

What's the plan?

An analysis of local plan coverage cross England

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The
countryside
charity



Executive summary

Introduction

Local plans set out the long-term development strategy for an area and are an important way for the public to be involved in shaping the future of the places where they live. They are vital to ensuring both the local community and investors have the confidence and certainty to manage the social, economic and environmental wellbeing of an area. Local plans set a baseline for determining planning applications and are critical to safeguarding and improving undeveloped areas of countryside, which is vital to tackling the climate and biodiversity crises.

In recognition of the importance of local plans, central government has pledged to ensure that all local plans in England are in place, and fully up-to-date, by the end of 2023. However, new research from CPRE, the countryside charity, shows that many local planning authorities (LPAs) have found getting adopted, ie approved, plans in place challenging and, what is more, keeping those plans current has proved even more problematic.

The government continues to take positive strides forward in various aspects of policy, including housing design, biodiversity and nature conservation. It is vital to have up-to-date local plans so that these plans can take into account the best new thinking, which is increasingly urgent in a number of areas, particularly those that relate to tackling the climate emergency.

This research report from CPRE, the countryside charity, provides an analysis of current local plan coverage across England and an assessment of the extent to which these plans can be considered up-to-date. It goes on to set out some key recommendations for how the government can work towards its target of full coverage by the end of 2023, an aim CPRE is keen to support.

Methodology

Freedom of Information requests (FOI) have been used to collect the information on existing and emerging plans as well as the LPAs' housing land supply position. All 330 LPAs were analysed as part of this report and the majority of the data was collected from May to August 2019. The full set of data can be found in the spreadsheets listed in the [appendix in the main report](#).

Key findings – plan coverage and currency

Our research shows that not all of England is covered by local plans and that a significant proportion would not pass the tests required to be seen as up-to-date. In England, the majority (90%) of LPAs have an adopted local plan – 10% of LPAs do not have a local plan, with most using older 'saved policies' from previous plans. Two key criteria need to be met for a plan to be classed as up-to-date:

- It needs to be less than five years old (or, having been reviewed for consistency with updated evidence and national policy, found not to require updating). Only around 40% of local plans meet this criterion.
- The council must be able to demonstrate that it has sufficient land identified in the plan (or with planning permission) to provide five years of housing development (known as the housing land supply). With this taken into account, only 30% of plans are up-to-date.

Since the housing land supply position can, and does, change frequently, and few LPAs publish information, it is difficult to be confident of the status of any local plan.

Therefore, the government is not currently able to describe our planning system as genuinely plan-led given that fewer than one third of LPAs in England are operating under an up-to-date plan for the purposes of deciding applications for new housing development. Furthermore, the current bar for a plan to become out-of-date is unhelpful, as plans could



be considered out-of-date shortly after adoption, due to a lack of housing land supply, or by default after five years, which represents only a third of a planning period for a typical local plan.

Key findings – looking ahead

- Our research reveals that over 80% of LPAs will need to review an existing plan, or adopt a new plan, in order to meet the government's proposed 2023 deadline.
- Even if all LPAs have an adopted plan in place by 2023, questions remain as to whether those plans will still be up-to-date by then, and for how long will they remain so.
- The government must decide if the 2023 deadline is a one-off target, or if it plans to reform processes to enable local authorities to keep their plans up-to-date.

Recommendations

CPRE is keen to work constructively with the government to help deliver full coverage of up-to-date local plans in England by the end of 2023. Accordingly, we recommend that:

1. **Monitor local plan coverage** – the government should monitor and publish a summary of local plan coverage across England at least annually. It should also monitor the currency of adopted plans in regards to the National Planning Policy Framework's (NPPF) requirements. This would furthermore enable the government to identify the strengths and weaknesses of existing policy requirements.
2. **Monitor and strengthen housing land supply positions** – the government should monitor LPAs' housing land supply positions and consider improving the policy's practicability, for instance by requiring set publication dates and freezing the housing land supply position by default until the next publication or monitoring date – potentially with a rapid strategic review option if a LPA is below five years supply.
3. **Produce guidance for LPAs on updating local plans** – the process to review local plans to keep them up-to-date remains vague. The government should produce clear guidance and for LPAs on how to review and subsequently update a local plan, which is essential to enable local authorities to maintain up-to-date plans.
4. **Learn lessons** – some local authorities took decades to adopt a local plan, or decided to withdraw draft plans before adoption. The government should work more closely with the relevant LPAs to try to learn from these lessons and provide the necessary support to address the barriers these LPAs face in plan preparation and adoption.
5. **Simplify statutory plan documents** – the number and structure of development plan documents is currently not prescribed by national planning legislation or policy. The government should help simplify the landscape by providing a clear structure of statutory plan documents across England, which would improve usability and make it easier to monitor and maintain up-to-date plans.

The full version of *'What's the plan? An analysis of local plan coverage across England'* is [available to view here](#).