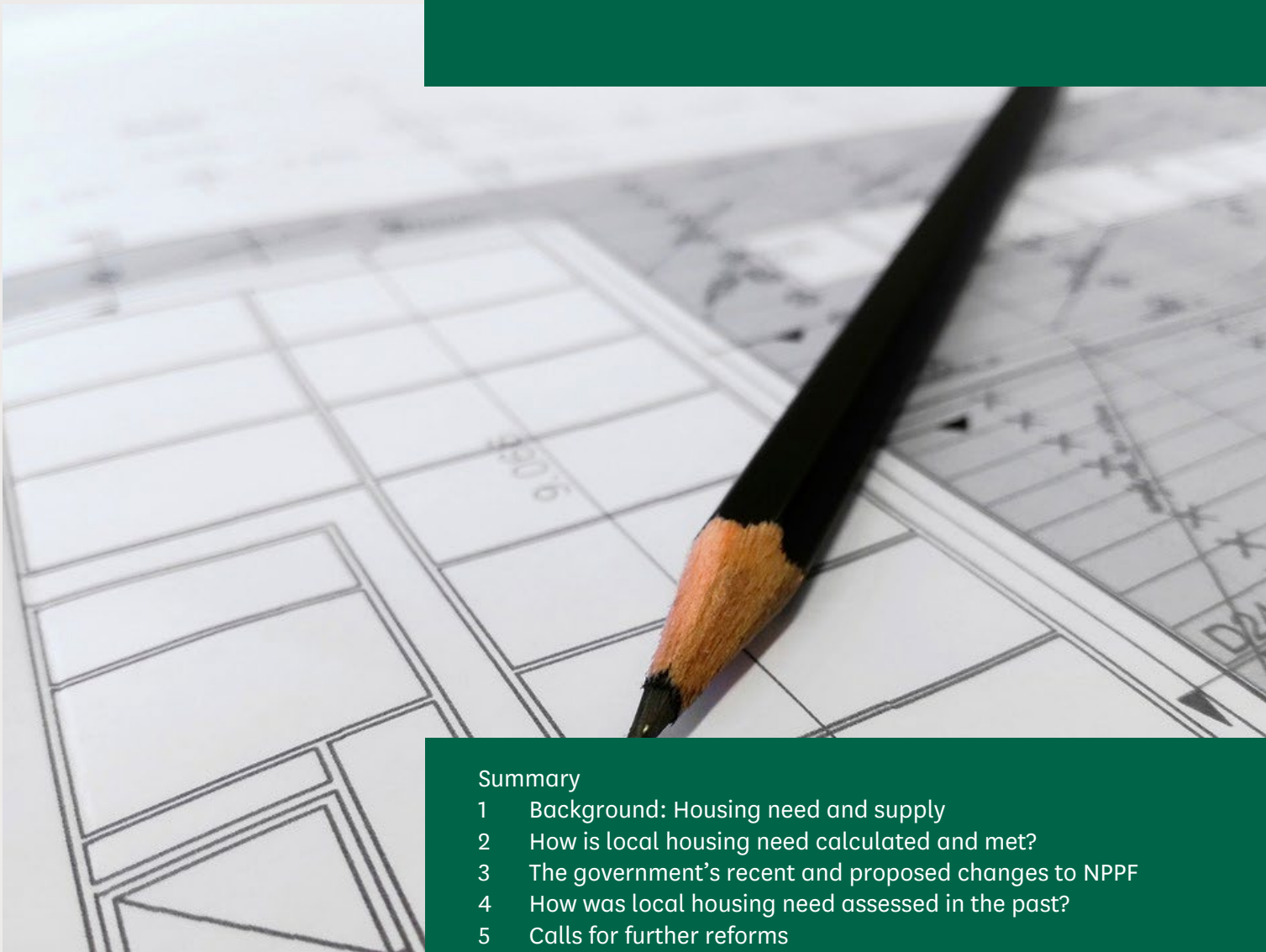


Research Briefing

12 March 2024

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# Calculating housing need in the planning system (England)



## Summary

- 1 Background: Housing need and supply
- 2 How is local housing need calculated and met?
- 3 The government's recent and proposed changes to NPPF
- 4 How was local housing need assessed in the past?
- 5 Calls for further reforms

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## Summary

Planning is a devolved matter, and this briefing focuses on England.

The government has set a national housing target of delivering 300,000 new homes in England per year by the mid-2020s. However, the government does not set binding local housing targets for local planning authorities (LPAs).

