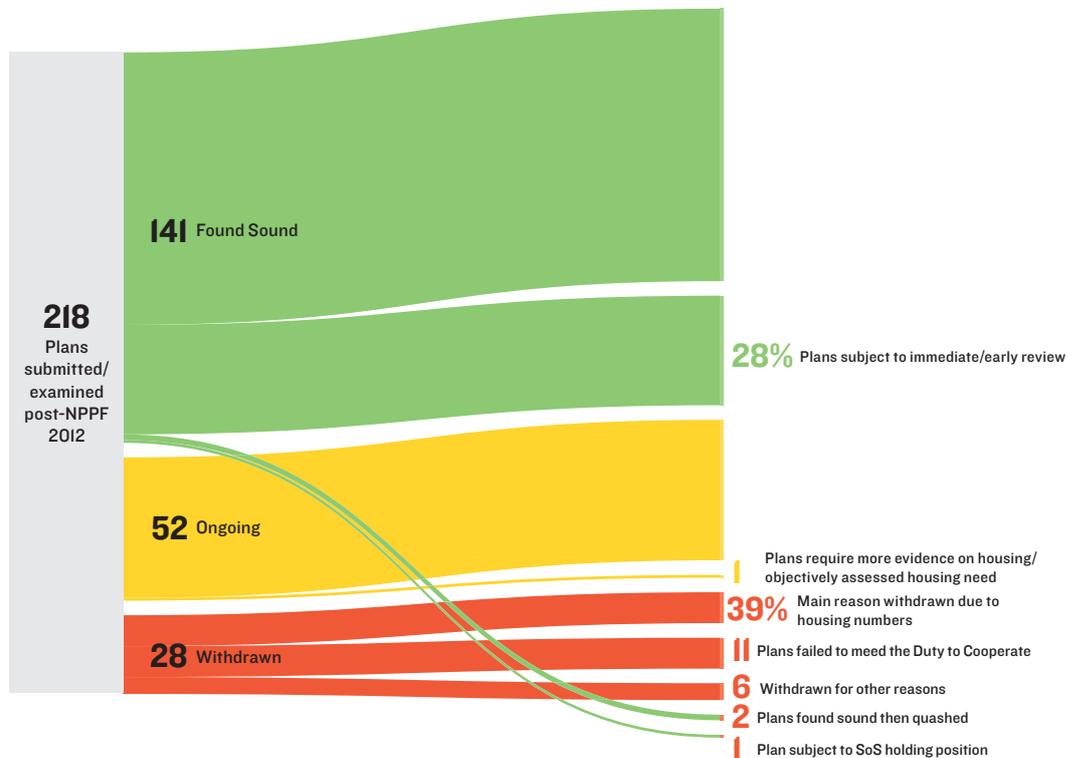
Since March 2012, 221 plans have been submitted for examination (Figure 3). In total, 141 of these have so far been found sound (64%), although with nearly one third of sound plans requiring an immediate or early review (a proportion that has been persistent over the last few years). Further, two sound plans subsequently saw their housing policies quashed whilst, at the current point one plan that has been found sound – Stevenage – is subject to a Secretary of State (SoS) holding direction, with a second, East Hertfordshire, recently having been given the go-ahead.

52 plans remain at examination, with a majority of those having been submitted within the last year. At the time of writing, just one of these requires more evidence on housing need, a problem that appears much less frequent

than in previous years. However, ongoing examinations, which will take place in advance of the Standard Method, may not continue this trend.

In total, 13% of post-NPPF 2012 plans submitted for examination have been withdrawn. Of these, inadequate housing provision remains one of the main reasons cited by Inspectors – accounting for 11 plans. However, failure to satisfy the duty-to-cooperate (DtC) is still the principle reason. High profile examples of the latter include Castle Point and St Albans, with the latter losing its legal challenge against the Inspector’s findings.

Figure 3: Tracking Local Plan progress post-NPPF 2012



Source: Lichfields analysis

## Getting the numbers right

A significant – and enduring, but to a lesser degree – hurdle in plan-making has been the assessment of housing needs and how areas seek to plan for them in setting the housing requirement figure. The difficulty in setting the right numbers is one reason why Government introduced the Standard Method for assessing local housing needs.

In total, over half of all plans have had to change their housing requirement through the examination process, with almost all needing to increase their planned housing number (Figure 4). Upwards pressure on housing numbers has become more common over the course of the NPPF 2012's six years,

with last year again seeing more than of half sound plans come with an increase from that at submission. Interestingly though, in the past year a much greater number of plans have seen their housing requirement *reduced*. Only a very small number of plans had seen reductions in previous years, but this has jumped – 29% of plans in 2017/18 needed to reduce their housing targets through the Examination process. One cited reason was the release of the 2014-based household projections,<sup>4</sup> which became the new 'starting point' for assessing housing need and presented a lower projected growth than their predecessor figures. In other locations, concerns over deliverability led to so-called 'aspirational' housing requirements being reined back.

