



Strategic Planning Research Unit  
*A specialist team within DLP Planning Ltd*

For and on behalf of  
**Royal Town Planning Institute**

**Local Plan Research Project**  
**Local Plan Preparation: Barriers and Opportunities**

**Prepared by**  
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## **1.0 INTRODUCTION**

### **a) The purpose of the research**

- 1.1 This report has been produced for the Royal Town Planning Institute (RTPI).
- 1.2 It is understood that the RTPI were seeking further research to support their submissions to the Government consultation (published 25<sup>th</sup> July 2023) on proposals to make local plans (and minerals and waste plans) simpler, faster to prepare, and more accessible. The Levelling Up and Regeneration Bill sets out changes to the legislation that governs how plans are produced and through this consultation the Government are asking for views on certain proposals to implement these changes. The consultation is open until 18<sup>th</sup> October 2023.

### **b) Description of research method**

- 1.3 The focus of the research is to gain a better understanding of how the plan making system has operated and delivered plans and to highlight good practice as well as barriers to plan making.
- 1.4 While the focus of the research has been on the selected case studies, our approach has also considered the available evidence at the 'all England' level so that the findings from the case studies may be placed in this wider context.
- 1.5 In the context of the "plan led system" it is pertinent to note not only the time taken to produce plans but also how many plans are being promoted through the system, as not producing a plan is the ultimate delay in the system.
- 1.6 The second element of a "plan led system" we have considered is the number of plans that have been produced which actually identify locations for development. It was considered important to make this distinction on the hypothesis that plans containing allocations might be more difficult to promote through the system as they are likely to raise site specific objections from both members of the public and politicians.
- 1.7 Both of these elements have been considered through time and across geographical regions with reference to changes in government policy and with reference to the presence or otherwise of Green Belt
- 1.8 The available information at the 'all England' level is published by the Planning Inspectorate (PINS) and provides the present status of development plans and the dates for their publication, submission, being found sound by an inspector, and final adoption.
- 1.9 From this initial work some 27 case studies were selected that reflected both those Councils who managed to produce a plan quickly and those whose plans had longer gestation periods. In selecting these case studies, we have attempted to achieve a broad geographical distribution and a range of different levels of constraints.
- 1.10 For the case studies, we have tried to identify the impact of the factors listed below on the Development Plan progress.
- a) Regional diversity: do areas of high housing pressure experience more political opposition leading to delays in the plan making process?
  - b) Has the changing nature of Government advice over the years impacted upon delivery of Development Plans?
  - c) Has the Duty to Cooperate (DtC), including non-statutory plans setting out housing numbers assisted the delivery of Development Plans?
  - d) Has the presence or absence of "Footnote 7" constraints such as Green Belt impacted on the delivery of Development Plans?
  - e) What is the impact of delayed responses or non-response by Statutory Consultees on

the Development Plan timetable?

- 1.11 Evidence in relation to the above has been gained from the documentation available on the respective Councils' websites regarding the progression of the Development Plan. This has included Local Plan websites, the Local Plan examination website (including correspondence from the Local Plan inspector) and online committee reports.
- 1.12 In terms of comparisons between the case studies, we have used the time between the issues and options report and the adoption of the plan as the measure of the plan making process. This is because it was a common indicator for all of the case studies. The publication date of the first evidence was also considered, but this raised issues with whether the evidence had been commissioned as part of the Development Plan process or for other reasons.

## 2.0 NATIONAL EVIDENCE

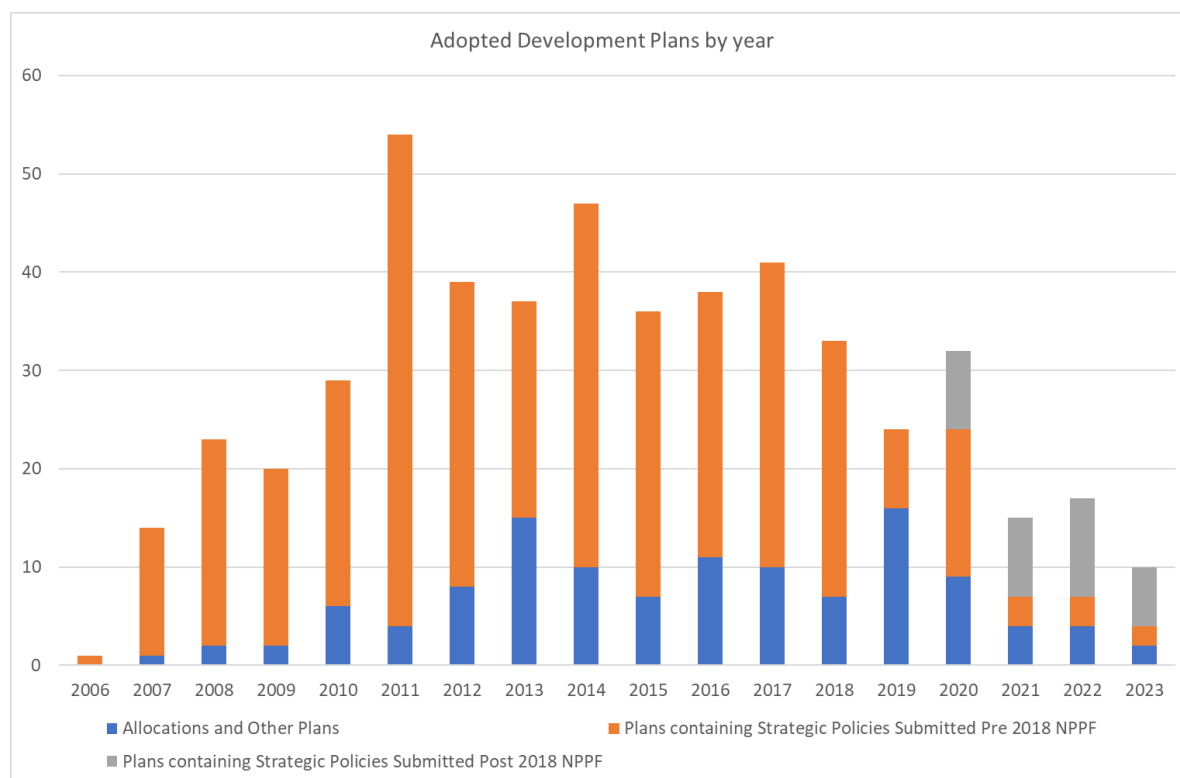
### a) Introduction

2.1 This section considers in general terms the influence of changes in national policy on the period of time between submission and adoption of Development Plans, as well as the impact on the overall number of plans adopted. The influence of the presence of Green Belt on the time taken is also considered. Lastly, the impact of the above is considered at a regional level to establish if there are regional differences.

### b) An analysis of the time taken between submission and adoption of Development Plans since 2007

2.2 The chart below shows the number of plans adopted each year since 2007. This divides plans up into those that contained strategic policies submitted before the changes in the 2018 NPPF came into effect and those plans with strategic policies submitted after the 2018 NPPF came into effect. The third category are plans which have been adopted which contain site allocations.

**Chart 1: Number of Development Plans adopted by year**



Source: PINS 2023

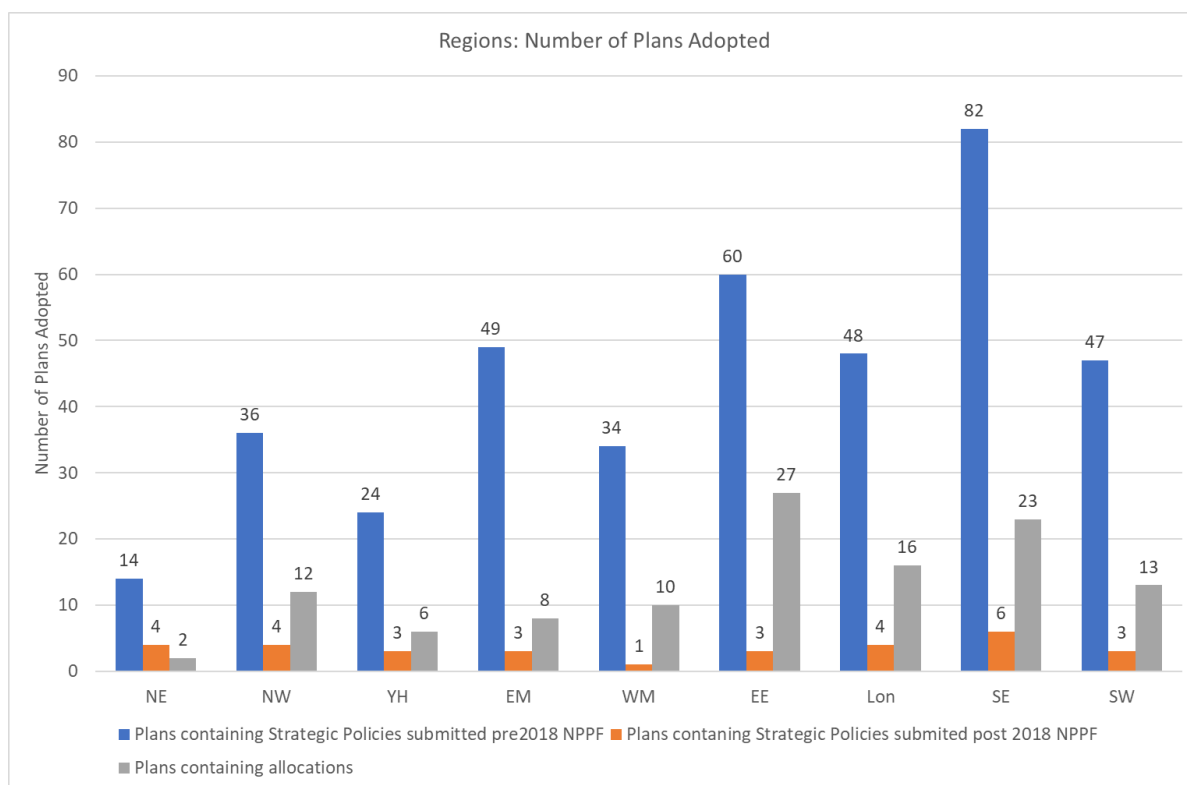
2.3 The above chart shows a peak of adopted Development Plans in 2011 just prior to the 2012 NPPF. This saw the revoking of Regional Spatial Strategies, which determined the level of development of housing and employment land to be provided at the district level. Under the 2012 NPPF the determination of the level of housing and employment to be planned for was undertaken at a local level albeit with a new “Duty to Cooperate” (DtC), which sought to ensure that any unmet needs were met in neighbouring authorities.

2.4 The information above from PINS suggests that the last two years have seen two of the lowest years for the adoption of local plans. This could be a response to the changes in the NPPF with Councils simply not pursuing the production of Development Plans under the

current policy regime. This disquiet with the present regime has been augmented by well publicised proposals to change national planning policy, and as of 11<sup>th</sup> September 2023 there were some 62 Councils who had delayed or withdrawn their Local Plans<sup>1</sup>.

2.5 The regional distribution of adopted plans has not been equal, as illustrated on the chart below. This shows that the South East and the East of England were the regions which adopted the most Plans prior to the impact of the changes in the 2018 NPPF coming into effect. These two regions also saw the most plans adopted under the transitional arrangements in the 2018 NPPF. Anecdotal evidence suggests that a number of Councils were utilising the transitional arrangements to pursue development plans with lower housing requirements as calculated under the 2012 NPPF to avoid having to plan for higher levels of housing that would result from the application of the Standard Method as required by the 2018 NPPF.

**Chart 2: Adopted Development Plans by Region**



Source: PINS 2023

**c) Implications of changes to the NPPF on the timing of the Development Plan process**

2.6 The chart below considers the time taken for Development Plans to progress from submission to adoption. Care needs to be taken in interpreting this data as it does not measure the time of plan preparation up to submission. This shows that for all types of plans adopted prior to the introduction of the 2012 NPPF the time between submission and adoption was shorter than plans considered under the later policy regimes. There are two potential reasons for this:

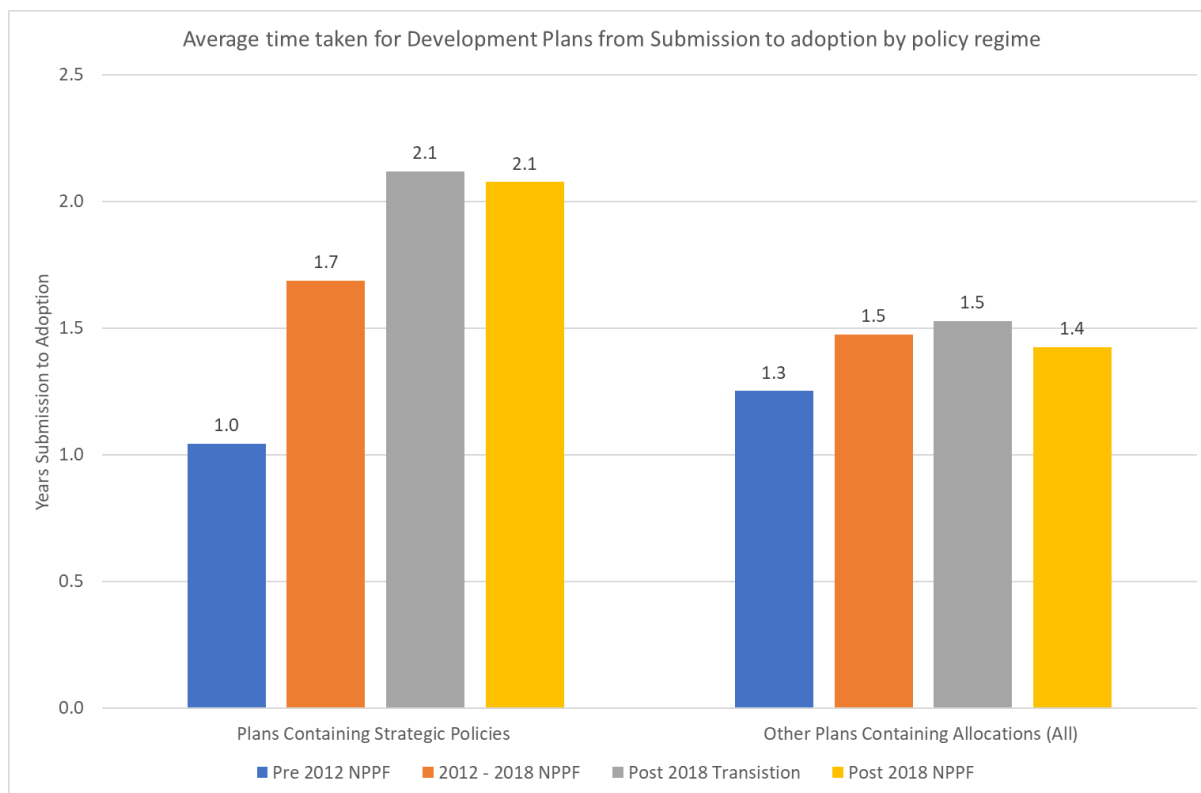
- a) The level of development was predetermined by the Regional Spatial Strategies which would remove the need to consider these complex matters at the examination of plans and the need to prepare evidence to support these figures.

<sup>1</sup> <https://www.hbf.co.uk/policy/planning-policy/delayed-local-plans/>



- b) Core Strategies rarely contained policies identifying allocations for development which removed the need to consider these detailed issues in terms of justifying the selection of sites.
- 2.7 The evidence also suggests that non-strategic plans that contain allocations have shorter time periods between submission and adoption. This is to some extent due to the fact that the issues of the overall level of development have been addressed in another document; either a Regional Strategy or in a Core Strategy. This removes an area dispute and negates the requirement for the development of a complex and time-consuming evidence base. In a way this is similar to all those plans produced in the pre-2012 NPPF period which all have the shortest timescales of the period that have been considered.
- 2.8 The Chart also shows that all types of Development Plan considered under the 2018 NPPF transitional arrangements took longer to reach adoption than those under the previous regimes. Again, anecdotal evidence suggests that potential reasons for this are:
- a) The evidence base was rushed so that the plan could be considered under the 2012 NPPF in order to avoid having to plan for the higher level of housing required by the Standard Method in the 2018 NPPF
  - b) A reluctance on behalf of the Planning Inspectorate to find plans unsound, therefore more time taken at examination to enhance the evidence base and/or an increased number of Main Modifications.
- 2.9 Plans under the “new regime” have only taken a marginally shorter time from submission to adoption despite the introduction of the Standard Method (SM) than those considered under the transition period. This is of course a small sample size and could be due to the both the LPAs and the Inspectorate adjusting to the new guidance. It might also be due in part to LPAs starting to hold back on processing the plan through the plan making process due to Government announcements signalling further changes to the plan making system. As this data reflects only those plans that have proceeded to adoption, it does not contain details of those plans that are being “held” at various stages of preparation by the LPAs or that have been withdrawn.