Instead, LPAs are required to calculate and meet housing need in their local area. The government sets out which steps LPAs must follow in the [National Planning Policy Framework](#) (NPPF). In brief, the NPPF states that LPAs must:

- [assess local housing need](#) when they are preparing their local plan using the ‘standard method’ provided by the government.
- set out policies in their local plan to meet their assessed local housing need. In doing so, LPAs can consider local land constraints.
- identify suitable sites in their local plan that can [deliver at least five years’ worth of housing](#). This is the ‘five-year housing land supply’.

## What is the standard method of calculating local housing need?

The ‘standard method’ of calculating local housing need consists of three main steps. Since 2020, an additional fourth step applies to certain urban LPAs:

1. **Baseline figure of the number of new homes needed in an area:** Calculate projected household growth for the next 10 years using the government’s 2014 household projections for England.
2. **Affordability adjustment:** Adjust the baseline figure upwards in areas where house prices are more than four times higher than earnings.
3. **Cap:** Cap the increase at 40% of the baseline or at 40% above the figure set out in the LPA’s local plan if the local plan was adopted or reviewed in the last five years.
4. **Urban uplift:** For the LPAs whose areas contain the largest proportion of the population of one of England’s 20 largest cities or urban centres, increase the figure by 35% after applying the cap.

In “exceptional circumstances”, LPAs can use an alternative approach to the standard method to assess local housing need. The [Planning Inspectorate assesses alternative approaches on a case-by-case basis](#) to ensure they are justified and make realistic assumptions about demographic growth.

## Is the figure a binding housing target or requirement?

The figure produced by the standard method is intended to be a starting point to determine the number of homes an LPA should plan for; [it is not a binding target or a requirement](#). LPAs can weigh the figure against local constraints (such as green belt land).

The government updated the NPPF in December 2023 to [state that the standard method provides “an advisory starting-point”](#), not a target.

## What is the five-year housing land supply?

In their local plans, LPAs must identify enough sites to deliver at least five years’ worth of housing to meet their local housing need. Until December 2023, all LPAs had to update their supply of sites annually.

In December 2023, [the government removed the requirement for LPAs to update their five-year housing land supply annually](#) if they have an up-to-date local plan (which was adopted in the last five years). Other LPAs must still update their supply every year.

## How is housing delivery enforced?

The [Planning Inspectorate examines whether LPAs have adequately assessed their local housing need](#) and allocated enough sites to meet that need in their local plans. To take effect, every local plan must be approved by the Planning Inspectorate.

The government also carries out an [annual assessment of housing delivery](#) in each LPA. If an LPA has delivered less than 75% of its local housing need, the [‘presumption in favour of sustainable development’](#) will apply. This means an LPA is generally expected to grant planning permission to new developments unless, for example, the site is on protected land.

## Views on the standard method and reforms

Opinions differ on the changes that the government made to the NPPF in 2023, which clarified that the standard method is “an advisory starting-point” and

removed the requirement for LPAs with an up-to-date local plan to maintain a rolling five-year supply of deliverable land for housing.

Industry groups have expressed [concern that these changes could reduce local housing delivery](#). The Levelling Up, Housing and Communities Select Committee also said that they could [make the government's national housing target of 300,000 new homes per year "impossible to achieve"](#).

LPAs and groups representing their interests, such as the Local Government Association, welcomed the changes, arguing that [they could help curb "speculative development"](#). The government said the changes will encourage LPAs to prepare local plans and that ["having plans in place unlocks land for homes"](#).

Beyond the recent changes, organisations have also called for other parts of the standard method to be reformed. Industry groups have said the [baseline figure for housing need should be based on occupied housing stock](#), while the Local Government Association argued that it should be based on [more recent household projections](#).

The Levelling Up, Housing and Communities Committee also criticised the 35% urban uplift. It questioned the ability of LPAs to meet the uplift given [constraints, such as green belt land and the availability of brownfield sites](#).

# 1 Background: Housing need and supply

The government has set a target of building 300,000 homes annually by the mid-2020s. It has said more homes are needed to meet rising demand for housing, in part the result of population growth. Housing need is also driven by a backlog of households living in substandard or unsuitable homes.

## 1.1 What is government's national housing target?

In its [2019 election manifesto](#), the Conservative Party committed to building 300,000 new homes per year in England by the mid-2020s and at least a million new homes over the course of the next parliament.<sup>1</sup> The government has restated its commitment to that target several times since 2019.<sup>2</sup>

This target is not set out in legislation, and there is no statutory obligation to deliver 300,000 new homes per year. Although the government has an overall national housing target of delivering 300,000 new homes annually, it does not set binding local housing targets for individual local planning authorities.