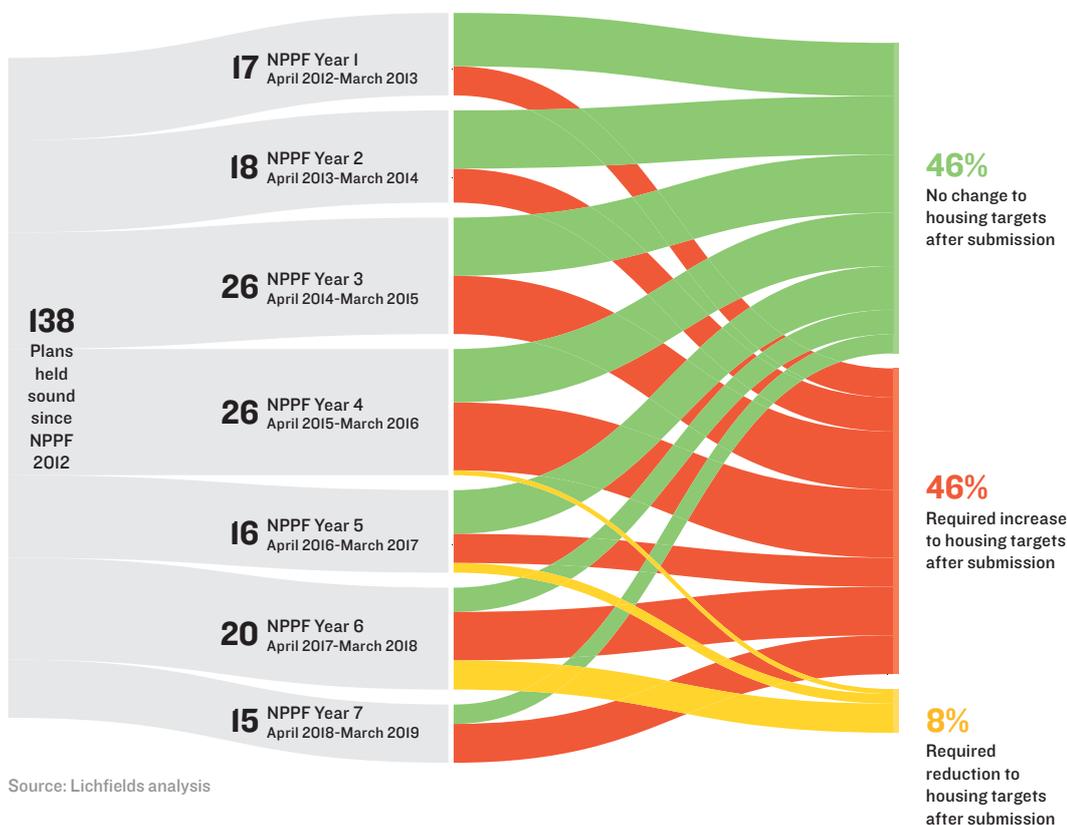
**46%**

of plans increased their housing targets at examination

**8%**

of plans reduced their housing targets at examination

Figure 4: Submitted housing requirement vs. adopted housing requirement



Source: Lichfields analysis

<sup>4</sup> Published 12th July 2016

18

months is the average time taken from submission to a plan being found sound

15

months is the average time taken at examination for plans submitted in 2016/17, down from 22 months in 2014/15

### A streamlined plan process?

From 1,300 pages of policy down to just 50; the NPPF 2012 was intended to be the ‘remedy’ for a slow and complex system. However, with strategic housing issues and the DtC proving problematic, the time taken from submission to a plan being found sound has increased under the NPPF 2012, to around an average of around 18 months, compared to around 12 months pre-NPPF 2012.<sup>5</sup> Extraordinarily, the joint examination of the two Local Plans for Cambridge/South Cambridgeshire took over four years before publication of the Inspectors’ reports in September 2018, adoption being over five years on from the initial Regulation 19 Consultation.