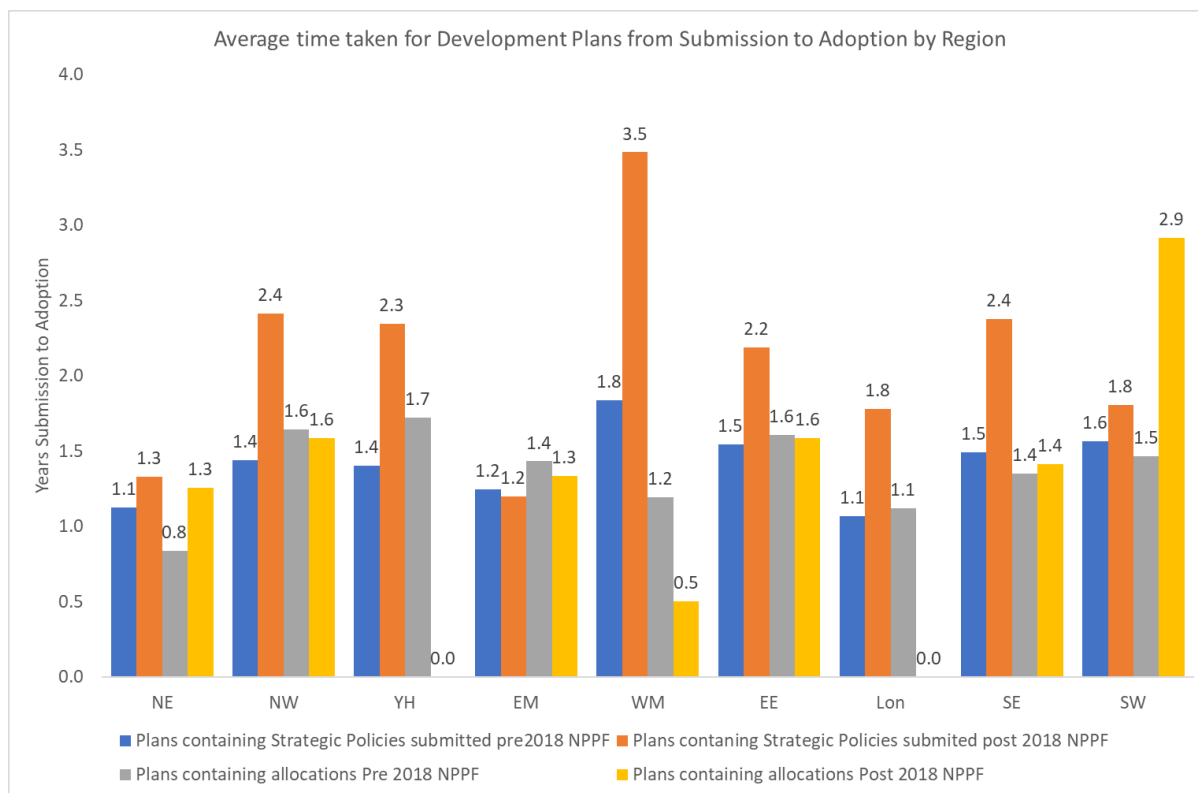
**Chart 3: Average time taken for Development Plans from Submission to Adoption by Policy Regime**



Source: PINS 2023

- 2.10 Considering the pattern at a regional level, the chart below shows for pre-2018 NPPF Development Plans there was only a small regional variation, with the West Midlands taking the longest (1.8 years) and London and the North East taking the least time (1.1 years).
- 2.11 For the post-2018 NPPF period (including the transition period), the time taken increased for all plans containing strategic policies, noticeably with West Midlands plans on average taking the longest (3.5 years) and East Midlands plans taking the shortest time.
- 2.12 For non-strategic plans containing allocations, again there is only a marginal differentiation in terms of the pre-2018 NPPF plans. For the post-2018 plans there are only a few in each region and therefore it would be unwise to draw general conclusions from these results, although noting that the South West had the longest period of 2.9 years. This will be considered in the case studies later.

**Chart 4: Average time taken for Development Plans from Submission to Adoption by Region and Policy Regime**

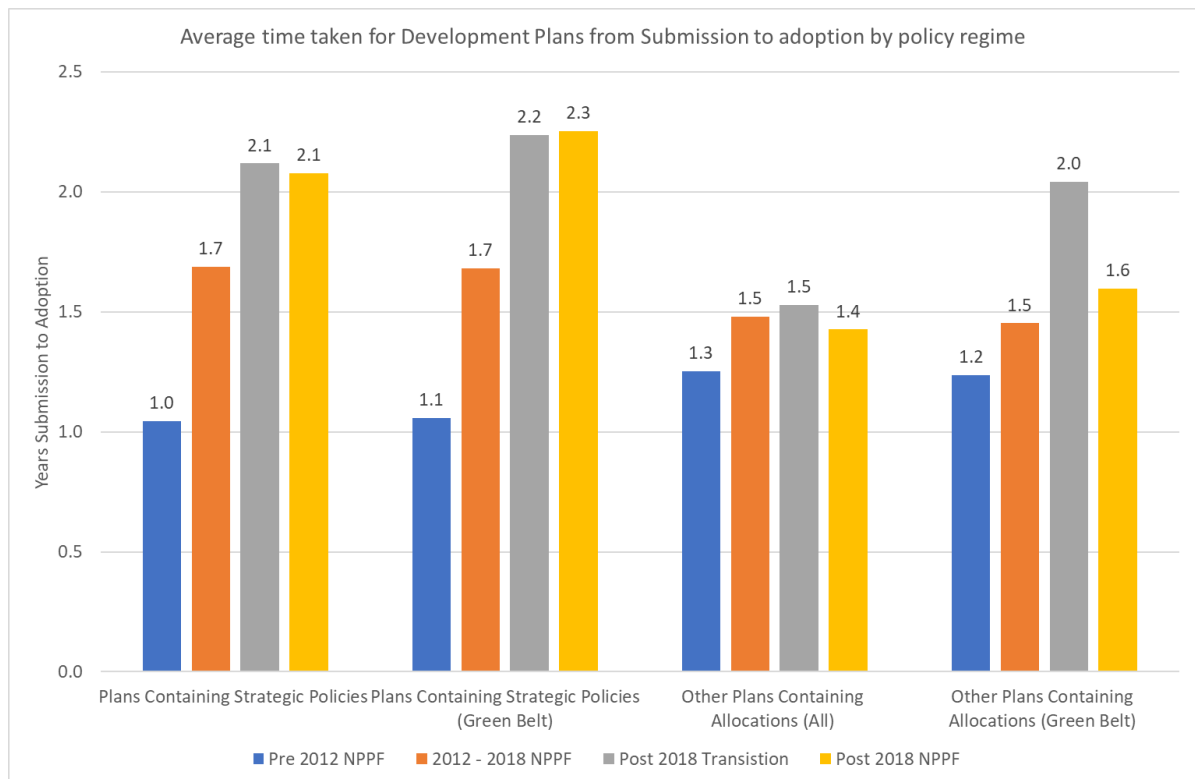


Source: PINS 2023

**d) The influence of the Green Belt on the timing of the Development Plan process**

2.13 Turning to the influence of Green Belt policy, for the most part this has not impacted on the time taken between submission and adoption for all types of plan in the pre-2012 NPPF and 2012 NPPF period with the average time being either the same or only slightly longer. The time taken between submission and adoption for Development Plans containing Green Belts did increase during the 2018 NPPF “transition period” and, as explained above, the potential of a rushed evidence base and the unwillingness of the inspectorate to find plans unsound is likely to have been a contributing factor for the extension of this period.

**Chart 5: Average time taken for Development Plans from Submission to Adoption by Policy Regime**



Source: PINS 2023

**e) The influence of AONB and the other Footnote 7 constraints on the timing of the Development Plan process**

2.14 Aligned with the assessment of the impact that Green Belt has upon an authority, we have reviewed the impact of other “Footnote 7” constraints.

2.15 “Footnote 7” constraints are the policies referred to in the NPPF (rather than those in Development Plans) relating to:

- a) Habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest
- b) Green Belt
- c) Local Green Space
- d) Area of Outstanding Natural Beauty,
- e) National Park (or within the Broads Authority)
- f) Heritage Coast
- g) Irreplaceable habitats
- h) Designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and
- i) Areas at risk of flooding or coastal change.

2.16 All Councils will have a number of the above constraints affecting their area so our approach to assessing the impact of these constraints at a national level is to consider the impact of AONB in the first instance as follows.

- a) The average timescale of all Councils
- b) The average timescale of those Councils without AONB
- c) The average timescale of those Councils with AONB
- d) The average timescale of those Councils with over 20% coverage of AONB

2.17 The same approach was then taken in respect of the area covered in a Council by the following Footnote 7 constraints:

- a) Green Belt
- b) AONB
- c) National Parks
- d) Flood Zone 3
- e) SSSIs

2.18 These results are set out below:

**Table 1. Impact of AONB and Footnote 7 constraints on the time taken from submission to adoption**

	All Plans	All Plans without constraint	All Plans with constraint	Plans with above 20% coverage by constraint
AONB	1.43	1.37	1.63	1.71
Footnote 7* Constraints	1.43	1.20	1.48	1.60

Source: *Data.Gov.UK.opensource portal*

2.19 Like the presence of Green Belt the presence of AONB within a Council's area appears to result in a marginal increase in the time taken between the submission of a Local Plan and adoption. The time taken marginally increases for Councils with over 20% of coverage by AONB. There is a similar pattern for Councils with the Footnote 7 constraints listed above.

2.20 Care does need to be taken with this analysis as mainly urban areas with only a small area of open space or countryside might have a relatively low coverage in terms of Footnote 7 constraints but still be constrained in terms of accommodating additional development.

#### **f) Conclusions from the national analysis.**

2.21 There are some obvious conclusions to draw from the above which are as follows:

- a) Changes to national policy appear to cause:
  - i) Disruption in the plan making process in terms of the time taken from submission to adoption.
  - ii) An apparent push by some LPAs to secure an adopted plan under the policy guidance that is to be replaced.
  - iii) Fewer plans being adopted immediately after national policy changes are introduced.
- b) Plans that do not have to address the issue of the overall level of development, such as those adopted pre 2012 and non-strategic plans under the 2012 NPPF that make allocations, appear to negotiate the period between submission and adoption quicker than plans that determine the level of development. Although if account is also taken

of the lead-in time for higher order plans to establish the level of development required then this apparent advantage is probably negated.

- c) There do not appear to be significant regional differences in the time taken between submission and adoption of development plans.
- d) With the exception of those plans considered under the 2018 NPPF transitional arrangement, the presence of Green Belt does not appear to have a significant impact the timing of adoption of development plans. Although those plans containing areas of Green Belt do take slightly longer to adopt.
- e) Plans that are required to address the constraints identified in Footnote 7 (Green Belt, AONB, National Parks, Flood Zone 3, and SSSIs) are on average likely to take marginally longer between submission and adoption, and this time period is likely to marginally increase the greater the extent of the coverage of these constraints.

2.22 It is noted that the above has only considered the impact of national policy and Footnote 7 constraints on the time taken from the submission to adoption of development plans, and as such it does not reflect the fact that many LPAs have clearly made the decision not to progress new plans through the development plan system and prefer to rely upon historic plans. The role of national policy in encouraging and discouraging plan making cannot be underestimated as is demonstrated by the “spikes” of adoptions prior to the changing of plan making regimes and, in the case of recent announcements, the withdrawal or suspension of many plans.

### 3.0 CASE STUDIES

- 3.1 A total of 28 case studies, spread geographically across England have been identified and considered. The assessment considers the timeframe from commencement of evidence base work to adoption of the relevant Development Plan document. As is set out below a range of factors have influenced the speed of preparation, including but not limited to significant delays resultant from delayed engagement with statutory consultees, legislative and policy changes, political intervention and the scale of opposition.
- 3.2 The case studies are ranked in the order of the time taken from the Issues and Options stage to adoption, with those plans with the shortest time being listed first. Where there has been more than one plan produced in the LPA all of the plans are grouped together and listed in accordance with the shortest time period.
- 3.3 While the previous section considered the national picture in terms of time taken between submission and adoption, the more limited collection of case studies allows for a detailed assessment to be made and considers the time taken between the publication of the Issues and Options and adoption (the latter is considered to provide the best consistent measure of the preparation time of the Development Plan). The results of this assessment are shown in the table below.

**Table 2. Analysis of time taken between Issues and Options and adoption of Development Plans in the case studies.**

	First evidence to adoption	Issues and Options to adoption	Submission to adoption years
OAHN average	8.1	5.4	3.0
SM average	8.3	4.4	2.2
RSS	5.3	4.1	1.3
Allocations	8.5	5.4	3.1
Allocations OAHN	9.3	6.4	3.9
Allocations SM	8.7	4.4	2.3
Allocations RSS	5.2	3.4	1.6

Source: PINS 2023/SPRU

- 3.4 In terms of the cases considered, it appears that those plans that required the housing need to be determined locally took on average a year longer to progress between the Issues and Options stage and adoption. Whereas plans based upon the Standard Method on average took a year less and plans based on the RSS housing requirement took even less time. Such an assessment ignores the fact that plans based on the RSS housing requirement did not necessarily make any allocations (such was the case with many Core Strategies) so that the issues to be addressed were less detailed and less site specific. However the same pattern emerges if one considers those non-strategic plans which contained allocations. Again care is required as for plans making allocations, which have to determine the level of housing need locally, have a more complex evidence base to address than plans making allocations to meet a predetermined level of need.
- 3.5 As will become apparent, some of the “quicker” Development Plans considered in the case studies often did not have to determine the level of development required and/or did not identify sites to meet this need.
- 3.6 While there are issues in terms of defining what may constitute first evidence in the case studies it is clear from the above that the time taken to the submission of the plan can be substantial and there appears to be a wider understanding across the sector that delays, particularly in these early stages of plan preparation and evidence gathering can be due to the engagement (or lack thereof) from Statutory Consultees.

3.7 While the case studies did look for evidence of delays due to lack of or inadequate response from Statutory Consultees, it has not been possible to establish this from the published information. This is partly because committee reports during the time of preparation (pre-submission) are less common and do not identify the causes of delay. The impact and scale of this is difficult to quantitatively measure as the reasons for delays are seldom recorded. The matter has nevertheless been noted in research published by the Local Plan Expert Group<sup>2</sup> (Paragraph 9.36) which reports:

*“A number of authorities express concern to us the plan making was made more difficult by the length of time which many statutory consultees took to respond during the plan making process and by the extent of requirements from those consultees for matters to be evidenced within the plan making process.”*

3.8 A number of Statutory Consultees produce annual reports on performance to DLUHC and while Natural England for example in their 2022/2023 performance review, have identified the need to create an action plan to support improving the responsiveness of engagement for planning applications, they do not record the time taken to respond to consultations on Local Plan Regulation 18 consultations<sup>3</sup> nor do they propose performance improvements for this activity.

3.9 The more detailed timing of the case studies allows for a further examination of the relationship between the level of housing being proposed, the coverage of existing constraints that are being addressed in the plan and the time taken for the adoption of the plan. The table below sets out the correlation between the extent to which the Council is covered by the constraint and the time taken to adoption or submission. The results returned are between 1 (which indicate a strong positive correlation) and -1 (which indicates a strong negative correlation).

**Table 3. Correlation between presence of constraints and time take to reach adoption from various stages of plan preparation**

	First evidence to adoption	Issues & Options to adoption	Submission to adoption	Issues and Options to Submission
Level of housing provision	0.03	0.03	0.16	-0.05
Green Belt	0.40	0.36	0.40	0.21
Footnote 7 Constraints	0.52	0.48	0.52	0.26

Source: PINS2023; Data.Gov.UK.opensource portal

3.10 The above analysis suggests that there is no relationship between the level of housing that is proposed within the plan and the time taken for the plan to proceed through the system. The low positive results suggest that there might be a weak link between the time taken to adopt a plan and the level of constraints (Green Belt, AONB, National Parks, Flood Zone 3, and SSSIs) within the Council's area.

3.11 This evidence suggests that there are clearly other factors which impact the time taken for plans to be progressed through the system. The case studies highlight some of these individual circumstances.

<sup>2</sup> Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016)

<sup>3</sup> 2021-22 Annual report to the Department for Levelling Up, Housing and Communities Natural England's timeliness on responses to planning consultations in England (June 2022)



**a) Mid Suffolk Core Strategy**

**Table 4. Mid Suffolk Core Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2003	01/04/2002	01/03/2005	31/10/2007	31/10/2007	27/08/2008	04/09/2008

Source: PINS2023; Mid Suffolk Webpage; SPRU Analysis.

**Table 5. Mid Suffolk Core Strategy Time Taken Between Stages**

Core Strategy 2008	
Period	Years
Start of Plan Period to Adoption	5.5
First Evidence to Adoption	6.4
Issues & Options to Adoption	3.5
Submission to Adoption	0.9

Source: PINS2023; Mid Suffolk Webpage; SPRU Analysis.

3.12 This Core Strategy was based on the RSS and made no site allocations.

3.13 Following the adoption of this Core Strategy (CS) the Council did not then produce a Site Allocations Local Plan but instead produced a focused review which was adopted in 2012. This proposed very limited changes and had one of the fastest plan preparation times, as illustrated below.

**b) Mid Suffolk Core Strategy Focused Review**

**Table 6. Mid Suffolk Core Strategy Focused Review Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan 2017	01/03/2003	31/10/2011	11/01/2012	11/01/2012	22/03/2012	27/09/2012	20/12/2012

Source: PINS 2023; Mid Suffolk Webpage; SPRU Analysis.

**Table 7. Mid Suffolk Core Strategy Focused Review Time Taken Between Stages**

Core Strategy Focused Review	
Period	Years
Start of Plan Period to Adoption	1.8
First Evidence to Adoption	3.8
Issues & Options to Adoption	2.3
Submission to Adoption	1.1

Source: PINS 20023; Bassetlaw Webpage; SPRU Analysis.

3.14 This Core Strategy was adopted in 2008 in accordance with the East of England Plan. It provided general distribution of growth but no site specific allocations.

3.15 The Allocations Plan was withdrawn in 2018 as result of appeal decision finding no 5 year land supply and decision to review housing need in accordance with 2013 SHMA.

3.16 As no site allocations plan was produced the Council finally partnered with Babergh to produce the Babergh and Mid Suffolk Joint Local Plan.

3.17 This Joint Plan was submitted for examination on 31 March 2021.

3.18 The examination hearing sessions were held on 21 June, between 22 September and 21 October 2021 and between 26 and 28 June 2023.