### 1 Positions of other parties

The [Labour Party published five missions](#) which, the party said, “we will build our manifesto around and, if elected, drive everything we do in government”. One of the five missions is to “get Britain building again”. The Labour Party said it would reform planning laws to “kickstart 1.5 million new homes”.<sup>3</sup>

The [Liberal Democrats' “pre-manifesto” plan](#) includes a commitment to “building at least 150,000 new council and social homes a year”.<sup>4</sup>

Neither the Labour Party's missions nor the Liberal Democrats' pre-manifesto plan state whether they intend to set binding housing targets for local areas.

<sup>1</sup> Conservative Party, [The Conservative and Unionist Party Manifesto](#) (PDF), 2019. The current parliament will last until January 2025 at the latest.

<sup>2</sup> For example: DLUHC, [PM to build 1 million new homes over this Parliament](#), July 2023; HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023

<sup>3</sup> Labour Party, [Labour's missions for Britain](#), January 2024

<sup>4</sup> Liberal Democrats, [For a fair deal: Autumn conference 2023](#), 2023

## 1.2

## Why are new homes needed?

### Population and household growth

The government has said that more homes are needed to meet rising demand for housing, in part the result of population growth.

England has a growing population. An estimated 57.1 million people lived in England in 2022, and its population has grown by around 360,000 people per year on average between 2012 and 2022.<sup>5</sup> The Office for National Statistics (ONS) also estimates that there were 28.2 million households living in England in 2022, an increase of around 1.6 million households since 2012.<sup>6</sup>

The ONS also publishes population projections. These projections are based on trends in population growth and household formation to date. They do not attempt to account for the impact of future developments, such as changes in migration patterns. According to the ONS' most recent 2021-based population projections, England's population is projected to grow by around 5.1 million to reach around 62.2 million people by mid-2036.<sup>7</sup>

The ONS also publishes projections of the number of households in England. These are discussed in box 7 in section 4.1 of this briefing.

### Backlog of housing need

Housing need is not only driven by population growth and increases in the number of households. There is also a backlog of people living in substandard or unsuitable homes, such as homes that are overcrowded, “do not provide a reasonable degree of thermal comfort”, or “are not in a reasonable state of repair”.<sup>8</sup> A [2018 report by the homelessness charity Crisis](#) estimated that there was a backlog of housing need of four million households in England.<sup>9</sup>

A [2023 report by the Centre for Cities](#) compared postwar housing delivery in the UK with other European countries, and found a backlog of a similar size.<sup>10</sup>

### Affordability pressures

The government has also argued that a failure to build enough homes has contributed to the rising cost of buying a home.<sup>11</sup> In an evidence session with the Housing, Communities and Local Government (HCLG) Committee in 2018, the government argued that delivering 300,000 new homes a year could

<sup>5</sup> ONS, [Population estimates for England and Wales: mid-2022, Estimates of the population for England and Wales](#), 23 November 2023

<sup>6</sup> ONS, [Families and households in the UK: 2022](#), 18 May 2023

<sup>7</sup> ONS, [Principal projection – England summary](#), 2021-based interim edition, 30 January 2024

<sup>8</sup> Homes England, [Fact Sheet 1. The need for homes](#), last updated January 2024

<sup>9</sup> Crisis, [Housing supply requirements: Low-income households & homeless people](#), December 2018

<sup>10</sup> Centre for Cities, [The housebuilding crisis: The UK's 4 million missing homes](#), February 2023

<sup>11</sup> Homes England, [Fact Sheet 1. The need for homes](#), last updated January 2024



reduce pressures on house prices.<sup>12</sup> Its successor, the Levelling Up, Housing and Communities (LUHC) Committee, also concluded in its [2023 report on the private rented sector](#) that a failure to build enough homes had resulted in an ‘affordability crisis’ in the private rented sector.<sup>13</sup>

However, other organisations, such as the housing consultancy Residential Analysts and the Town and Country Planning Association, have argued that building more homes would not necessarily reduce house prices and address affordability pressures. In a 2018 report, Residential Analysts said that “new supply will probably only limit future price rises rather than improving current levels of affordability”.<sup>14</sup>

## 1.3

### Where are new homes needed?

The government has said “all areas of England need new homes”. It has said that housing pressures are greatest in urban areas, but that new homes are also needed in rural areas.<sup>15</sup>

Different places in England have seen very different patterns in the factors that affect housing need. According to the ONS’ population estimates, in 12 local authorities in England, the population fell between 2012 and 2022.<sup>16</sup> In the same period, some of the largest population rises were seen in the City of London (44%), Tower Hamlets (24%), Dartford (20%) and Cambridge (18%).