However, there is evidence of a quickening, with three quarters of plans submitted between April 2016-March 2017 now taking less than the 18 month average since 2012. While average examination timescales stretched to 22 months for plans submitted in 2014/15, by 2016/17 this had reduced to 15 months. On a year by year basis, whilst the number of plans taking 18+ months at examination peaked at over 50% for plans submitted in 2013/14 and 2014/15 (years two and three), it has subsequently decreased to less than a quarter of plans taking longer than 18 months through examination, albeit we

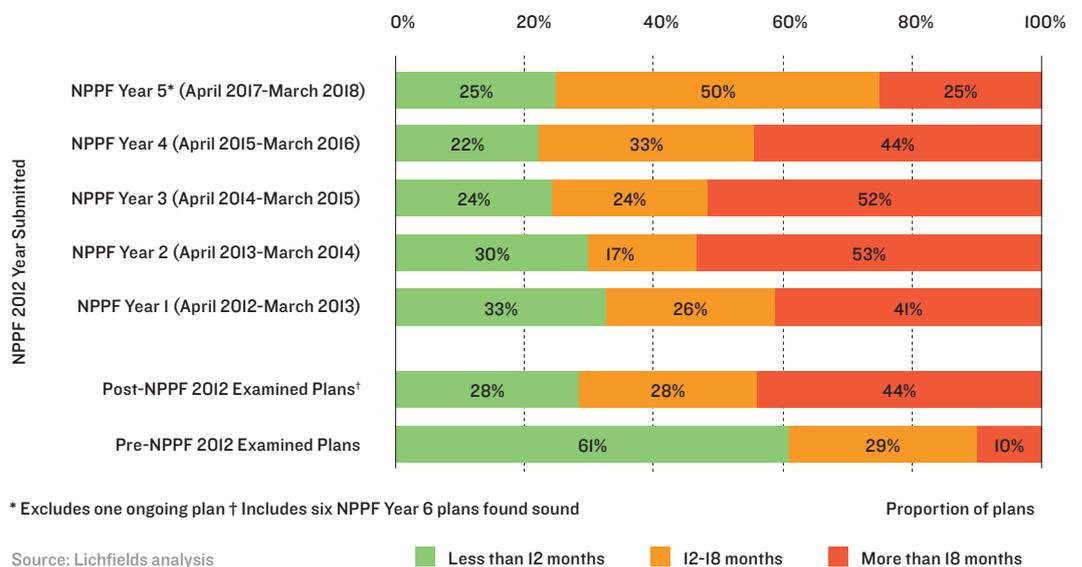
still await the denouement for the glut of plans submitted since March 2017 (year six). Figure 4 shows that average examination time has been decreasing, with 44% of plans submitted in year four, and 79% of plans submitted in year five being found sound within 18 months.

One explanation is that recent examinations have seen a reduction in the number of hearings and requirements for Councils to produce further evidence – particularly on housing. Experience suggests Inspectors appear to be piecing together any changes to Local Plans based on the evidence already in front of Examination, rather than sending Councils away to do more work and produce Main Modifications, necessitating further representations hearing sessions, as was often the case in some earlier plan examinations. Anecdotally, many representors now believe the bar for soundness is being set lower than in earlier NPPF 2012 plans; equally, it may be that plans and their evidence are more soundly based. Another explanation is the use of ‘early review’, which a 2015 Written Ministerial Statement suggested could reduce delays in plan-making. Our previous research<sup>6</sup> highlighted that early reviews have been utilised to address uncertainty and unresolved cross-boundary issues. In Chapter 4 we consider in more detail the impact of such reviews on authorities with plans adopted under the NPPF 2012.

<sup>5</sup> It is important to remember, though, that Regional Strategies which prior to 2010 had set housing requirements, also had sometimes lengthy examinations extending to several years and this added to the total length of plan-making

<sup>6</sup> Planned and deliver Local Plan-making under the NPPF: A five-year progress report

Figure 5: Examination timescales as a proportion of plans submitted by NPPF 2012 Years