3.19 The Main Modifications can be summarised as follows:

- a) Addressing the lack of robustness of the site allocation selection process and the spatial strategy by deleting the plan's spatial strategy and site allocations, thereby making the plan a Part 1 Plan, to be supported in due course by a Part 2 Plan;
- b) Combining the various policies which address affordable housing and altering the affordable housing requirement in respect of housing development on brownfield sites;
- c) Providing for a more positively prepared policy approach to the determination of applications for sites for Gypsies, Travellers and Travelling Showpeople;
- d) Amending and clarifying the employment policies so that they provide an effective framework for employment development;
- e) Adding a new policy on Intensive Livestock and Poultry Farming to provide an effective framework for dealing with such developments;
- f) Amending and clarifying policy LP01 on windfall housing development; • Deleting policy LP30 - Designation of Open Spaces; and
- g) A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

**c) North West Leicestershire Policy S1 Review**

**Table 8. North West Leicestershire Policy S1 Review Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Policy S1 Review	01/03/2011	01/02/2018	20/11/2019	20/11/2019	18/02/2020	17/02/2021	16/03/2021

Source: PINS 2023; North West Leicestershire Local Plan Webpage; SPRU Analysis.

**Table 9. North West Leicestershire Policy S1 Time Taken Between Stages**

Local Plan S1 Review	
Period	Years
Start of Plan Period to Adoption	6.73
First Evidence to Adoption	3.89
Issues & Options to Adoption	2.07
Submission to Adoption	1.46

Source: PINS 2023; North West Leicestershire Local Plan Webpage; SPRU Analysis.

3.20 Inspector found that enough progress had been made on substantive review to allow this partial review to proceed without taking into account the results of the Standard Method for this district or the unmet need for Leicester.

3.21 The plan made no additional allocations.

**d) North West Leicestershire 2011-2031 Local Plan**

**Table 10. North West Leicestershire Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan 2017	01/03/2011	01/01/2014	29/10/2015	04/07/2016	04/10/2016	12/10/2017	21/11/2017

Source: North West Leicestershire Local Plan Webpage; SPRU Analysis.

**Table 11. North West Leicestershire Time Taken Between Stages**

Local Plan 2011-31	
Period	Years
Start of Plan Period to Adoption	6.73
First Evidence to Adoption	3.89
Issues & Options to Adoption	2.07
Submission to Adoption	1.46

Source: North West Leicestershire Local Plan Webpage; SPRU Analysis.

3.22 As is detailed above, evidence base gathering commenced on the North West Leicestershire Local Plan in early 2014, three years post the Plan base date. The Plan was adopted in November 2017. Of the case studies outlined below, the timeframes from start to adoption were amongst the quickest recorded.

3.23 The below considers how the preparation and particularly the Examination of the Local Plan was conducted so as to avoid some of the lengthier delays that have been noted with other schemes.

3.24 The consultation process employed by the Council was as follows;

1. Local Plan Consultation (My Say) – Regulation 18 – 20 June 2014 – 19 September 2014
2. Draft Limits to Development and Town Centre Boundary Consultation – 17 November

2014 – 9 January 2015

3. Draft Local Plan Consultation (Regulation 18) – 29 September 2015 – 30 November 2015
  4. Publication Local Plan Consultation (Regulation 19) – 4 July 2016 to 15 August 2016
- 3.25 It is material in assessing the timeframes associated with preparation of a Local Plan to consider the number of consultee comments received at each consultation stage. For North West Leicestershire and the consultations set out above – these were as follows;
1. Local Plan Consultation (My Say) – 77 responses
  2. Draft Limits to Development and Town Centre Boundary Consultation – 22 responses
  3. Draft Local Plan Consultation (Regulation 18) – 326 individual responses & 424 standard letters
  4. Publication Local Plan Consultation (Regulation 19) – 110 individual responses & 406 detailed comments
- 3.26 The housing requirement in the draft Local Plan was derived, with an uplift, from the 2014 County-wide SHMA, reflecting rate of dwelling completions and the SoS approval of the East Midlands Gateway Strategic Rail Freight Interchange. However, progress on the Plan was delayed temporarily by the need to commission and publish the North West Leicestershire Review of Housing Requirements following failure at appeal to demonstrate a Housing Land Supply (HLS) in early 2016.
- 3.27 A number of representors to the above listed Regulation 18 and 19 consultations expressed concerns about adopting a requirement in advance of the regional assessment. This was reported at committed in January 2016 and a decision to review with Counsel was made.
- 3.28 The HNA authorities further to this commissioned a new HEDNA, but the Council decided, further to liaison with PINS and legal Counsel, to proceed with the publication and submission of the Plan on the basis of the 2016 Internal Review. The collaborative decision to proceed on internal review allowed the Council to progress with Examination circa 18 months ahead of the publication of the HEDNA. The HEDNA was published at the end of January 2017, shortly after the conclusion of the first block of Hearing Statements.
- 3.29 In order to ensure that the findings of the HEDNA could be fully considered, the Council proceeded on the basis that an early review of the Plan should be triggered should the findings of the HEDNA require increased development land requirements or if a new MoU were to result in unmet need from other authorities. The Inspector confirmed that it was only possible to find the Plan sound on the basis of an early review, but representors and the Council were invited to review and make submissions in respect of the HEDNA. The Council submitted an Addendum Report and SA update reflecting the updated position but progressed with the early review under Policy S1.

e) **Central Lincolnshire LP 2012 – 2036**

**Table 12. Central Lincolnshire Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2012	01/03/2014	01/03/2015	15/04/2016	20/06/2016	10/04/2017	24/04/2017

Source: PINS 2023; Central Lincolnshire LP Webpage; SPRU Analysis.

**Table 13. Central Lincolnshire Time Taken Between Stages**

Local Plan	
Period	Years
Start of plan period to Adoption	5.1
First Evidence to Adoption	3.1
Issues & Options to Adoption	2.1
Submission to Adoption	1.1

Source: PINS 2023; Central Lincolnshire LP Plan Webpage; SPRU Analysis.

- 3.30 The 2036 Plan includes the allocation of 8 Sustainable Urban Extensions. Throughout the Examination process, several infrastructure costs were identified, and it was noted that there were no developers in place to bring elements of or all of the allocated sites forward. The Inspector (paragraph 182) accordingly sought the implementation of a review mechanism that would allow the Council to respond should delivery on any of the sites stall. Additionally, the review Policy LP54 allowed any post 2036 capacity on the SUEs to come forward before the end of the plan period to compensate for potential lower rates of delivery on any of the other 150 residential allocations.
- 3.31 Additionally, certain site specific policy requirements, such as the provisions required under Local Plan Policy 14 (Access and Water), were confirmed not to have been thoroughly tested through the whole plan viability testing. With the EA and Anglian Water confirming that the whole of Central Lincolnshire fell within an area of serious water stress, where drought was a particular concern, the additional policy requirements in respect of water were considered necessary and appropriate, however, representors and the Inspectors considered the need to undertake further viability testing to consider the additional financial implications. However, the recent publication of DCLG data negated the need to specifically test these, with the Inspectors content that nationally published cost estimates could be utilised to avoid unnecessary delays to the process that would occur through the need to update the whole Plan Viability (Paragraph 373).

**f) Central Lincolnshire LP 2018 – 2040**

**Table 14. Central Lincolnshire Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2018	01/03/2015	01/06/2019	16/03/2022	08/07/2022	28/03/2023	13/04/2023

Source: PINS 2023; Central Lincolnshire LP Webpage; SPRU Analysis.

**Table 15. Central Lincolnshire Time Taken Between Stages**

Local Plan 2018- 40	
Period	Years
Start of plan period to Adoption	5.2
First Evidence to Adoption	8.1
Issues & Options to Adoption	3.9
Submission to Adoption	1.1

Source: PINS 2023; Central Lincolnshire LP Plan Webpage; SPRU Analysis.

- 3.32 This was produced in conformity with the 2021 NPPF.
- 3.33 The preparation of this Local Plan commenced in 2019. The first round of consultation was the Issues and Options Consultation undertaken in June and July 2019.
- 3.34 Further consultation was undertaken on a Consultation Draft Local Plan in summer 2021 where comments were invited on the first draft version of the plan. Then in spring 2022 the Proposed Submission Consultation was undertaken before the plan was submitted in summer 2022.
- 3.35 This Local Plan replaces all the Central Lincolnshire Local Plan which was adopted in April 2017 (see above).
- 3.36 It should be noted that “Central Lincolnshire” refers to the combined area covered by the City of Lincoln, North Kesteven and West Lindsey. These three Councils have come together in a formal partnership with Lincolnshire County Council to prepare a joint Local Plan for the area.
- 3.37 The Preparation of this Local Plan was the responsibility of a Joint Committee established by Parliamentary Order in 2009. The Committee has representatives from each of the four partner Councils and has full decision-making powers on planning policy matters.
- 3.38 The plan rolls forward the time period of the previously adopted plan by four years from 2036 to 2040. As such there were few changes and the Inspector recommended only limited modifications including:
- Modify Policy S2 to state that the housing requirement is 1,102 dwellings per year.
  - Modify Policy S3 to include requirements for development proposals adjacent to the Lincoln Urban Area, the Main Towns and the Market Towns.
  - Include a requirement to consider reviewing the Plan should one or more of the Sustainable Urban Extensions fail to deliver as expected.
  - Clarify the position regarding land at the Western Growth Corridor not covered by the extant planning permission in Policy S69.
  - Provide flexibility for land at the South West Quadrant to come forward in advance of the North Hykeham Relief Road, where justified.
  - Modify Policy S75 to require the redevelopment of RAF Scampton to come forward in accordance with a development plan document, such as through an Area Action Plan

or a partial review of the Local Plan.

- g) Delete housing sites at Carholme Road, Lincoln (COL/CAR/005), land rear of Grantham Road Car Park, Sleaford (NK/SLEA/018), Linwood Road, Market Rasen (WL/MARK/007) and Green Man Road, Navenby (NK/NAV/007).



**g) Bassetlaw District Council Core Strategy**

**Table 16. Bassetlaw Core Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan 2017	01/03/2010	01/03/2008	01/09/2009	08/11/2010	31/01/2011	14/11/2011	22/12/2011

Source: PINS & Bassetlaw Webpage; SPRU Analysis.

**Table 17. Bassetlaw Core Strategy Time Taken Between Stages**

Core Strategy	
Period	Years
Start of Plan Period to Adoption	1.8
First Evidence to Adoption	3.8
Issues & Options to Adoption	2.3
Submission to Adoption	1.1

Source: PINS & Bassetlaw Webpage; SPRU Analysis.

- 3.39 During the examination the Government’s Plan for Growth was published along with the statement by the Communities Secretary on 23 March 2011 entitled ‘Radical Changes in Housing and Planning will Drive Growth’, and the statement by the Minister for Decentralisation, also on 23 March, entitled ‘Planning for Growth’. Those who made representations on the Core Strategy and Development Management Policies DPD, together with the Council, were given the opportunity by the Inspector to comment on these policy initiatives.
- 3.40 On 25 July 2011, the Government issued the consultation draft of the National Planning Policy Framework (NPPF). The consultation period ended on 17 October 2011. Those who made representations on the Core Strategy and Development Management Policies DPD and the Focused Changes, together with the Council, were given the opportunity by the Inspector of commenting on the possible implications of the Consultation Draft NPPF for the DPD.
- 3.41 Given that the Plan was prepared and adopted prior to the NPPF 2012 and given the evidence available at the time on regional need, regard was had throughout the Plan preparation to the East Midlands Regional Plan – March 2009 Regional Spatial Strategy. The Inspector during the Examination of the Plan required through further changes additional regard and reference to the RSS requirements for Bassetlaw.
- 3.42 As part of the plan preparation process a number of representations were received that argued that the Plan should provide additional detail about the direction of growth in the settlements identified for development. The Inspector however concluded that in order to identify directions of growth of strategic sites at such a late stage in the process would introduce considerable delay because of the additional work and public consultation that would be required (paragraph 46 IR). They considered that this would not accord with the Government’s exhortations to press ahead with development plan documents.
- 3.43 The absence of specific allocations was fundamental to progress on the Plan and again the Inspector’s Report neatly articulates why the Plan was found sound in the absence of allocations:

*“The Council is also preparing its Site Allocations DPD and it is anticipated that this will be submitted to the Secretary of State towards the later part of 2012. Any delay in the adoption of the Core Strategy and Development Management Policies DPD would not only mean that the Council would have to continue to rely on non-statutory guidance but would also cause significant delay in the allocation of the housing and employment sites required*



*to meet the District's needs”.*

- 3.44 The Allocations Plan that was to implement the CS was withdrawn in 2018 as result of appeal decision finding no 5 year land supply and decision to review housing need in accordance with 2013 SHMA.

## h) Fareham Borough Core Strategy 2011

**Table 18. Fareham Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2006	01/03/2005	01/03/2009	13/12/2010	28/02/2011	20/07/2011	04/08/2011

Source: Fareham Local Plan Webpage; SPRU Analysis.

**Table 19. Fareham Time Taken Between Stages**

Core Strategy 2011	
Period	Years
First Evidence to Adoption	6.43 years
Issues & Options to Adoption	2.43 years
Submission to Adoption	0.68 years

Source: Fareham Local Plan Webpage; SPRU Analysis.

- 3.45 While the Core Strategy states that it identified the Borough's development needs up to 2026 and how they will be met with reference to various technical studies and the consultation on earlier versions of this plan, it nevertheless was in accordance with the RSS the "South Hampshire Sub-Regional Strategy", which identified the role for Fareham and set the housing and employment requirement.
- 3.46 The CS did identify a strategic employment site and a strategic housing site (Daedalus Airfield and Coldeast Hospital). Other allocations were to be identified in a Sites Allocation DPD.
- 3.47 The Development Sites & Policies Plan (Part of the Local Plan) & Welborne Plan (Part 3 of the Local Plan) was adopted in 2015. This is some 6 years after the Issues and Options for the Core Strategy and 9 years from the start of the plan period.

## i) Fareham Borough Council Local Plan 2037

**Table 20. Fareham Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2021	01/03/2016	01/11/2017	06/11/2020	30/09/2021	23/03/2023	05/04/2023

Source: Fareham Local Plan Webpage; SPRU Analysis.

**Table 21. Fareham Time Taken Between Stages**

Local Plan 2037	
Period	Years
Start of Plan Period to Adoption	2.1
First Evidence to Adoption	7.1
Issues & Options to Adoption	5.4
Submission to Adoption	2.5

Source: Fareham Local Plan Webpage; SPRU Analysis.

- 3.48 Central to the preparation and examination of the Plan was the use of a stepped trajectory. The previous housing requirement from the Development Sites and Policies Plan and the Welborne Plan amounted to 337 dpa between 2021 and 2036. Using the Standard Method, the local housing need at the time of the Examination was 541 dwellings. An additional difficulty in the Borough has been the inability of the Council to grant planning permissions during the period between February 2019 and August 2021 due to the nutrient neutrality issue, set out further below. The Council confirmed at the point of submission, that without a

stepped requirement, the housing policies in the Plan would immediately be deemed out of date and the presumption would be applied upon adoption as a result of Housing Delivery Test. Through multiple iterations of a housing trajectory, the Council projected that delivery would not improve until 2025. Accordingly, and especially given the nutrient neutrality issue, the Inspector confirmed that it was appropriate and justified to utilise a stepped trajectory that would (under Policy H1) see the delivery of at least 420 dwellings over the first 2-years of the Plan (210 dpa), and at least 9,140 (averaging 653 dpa) between 2023/2024 and 2036/2037 (paragraph 74).

- 3.49 Indeed, so as to ensure that representors were afforded the opportunity to respond to interim comments relating to a stepped trajectory, ahead of the issue of a Final Report, the Inspector instructed the undertaking of a further public consultation on three post hearing session topic papers; H1: Housing Provision, HP2 – Provision of Affordable Housing and Appendix B – Housing.
- 3.50 As is confirmed in the Inspector’s Report, contrary to paragraph 22 of the Framework, upon adoption, the Plan looked ahead to around 14 years. This was a matter of detailed discussion at the Examination, with the Council noting prolonged discussions with DEFRA regarding nutrient neutrality as delaying the wider process. The Inspector in their report (paragraph 47) confirmed that the approach would not conform with the Framework, but noted that the extent of additional work that would be required to extend that plan period would be so significant that it would prevent the sites allocated in the Plan from coming forward in a timely manner which is contrary to the Government’s objective to boost the supply of housing (paragraph 47).
- 3.51 In March 2022, a Written Ministerial Statement (WMS) was published by the Secretary of State for Environment, Food and Rural Affairs. This outlined a change of approach to the assessment of development proposals in river catchments where protected water bodies are in an unfavourable condition. This is a matter that the Council had been working on with Natural England since early 2019 in order to mitigate the potential for nutrient pollution on protected sites, in particular those in the Solent. The HRA Update (FBC099) undertaken at Main Modifications (MM) stage, takes account of the WMS and applies the changed approach to the assessment (Paragraph 39).
- 3.52 Noting particular concerns about the reallocation of town centres sites that had not come forward as part of the 2011 Plan and wider concerns about delays to delivery of a number of sites, the Inspector amended the Plan as submitted to once again include a firmer commitment to an early review where required.

**j) Bedford Core Strategy 2006**

**Table 22. Bedford Core Strategy 2006 Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2005	01/07/2005	03/07/2006	03/07/2006	12/02/2008	16/04/2008	01/03/2005

Source: PINS2023; Bedford Council Webpage; SPRU Analysis.

**Table 23. Bedford Core Strategy Time Taken Between Stages**

Local Plan 2006	
Period	Years
Start to Adoption	7.1
First Evidence to Adoption	3.1
Issues & Options to Adoption	2.3
Submission to Adoption	1.9

Source: PINS2023; Bedford Council Webpage; SPRU Analysis.

- 3.53 This Core Strategy was based on the East of England Plan and contained a proposal for a new settlement at Wixams which was also previously identified in the Milton Keynes & South Midlands Sub-Regional Strategy.
- 3.54 This Core Strategy was followed by the adoption of the Allocations and Designations Local Plan in 2013.

**k) Bedford Local Plan 2030**

**Table 24. Bedford Local Plan 2030 Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2015	01/03/2013	13/01/2014	18/09/2018	14/12/2018	20/12/2019	15/01/2020

Source: PINS2023; Bedford Council Webpage; SPRU Analysis.