Affordability pressures and household overcrowding also vary widely across England.<sup>17</sup> For further information on overcrowding, see the Library briefing, [Overcrowded housing \(England\)](#).

A [2018 report by the National Housing Federation \(NHF\) and the charity Crisis](#) highlighted that housing pressures were greatest in the south of England and in London.<sup>18</sup> A [2018 report by the consultancy Residential Analysts](#) (PDF) also argued that housing supply was not a national issue but “very much a London and South East problem with some other localised hotspots”.<sup>19</sup>

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<sup>12</sup> Housing, Communities and Local Government (HCLG) Committee, [Oral evidence: Housing prices](#) (PDF), HC 830 2017-19, 12 March 2018, Q3

<sup>13</sup> Levelling Up, Housing and Communities (LUHC) Committee, [Reforming the private rented sector](#) (PDF), HC 624 2022-23, February 2023, para 112

<sup>14</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 34 [Town and Country Planning Association, TCPA]; Residential Analysts, [A housing crisis? More like a series of local crises needing local solutions](#) (PDF), October 2018

<sup>15</sup> Homes England, [Fact Sheet 1. The need for homes](#), last updated January 2024

<sup>16</sup> ONS, Mid-year population estimates for 2012 and 2022, via [ONS Nomis](#) [accessed 11 March 2023]

<sup>17</sup> ONS, [Housing affordability in England and Wales: 2022](#), 22 March 2023

<sup>18</sup> Crisis and National Housing Federation (NHF), [Housing supply requirements: Low-income households & homeless people](#), December 2018

<sup>19</sup> Residential Analysts, [A housing crisis? More like a series of local crises needing local solutions](#) (PDF), October 2018

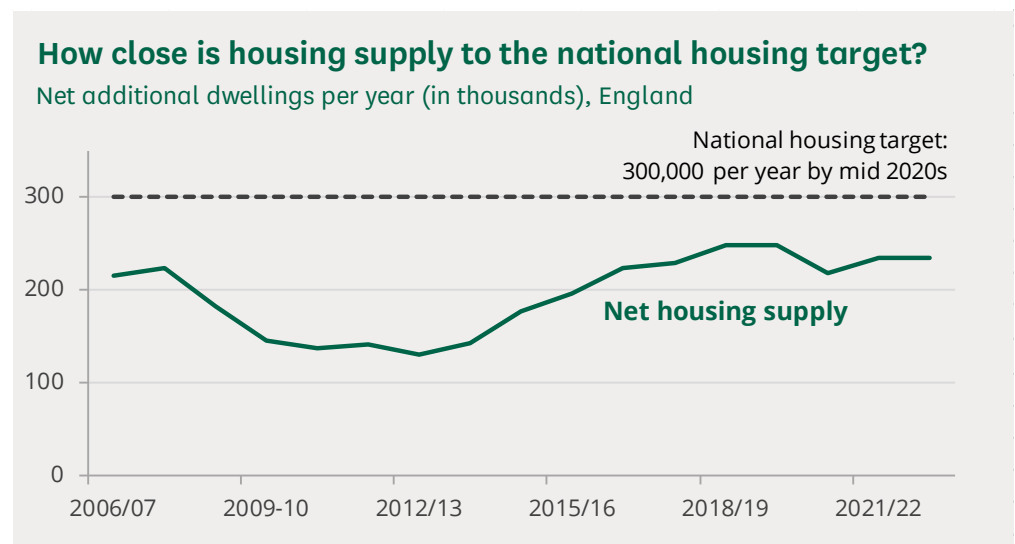
## 1.4

## Is housing supply meeting housing need?

The main measure of housing supply in England is [data on the number of net additional dwellings published by the Department for Levelling Up, Housing and Communities \(DLUHC\)](#). The net additional dwellings figure is the sum of new builds, homes created through a change of use (for example, from an office to a block of flats) and conversions, minus the number of demolitions.

As shown in the chart below, net housing supply has increased in recent years, from a low point of around 130,600 net additional dwellings in 2012/13 to a high point of around 248,600 net additional homes in 2019/20. From April 2022 to March 2023, 234,400 net additional homes were delivered.<sup>20</sup>

To reach the government's national housing target of 300,000, net housing supply would have to increase by 25%.