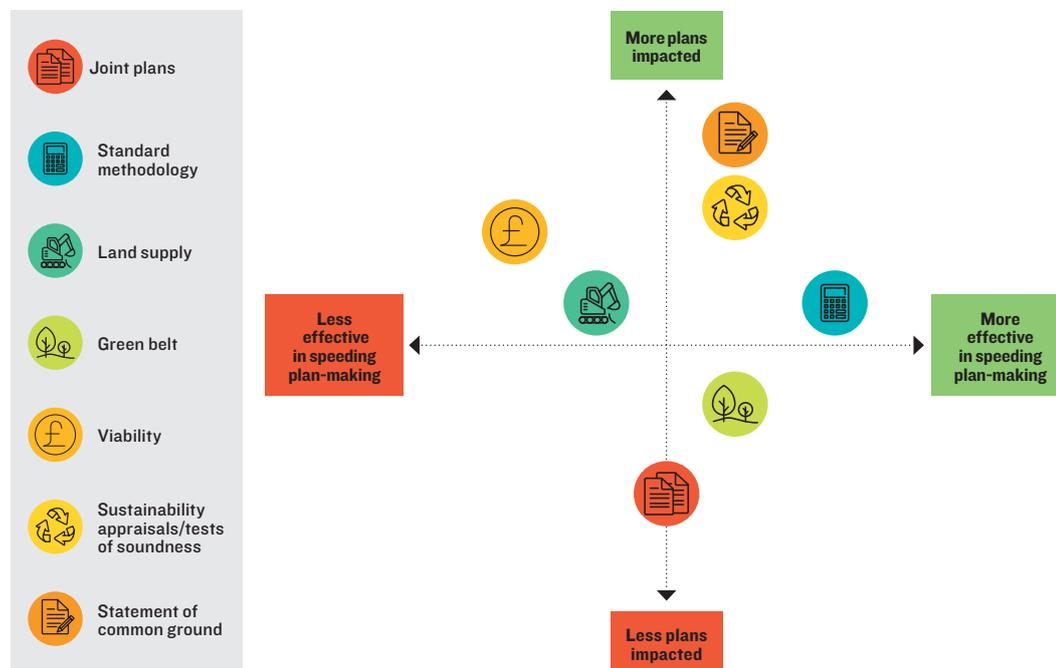


# 03 Increasing efficiency and delivering a plan-led system

Whilst the time taken to examine a Local Plan appears to be decreasing, recurrent issues still plague the plan-making process. We've assessed which of the Government's more significant changes to policy and practice might make the most difference based on two aspects: impact – how many plans the change might help; and

effectiveness – how likely the change is to result in faster/more streamlined plan-making. From the 85 policy changes set out in the NPPF 2018 and accompanying documents, we've distilled seven with a direct impact on the plan-making process and rated them (Figure 6) to provide an indicative overview of our analysis below

Figure 6: Our headline estimate of the impact and effectiveness of the NPPF 2018's policies affecting plan-making<sup>7</sup>



Source: Lichfields analysis



This revised planning framework sets out our vision of a planning system that delivers the homes we need. I am clear that quantity must never compromise the quality of what is built.

Secretary of State  
 for Communities,  
 Rt Hon James  
 Brokenshire MP

<sup>7</sup> Secretary of State for Communities, Rt Hon James Brokenshire MP.

Available at: <https://www.gov.uk/government/news/governments-new-planning-rulebook-to-deliver-more-quality-well-designed-homes>



Where local councils come forward with sensible, robust Local Plans – and are willing to take the tough decisions – I will back them all the way... And Westminster politicians should not stand in the way of that.

**Rt Hon Sajid Javid  
MP, November 2016**

## What will change under the new NPPF 2018 guidelines?



### 1. Joint plan-making

To improve strategic level planning, the NPPF 2018 strengthens the role of joint plans (Para 17). In theory, this supports local authorities who 'pool' both staff and resources to produce and examine a plan at a faster rate and enables neighbouring authorities to engage and plan strategically together.

However, since the introduction of the NPPF 2012, only 17 joint plans (8%) have been submitted, with 11 of those having been found sound, albeit that the average timescale for these has been broadly similar to other plans. There is a renewed flurry of strategic planning (for example, in Manchester, Oxfordshire, Hertfordshire and Essex), but the compromises and complexities inherent to joint plans are likely to outweigh any administrative or process benefits given how few joint plans have progressed to adoption.



### 2. Standard housing needs method

The Standard Method seeks to simplify the hotly contested issue of objectively assessed housing need - providing more certainty and speeding up plan-making. It defines a "minimum starting point" for local housing need using baseline demographic-led projections and including an upwards adjustment to reflect affordability in a consistent manner fixed for two years from plan submission.

Of the local plans due for review over the next two years nearly half of all adopted plans will be required to increase their housing requirement. For those that do not see a rise in objectively assessed need, room is left to increase this where there are 'exceptional circumstances' especially reflecting economic growth ambitions.



### 3. Land Supply and small sites

The NPPF 2018 introduces changes to how land supply is addressed, focused on two issues: Firstly, changes to the definition of 'deliverable'. The NPPF 2018 and PPG heightens the evidential threshold that plan makers will need to apply in order to include sites within the five year land supply. The challenge in decision making and appeals has been well recognised, but it clearly applies to plan making too (NPPF 2012 para 67).