**Table 25. Bedford Local Plan 2030 Time Taken Between Stages**

Local Plan 2030	
Period	Years
Start to Adoption	4.9
First Evidence to Adoption	6.9
Issues & Options to Adoption	6.0
Submission to Adoption	1.6

Source: PINS2023; Bedford Council Webpage; SPRU Analysis.

- 3.55 The Plan was examined under the transitional arrangements of the 2018 NPPF.
- 3.56 Given the lead-in time from the commencement of work on the evidence base, between 2014 and 2017, the Council held 4 separate Issues and Options consultations. The basis for the additional Issues and Options consultations was the availability of new data in respect of housing need, generated in part because of the wider regional growth aspirations.
- 3.57 The final Issues and Options consultation sought views on extending the Plan period to 2035.
- 3.58 Taking account of the results of the 2017 Issues and Options consultation and of further information that had become available, a Proposed Submission Plan was prepared in January 2018.
- 3.59 As part of the consultation it became apparent that agreement on noise mitigation measures

had not been reached between the promoter of the new garden village at Colworth Park and the operator of the nearby Santa Pod raceway. As such agreement was necessary to enable the garden village to go ahead, the Council resolved to defer submission of the plan to enable alternative options to be considered, changes to be made to the plan and a second period of public consultation under Regulation 19 to take place. Revisions were made to the draft Local Plan to exclude the garden village allocation and make other consequential changes, including amending the end-date of the plan to 2030. The amended plan was agreed in September 2018 for pre-submission consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

- 3.60 The consultation commenced on 18 September and ended on 30 October 2018. Further minor changes were not made to the draft plan in response to the representations that had been made during the January 2018 consultation. The intention was that these would be considered as part of the examination process.
- 3.61 As with Plan:MK, the Bedford Local Plan 2030 was prepared in the context of the emerging CamOx Arc. The Plan was prepared under transitional arrangements and against the requirements of the 2012 NPPF. The NPPF required that plans take account of longer-term requirements, however consequently the Council confirmed that extending the Plan period beyond 2030 would not be pragmatic and would cause considerable delay on the basis that at the time of the plan preparation and submission, there was considerable uncertainty about the level of development and infrastructure that would be required.
- 3.62 Notwithstanding this and that the work sat within the evidence base included the aforementioned NIC Report, the Inspector confirmed that there was a need for the plan to respond appropriately to longer term requirements, and as such as statutory requirement for the plan to be reviewed and then updated within 5-years of adoption was implemented.
- 3.63 At the time of the examination in 2019, the plan period to 2030 was just over 10 years. The Council had selected the shorter time period to reduce the level of allocations that had to be made within the plan and is in part a consequence of the long period of time preparation with issues in 2014.
- 3.64 The time period and the objectively assessed housing need (OAHN) were subject to challenge, examined and found to be sound.
- 3.65 The plan placed a high reliance on Neighbourhood Plans to identify and deliver dwellings, and again this was a major issue.
- 3.66 The allocations which had been identified were also subject to challenge.
- 3.67 New settlements were considered but not allocated. Wixams had already been allocated previously.
- 3.68 While the Plan was found sound, in order to address the shortcomings of the plan, an early review policy was inserted by the Inspector in MM. Other modifications included:
- a) Changes to ensure that there are effective policies to deal with flood risk, biodiversity and adaptation to climate change;
  - b) Alterations to ensure that policies aimed at enhancing the quality of the built environment are effective;
  - c) Greater emphasis on historic environment and heritage assets, so as to be consistent with national policy.
- 3.69 It is appropriate to note that the nature of the early review policy has this has resulted in the Council producing the next version of the plan which is now at examination. The wording of the review policy is as follows:

*“Policy 1 - Reviewing the Local Plan 2030*

*The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’ in accordance with paragraph 11 d) of the National Planning Policy Framework 2019.*

*The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment.*

*The review will also serve to build stronger working relationships with adjoining and nearby authorities and may result in the preparation of a joint strategic plan based on a wider geography.”*

**I) Bedford Local Plan 2040**

**Table 26. Bedford Local Plan 2030 Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/20	01/07/21	14/07/23	29/06/23	15/06/23		

Source: PINS2023; Bedford Council Webpage; SPRU Analysis.

- 3.70 This plan is presently at Examination as a result of the early review policy in the Bedford 2030 Plan.
- 3.71 This quick progress is based on the fact that the evidence base was relatively new, the housing requirement was determined by the Standard Method; albeit the introduction of a stepped approach means this will not be met for the first five years.
- 3.72 At the Examination however National Highways appeared and advised that notice of consultation and the wider Examination had been missed and as such, they attended the hearing sessions to raise in principle concerns in respect of the highway modelling undertaken and the ability of some strategic allocations to come forward.
- 3.73 This also related to a cross boundary issues with Central Bedfordshire regarding highway capacity.
- 3.74 As a result of National Highways’ submission at the Examination and the submission of additional representations outside of formal consultation opportunities, the Local Plan Inspector has advised of the need for additional public consultation in the middle of the Examination.
- 3.75 It should be noted that National Highways had previously raised concerns but have acknowledged that they have failed to engage on an ongoing basis.

**m) Bath & North East Somerset District Council Core Strategy**

**Table 27. BANES Core Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2011	01/03/2007	01/09/2007	16/12/2010	03/05/2011	24/06/2014	10/07/2014

Source: PINS & BANES Webpage; SPRU Analysis.

**Table 28. BANES Core Strategy Time Taken Between Stages**

Core Strategy 2008	
Period	Years
Start of Plan Period to Adoption	3.4
First Evidence to Adoption	7.4
Issues & Options to Adoption	6.7
Submission to Adoption	3.8

Source: PINS & BANES Webpage; SPRU Analysis.

- 3.76 This Core Strategy was at examination with the publication of the 2012 NPPF. Examination was delayed and the Core Strategy proceeded based on a LHN not RSS figure. The Core Strategy made a number of Strategic Site allocations requiring revised Green Belt boundaries.

**n) Bath & North East Somerset District Council Local Plan Partial Update**

**Table 29. BANES Local Plan Partial Update Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
LP	01/03/2020	01/03/2020	01/04/2020	28/08/2021	17/12/2021	13/12/2022	19/01/2023

Source: PINS & BANES Webpage; SPRU Analysis.

**Table 30. Local Plan Partial Update Time Taken Between Stages**

Local Plan Partial Update	
Period	Years
Start of Plan Period to Adoption	2.9
First Evidence to Adoption	2.9
Issues & Options to Adoption	2.8
Submission to Adoption	1.5

Source: PINS & BANES Webpage; SPRU Analysis.

- 3.77 This was a Partial Update.
- 3.78 The DtCDuty to Cooperate (DtC) was considered outside of the scope of the plan Examination.
- 3.79 Originally the plan was being progressed in line with the Joint Spatial Plan (JSP) but this was withdrawn.
- 3.80 The Partial Update was undertaken while the full review was being prepared. LPPU sought to address five-year land supply. It did not review housing requirements in the earlier CS. The Inspector considered the implications of SM but the CS had a higher requirement (676 compared to 722). In these circumstances the DtC issues were considered to be limited by the Local Plan Inspector.



**o) Havant Borough Council Core Strategy**

**Table 31. Havant Core Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2006	01/03/2005	01/03/2008	31/03/2010	02/06/2010	29/12/2010	01/03/2006

Source: PINS; Havant Webpage; SPRU Analysis.

**Table 32. Havant Core Strategy Time Taken Between Stages**

Core Strategy	
Period	Years
Start of Plan Period to Adoption	5.0
First Evidence to Adoption	6.0
Issues & Options to Adoption	3.0
Submission to Adoption	1.0

Source: PINS; Havant Webpage; SPRU Analysis.

- 3.81 The Core Strategy was produced in accordance with the RSS and made no allocations.
- 3.82 After the Core Strategy, the Council adopted the Local Plan (Allocations) in July 2014 which was 6 years after the Issues and Options for the Core Strategy.



**p) Rutland Council Core Strategy**

**Table 33. Rutland Core Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2006	01/05/2003	01/01/2008	12/08/2010	29/11/2010	26/05/2011	11/07/2011

Source: PINS; Rutland Webpage; SPRU Analysis.

**Table 34. Rutland Core Strategy Time Taken Between Stages**

Core Strategy 2008	
Period	Years
Start of Plan Period to Adoption	5.4
First Evidence to Adoption	8.2
Issues & Options to Adoption	3.5
Submission to Adoption	0.9

Source: PINS; Rutland Webpage; SPRU Analysis.

- 3.83 This Core Strategy was produced in accordance with the RSS but made no site allocations. These were made in the Site Allocations Plan.

**q) Rutland Site Allocations**

**Table 35. Rutland Core Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2006	01/08/2010	01/09/2011	01/04/2013	01/07/2013		01/10/2014

Source: PINS; Rutland Webpage; SPRU Analysis.

**Table 36. Rutland Site Allocations Time Taken Between Stages**

Site Allocations	
Period	Years
Start of Plan Period to Adoption	8.6
First Evidence to Adoption	4.2
Issues & Options to Adoption	3.1
Submission to Adoption	1.6

Source: PINS; Rutland Webpage; SPRU Analysis.

- 3.84 This Site and Allocations Local Plan was adopted in accordance with the Core Strategy so did not revisit the housing requirement.
- 3.85 A Baseline and Scoping Report was prepared in July 2011 and updated in September 2012 which identified the key sustainability issues facing Rutland. The options identified at the Issues and Options stage were appraised against the draft Sustainability Appraisal (SA) Objectives and an options appraisal carried out between the Issues and Options stage and the Preferred Options stage. A SA was prepared for the Preferred Options DPD and the Submission DPD. This involved an assessment of the effects of the DPD on the SA Objectives, including cumulative effects, possible mitigation measures and monitoring indicators to be used. A Supplementary SA was prepared for the Proposed Modifications to the DPD.
- 3.86 A number of amendments to the sustainability objectives and criteria of the DPD were made following the recommendations of the Baseline and Scoping Report (July 2011) and was later updated (Sept 2012).

**r) The Rutland Local Plan Review 2015 to 2036 (Withdrawn)**

- 3.87 The Council started preparing this plan in 2014, being one of a number of LPAs to commission a SHMA for the Peterborough Sub Regional Housing Market.
- 3.88 This was followed by an Issues and Options consultation in November 2015.
- 3.89 The Regulation 19 Local Plan included the strategic allocation for a garden village at St. George's barracks site.
- 3.90 In November 2019 the Government announced its decision to award £29.4m Housing Infrastructure Funding (HIF) to the St. George's Garden Village scheme. As a result, it was considered that there was sufficient evidence of the viability of the new settlement to justify the allocation of the St. George's site within the Local Plan although the terms and conditions of the HIF grant were not agreed prior to Local Plan submission.
- 3.91 Following consideration of all responses received, the Local Plan was submitted to the Government in February 2021 for public examination under Regulation 22. The Planning Inspectorate subsequently appointed a Planning Inspector to hold an independent examination of the Rutland Local Plan (2018-2036).
- 3.92 In March 2021 the Council decided not to accept the £29.4m Housing Infrastructure Fund (HIF) grant from Homes England towards the early delivery of infrastructure to support the comprehensive development of St George's Barracks as a garden village. This decision created a viability gap for the St. George's Garden Village scheme, undermining the deliverability of the site.
- 3.93 Following the decision not to accept the HIF grant the appointed Planning Inspector wrote to the Council on 24th March 2021 advising of their decision to pause the Examination process to enable the Council to consider the implications and confirm its intentions regarding the Examination stating:
- "In order to avoid wasted time and expense to the Council and other participants, it is not sensible for the Examination process to progress further at this stage without a clear understanding of the potential implications of this significant development for the Examination."*
- 3.94 Without grant funding the Council concluded (in line with the findings of the Local Plan Whole Plan Viability Study) that there was insufficient evidence to justify the proposals for St. George's in terms of viability and deliverability. Given the strategic significance of the St. George's allocation in the submitted Local Plan this decision by the Council not to accept the funding meant that the wider development strategy was undermined, and it was no longer possible to demonstrate that the Plan met the test of soundness and therefore the Council withdrew the Local Plan from the Examination process.

s) **Milton Keynes Plan Core Strategy**

**Table 37. Milton Keynes CS Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2011	01/01/2005	01/12/2006	17/02/2010	01/03/2011	29/05/2013	10/07/2013

Source: PINS2023; MK Local Plan Webpage; SPRU Analysis.

**Table 38. Milton Keynes CS Time Taken Between Stages**

MKCS	
Period	Years
Start to Adoption	2.4
First Evidence to Adoption	8.5
Issues & Options to Adoption	6.6
Submission to Adoption	3.6

Source: PINS2013; MK Local Plan Webpage; SPRU Analysis.

- 3.95 This plan started being prepared to be in accordance with the RSS, however the RSS was revoked in July 2010 after the CS was published but prior to it being submitted for Examination.
- 3.96 The housing requirement of 1750 dpa was below that required by the withdrawn RSS (2068 dpa).
- 3.97 In addressing the changing nature of Government guidance the Inspector recommended a number of modifications including:
- Confirmation that the Plan's housing target is an interim, minimum figure;
  - Changes to the definition of the Strategic Land Allocation, its housing capacity and development principles;
  - Clarification about how non-strategic sites will be brought forward and a rolling five-year supply of housing land will be maintained;
  - Confirmation that the Council will undertake an early review of the Plan that will address needs in co-operation with adjoining authorities to 2031 and beyond;
- 3.98 This CS was adopted in July 2013 and was complemented by a Site Allocation Plan adopted in 2018. This means that 12 years after the Issues and Options for the CS and 5 years after its adoption the allocations being proposed were only those required to meet this dated evidence prepared under an earlier policy Framework.

t) **Milton Keynes Plan MK 2019**

**Table 39. Milton Keynes Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2016	01/01/2013	01/09/2016	08/11/2017	29/03/2018	12/02/2019	20/03/2019

Source: PINS2023; MK Local Plan Webpage; SPRU Analysis.

**Table 40. Milton Keynes Time Taken Between Stages**

Plan MK 2019	
Period	Years
Start to Adoption	3.1
First Evidence to Adoption	6.2
Issues & Options to Adoption	3.2
Submission to Adoption	1.4

Source: PINS2013; MK Local Plan Webpage; SPRU Analysis.

- 3.99 The wider strategic context, in the form of the CamOx Arc was considered in detail throughout the Plan:MK process including at Examination. The Council, noting the wider context, had set out in a report prepared by an independent commission, the future regional and national role of the City ('Partnering for Prosperity', November 2017). The preparation of the evidence base had therefore been informed by a raft of regional uncertainties and emerging commitments for higher levels of housing and economic growth.
- 3.100 The Council submitted the Plan for Examination, including the above-referenced regional evidence, in the absence of a clear direction and remaining uncertainties with regard to Government timeframes and objectives. The Examination considered the evidence in the round, but the Inspector notes that neither of the independent reports had been subject to a sustainability appraisal, detailed environmental or infrastructure capacity testing or independent examination. The Inspector concludes in their report at paragraph 18 that *"In broad terms, whilst a direction of travel for transformational growth is clearly emerging, neither report provides the necessary basis to significantly delay adopting Plan:MK in order to contemplate a higher, but as yet untested, growth strategy"*.
- 3.101 Given the lead-in to submission, and the delays associated with regional growth research, upon adoption, the plan period horizon was just 12 years. The Inspector notes that this was contrary to NPPF paragraph 157, which the Plan was being Examined under, but noted at paragraph 24 of their Inspector's Report (IR), that extending the Plan period would involve *'appreciable time and effort to update the evidence base, particularly on infrastructure and transport planning'*. This Inspector confirmed that the Plan had, in their assessment, been prepared over an appropriate timeframe and the plan period was justified (paragraph 24).
- 3.102 Aligned with the wider regional context, a review, sooner than the statutory 5-year review, was considered necessary. Through DtC and the submitted Statement of Common Ground (SoCG), the Council agreed that the timing of any review would need to be informed by the MK Futures Growth Strategy and ongoing work with neighbouring authorities. The Inspector, as such, placed a requirement on the Council to apply an expediated review period, with a new Strategic Plan to be submitted for Examination by the end of 2022. This reflected an agreement with the Council that Plan:MK was essentially an interim Plan.

**u) Suffolk Coastal Core Strategy & Development Management Policies**

3.103 The preparation of the Suffolk Coastal Plan is amongst the quickest of the recorded Case Studies, with initial evidence base work commencing in 2016 and the Plans being adopted 4.57 years post that point.

**Table 41. Suffolk Coastal Core Strategy & Development Management Policies Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2010	01/03/2006	01/02/2007	25/01/2012	08/05/2012	06/06/2013	05/07/2013

Source: PINS 2013; Suffolk Coastal Local Plan Webpage; SPRU Analysis.

**Table 42. Suffolk Coastal Core Strategy & Development Management Policies Time Taken Between Stages**

Core Strategy	
Period	Years
Start to Adoption	3.3
First Evidence to Adoption	7.3
Issues & Options to Adoption	6.9
Submission to Adoption	3.6

Source: PINS 2023; Suffolk Coastal Local Plan Webpage; SPRU Analysis.

3.104 The CS was submitted for examination based on the RSS figure, but the NPPF revoked the RSS and the new OAHN was higher.

3.105 The CS did not propose to meet this higher figure but committed to an early review.

3.106 The Site Allocations Plan was adopted in January 2017 almost 9 years after the Issues and Options for the Core Strategy and four years after its adoption but was still based on the lower RSS requirement.

**v) Suffolk Coastal Local Plan**

3.107 The preparation of the Suffolk Coastal Plan is amongst the quickest of the recorded Case Studies, with initial evidence base work commencing in 2016 and the Plans being adopted 4.57 years post that point.

**Table 43. Suffolk Coastal Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2018	01/03/2016	01/07/201	14/01 2019	29/03 2019	08/09/2020	23/09/2020

Source: PINS 2013; Suffolk Coastal Local Plan Webpage; SPRU Analysis.