Source: DLUHC and MHCLG, [Live tables on housing supply: Net additional dwellings, Table 120: Components of housing supply: net additional dwellings, England](#) (ODS, opens in Excel), 29 November 2023

<sup>20</sup> DLUHC and MHCLG, [Live tables on housing supply: Net additional dwellings, Table 120: Components of housing supply: net additional dwellings, England](#) (ODS, opens in Excel), 29 November 2023

## 2

## How is local housing need calculated and met?

Although the government has an overall national housing target of delivering 300,000 new homes per year by the mid-2020s, it does not set binding local housing targets for individual local planning authorities (LPAs).

Instead, LPAs are required to calculate and meet housing need in their local area. The government sets out which steps LPAs must follow in the [National Planning Policy Framework](#) (NPPF, last updated December 2023). The NPPF provides the framework against which LPAs draw up their local plans. In brief, the NPPF states that LPAs must:

- assess local housing need when they are preparing their local plan using the ‘standard method’ provided by the government (see section 2.1).
- set out policies in their local plan to meet their assessed local housing need. In doing so, LPAs can consider local land constraints.
- identify suitable sites in their local plan that are capable of delivering at least five years’ worth of housing (see section 2.3 of this briefing).<sup>21</sup>

Every local plan must be approved by the Planning Inspectorate, an executive body of the Department for Levelling Up, Housing and Communities (DLUHC). When examining a local plan, a planning inspector will consider whether an LPA has adequately assessed its local housing need and allocated a sufficient number of sites to meet that need.<sup>22</sup>

Following consultation, the government [updated the NPPF in December 2023](#) to clarify that the standard method provides “an advisory starting-point” for calculating local housing need, not a binding housing target. The government also removed the requirement for LPAs that have an up-to-date local plan to update their five-year housing land supply annually.<sup>23</sup> Further information on these changes is set out below and in section 3.

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<sup>21</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023

<sup>22</sup> [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)

<sup>23</sup> HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023; DLUHC [Levelling-up and Regeneration Bill: Reforms to national planning policy](#), last updated December 2023

## 2 What is the role of the local plan?

The local plan sets out a local planning authority's strategic priorities and policies for the future development and land use in their area. It identifies what development is needed (including how many new homes are needed), where it should go, and what land is protected.

Planning applications for new development are decided in line with the local plan, unless "material considerations" indicate otherwise.<sup>24</sup> This means that, in general, development can only proceed if it is in line with the local plan.

There is no set list of material considerations. One material consideration is the government's [National Planning Policy Framework](#) (NPPF).<sup>25</sup>

### 2.1

## Calculating local housing need: The standard method

The NPPF states that LPAs should include policies in their local plan to deliver a sufficient supply of homes to meet local housing need. To assess how many homes are needed in a local area, the NPPF states that LPAs should conduct "a housing need assessment [...] using the standard method".<sup>26</sup>

### The standard method

The government first set out a standard method to assess local housing need as part of its July 2018 update to the NPPF. The original standard method, as set out in July 2018, consisted of three steps:

1. Calculate projected household growth for the next 10 years using the [DLUHC's 2014 household projections for England](#). This is the baseline number of new homes needed.
2. Adjust this baseline figure upwards in areas where house prices are significantly higher than the earnings of people who work in these areas. Affordability is measured using the [Office for National Statistics' \(ONS\) house price to workplace-based earnings ratio](#), which compares the median house price in an area with the median annual earnings of full-time employees who work in that area.

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<sup>24</sup> [Section 70\(2\) of the Town and Country Planning Act 1990; Section 38\(6\) of the Planning and Compulsory Purchase Act 2004](#)

<sup>25</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023

<sup>26</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023; DLUHC, [National Planning Policy Framework](#), September 2023 [available on the website of the National Archives]

- a) No adjustment is made where median house prices are up to four times higher than median earnings (so the ratio is four or lower).
  - b) If the ratio is higher than four, the housing need figure is adjusted upwards by 0.25% for each 1% it exceeds four. For example, if the median house prices in an area are eight times higher than median earnings, the housing need figure is increased by 25%.
3. Cap the increase at 40% above the baseline or at 40% above the housing need figure set out in the current local plan.
- a) Housing need is capped at 40% above the figure set out in the current local plan where LPAs adopted or reviewed the relevant policies in the plan in the last five years.
  - b) If the LPA adopted or reviewed the policies more than five years ago, housing need is capped at 40% above the baseline or at 40% above the figure set out in the current local plan (whichever is higher).<sup>27</sup>