Secondly, increasing the importance of small sites. Under NPPF 2012, provision for a wide mix of sites was often through the provision of windfall rates or through Neighbourhood Plans, rather than as specific allocations. The new NPPF 2018 instead places a higher expectation on authorities to ensure that at least 10% of housing sites identified through plans and brownfield registers are 1ha or less. For some authorities this will result in a significant number of sites needing to be identified up-front at the plan-making stage; albeit, the NPPF 2018 does caveat this requirement, and allows for non-compliance subject to 'strong reasons' why 10% cannot be achieved. The requirement is likely to add to the SHLAA process and resourcing required, though perhaps not substantially affecting timescales, with the hope that a wider range of small sites will ensure more robust and resilient five-year land supply positions at Local Plan examinations.



### 4. Green Belt

Reflecting the Government's manifesto pledge, the NPPF 2018 changes Green Belt policy. Under the presumption in favour of sustainable development, its role as restricting development is tied to where it provides a "strong reason" for doing so, whilst those plan makers releasing Green Belt have first to show they have examined all other reasonable options, including brownfield sites, optimising density, and meeting needs in adjoining authorities.

These changes require a more codified approach to demonstrating exceptional circumstances, but guidance and best practice on how to undertake Green Belt reviews remains lacking. And particularly around London, the Standard Method is increasing not reducing development pressures in Green Belt authorities. Nationally, 4 in 10 local authorities are constrained by Green Belt, and just 41% of these authorities have a post-NPPF 2012 Local Plan, emblematic of the inherent political and planning challenges associated with balancing development needs with a totemic policy restriction.

## 5. Viability

Paragraph 34 of the NPPF 2018 seeks to shift viability testing away from the decision-making process and front-loads it into plan-making. Its intention is to test site allocations, including anticipated land values, infrastructure costs, and affordable housing, to ensure that policies are viably deliverable.

Whilst in theory this is likely to speed up the decision-making process, through the reduction in ad-hoc viability assessments, the knock-on effect for Local Plans could be significant. Although the PPG provides clarity on many of the Government's position on key inputs into viability appraisals; much remains to be debated, and a topic that has hitherto been given relatively cursory attention at Examinations will almost certainly see greater levels of attention in evidence and through representations.



## 6. Sustainability Appraisal/ Tests of Soundness

A small change in the wording of paragraph 35b from “*the most appropriate strategy*” to “*an appropriate strategy*” required to demonstrate a ‘Justified’ plan seemingly reduces the burden of evidence in support of a local plan.

This clarification may help discourage speculative objections, but is unlikely to affect many plans as only six have been stalled at examination due to their Sustainability Appraisal, and experience is that Inspectors have been loath to engage with the concept of rejecting a plan just because a ‘more appropriate’ strategy might be available.



## 7. Statements of common ground

Introduced in 2011, the DtC was intended to tackle strategic level cross-boundary matters through the plan process. For some authorities the hurdle was too high, with 11 plans withdrawn due to failing the DtC, and numerous plans subject to an early review requirement to take account of unmet need arising from neighbouring authorities.

NPPF 2018 introduces more urgency to the requirement, with the introduction of Statements of Common Ground, but with no legal requirement beyond the existing DtC provisions, in reality, the implications are unclear.

# 04 Time for a review?



Local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

PPG Paragraph 043

## A statutory requirement

Alongside a statutory requirement to prepare and keep up-to-date a Local Plan, the Government recently introduced a statutory requirement for LPAs to review their Local Plans (in whole or in part) within five years of adoption.<sup>8</sup> This is reaffirmed in Paragraph 33 of the NPPF 2018; albeit, a plan “does not become out-of-date automatically after 5 years”.<sup>9</sup> The above indicates that, once adopted, an LPA can rely on the strategic policies contained within a plan for a maximum period of five years. However, there are exceptions to this. In particular, changes in the LHN, or where the plan-making activity by other authorities, such as the identification of ‘unmet housing need.

Importantly, for the authorities who benefit from an up-to-date Local Plan, the struggles of plan-making and the examination process may seem a distant memory. But, for some, the statutory requirement to review their Local Plans within five years of adoption (and then, in all likelihood, update it) is looming and the process will need to begin again. Whilst not a ‘Local Plan Review’ per se (e.g. update the plan and adopt it), it is clear that these authorities will need to review their plans against the context of the Governments refined plan-making tests set out in the NPPF 2018. We’ve looked at LPAs which will need to review their plans and how quickly, illustrated in Figure 7.

## The early adopters

Our analysis of 129 up-to-date post-NPPF 2012 Local Plans, covering 150 LPAs, shows that 87 authorities will require a statutory review within the next two years. This equates to 74 plans (when accounting for joint plans), or just over half of all the post-NPPF 2012 adopted plans.