**Table 44. Suffolk Coastal Time Taken Between Stages**

Local Plan	
Period	Years
Start to Adoption	2.6
First Evidence to Adoption	4.6
Issues & Options to Adoption	3.2
Submission to Adoption	0.9

Source: PINS 2023; Suffolk Coastal Local Plan Webpage; SPRU Analysis.

3.108 Prepared under transitional arrangements, the process pertaining to the preparation of the Suffolk Coastal Local Plan was frustrated, as confirmed by the Council, by the release of new

projections, guidance and policy.

- 3.109 Additionally, between the Regulation 19 version of the Plan and Examination, considerably uncertainty was identified in respect of the Ipswich Northern Route. Highways England, now National Highways, had identified the project as a key infrastructure priority that would unlock housing need and assist in meeting unmet needs from Ipswich.
- 3.110 As with North West Leicestershire, both the infrastructure requirements associated with joint working and the issue of unmet need was a substantial consideration in the wider plan process. The Inspector in their report (paragraph 71) confirmed the complexities associated with this and confirmed that the Plan would not be capable of being found sound given process on other plans in the HMA and the Ipswich Northern Route not proceeding unless an immediate review mechanism was agreed.
- 3.111 The DtC was met in part by the SHMA that covered the Ipswich HMA. The Inspector modified the plan so it met the SM housing requirement. The Inspectors recommended the deletion of one site and made adjustments to other site allocations but made no further recommendations for additional sites.

w) **Darlington Borough Council Core Strategy**

**Table 45. Darlington Core Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2004	01/03/2009	07/01/2008	12/08/2010	29/10/2010	13/04/2011	06/05/2011

Source: PINS; Darlington Webpage; SPRU Analysis.

**Table 46. Darlington Core Strategy Time Taken Between Stages**

Core Strategy	
Period	Years
Start of Plan Period to Adoption	8.6
First Evidence to Adoption	4.2
Issues & Options to Adoption	3.1
Submission to Adoption	1.6

Source: PINS; Darlington; Webpage; SPRU Analysis.

3.112 This Core Strategy was based on the RSS and made no site allocation.

3.113 Following the adoption of this CS the Council did not then produce a Site and Allocations Local Plan but instead went on to produce a local plan which was then adopted in February 2022.

x) **Darlington Local Plan**

**Table 47. Darlington Local Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
LP	01/03/2016	01/03/2009	01/07/2016	06/08/2020	22/12/2020	28/01/2022	17/02/2022

Source: PINS; Darlington Webpage; SPRU Analysis.

**Table 48. Darlington Local Plan Time Taken Between Stages**

Local Plan	
Period	Years
Start of Plan Period to Adoption	6.0
First Evidence to Adoption	13.0
Issues & Options to Adoption	5.7
Submission to Adoption	1.6

Source: PINS; Darlington; Webpage; SPRU Analysis.

3.114 This was a replacement to the Core Strategy but unlike the CS determined the level of development needs and made allocations to meet these needs. The was based on the RSS and made no site allocations.

3.115 Following the adoption of this CS the Council did not then produce a Site and Allocations Local Plan but instead went on to produce this local plan which was then adopted in February 2022.

3.116 This was submitted after the end of the 2018 NPPF although was prepared beforehand so the Council had to address the issue of the housing requirement generated by the SM, The housing figure was challenged by objectors as part of the LP examination, but the Council had already proposed a higher figure than that resulting from the SM, so no modifications were recommended. In addition, the proposed allocations were examined but none were recommended for deletion from the plan.



**y) Chesterfield Borough Council Core Strategy 2011 - 2031**

**Table 49. Chesterfield Borough Core Strategy 2011 - 2031 Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2018	01/03/2008	01/06/2009	06/02/2012	28/09/2012	19/06/2013	24/07/2013

Source: PINS; Chesterfield Webpage; SPRU Analysis.

**Table 50. Chesterfield Borough Core Strategy 2011 – 2031 Time Taken Between Stages**

Core Strategy 2011-31	
Period	Years
Start of Plan Period to Adoption	2.4
First Evidence to Adoption	12.4
Issues & Options to Adoption	3.5
Submission to Adoption	1.0

Source: PINS; Chesterfield; Webpage; SPRU Analysis.

3.117 Although submitted after the revocation of the RSS, the Core Strategy states that the Council has reviewed its strategic housing requirement and has decided that the annual requirement of 380 included in the RSS is still appropriate. The Council considered that this requirement closely supported the employment led scenario developed from the 2008 based household projections.

3.118 The CS confirmed levels of provision but made no allocations.

**z) Chesterfield Borough Local Plan 2018 - 2035**

**Table 51. Chesterfield Borough Local Plan Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2018	01/03/2008	01/01/2017	14/01/2019	28/06/2019	27/05/2020	15/07/2020

Source: PINS; Chesterfield Webpage; SPRU Analysis.

**Table 52. Chesterfield Borough Local Plan Time Taken Between Stages**

Local Plan 2018 - 2035	
Period	Years
Start of Plan Period to Adoption	2.4
First Evidence to Adoption	12.4
Issues & Options to Adoption	3.5
Submission to Adoption	1.0

Source: PINS; Chesterfield; Webpage; SPRU Analysis.

3.119 This plan effectively followed on from the Core Strategy as the Council failed to produce the required Sites and Allocations Plan to support the policies in the CS. Therefore, while the period from Issues and Options to adoption is short, at just 3.5 years, there was a long lead-in time in respect of the production of evidence in respect of the site allocations.

3.120 The Chesterfield Local Plan process, as detailed in the tables above, was a reasonably quick process, with the Inspector noting the efficiency within the wider process and through the Examination process.

3.121 A number of changes were made to the Plan throughout the preparation, including adjusting and increasing the Plan period so as to be compliant with national policy. Furthermore, given the publication of the Standard Method during the preparation of the Plan, consideration throughout the process, was given to adjusting the housing requirement on multiple



occasions, with work from the wider Housing Market Area being closely reflected throughout. During the Examination process, and further to additional Housing Topic Papers being produced, the Inspector confirmed that the use of LHN was appropriate in Chesterfield.

- 3.122 A number of main modifications, including extending the Plan period and altering the adopted housing requirement, were made but were not significant so as to act to delay the wider process. Indeed the principal additional work required, save for that pertaining to the Plan period and housing requirement, was for the Council to demonstrate that the Plan's employment allocation policies were positively worded.
- 3.123 Noting the complexities associated with HS2 for neighbouring North East Derbyshire and that HS2 would be a very significant infrastructure project for the Borough in the medium to long term of the plan period, the Council's approach to the project was considered to strike the right balance between supporting and enabling the then preferred route options without placing undue reliance on it. Ultimately the Inspector concluded that the benefits of HS2 to Chesterfield would be significant, however delivery of the Plan would not be at risk if HS2 Phase 2b were to be delayed or cancelled. Clearly, having been witness to the wider implications for the North East Derbyshire Local Plan, the Council had to work hard to ensure that the Plan could be self-sufficient without relying on national strategic infrastructure.
- 3.124 The LP was published prior to the requirement for plans to make provision for housing using the Standard Method however the SHMA had considered this level of provision and the final Objectively Assessed Housing Need, based on meeting economic growth, was higher than the output of the SM. The LP Examination considered the issue of OAHN, but no increase was proposed.

aa) **Northumberland Council Local Plan**

**Table 53. Northumberland Local Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2016	01/01/2011	15/08/2018	30/01/2019	29/05/2019	26/01/2022	31/03/2022

Source: PINS; Northumberland; Webpage; SPRU Analysis.

**Table 54. Northumberland Local Plan Time Taken Between Stages**

Local Plan	
Period	Years
Start of Plan Period to Adoption	6.1
First Evidence to Adoption	11.2
Issues & Options to Adoption	3.6
Submission to Adoption	3.4

Source: PINS; Northumberland; Webpage; SPRU Analysis.

- 3.125 The Northumberland Local Plan was submitted for Examination on 29<sup>th</sup> May 2019 and was found sound in January 2022.
- 3.126 The Plan was prepared in the context of the February 2019 version of the National Planning Policy Framework (NPPF). At a late stage in the examination the 2021 version of the NPPF was published. The Council indicated that they would update the Plan in accordance with the revised NPPF as part of an early partial update of the Plan. The Inspector considered this to be a sensible and pragmatic approach to avoid delay in the adoption of the Plan. Any disadvantage of the Plan not being informed by the 2021 NPPF was outweighed by the benefits of it being adopted sooner than would otherwise be the case.
- 3.127 Turning to the need and supply of sites for Gypsies, Travellers and Travelling Showpeople, work had commenced in 2014 on identified needs. This was indeed updated by the Council prior to submission in 2018, but was still predicated on survey data collected in 2014. The Inspector again recognised that this did not constitute up-to-date data upon which needs and supply could be considered, but noted during the associated hearing sessions in 2020, that in order to overcome the issue, an updated assessment would be required. They confirmed that this would be a significant piece of work that would result in a significant delay in the Examination and adoption of the Plan. Such a delay was considered to have an adverse effect on housing delivery and the provision of affordable and accessible housing. Accordingly, through a main modification to Policy HOU12, the Council committed to undertake a new assessment and submit for Examination a separate Gypsy, Traveller and Travelling Showpeople Local Plan within 18 months of adoption of the Local Plan.
- 3.128 Similarly, deficiencies in evidence pertaining to Public Open Space were noted, with the Inspector concluding that a number of proposed allocations were no longer justified by evidence. Again it was determined that undertaking a revaluation of open spaces during the Examination would result in an unreasonable delay to adoption and further main modifications were included to ensure the Council undertook an early partial review of the plan in relation to open space, sport and recreation and the allocated Protected Open Space Sites.
- 3.129 The Local Plan makes provision for in excess of SM (885 dpa to meet economic projections rather than the 717 dpa required to meet the Standard Method).
- 3.130 The Inspector required a number of modifications before finding the plan sound. These included:
- a) Deletion of a Green Belt site safeguarded for employment.

- b) Clarifying the role of small villages in the settlement hierarchy and modifying the approach to development in the countryside.
- c) Clarification regarding the employment uses on sites released from the Green Belt and the need for clearly defined boundaries.
- d) Explanation of compensatory improvements to remaining Green Belt land to ensure consistency with national policy.
- e) Various modifications to housing policies and site allocations to ensure that policies reflect up to date information on local housing need and housing supply.
- f) Modifications to affordable housing Policy HOU6 to reflect updated viability information.

**bb) Mole Valley District Council Core Strategy**

**Table 55. Mole Valley CS Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2006	01/01/2006	01/01/2006	14/11/2008	20/02/2009	31/07/2009	01/10/2009

Source: PINS; Mole Valley Webpage; SPRU Analysis.

**Table 56. Mole Valley CS Time Taken Between Stages**

Core Strategy	
Period	Years
Start of Plan Period to Adoption	3.4
First Evidence to Adoption	3.75
Issues & Options to Adoption	3.75
Submission to Adoption	0.9

Source: PINS2023; Mole Valley; Webpage; SPRU Analysis.

- 3.131 The CS was based on the RSS and Policy CS1 stated that the Council would review the existing Green Belt boundary through the Land Allocations Development Plan Document to ensure that there is sufficient land available to meet development requirements throughout the Plan period.
- 3.132 The Council did not produce a Land Allocations Development Plan.

**cc) Mole Valley Local Plan**

**Table 57. Mole Vale Local Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
LP			01/07/2017	20/09/2021	14/02/2022		

Source: PINS2023; Mole Valley Webpage; SPRU Analysis.

- 3.133 The Issues and Options for the Local Plan was consulted on in 2017, some 8 years after the adoption of the Core Strategy.
- 3.134 On 17 February 202, the Inspector suggested the Council might like to invite the Inspector to pause the Examination “until there is greater certainty around future Government policy.” . The Council made such a request and it was duly granted on the 27 February 2023, with the Inspector agreeing to pause the Examination until 25 May 2023.
- 3.135 However the Council stated that “should the NPPF revisions be delayed in any way, the Council may seek an extension to the pause beyond 25 May.”
- 3.136 The subsequent delays in the publication of the revised NPPF have led the Council to propose that the Inspector pauses the Local Plan examination until there is clarity as to the delivery of the revised NPPF. Reference was made to the pause currently in place for the Solihull Local Plan examination (see 6 March letter from Inspector and 15 March letter from Solihull Borough Council), which was at the exact same point in the examination process.
- 3.137 The Council have stated that they must act in the best interests of the district by waiting for the promised revisions to the NPPF or alternatively news of a policy U-turn by the Government. The Inspector has agreed to pause the examination of the plan until the NPPF is revised (ED64).

**dd) Central Bedfordshire Borough Council Core Strategy**

**Table 58. Central Bedfordshire Core Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS	01/03/2001	01/03/2003	01/02/2006	13/10/2008	19/02/2009	21/08/2009	19/11/2009

Source: PINS2023; Central Bedfordshire Webpage; SPRU Analysis.

**Table 59. Central Bedfordshire Core Strategy Time Taken Between Stages**

Core Strategy	
Period	Years
Start of Plan Period to Adoption	8.7
First Evidence to Adoption	6.7
Issues & Options to Adoption	3.8
Submission to Adoption	1.2

Source: PINS2023; Central Bedfordshire Webpage; SPRU Analysis.

- 3.138 CS produced in accordance with the RSS and highlighted levels of development in different locations but did not make site allocations. The CS was followed up by a Site Allocations Plan adopted in 2011.
- 3.139 Therefore, while the period from Issues and Options was relatively short, just some 3.8 years, it still took a further two years to have planned allocations.

**ee) Central Bedfordshire Local Plan 2018 - 2035**

**Table 60. Central Bedfordshire Local Plan Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
LP	01/03/2015	01/05/2017	01/11/2016	11/01/2018	30/04/2018	15/07/2021	22/07/2021

Source: PINS2023; Central Bedfordshire Webpage; SPRU Analysis.

**Table 61. Central Bedfordshire Local Plan Time Taken Between Stages**

Local Plan	
Period	Years
Start of Plan Period to Adoption	6.4
First Evidence to Adoption	4.2
Issues & Options to Adoption	4.7
Submission to Adoption	3.7

Source: PINS2023; Central Bedfordshire Webpage; SPRU Analysis

- 3.140 The Local Plan Examination highlighted issues of OAHN, DtC and site selection.
- 3.141 It should be noted that as part of the DtC CBC took 7,350 dwellings of unmet need from Luton.

**ff) Oxford City Local Plan 2001 - 2016**

**Table 62. Oxford City Core Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
LP	01/03/2006		01/06/2006	05/09/2008	21/11/2008	21/12/2010	14/03/2011

Source: PINS2023; Oxford City Webpage; SPRU Analysis.

**Table 63. Oxford City Core Strategy Time Taken Between Stages**

Core Strategy	
Period	Years
Start of Plan Period to Adoption	5.0
First Evidence to Adoption	
Issues & Options to Adoption	4.8
Submission to Adoption	2.7

Source: PINS2023; Oxford City Webpage; SPRU Analysis.

3.142 The CS was produced in accordance with the RSS (The South East Plan) but site allocations were to be made in a separate DPD.

3.143 The period from Issues and Options was some 4.8 years and in this time the Plan was subject to extensive public consultation.

**gg) Oxford City Local Plan 2016 - 2036**

**Table 64. Oxford City Local Plan Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
LP	01/03/2016	05/08/2016	05/08/2016	01/11/2018	22/03/2019	15/05/2020	08/06/2020

Source: PINS2023; Oxford City Webpage; SPRU Analysis.

**Table 65. Oxford City Local Plan Time Taken Between Stages**

Local Plan	
Period	Years
Start of Plan Period to Adoption	4.3
First Evidence to Adoption	3.8
Issues & Options to Adoption	3.8
Submission to Adoption	1.7

Source: PINS2023; Oxford City Webpage; SPRU Analysis.

3.144 The housing requirement in the local plan was established by a new capacity-based housing approach and introduced a new stepped trajectory for the number of homes to be built per year, to ensure a sound and deliverable plan.

3.145 While the OAHN was some 1400 dpa and the provision made was 544 dpa, the DtC was met as neighbouring districts of Cherwell, South Oxfordshire, Vale of White Horse and West Oxfordshire agreed to accommodate much of the unmet need.

hh) **Chiltern District Council**

**Table 66. Chiltern Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2006	01/03/2008	01/01/2008	14/10/2010	13/01/2011	06/10/2011	15/11/2011

Source: *Chiltern Local Plan Webpage; SPRU Analysis.*

**Table 67. Chiltern Time Taken Between Stages**

Core Strategy	
Period	Years
Start to Adoption	5.7
First Evidence to Adoption	3.7
Issues & Options to Adoption	3.9
Submission to Adoption	1.1

Source: *Chiltern Local Plan Webpage; SPRU Analysis.*

- 3.146 The Chiltern Core Strategy Development Plan Document was submitted in January 2011 and was found sound in a report in October 2011.
- 3.147 A limited number of changes were required between the submitted version of the Plan and that was found sound. However, there was a notable change relating to an increase in the overall housing provision from the submitted 2,400 dwellings to a range of between 2,650 and 2,900 dwellings. Additionally, a clearer expression of the overall strategy was also required.
- 3.148 Despite the seemingly quick Examination process, it is noted that in addition to addressing housing requirements, there was some confusion throughout the preparation of the Plan and indeed at Examination in respect of the approach taken to review Green Belt Boundaries and why indeed the Council had only considered reviewing village boundaries. The Inspector concluded that the approach taken was a legacy approach, but that the approach was fundamentally unsound. As such the Council, at a late stage of the Plan making process, proposed to overcome the issue by deleting the part of Policy GB5 which allowed for development of more than infilling change.
- 3.149 The Inspector considered (as set out at paragraph 64 of Inspector’s Report) that the issue was not of such significance as to require a delay in the Examination to allow for an assessment for be retrospectively made of the suitability of Green Belt Villages. It was instead confirmed that this would be considered as part of a review.



ii) **Watford Borough Council Core Strategy**

**Table 68. Watford Borough Council CS Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2006	01/12/2005	01/12/2005	18/05/2011	28/02/2012	20/11/2012	30/01/2013

Source: PINS2023; Watford Borough Council Webpage; SPRU Analysis.

**Table 69. Watford Borough CS Time Taken Between Stages**

Core Strategy	
Period	Years
Start to Adoption	6.9
First Evidence to Adoption	7.2
Issues & Options to Adoption	7.2
Submission to Adoption	1.8

Source: PINS2023; Watford Borough Council Webpage; SPRU Analysis

- 3.150 This plan was preceded by the Watford Core Strategy 2006 which was impacted by the 2012 NPPF. The CS considered OAHN but determined the previous RSS was the "most realistic".
- 3.151 No allocations made and no allocations DPD, but plan reviewed.

jj) **Watford Borough Council Core Strategy**

**Table 70. Watford Borough Council CS Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2021	01/08/2017	01/09/2018	18/01/2021	06/08/2021	20/09/2022	17/10/2022

Source: PINS2023; Watford Borough Council Webpage; SPRU Analysis.

**Table 71. Watford Borough CS Time Taken Between Stages**

Core Strategy	
Period	Years
Start to Adoption	1.6
First Evidence to Adoption	5.2
Issues & Options to Adoption	4.1
Submission to Adoption	1.8

Source: PINS2023; Watford Borough Council Webpage; SPRU Analysis

- 3.152 This plan was considered under the 2018 NPPF.
- 3.153 It is worth noting that Watford is one of five authorities in South West Hertfordshire that share administrative boundaries and issues across the wider area, such as housing, employment and infrastructure. To plan strategically for growth in the area, Watford Borough Council, in conjunction with Dacorum Borough Council, Hertsmere Borough Council, Three Rivers District Council and St. Albans City & District Council, are preparing the South West Hertfordshire Joint Strategic Plan.
- 3.154 The housing requirement was based on the Standard Method although the Inspector reduced this via a main modification as the calculation had changed.
- 3.155 The identified need for 784 additional homes per year compared with an historic average completion rate of under 380 homes per year. The evidence base of the Plan demonstrated that a number of spatial options to accommodate these homes, and economic development, were considered and assessed during the preparation of the Plan. However, the built-up

nature of the Borough meant that realistic opportunities for accommodating such a scale of development are extremely limited. This is exemplified by the fact that every site that was identified as being available and suitable is allocated in the Plan following a thorough process that involved consideration of all undeveloped land, including Green Belt, as well as opportunities on currently and previously developed land.

- 3.156 The Council carried out a systematic two-stage Green Belt assessment during the preparation of the Plan to inform decisions about whether changes needed to be made to help meet development needs or for other reasons. Based on that, and other site specific information, the Plan removed a limited amount of land from the Green Belt in five locations.
- 3.157 With 19% of the authority being Green Belt, the preparation of the Local Plan and indeed the associated Examination in Public, was dominated by the need to demonstrate Exceptional Circumstances to justify Green Belt land release. The Council had identified 5 locations in the Green Belt to release land further to demonstrating Exceptional Circumstances. Further to two separate Green Belt Assessments and consideration at Examination, the Inspector concluded that Exceptional Circumstances had been demonstrated.
- 3.158 Principally, the lengthiest part of the preparation of the Plan and the Examination related to the determination of an appropriate plan period and housing requirement. Indeed, throughout the Examination process, it was determined that it was necessary to increase the Plan period and to adopt a housing requirement that reflected the latest local housing need figure derived from the Standard Method.
- 3.159 This involved the preparation of a number of topic papers and updates in respect of the housing trajectory, the first of which were consulted upon. Whilst in the context of a Green Belt authority, the Examination process and indeed wider plan making process was seemingly swift, the almost complete absence of alternative options for growth outside of the Green Belt was considered to result in limited options for the Council, thus it can be reasonably assumed the decisions that the Council made were appropriate and reflective of the local geography.
- 3.160 The Inspector identified the issue of the viability of nearly 4,000 of the new homes proposed in the Plan as they were to be provided on allocations that the evidence indicated may not be viable unless fewer affordable homes were provided than required by policy. To address these concerns, proposed modifications were made to the affordable housing policy.
- 3.161 The period from Issues and Options to adoption of 4.1 years is short given that this included a comprehensive Green Belt review, as highlighted above. According to the Plan this period included three separate rounds of public consultation. This timescale is different to that of St Albans that is within the same sub-area (see above) and faces similar issues.

**kk) Durham Council Local Plan**

**Table 72. Durham Council Local Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2016	01/03/2008	01/06/2016	25/01/2019	28/06/2019	17/09/2020	21/10/2020

Source: PINS2023; Durham Council Webpage; SPRU Analysis.

**Table 73. Durham Council Time Taken Between Stages**

Local Plan	
Period	Years
Start to Adoption	4.6
First Evidence to Adoption	12.6
Issues & Options to Adoption	4.4
Submission to Adoption	1.8

Source: PINS2023; Watford Borough Council Webpage; SPRU Analysis

- 3.163 The LP set a higher dwelling requirement than the SM to meet affordable housing needs.
- 3.164 As with a few other case studies, the County Durham Local Plan was dominated by discussion around nationally significant infrastructure, and in this case particularly around the northern and western Durham relief roads and the future Barnard Castle Relief Road.
- 3.165 The Plan was subject to Sustainability Appraisal during its preparation and to inform the proposed main modifications. A number of distinct options were assessed for the broad spatial distribution of housing development across the county, although only limited consideration was given to alternative levels of household growth. All potential developable housing sites identified through the Strategic Housing Land Availability Assessment were appraised. Consideration was given to whether there were any reasonable alternatives to seeking to meet identified needs for economic development in each of the identified commercial property market areas. A number of options were appraised to address what the Council had identified as significant congestion problems in the city of Durham, although the focus was on variations around the two proposed relief roads that are included as proposals in the Plan. Potential alternative solutions, aimed at addressing the issues through a wider and more intensive range of sustainable transport interventions, were concluded to be unrealistic at an early stage.
- 3.166 No Statutory Consultees raised any significant concerns about the sustainability process. However there was still criticism from others about the range of options that were considered in relation to some significant matters and the quality and depth of the analysis included in the report, but concerns related to the reliance of the strategy on the above infrastructure were considered in detail.
- 3.167 Indeed, the evidence provided indicated that to some extent the proposed infrastructure was not necessary to justify the release of additional land from the Green Belt. Indeed, the release of excess Green Belt land was a dominant theme throughout the process, with the release of land owned by the Council adjacent to the A691, being considered by the Inspector to fail the Exceptional Circumstances test on the basis that there was no need to allocate more land to meet housing needs during the Plan period and it would be premature to determine whether or how the city might need to grow further in the longer term.

## II) St Albans Council Local Plan Review 1994

**Table 74. St Albans Council Local Plan Review 1994 Strategy Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
LP	01/03/1981	01/07/1987	31/01/1990	31/10/1990	25/03/1991	11/07/1993	01/11/1994

Source: PINS2023; Oxford City Webpage; SPRU Analysis.

**Table 75. St Albans Council Local Plan Review 1994 Time Taken Between Stages**

Local Plan	
Period	Years
Start of Plan Period to Adoption	13.7
First Evidence to Adoption	7.3
Issues & Options to Adoption	4.7
Submission to Adoption	4.2

Source: PINS2023; Oxford City Webpage; SPRU Analysis.

- 3.168 The District Local Plan Review 1994 is the current adopted Local Plan.
- 3.169 In 1990, the Plan was certificated as being in general conformity with the Hertfordshire County Structure Plan 1986 Review, which had a time horizon of 1996. However, the 1986 Review was superseded by the Hertfordshire County Structure Plan Alterations 1991. As a result, the Structure Plan time horizon has been rolled forward to 2001.
- 3.170 The Plan states that the District Council recognises that there is a need to prepare Alterations or a full Review of the District Plan, looking to 2001 or beyond, as a matter of urgency.
- 3.171 The Plan was produced in accordance with the extant Structure Plan which in turn was based on the housing requirements in the Regional Guidance of 1986.
- 3.172 This demonstrates the potential length of time it takes for allocations to be proposed on the ground when there is passing down of targets from regional to sub regional to local level. Effectively by the time the Local Plan had been produced there was only 2 years of the original Regional and Structure Plan period left.
- 3.173 By the time the Local Plan was adopted it was not required to make any new housing allocations as the earlier target had been met by windfall completions. The average rate of housing required over the 20 year plan period was 780 dpa (13,600/20)

## mm) St Albans Core Strategy/Strategic Local Plan

**Table 76. St Albans Core Strategy/Strategic Local Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS/LP		01/05/2006	01/07/2007			NA	Withdrawn 23/11/20

- 3.174 The Core Strategy was subject to a protracted preparation, with many opportunities for the public and stakeholders to comment. The timeline and content of previous Core Strategy Consultations was as follows:
- Joint Issues and Options Consultation: May 2006
  - Core Strategy Issues and Options Consultation: July 2007
  - Shaping Our Community – Emerging Core Strategy: July 2009
  - The Core Strategy: Consultation on the Strategy for Locating Future
  - Development in the District: December 2010

3.175 This process was impacted by the Government publishing the draft National Planning Policy Framework on 25 July.

3.176 In November 2011 the Council decided not to progress the Core Strategy until the Government finalised the NPPF and the revocation of the RSS.

**nn) St Albans Core Local Plan 2016 - 2036**

**Table 77. St Albans Core Strategy/Strategic Local Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
CS/LP			08/01/2018	04/09/2018	29/03/2019	NA	Withdrawn 23/11/20

Source: PINS2023; St Albans Webpage; SPRU Analysis.

3.177 The Local Plan 'Have your say' Issues and Options (Regulation 18) took place January 8 – February 21, 2018. Although the Council also relied on the previous consultations on the earlier draft Local Plan documents in the 2006-2016 period highlighted above.

3.178 The Examining Inspectors had written to the Council on 27 January 2020, expressing concern in relation to legal compliance and soundness of the draft Local Plan. At the Inspectors' suggestion, the hearings scheduled for weeks commencing 3 and 10 February were cancelled.

3.179 The Inspectors' letter of the 20<sup>th</sup> April 2020 highlighted the main concerns these being:

- a) Failure to engage constructively and actively with neighbouring authorities on the strategic matters of
  - i) the Radlett Strategic Rail Freight Interchange proposal and
  - ii) their ability to accommodate St Alban's housing needs outside of the Green Belt;
- b) Plan preparation not being in accordance with the Council's Statement of Community Involvement;
- c) Inadequate evidence to support the Council's contention that exceptional circumstances exist to alter the boundaries of the Green Belt;
- d) Failure of the Sustainability Appraisal to consider some seemingly credible and obvious reasonable alternatives to the policies and proposals of the plan;
- e) Failure of the plan to meet objectively assessed needs; and
- f) Absence of key pieces of supporting evidence for the plan.

3.180 The main issue with regard to the DtC was the large site in the district (the Radlett site) which had planning permission for a Strategic Rail Freight Interchange (SRFI), but was proposed for housing in the Plan as the Park Street Garden Village (PSGV) Broad Location. The SRFI is not identified as a strategic matter by the Council. It is argued that this is because it is not a proposal included in the Plan. The proposed alternative development of PSGV has the effect of precluding the SRFI. On this basis, the Council considered that it did not need to cooperate in relation to this matter, since once the SRFI ceased to be a strategic site promoted under the Plan, it was no longer required to engage in the DtC discussions.

3.181 It was the Inspectors' view that the SRFI was a strategic matter for the purposes of the DtC, as these are allocations for housing development to meet identified housing need. Thus, the use of the land at the Radlett site, whether as a SRFI or a housing allocation, is a strategic matter about which the Council should have been engaging and cooperating with neighbouring authorities.

3.182 The Inspectors went onto state:

*“Whilst the Council’s decision not to pursue the allocation of the SRFI in the Plan does not in itself indicate a failure to comply with the DtC, the Council has not engaged or cooperated with other bodies (including other LPAs) with regard to this issue.”*

3.183 The Council’s approach to the Green Belt was also of concern to the Inspectors in relation to the DtC, as was the approach to the assessment of the Green Belt with the Inspectors stating;

*“32. Whilst the Council indicated at the hearings that the 2013 Green Belt Review was not done with any level of development need or target in mind, it was prepared around the time that the Council was working on the previous SLP. At that time housing requirements were 8,720 (or 436 per annum) and so much lower than the current objectively assessed need (OAN) of 14,608 homes over the plan period. However, the Green Belt Review was not revisited in the context of the much higher scale of unmet need which could only be met by Green Belt release that was subsequently identified in the Plan.”*

3.184 On the 1<sup>st</sup> September the Inspectors wrote to the Council confirming that the plan had not met the Duty to Cooperate.



oo) **Hambleton Local Plan 2022**

**Table 78. Hambleton Local Plan 2022 Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2014	01/03/2010	01/02/2016	30/07/2019	31/03/2020	19/01/2022	22/02/2022

Source: PINS2023; Hambleton Council Webpage; SPRU Analysis.

**Table 79. Hambleton Local Plan 2022 Time Taken Between Stages**

Local Plan 2022	
Period	Years
Start to Adoption	8.0
First Evidence to Adoption	12.0
Issues & Options to Adoption	6.1
Submission to Adoption	2.7

Source: PINS2023; Hambleton Council Webpage; SPRU Analysis.

- 3.185 Previously Hambleton had approved a CS in 2007, a Development Management Development Plan Document in 2008 and an Allocations Development Plan Document in 2010.
- 3.186 While the Hambleton Local Plan was adopted on 22 February 2022, Policy HG6 committed the Council to undertake an urgent review within 6 months of adoption.
- 3.187 The Plan made provision for a higher housing requirement than SM.
- 3.188 Much of the plan preparation and Examination was dominated by discussions and evidence underpinning the identified housing requirement and extending the plan period to reflect national policy. Indeed during the Examination and through main modifications, the Plan period was extended by a single year to run until 2036 and the housing requirement was, in line with this, extended to account for the additional plan year.
- 3.189 It appears from reviewing consultation statements, that additional public consultation exercises were considered essential on the basis of an element of political change and uncertainty around the planned level of growth and the wider strategy to be employed.
- 3.190 However, noting the considerable delay that prevent adoption of the Plan, and the need for extensive additional work to be carried out mid-examination, the Inspector concluded that it was appropriate for a plan to be adopted that fell marginally short of the 15-year recommended timeframe. As set out in paragraph 68 of the IR, the Inspector concluded that further delays to adoption of the plan to add a single additional year to the plan period would be more likely to frustrate rather than accelerate delivery of new housing in Hambleton.
- 3.191 A further specific issue that required an early review of the plan was the latest evidence demonstrating a significant need for Gypsy and Traveller and Travelling Showpeople Accommodation which the submitted Plan failed to make any dedicated provision for.
- 3.192 The Inspector found that in this regard, the Plan was not positively prepared and was not consistent with paragraph 62 of the Framework which requires plans to make provision for different groups in the community. Addressing this soundness issue could have been resolved by either suspending the Examination and finding specific sites to allocate, requiring the Council to update the Plan within a prescribed timescale post-adoption or by requiring the Council to prepare a separate Gypsy and Traveller and Travelling Showpeople Development Plan Document. The Council's preference was for carrying out an urgent review and partial update of the Plan Examination.
- 3.193 In summary the Inspector's recommended modifications included:



- a) Extend the plan period by 1 year, to run from 2014 to 2036;
- b) Increase the housing requirement to reflect the extended plan period, rising from 6,615 to a minimum of 6,930 dwellings;
- c) Modify Policy S3 to clarify that the development strategy for the area is to focus growth towards the two main towns of Northallerton and Thirsk and the remaining Market Towns of Bedale, Easingwold and Stokesley;
- d) Modify Policies S5 and HG5 in relation to windfall housing sites;
- e) Introduce a requirement to carry out an early review and update of the Plan in order to meet the needs of gypsies and travellers and travelling showpeople;
- f) Modify Policy HG2 to remove the requirement for new homes to meet Building Regulation M4(2) standards, whilst clarifying precisely what is required in respect of wheelchair adaptable and wheelchair accessible homes;
- g) Identify the Sowerby Gateway Business Park as a Key Employment Location;
- h) Delete the safeguarded land at Leeming Bar and modify Policy LEB3 to provide clear and effective policy requirements concerning the provision of new employment development.

pp) **Doncaster Core Strategy 2011**

**Table 80. Doncaster Core Strategy 2011 Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2011	01/06/2005	01/06/2005	21/03/2011	29/07/2011	26/03/2012	18/05/2012

Source: PINS2023; Doncaster Council Webpage; SPRU Analysis.

**Table 81. Doncaster Core Strategy 2011 Time Taken Between Stages**

Core Strategy 2011	
Period	Years
Start to Adoption	1.2
First Evidence to Adoption	7.0
Issues & Options to Adoption	7.0
Submission to Adoption	1.2

Source: PINS2023; Doncaster Council Webpage; SPRU Analysis

- 3.194 The publication of Issues and Options was in 2005 so the start of plan-making was earlier than this.
- 3.195 This CS was based on the housing and employment requirements in the RSS. The CS proposed a distribution of development but made no allocations.
- 3.196 The Council produced its Sites and Policies Development Plan Document, and this was at Examination by 2014, just 2 years after the adoption of the Core Strategy.
- 3.197 The Council however abandoned its Sites and Policies Development Plan Document (S&P DPD), which was submitted for Examination in December 2014. The withdrawal came after a Planning Inspector raised concerns over the S&P DPD, outlining that it was not based on an objective assessment of the need for housing, as is required by the National Planning Policy Framework.
- 3.198 The Inspector added that the site selection methodologies used by the Council were flawed, and that the S&P DPD should be redrafted to make it simpler. The inspector stated:  
*"I found that the [S&P] DPD was extremely difficult to understand and, in my view, dealt with issues in an overly complicated way."*

qq) **Doncaster Local Plan 2015 - 2035**

**Table 82. Doncaster Local Plan 2015 – 2035 Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2015	01/03/2014	01/09/2015	12/08/2019	04/03/2020	30/06/2021	23/09/2021

Source: PINS2023; Doncaster Council Webpage; SPRU Analysis.