More pressingly, 78% of these plans require a review within the next year, with many having already passed the statutory five-year deadline. For example, the Hertsmere ‘Core Strategy (2013)’ (one of the first plans to be adopted post-2012 NPPF) included a commitment to an early review within three years of adoption, and has surpassed both the early review requirement and statutory five-year period. Largely, it is the early adopters – those authorities who crossed the line first – that will need to contend with the new NPPF plan-making tests. But many of the plans due to be reviewed imminently, are required to do so by virtue of a ‘time-specified’ early review requirement. Indeed, the Ipswich ‘Local Plan 2011-2031’ was adopted in January 2017, but committed to review its plan, and produce a joint or aligned plan by 2019, rather than the implied statutory timescale of 2022.

However, plan-making to-date has been slow, and the spatial progression of plans has been staggered and often uncoordinated – despite the DtC. The result is that, for some authorities, the plan-making activity of neighbouring LPAs, alongside increasing housing needs, will mean that the period of time for which they can rely on an adopted plan will be markedly less than the statutory five-year period.

In practice, this will likely result in many more than just the 87 LPAs already facing an expiring five-year period needing to review and then update their plan in the short term, and doing so against the NPPF 2018.

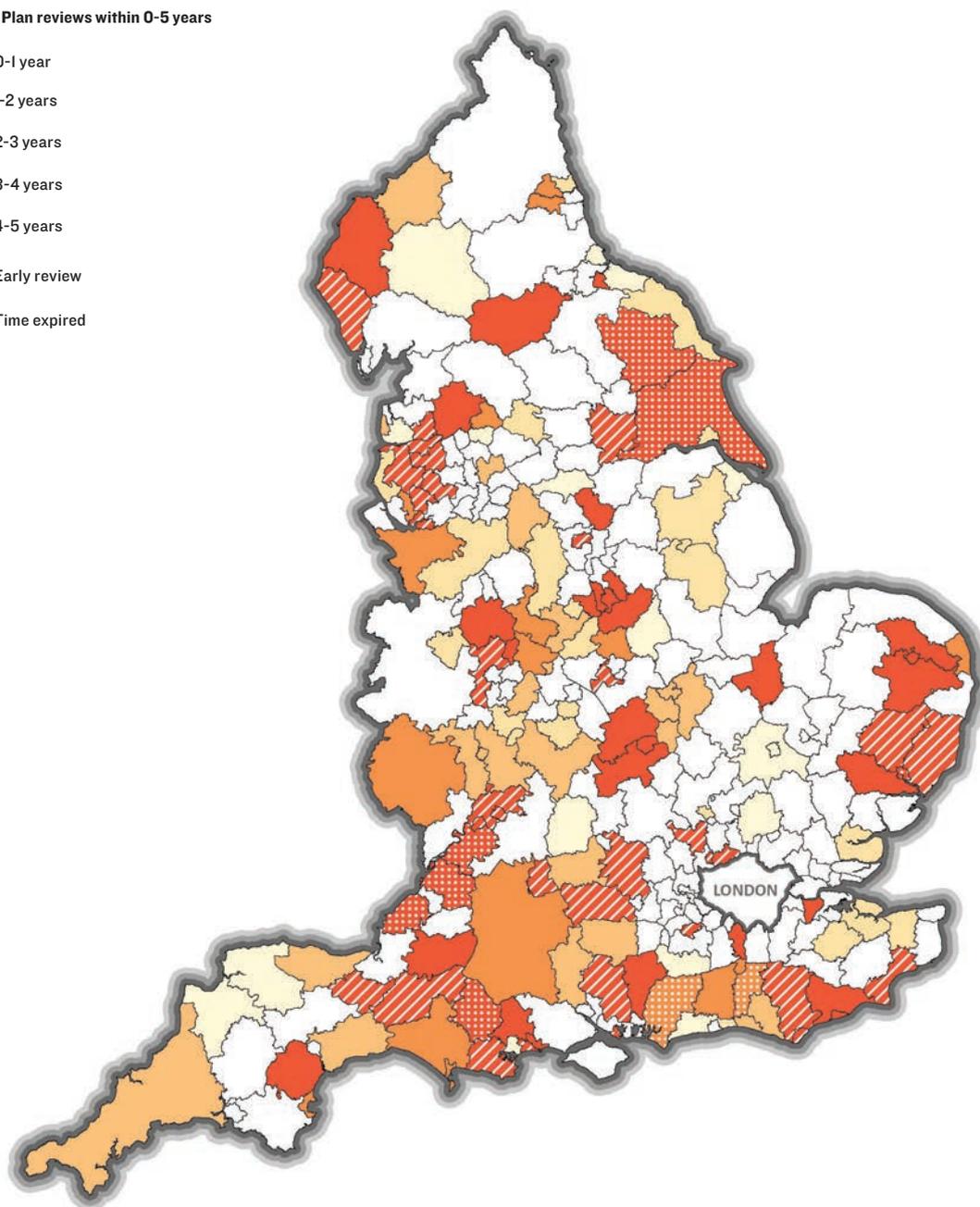
<sup>8</sup> Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (as of 6 April 2018)