**Table 83. Doncaster Local Plan 2015 - 2035 Time Taken Between Stages**

Local Plan 2015 - 2035	
Period	Years
Start to Adoption	6.6
First Evidence to Adoption	7.6
Issues & Options to Adoption	6.1
Submission to Adoption	2.2

Source: PINS2023; Doncaster Council Webpage; SPRU Analysis

- 3.199 There was a lengthy period between the Issues and Options (2014) and the submission of the plan under the then new 2018 NPPF. This meant that at the beginning of the process the Council were considering the Objectively Assessed Housing Need and then prior to submitting the plan had to address the level of housing required by the Standard Method. As the level of housing being planned for exceeded the Standard Method this did not require additional allocations. The housing requirement was presented as a range which was then modified by the Inspector.
- 3.200 Throughout the Plan preparation, the Council had taken a seemingly progressive and proactive approach to planning for housing and had consistently prepared evidence to support the adoption of a housing requirement in excess of the Standard Method.
- 3.201 Given the proactive approach, a number of developers had consistently supported the aspirations of the Council and there were concerns relating to Green Belt release that dominated the process, particularly in light of the Council’s preference to exceed the minimum requirement.
- 3.202 Whilst the overall approach and strategy was endorsed by the Inspector, through main modifications, the Council were instructed to delete references to the housing requirement being a range and instead set a minimum requirement of 920 net additional new homes per year between 2018 and 2035.
- 3.203 Further to concluding that exceptional circumstances had been met to justify release of sites from the Green Belt, the Inspector determined that through Main Modifications, subject to consultation, the development requirements for the eight housing allocations removed from the Green Belt should be amended to secure permanent boundaries and compensatory improvements for the remaining Green Belt.
- 3.204 Similar to other case studies, the strategic infrastructure associated with Doncaster Sheffield Airport was also fundamental to the plan and its preparation and adoption. Indeed, whilst many had referenced uncertainties around wider infrastructure and rail improvements around the Airport, the Inspector noted that the approach taken in Policy 7 relating to Doncaster Sheffield Airport, including the significant amount of housing development linked to job growth, was justified subject to a number of modifications. Whilst different decisions could have been made about the amount and location of development in this part of the Borough, including at the airport, Auckley-Hayfield Green and nearby villages of Finningley, Branton and Blaxton, they were satisfied that the approach taken in the Plan was sound in the context of the responsibility the Council has to determine such matters.

3.205 This approach directly contrasts with that taken by the Durham and Chesterfield Inspectors who concluded that a plan based on as yet unsecured infrastructure was unjustified.

3.206 The main modifications included the following:

- a) Delete Policy 1 to ensure consistency with the national policy presumption in favour of sustainable development.
- b) Edit and restructure Policies 2 and 3 to clearly set out the spatial strategy and levels of growth, and accurately reflect the allocations including the distribution of development to the Doncaster main urban area and other parts of the Borough.
- c) Amend Policies 2 and 58, and development requirements for some allocations, to ensure consistency with national policy on flood risk.
- d) Delete references to the housing requirement being a range, and instead set a minimum requirement of 920 net additional homes per year between 2018 and 2035.
- e) Amend and clarify how the five year housing requirement will be calculated, taking account of completions since 2018 (rather than 2015).
- f) Amend the reasoned justification and housing trajectory to accurately reflect updated evidence relating to commitments and allocations.
- g) Amend the development requirements for eight housing allocations removed from the Green Belt so that the Plan is effective in securing permanent boundaries and compensatory improvements to remaining Green Belt.

rr) **Epping Forrest Local Plan 2011 - 2033**

**Table 84. Epping Forrest Local 2011 – 2033 Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2011	01/03/2010	01/10/2016	18/12/2017	21/09/2018	09/02/2023	06/03/2023

Source: PINS2023; Epping Forrest Council Webpage; SPRU Analysis.

**Table 85. Epping Forrest Local Plan 2011 – 2033 Time Taken Between Stages**

Local Plan 2011 - 2033	
Period	Years
Start to Adoption	12.0
First Evidence to Adoption	13.0
Issues & Options to Adoption	6.4
Submission to Adoption	3.6

Source: PINS2023; Epping Forrest Council Webpage; SPRU Analysis

- 3.207 The Council made a specific decision (cabinet meeting 7 December 2017) to bring the plan forward under the 2012 NPPF rather than under the 2018 NPPF in order to avoid having to plan for the higher housing requirements (518 dpa compared to 923 dpa under the Standard Method).
- 3.208 This Plan was examined under the transitional arrangements. While it was a long time to reach the Issues and Options stage it did include number of large strategic allocations. Concerns about the delivery of some of these strategic sites resulted in two modifications to the Plan during the Examination; one was a trigger for an early review and the second was the introduction of a “stepped trajectory” to provide a mathematical device to allow the Plan to have a chance of demonstrating a five year land supply on the date of adoption.
- 3.209 The LP based on OAHN also included 3,900 dwellings in and around Harlow as part of the 11,400 dwellings.
- 3.210 As part of the Examination process the Inspector consulted on 2018 household projections, as these represented new evidence that became available during the Examination.
- 3.211 A major issue was the impact on Epping Forrest Special Area of Conservation of Air Pollution of additional recreational trips and a lack of mitigation, including the fact that the plan identified no Suitable Alternative Natural Green Space (SANGS). These issues were highlighted by Natural England during the consultation process who maintained their objection at the examination.
- 3.212 The Inspector concluded on this matter:
- “128. In the submitted plan, Policy DM2 did not provide adequate safeguards for the SAC, being imprecise in its requirements for development management. The evidence base underlying the policy at the time the plan was submitted lacked adequate strategies for matters such as a strategic access management and monitoring plan (SAMM) and suitable alternative natural greenspace (SANG). In addition, the methodology and conclusions of the original HRA were criticised by Natural England and the Conservators of Epping Forest. These issues are summarised in Inspector Ms Phillips’ post-hearing note ED98, paragraphs 12 to 19. The Council subsequently carried out a considerable amount of work which necessitated surveys and modelling for various habitat, traffic and air quality scenarios, and developed three strategies which are referred to in more detail below.*
- 129. As a consequence of this additional work, Policy DM2 has been substantially revised by MM47 in the interests of soundness and legal compliance.<sup>8</sup> It now states that new*

*development for which it is not possible to conclude no adverse effect on the integrity of the Epping Forest Special Area for Conservation or the Lee Valley Special Protection Area, either alone or in combination with other plans or projects, will not be permitted.”*

- 3.213 Part of the solution included the production of a separate Green Infrastructure Strategy (EB159, April 2021) which took a strategic and holistic approach towards protecting, maintaining and enhancing the ecology, landscape and heritage in the district and formed a key part of the Council’s approach to avoiding or mitigating the effects of plans and projects, both alone and in combination, on the Epping Forest SAC.
- 3.214 The Inspector did note that most of these initiatives and regulatory changes were very recent indeed, and their impacts were not fully accounted for in the methodological background to the plan and HRA.
- 3.215 There was at least the suggestion that if the Council had attempted to resolve these issues prior to submission then the Plan could not have been considered under the transitional arrangements and a much higher housing requirement would have had to have been planned for.

ss) **St Helens Metropolitan Borough Council Core Strategy**

**Table 86. St Helens Metropolitan Borough Council Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2003	01/08/2005	01/03/2005	27/01/2011	31/05/2011	01/10/2012	31/10/2012

Source: PINS2023; St Helens Metropolitan Borough Council Webpage; SPRU Analysis.

**Table 87. St Helens Metropolitan Borough Council Time Taken Between Stages**

Local Plan	
Period	Years
Start to Adoption	9.7
First Evidence to Adoption	7.2
Issues & Options to Adoption	7.7
Submission to Adoption	1.9

Source: PINS2023; St Helens Metropolitan Borough Council Webpage; SPRU Analysis

3.216 The CS was based on meeting the RSS dwelling requirement and did not propose Green Belt release for housing (CS paragraph 6.6).

3.217 The National Planning Policy Framework (NPPF), replacing virtually all previously existing national planning policy and guidance, was published whilst the Examination Hearings were in progress. This does not explain the long lead-in time from Issues and Options to submission in 2011.

3.218 The Local Plan Inspector commented on the time taken as follows:

*“The CS has been developed over a number of years and has included seven formal stages of public consultation (involving local organisations and residents, voluntary groups, businesses and neighbouring authorities) from that on the Issues and Options in August 2005 through to the seeking of views on the plan’s accordance with the NPPF in April-June 2012. The somewhat drawn-out process and the number of stages of consultation and document revisions has, no doubt, confused and exasperated some members of the public. However, it is evident that, partly thanks to the hard work of both Council officers and community organisations, public engagement has been maintained and a large number of representations from the general public were submitted at each of the main stages of consultation. These mostly concern the identification of a strategic location for a possible Strategic Rail Freight Interchange.”*

3.219 The proposed modifications included the following:

- a) Making clear in the Spatial Vision that the challenge of positively meeting development needs whilst protecting the Green Belt lies at the Plan’s heart;
- b) Clarifying elements of the Overall Spatial Strategy (Policy CSS 1);
- c) Amendments throughout the document to reflect the current status of the Regional Spatial Strategy;
- d) Introducing a new policy (Policy CSD 1) reflecting the presumption in favour of sustainable development;
- e) The deletion of references to Major Developed Sites in the Green Belt;
- f) Alterations to Policy CAS 2 to provide greater flexibility in the location of new St Helens town centre shopping floorspace and making clear that the need for measures to facilitate linked trips in the town centre includes the former Tesco site at Chalon Way;
- g) The inclusion in Policy CSS 1 of the requirement for impact assessments for out-of-



centre town centre uses and making clear in the supporting text that the boundaries of local and district centres and Earlestown town centre will be defined in the Allocations DPD;

- h) Alterations to Policy CAS 3.2 to reflect the fact that it is unlikely to be the Council from whom consent would be sought for a possible Strategic Rail Freight Interchange (SRFI) at Parkside;
- i) Alterations to Policy CAS 3.2 to ensure internal consistency and to refer to heritage impacts, strategic road network mitigation and the need for a travel plan.

**tt) St Helens Metropolitan Borough Council Local Plan 2037**

**Table 88. St Helens Metropolitan Borough Council Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2021	01/01/2016	01/01/2016	17/01/2019	29/10/2020	18/05/2022	12/07/2022

Source: PINS2023; St Helens Metropolitan Borough Council Webpage; SPRU Analysis.

**Table 89. St Helens Metropolitan Borough Council Time Taken Between Stages**

Local Plan 2037	
Period	Years
Start to Adoption	1.4
First Evidence to Adoption	6.5
Issues & Options to Adoption	6.5
Submission to Adoption	3.6

Source: PINS2023; St Helens Metropolitan Borough Council Webpage; SPRU Analysis

- 3.220 The previous plan was the Core Strategy adopted in 2012 based upon the RSS and the previously 'saved' policies of the St Helens Unitary Development Plan 1998. There had been no plan since 1998 which made new allocations.
- 3.221 The issue of DtC was addressed by a Statement of Common Ground (SOCG) dated October 2019 between the LCR authorities and West Lancashire Borough Council setting out the housing needed for each LPA at that time, based on adopted and emerging LPs. The SOCG noted that there was no current unmet need to be distributed among or beyond the seven LPAs.
- 3.222 The Inspector however noted that Liverpool, where the LP was examined under the transitional arrangements and so was subject to the 2012 Framework and the transition to the Standard Method, including the city's uplift, increased the city's housing requirement but concluded that this was a matter to be addressed by an update of the Liverpool LP and other LP reviews in the LCR. The Inspector concluded that in any event St Helens lies in a different HMA.
- 3.223 The Inspector made a number of modifications including the following:
  - a) Extending the timeframe of the Plan to ensure a 15 year period post-adoption;
  - b) Taking into account the Council's climate change emergency declaration;
  - c) Ensuring that Green Belt policy relating to safeguarded land and compensatory improvements is positively prepared and consistent with national policy;
  - d) Clearly articulating the exceptional circumstances for Green Belt release at strategic and site levels;
  - e) Modifying Policies LPA02 and LPA05 so that the Plan promotes the effective use of land;

- f) Ensuring that the Site Profiles for allocated and safeguarded sites are site specific and not generic;
- g) The inclusion of bespoke policies for the Bold Forest Garden Suburb and Parkside West;
- h) Revising the boundaries for allocated Sites 7HA and 9EA and safeguarded Site 4HS so that they are positively prepared, justified, and effective;
- i) Modifying housing mix, affordable housing, and housing standards policies so that they are effective and consistent with national policy;
- j) Ensuring that the housing and employment land supply position is up-to-date so that the Plan is effective.

**uu) Mid Devon District Council (review)**

**Table 90. Mid Devon District Council (review) Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2013	01/03/2012	19/08/2013	09/02/2015	31/03/2017	27/06/2020	29/07/2020

Source: PINS2023; Mid Devon District Council Webpage; SPRU Analysis.

**Table 91. Mid Devon District Council (review) Time Taken Between Stages**

Local Plan review	
Period	Years
Start to Adoption	7.4
First Evidence to Adoption	8.4
Issues & Options to Adoption	6.9
Submission to Adoption	5.8

Source: PINS2023; Mid Devon District Council (review) Webpage; SPRU Analysis

- 3.224 This review was preceded by the Core Strategy (Adopted 2007).
- 3.225 The first iteration was published for consultation in 2015. In response to that consultation process, the Council made significant changes to it. The consultation exercise was then re-run and it was that second iteration of the Plan, the Mid Devon Local Plan Review 2013-2033 Proposed Submission (incorporating proposed modifications) of January 2017, that was submitted for examination in March 2017.
- 3.226 The review was examined under the transition arrangements in the 2018 NPPF.
- 3.227 This review allocated slightly above the housing need identified by the SHMA.
- 3.228 The Plan included a series of allocations that sought to deliver the housing and commercial development identified including some significant allocations.
- 3.229 Strategic infrastructure was key to the plan process and wider Examination. Specifically, careful consideration was given to highway impacts around the Cullompton junction. The Council had proposed the allocation of a significant number of residential units around Cullompton, which were dependent upon highway infrastructure upgrades. The Council had received funding from Central Government, albeit conditional, for part of the cost of the CTCRR.
- 3.230 However, the Council's assumptions about delivery of the CTCRR were noted as being optimistic. As a result, the housing trajectory outlined in the Plan, which after the first five years was so dependent on the prompt delivery of the CTCRR, did not appear capable of delivering a rolling five-year supply of deliverable housing sites.
- 3.231 Despite noting this, the Inspector concluded that there was some scope for slippages but noted in particular the Council's obvious appreciation for the need for rapid progress on the CTCRR. As such the approach taken was not considered unrealistic, but clearly discussions and additional information required to demonstrate this had caused something of a wider delay.
- 3.232 The Inspector made the following Main Modifications:
- a) MMs to establish a proper link between the development of housing and related infrastructure and to provide for a trajectory that should ensure a rolling five-year supply of deliverable housing sites;
  - b) A group of MMs necessary to allow the Plan to properly provide for the needs of Gypsies and Travellers and Travelling Show-People;

- c) MMs to ensure the major development proposed at Junction 27 of the M5 is brought forward in an acceptable way;
- d) MMs to deal with constraints relating to the allocation under Policy SP2; and
- e) Various MMs to ensure that development management policies are effective and consistent with national policy.

vv) **North East Derbyshire District Council LP 2014 - 2034**

**Table 92. North East Derbyshire District Council LP 2014 - 2034 Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2014	30/04/2009	02/08/2012	21/02/2018	24/05/2018	19/07/2021	29/11/2021

Source: PINS2023; North East Derbyshire District Council Webpage; SPRU Analysis.

**Table 93. North East Derbyshire District Council LP 2014 – 2034 Time Taken Between Stages**

Local Plan	
Period	Years
Start to Adoption	7.7
First Evidence to Adoption	12.6
Issues & Options to Adoption	9.3
Submission to Adoption	4

Source: PINS2023; North East Derbyshire Council (review) Webpage; SPRU Analysis

- 3.233 This Plan was preceded by the superseded 2001 – 2011 Local Plan.
- 3.234 The Plan was considered under the transitional arrangements set out in the 2018 NPPF.
- 3.235 Early work on the Local Plan was based upon the production of a Core Strategy. The first stage in this process was the production of the Sustainability Appraisal Scoping Report, which assessed the potential effects of the Core Strategy. Consultation on the Scoping Report took place between the 2<sup>nd</sup> April and 11<sup>th</sup> May 2007.
- 3.236 There were a number of key issues that were raised during the consultation on the Draft Local Plan. These primarily related to the proposed quantum and distribution of housing growth, and concern over proposals to remove land from the Green Belt provide for growth around the main towns.
- 3.237 A number of statutory consultees raised concerns in respect of the draft Plan, including from neighbouring authorities. Sheffield City Council supported the proposed housing target but housing target, but formally asked to explore options to accommodate additional growth outside Sheffield and what scope there would be in North East Derbyshire to meet some of Sheffield’s needs.
- 3.238 Derbyshire County Council (DCC) and Historic England raised concerns about the proposed strategic employment site covered by Policy SS7(Land South of Markham Vale). Both raised concerns that the site could not be delivered in an acceptable form and advised that a Heritage Impact Assessment and Visual Appraisal should be undertaken.
- 3.239 Highways England commented that a number of large scale allocations are in close proximity to and are likely to have impacts upon the operation of the strategic road network. They state that these impacts need to be understood as part of the plan making process through an appropriate Transport Assessment.
- 3.240 As such, between the Regulation 19 consultation and submission of the Plan, the Council were required to undertake extensive additional assessments. The Council noted that statutory consultee comments at early stages of the process with the same level of detail would have supported a more comprehensive assessment of the Plan in a more timely manner.
- 3.241 Additionally, given the period of time to produce the Plan and drip fed information in respect of timings and route of HS2 during the plan preparation process, and number of allocations, including the significant allocation under Policy SS6 (Coalite Priority Regeneration Area) had

to be revisited. With particular reference to the strategic Coalite site Coalite, the HS2 route cut through the corner of an approved housing site and as such, residential uses on the site in North East Derbyshire were considered unrealistic.