<sup>9</sup> PPG Paragraph 045

Figure 7: Local Plan statutory and early reviews within 0-5 years by LPA (District)<sup>10</sup>

**Local Plan reviews within 0-5 years**

- 0-1 year
- 1-2 years
- 2-3 years
- 3-4 years
- 4-5 years
- Early review
- Time expired



Source: Lichfields analysis

**53%**

of adopted plans will need to be reviewed within the next 2 years

<sup>10</sup> Excluding London, National Park Local Planning Authorities, Authorities with quashed plans, or plans subject to a holding position, and authorities which have submitted a plan for examination, or which has been adopted, subsequent to a previous post-NPPF 2012 Local Plan

### Planning for more homes?

For the LPAs required to review their plans in the next two years this will be in the context of the NPPF 2018; but more importantly, the Standard Method for estimating the minimum level of housing need.

Of the 74 plans that will be statutorily required to review their plans within the next two years, 42 plans – or 57% – would see a minimum local housing need figure above that of their current adopted Local Plan targets, with 30 of those seeing increases of above 20% making it almost inevitable that review will trigger a plan update.<sup>11</sup> This presents a significant challenge given the short timescales and likely land supply constraints involved.

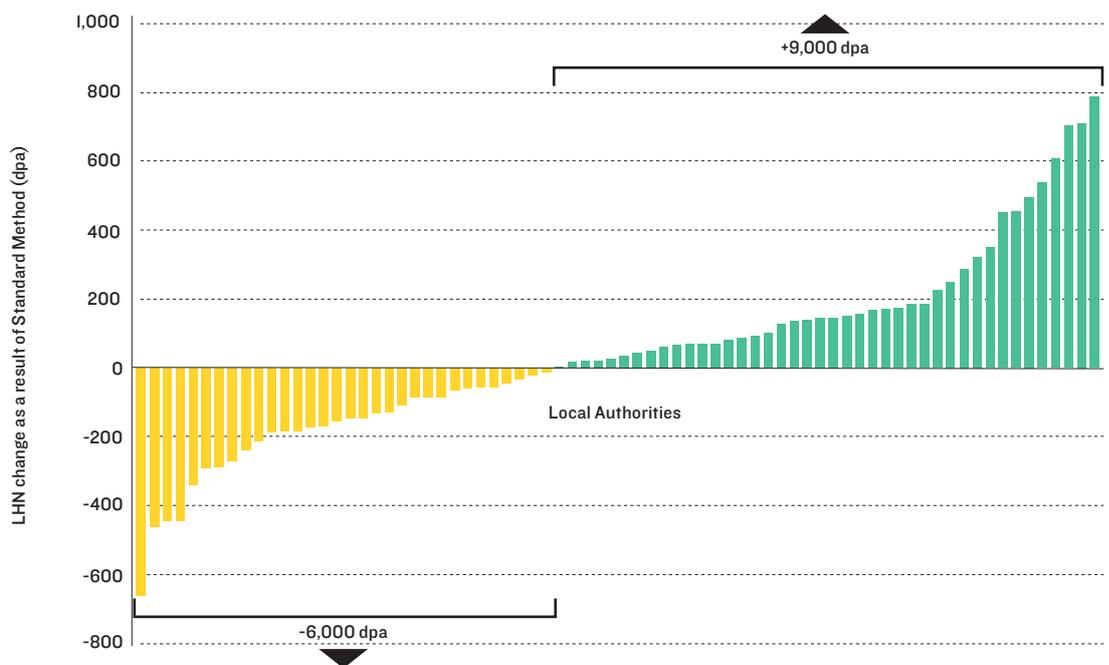
Whilst these 30 plans would see a median increase of 146 dwellings per annum (dpa), some plans would see more significant increases. For example, the two authorities within the 'Joint West Dorset, Weymouth & Portland Plan'

would need to grapple with the distribution of a minimum additional c.700 dwellings per annum under the Standard Method.

Conversely, 32 plans would see local housing need figures below their existing housing requirements, with a median decrease of -150 dpa. Well over half of these authorities would notionally see a 20% or higher decrease in housing numbers if they were to follow the minimum figures of the Standard Method for their plan (as explained, the minimum starting point is not the automatic 'end point' of local housing need).

Cumulatively, the 74 plans due for review would need to plan for a notional net increase in housing need of a minimum c.3,000 dpa; only a 6% increase above the currently adopted number. However, the 42 plans which will see an increase in their LHN will together require 9,000 additional dpa as part of their housing requirements, accounting for nearly one third of plans adopted under the NPPF 2012.

Figure 8: Change in Local Housing Need compared to adopted Local Plan requirements for plans requiring review in the next two years



Source: Lichfields analysis

<sup>11</sup> For the purposes of the analysis, the Standard Method is applied using the 2014-based household projections based on the position promulgated in the Technical Consultation

# 05 Conclusions

After just over six years of plan-making under the 'simpler and swifter' NPPF 2012, certain issues have persistently plagued the plan-making system. Consequently, only half of authorities benefit from an up-to-date plan on the eve of the introduction of the revised NPPF 2018 taking effect. 22% of LPAs have failed to produce a post-NPPF 2012 plan for examination.

Further still, of those authorities who have submitted plans, examinations have regularly been held up by the issues of housing need and the DtC. Nearly half of plans that have been examined were required to amend their housing requirement, and one third of plans being subject to early review requirements. These factors have significantly lengthened the time taken to examine plans under the NPPF 2012 (now taking on average 18 months), albeit examination timescales do appear to have improved recently.

Acutely aware of this, and amidst the national housing crisis and establishment of a 300,000 homes per annum national housing ambition, the Government has revisited the framework in a bid to quicken the process and achieve higher housebuilding rates through a plan-led system. Under the new statutory requirement in legislation to review Local Plans [in whole or in part] every five years, over half of LPAs that currently benefit from an up-to-date plan will be required to review and potentially update it within the next two years. This suggests that, even for the LPAs who achieved a sound Local Plan under the NPPF 2012, the plan-making challenge is far from over.

Our analysis identified seven key policy changes which are likely to impact the rate and quality of plan-making. This highlights some welcome policy reforms which should smooth the process, albeit other reforms are likely to become the new plan-making battlegrounds. As the topic of debate shifts from housing need – the floor of which is now largely set in stone through the Standard Methodology – to viability, time will tell whether these changes will, on balance, quicken or stall the plan-making process.

Further challenges might also be caused in reviews triggered by changes in 'local circumstances'. Over 60% of plans facing reviews in the next two years will need to respond to increases in their LHN calculated through the Standard Method compared to adopted housing targets. It remains to be seen whether the NPPF 2018 will support authorities in identifying deliverable sites to meet this additional land supply challenge.

The Government's commitment to a plan-led system for increasing housing delivery is clear. The Minister of State for Housing's recent comment that 4-5 millions homes are required "in planning" to achieve 300,000 homes per annum is testament to that.<sup>12</sup> But whatever is done to expedite the Local Plan process, it is Local Planning Authorities that must interpret and positively respond to these changes, and deliver on plan-making commitments. Without up to date plans in place, the nation will continue to struggle to deliver the new homes it needs in a way that puts local communities in control.

<sup>12</sup> The comments of Kit Malthouse MP were made to The Times on 4th January 2019. The 4-5 million is equivalent to 300,000 per annum in combination with the NPPF requirement for plans to look ahead over a minimum 15 year period

# The Lichfields perspective

What makes us different? We're not just independent but independent-minded. We're always prepared to take a view. But we always do that for the right reasons – we want to help our clients make the best possible decisions.

We have an energetic entrepreneurial culture that means we can respond quickly and intelligently to change, and our distinctive collaborative approach brings together all the different disciplines to work faster, smarter, and harder on our clients' behalf.

## Sharing our knowledge

We are a leading voice in the development industry, and no-one is better connected across the sector. We work closely with government and leading business and property organisations, sharing our knowledge and helping to shape policy for the future.

## Publishing market intelligence

We are at the forefront of market analysis and we track government policy and legislation so we can give fresh insight to our clients. Our Think Tank is a catalyst for industry-leading thinking on planning and development.

## Read more

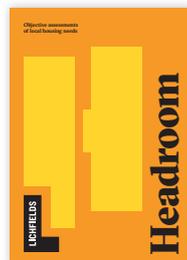
You can read more of our research and insight at [lichfields.uk](http://lichfields.uk)

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Making the economic case for development



### Headroom

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### Sizemix

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### Workspace

Assessing economic needs

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