- 3.242 The Plan proposed a number of Green Belt releases to meet the housing requirement and was subject to organised public opposition.
- 3.243 Inspector removed one GB site and amended another.

**ww) North Hertfordshire District Council LP 2011 - 2031**

**Table 94. North Hertfordshire District Council LP 2011 - 2031 Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2011	01/01/2007	01/02/2013	19/10/2016	09/06/2017	08/09/2022	08/11/2022

Source: PINS2023; North Hertfordshire District Council Webpage; SPRU Analysis.

**Table 95. North Hertfordshire District Council LP 2011 - 2031 Time Taken Between Stages**

Local Plan	
Period	Years
Start to Adoption	11.7
First Evidence to Adoption	15.7
Issues & Options to Adoption	9.7
Submission to Adoption	6.4

Source: PINS2023; North Hertfordshire District Council Webpage; SPRU Analysis

- 3.244 The plan was started in 2013 just after the introduction of the 2012 NPPF and took three years to be submitted from Issues and Options.
- 3.245 Consultation on the North Hertfordshire Proposed Submission Local Plan 2011 – 2031 took place over a six-week period between 19 October 2016 and 30 November 2016. In total, representations were received from 2,551 unique respondents.
- 3.246 The North Hertfordshire Local Plan was examined under transitional arrangements and considered in the context of the 2012 NPPF.
- 3.247 Given the geographical context in which North Hertfordshire lies, the Council, under the Duty to Cooperate and through numerous MoU, had agreed to address unmet housing needs from surrounding authorities including Luton. Considerable work and discussion had taken place between the Council and Luton in particular, with a Statement of Common Ground produced and submitted to the Examination in December 2020 identifying supply in Luton which exceeded the Luton adopted Local Plan housing requirement. The North Hertfordshire Inspector, over an extended period of time, was required to assess in detail the emerging data from Luton in respect of supply and quantum of unmet need. The Inspector, as confirmed in their report at paragraph 83, concluded that the situation was complex, but for the specific purpose of the Examination the change in the housing situation in Luton should not be regarded as meaningful for the North Hertfordshire Local Plan. Indeed they concluded that continually delaying decisions and the Local Plan Examination to allow for further updates on supply, would not deliver much-needed housing.
- 3.248 In addition to this, considerable time, further to input from representors, was spent on considering the impact of the 2018 projections. Again the Inspector determined that hearing extensive additional information on the matter would simply act to delay the process.
- 3.249 Given the Green Belt coverage in the authority and a number of proposed strategic Green Belt sites, the Local Plan process comprised numerous assessments of need, and work from the Council to demonstrate Exceptional Circumstances was meaningful.
- 3.250 With regard to affordable housing, whilst the Inspector confirmed that the Plan does all it can, in the context of a chronic and urgent need, the Council committed to an early review through a further Main Modification. With this mechanism in place the Inspector concluded that a failure to meet affordable housing needs was not justification for finding the Plan unsound. The same was concluded in respect of self-build first homes.
- 3.251 In the modification the Inspector reduced the OAN and housing requirement to 11,500 and



11,600 respectively. The Inspector also introduced the Liverpool method to mathematically secure a five year land supply rather than suggesting allocating additional sites that would deliver in five years.

- 3.252 In terms of the DtC the Plan allocated some 1,950 dwellings to meet Luton's unmet need of which 1,400 are to be delivered in the Plan period.
- 3.253 The plan was also modified to include a policy commitment to early review of LP.
- 3.254 The timescale of this Local Plan was affected by a start on consultation on the CS Preferred Options and Development Policies Options in 2007, and also by the consultation on the Stevenage and North Herts Action Plan in the same year. This was followed by Land Allocations and Options in 2008 and Land Allocations Additional Suggested Sites Issues & Options (2009). The NPPF in 2012 and the revocation of the East of England Plan led to the Council merging two strands into a single plan (see LP paragraph 1.24 and 1.25).

**xx) Welwyn Hatfield District Council**

**Table 96. Welwyn Hatfield District Council Plan Preparation Timeframe**

Plan	Start of Plan Period	Evidence Base	Issues & Options	Published	Submitted	Found Sound	Adopted
Local Plan	01/03/2016	01/01/2004	04/03/2009	30/08/2016	15/05/2017	25/09/2023	01/11/2023 (?)

Source: PINS2023; Welwyn Hatfield District Council Webpage; SPRU Analysis.

**Table 97. Welwyn Hatfield District Council Time Taken Between Stages**

Local Plan	
Period	Years
Start to Adoption	7.7
First Evidence to Adoption	19.9
Issues & Options to Adoption	14.7
Submission to Adoption	7.6 (?)

Source: PINS2023; Welwyn Hatfield District Council Webpage; SPRU Analysis

- 3.255 The Welwyn Hatfield District Plan was adopted by Welwyn Hatfield Borough Council in April 2005.
- 3.256 This review was considered under the transitional arrangements to avoid the higher housing requirement that would result from the application of the 2018 NPPF. It has not yet been formally adopted but it is expected that it will be in the next month, but it has been recommended for adoption in the Planning Officer report of the 5<sup>th</sup> October 2023.
- 3.257 The public consultation in 2016/17 was undertaken on the publication of the Draft Local Plan and accompanying policies maps prior to its submission for examination (Regulation 19).
- 3.258 The submitted Draft Local Plan covered the period from 2013 to 2032. However, during the Examination the Council agreed that the start date of the plan should move to 2016 and the end date of the plan to 2036. During the Examination the soundness and legal compliance of the plan were considered. The process included a number of hearing sessions of the Examination in Public (EIP); these sessions commenced in September 2017 and concluded in March 2021.
- 3.259 In a letter dated 15th October 2021, the Council wrote to the Planning Inspector advising that following comments from the Prime Minister, they had written to the Secretary of State for Levelling Up, Housing and Communities, to seek clarification in respect of the approach to be taken to Green Belt release. This decision resulted in a delay to the Main Modifications consultation and was subject to the response from the Secretary of State.
- 3.260 By virtue of the transitional arrangement set out in paragraph 220 of the 2021 NPPF the relevant guidance relating to the determination of housing need for the emerging Welwyn Hatfield Local Plan is contained in the 2012 NPPF, and the corresponding National Planning Policy Guidance (NPPG) on Housing and Economic Needs Assessment applies.
- 3.261 It is clear that the Inspector was unconvinced by the reasoning behind the Council's under-provision of housing which originally appeared partly to be based on the issue of education capacity and by the approach to the assessment of Green Belt release. The Inspector was also sceptical with regard to the justification for a new village of 1,000 dwellings contained within the Plan.
- 3.262 These issues and others meant that throughout the examination, further technical work has been requested by the examining Inspector and finally a number of modifications were proposed, including:

- a) Further work in relation to the Green Belt and consequently the Stage 3 Green Belt Study was commissioned, published and subsequently examined at the Stage 5 hearing session in November 2018.
- b) During the Examination, the Inspector indicated a need for modifications to the plan to increase the housing target in order to meet the OAN, which at that point was acknowledged to be around 16,000 homes. This resulted in the following:
  - i) A Call for Sites was undertaken in January 2019 and consultation on sites promoted through the Call for Sites took place in May/June 2019.
  - ii) An update to the Housing and Economic Land Availability Assessment (HELAA), which was published in January 2020, assessed the suitability, availability and achievability of these promoted sites for development.
  - iii) A revised Site Selection Background Paper which considered different options for the selection of sites, and this was presented to Cabinet Planning and Parking Panel (CPPP) on 23 and 29 January 2020.
- c) Following the release of the 2018-household projections in June 2020, the Council commissioned a review on the implications of the updated projections on its Objectively Assessed Need for housing which was published in September 2020. This was subject to consultation which was carried out by the Inspector and consequently examined at a Hearing session in February 2021. In a series of letters and notes issued in June 2021, the examining Inspector concluded that the new projections represented a meaningful change to the OAN, justifying a reduction in the target from 16,000 (800 dwellings per annum) to 15,200 (760 dwellings per annum), over the 2016-2036 plan period.
- d) At a meeting of the Cabinet Planning and Parking Panel (CPPP) on 13 January 2022, members agreed that a strategy to meet an OAN of 15,200 could not be supported.
- e) Following a further review of the sites available, the Council then agreed in July 2022 to a strategy which would provide 12,775 dwellings over the plan period 2016-2036, of which 8,517 of these dwellings would be delivered over the first ten years following adoption (assumed to be 2023/2024). An early review would then consider opportunities to meet the remaining need, which would be undertaken in the context of housing need and national policy at the time of the review.
- f) Following this, the Council received a response from the Inspector in September 2022 which indicated that a supply of 9,200 dwellings over the first ten years could be found sound.

3.263 The Inspector's proposed modifications were substantial including the removal of the new village of 1,0000 dwellings and also included the following:

- a) Amendment to the Plan period to one that covers the period 2016-2036
- b) Changes to the Spatial Vision, the Strategic Objectives and Policies SP2 and SP3, to clearly set out the Plan's revised targets for the delivery of employment, retail floorspace and housing numbers.
- c) Amendments to Policy SP2 to confirm that the Council is committed to undertaking an immediate review of the Plan, with a submission date no later than three years after the date that this Plan is adopted.
- d) Amendments to the settlement chapters and to Table 2 (Distribution of Housing Growth) to include additional or extended development sites, amendments to housing capacities and the removal of sites or parts of sites that the Inspector found to be unsound.
- e) Updates to the Economy chapter to account for changes in the employment forecasts,

employment land supply and to the Use Classes Order.

- 3.264 In some respects it is possible to reflect that the time taken for the development of this Plan may be due to the political sensitivity of Green Belt release (there was correspondence on this matter between the Council and the Government ministers), the thoroughness of the Examination process, the strength of local politicians in resisting the Inspector's recommendations and the perceived inability (at least) for an Inspector to find a plan unsound.

## 4.0 CONCLUSIONS

4.1 The quantitative review of the time taken for the production of development plans at both the national level and in more detail for the selected case studies enables the research questions set at the outset to be revisited.

### a) Changes to national policy

4.2 Using national data from the Planning Inspectorate we conclude that changes to national policy appear to cause disruption in the planning process in terms of the time taken from submission to adoption due to:

- a) a push by some LPAs to secure an adopted plan under the policy guidance that is to be replaced; and
- b) fewer plans being adopted immediately after national policy changes are introduced.

4.3 Furthermore many LPAs have decided not to progress new plans through the development plan system and prefer to rely upon historic plans.

4.4 The case studies also clearly highlight the negative impact of proposed changes to national policy resulting in a rushing of some LPAs to progress plans under the transitional arrangements to secure lower housing numbers or, as it happening presently, either suspending plan making and examinations or withdrawing plans in the hope that statements by politicians will result in changes which will allow LPAs to reduce the level of development (particularly housing) that they will need to accommodate.

4.5 At present the impact of Government announcements trailing further changes to the planning system has resulted in the withdrawal or suspension of 62 development plans.

### b) Areas of higher and lower development value

4.6 Using national data from PINS we looked at whole regions as a proxy for higher and lower value and consider that there do not appear to be significant regional differences in the time taken between submission and adoption of development plans. This is perhaps contrary to expectations, as it might be supposed that where development values are higher, plans would be more contentious. On the other hand it could also be the case that areas of higher development value have better resourced planning departments. That is certainly the finding from other RTPI research on resourcing.

### c) Footnote 7 considerations, including Green Belts

4.7 The PINS data suggests that, with the exception of those plans considered under the 2018 NPPF transition arrangement, the presence of Green Belts does not appear to have a significant impact the timing of adoption of local plans. Although those plans containing areas of Green Belt do take slightly longer to adopt. The combined impact of the main Footnote 7 constraints is to marginally extend the time of the plan making process.

### d) National infrastructure

4.8 Through the case study work we identified an additional factor in local plan progress. We found that decisions or lack of decisions on major infrastructure (such as the CamOx Arc or the relief roads in Durham) can impinge negatively on the plan making process creating uncertainty and prolonging both plan-making and the Examination of plans.

### e) Statutory Consultees

4.9 As highlighted in the introduction to the case studies, there appears to be evidence that Statutory Consultee engagement, or lack of it, has delayed the publication or submission of plans, but this is difficult to draw out from the written sources. There are however examples of where the lack of ongoing engagement (possibly on both sides) has led to delays at the

examination process.

- 4.10 One example is the ongoing Examination of the Bedford Local Plan 2040, where National Highways advised that notice of consultation and the Examination had been missed and as such, attended the hearing sessions to raise concerns in respect of the highway modelling undertaken and the ability of some strategic allocations to come forward. As a result of this and the submission of additional representations outside of formal consultation opportunities, the Local Plan Inspector advised of the need for additional public consultation in the middle of the Examination. National Highways had previously raised concerns but acknowledge that they have failed to engage on an ongoing basis<sup>4</sup>.
- 4.11 A second example is the County Durham Plan in which National Highways' involvement (then Highways England) resulted in the identification of land in excess of what was required for the purpose of meeting the identified housing and employment allocations so as to support significant strategic infrastructure upgrades. The Inspector as part of the Examination concluded that the allocation of this land and the provision of the proposed highway infrastructure was not justified and given the Green Belt status of the land, didn't meet the exceptional circumstances test. Accordingly, through Main Modifications, land proposed for allocation was removed from the Plan.
- 4.12 Possibly a more common example is the situation at Epping Forrest where objections from Natural England were under played during the plan preparation stage and indeed at the early stages of the Examination only for the Inspector to realise later that Natural England were maintaining their objection to the plan. Again this required a delay to the Examination and additional work to satisfy this objection.

**f) Housing numbers agreed at higher level**

- 4.13 Using national data from PINS we conclude that plans that do not have to address the issue of the overall level of development appear to negotiate the period between submission and adoption more quickly. The case studies also revealed that some of the "quicker" development plans often did not have to determine the level of development required and/or did not identify sites to meet this need.
- 4.14 It is clear that setting the housing requirement locally is likely to extend the time period for plan preparation.
- 4.15 Moving the determination of the housing requirement upstream does mean time and resources do have to be devoted to it at some point. One solution is for central government to determine housing numbers directly. The Standard Method attempted to address this issue; however Councils can decide simply not produce a plan if they consider the housing requirement too high. This reduces the effect of a national approach, at least until now, noting that the Levelling-up and Regeneration Bill will introduce a statutory requirement to produce a plan. This is partly demonstrated by the drop off in plans coming forward under the 2018 NPPF. This is exacerbated by the Government itself suggesting that it may be abandoned.

**g) Duty to Cooperate**

- 4.16 National government is not the only means of setting housing numbers for local plans. Since the Localism Act 2012 there has been a Duty to Cooperate which has been responsible for both speeding up the production of plans but also for delays.
- 4.17 In North West Leicestershire there was an 'in principle' agreement with adjoining authorities to address unmet needs from Leicester. However individual progress on local plans and

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<sup>4</sup><https://edrms.bedford.gov.uk/OpenDocument.aspx?id=dHXXqsYajT4xGnhsNtI1Lg%3d%3d&name=ED74%20Block%20%20Actions.pdf>



different timeframes for evidence base gathering, consultation and adoption resulted in the need to implement an immediate review to respond to new evidence and ongoing engagement with other Leicestershire authorities. However, this limited review found that enough progress was being made on the next full plan for no modifications to be made to the present plan.

- 4.18 In Ipswich, failure to align plan progression and evidence relating to housing need and infrastructure delayed progress on the Plan to some extent and necessitated an immediate review to consider unmet housing needs from Ipswich and infrastructure provision, including the Ipswich Northern Route.
- 4.19 The Oxford Plan benefited from the DtC and working with adjoining authorities to effectively distribute growth that could not be met in Oxford, allowing Oxford City Council to adopt a constraint based Plan that, without such an agreement, clearly would not have been capable of being found sound.
- 4.20 It should however be noted that the agreement to address Oxford's unmet housing needs has been problematic for the other authorities, particularly Cherwell, where the Inspector required an immediate partial review of their Plan to address this issue and plan for meeting Oxford's unmet housing needs.
- 4.21 North Hertfordshire was clearly delayed both by the discussions around Stevenage's and then Luton's needs. Eventually agreements were reached that allowed the plan to proceed without a significant debate on the level of unmet need from these neighbouring authorities.
- 4.22 The Duty to Cooperate can either speed up and delay the plan making process and at times it can have opposite effects for different parties, allowing one to proceed while placing an additional burden on others to find additional sites for development (for example the authorities in and around Oxfordshire).

#### **h) Informal strategic plans**

- 4.23 Watford, despite being surrounded by Green Belt and located within reasonable proximity of authorities that have historically struggled to progress and adopt plans, has nevertheless progressed and adopted a plan in a relatively quick timescale. In part, the ongoing work on the Joint Spatial Plan and the almost top-down approach in respect of housing and employment land requirements assisted in the process and limited the scale of evidence base documents required.
- 4.24 It is however noted that monitoring the other authorities that form part of the same Joint South West Herts Spatial Plan does not indicate a wider benefit in respect of impact on development plans.
- 4.25 This informal approach to planning for the wider area is similar to that adopted in Leicestershire which under pinned the DtC for those authorities.

#### **i) Other factors**

- 4.26 The most timely local plan progress is made where there is strong and consistent support for the process by both the Council and members
- 4.27 Lastly, as highlighted in this report, the timescale for plan preparation appears to be only part of the issue in respect of improving development plan coverage and further investigation is required into the circumstances that prevail in those Councils which are not progressing a plan through the system in any meaningful way.





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