### **An additional step since December 2020: 35% urban uplift**

In December 2020, following consultation, the government [updated the standard method to include an additional step](#) for certain urban LPAs:

4. Increase the housing need figure by 35% (after applying the cap) for the LPAs whose areas contain “the largest proportion of population” of the largest 20 cities or urban centres. This is called ‘urban uplift’.<sup>28</sup>

The government said the urban uplift would ensure that more homes were built in cities and urban areas. It said that utilising land in urban areas could “maximise existing infrastructure such as public transport, schools, medical facilities and shops” and “give priority to the development of brownfield land, and thereby protect our green spaces”. It also said that building more homes in cities would “reduces the need for unnecessary high-carbon travel”.<sup>29</sup>

The government states that the 35% urban uplift “is expected to be met by the cities and urban centres themselves” rather than exported to neighbouring areas.<sup>30</sup> Exceptions apply where LPAs have adopted voluntary cross-boundary agreements with neighbouring LPAs.<sup>31</sup>

For further information about how LPAs should assess local housing need, see [government guidance on housing and economic needs assessments](#).

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<sup>27</sup> DLUHC and MHCLG, [Housing and economic needs assessment](#), last updated December 2020

<sup>28</sup> MHCLG, [Changes to the current planning system](#), last updated April 2021

<sup>29</sup> MHCLG, [Changes to the current planning system](#), last updated April 2021

<sup>30</sup> DLUHC and MHCLG, [Housing and economic needs assessment](#), last updated December 2020, para 35; DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 62

<sup>31</sup> HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023; DLUHC [Levelling-up and Regeneration Bill: Reforms to national planning policy](#), last updated December 2023; DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 62

### 3 Which LPAs are subject to the urban uplift?

The government explained the urban uplift applies to “Greater London and to the local authorities which contain the largest proportion of the other 19 most populated cities and urban centres in England”.<sup>32</sup>

The list of the most populated cities and urban centres is derived by ranking a list of major towns and cities held by the ONS by the most recent estimates of their population size, and identifying the LPAs that contain the largest part of the population of those areas.

The most recent population estimates that allow for this analysis are for mid-2020. The government states that the (non-London) list of urban LPAs derived from this data are:

Birmingham, Bradford, Brighton and Hove, Bristol, Coventry, Derby, Kingston upon Hull, Leeds, Leicester, Liverpool, Manchester, Newcastle upon Tyne, Nottingham, Plymouth, Reading, Sheffield, Southampton, Stoke-on-Trent, and Wolverhampton.<sup>33</sup>

### Can local authorities use alternative approaches?

LPAs should use the standard method to determine how many homes they need to plan for. The NPPF states that LPAs should only use an alternative approach in “exceptional circumstances”. Where an alternative approach results in a lower housing need figure than the one produced by standard method, the [government’s planning practice guidance](#) states that LPAs need to demonstrate that their alternative approach makes “realistic assumptions of demographic growth” at examination.<sup>34</sup>

In December 2023, the government updated the NPPF to state that “particular demographic characteristics” could constitute “exceptional circumstances” that may justify the use of an alternative approach. These demographic characteristics could include, for example, “islands with no land bridge that have a significant proportion of elderly residents”.<sup>35</sup> The government said an example of such an island was the Isle of Wight.<sup>36</sup>

However, the NPPF does not provide an exhaustive list of what may constitute exceptional circumstances.<sup>37</sup> Whether exceptional circumstances exist and

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<sup>32</sup> DLUHC, [Changes to the current planning system](#), last updated April 2021

<sup>33</sup> DLUHC and MHCLG, [Housing and economic needs assessment](#), last updated December 2020

<sup>34</sup> DLUHC, [National Planning Policy Framework](#), last updated September 2023, para 61; DLUHC and MHCLG, [Housing and economic needs assessment](#), last updated December 2020, para 15

<sup>35</sup> HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023; DLUHC [Levelling-up and Regeneration Bill: Reforms to national planning policy](#), last updated December 2023; DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 61

<sup>36</sup> HC Deb [[Long-term Plan for Housing](#)] 19 December 2023, c1277-1278

<sup>37</sup> PQ 7519 [[Housing: Construction](#)] 19 December 2023

justify the use of an alternative approach is for the Planning Inspectorate to determine on a case-by-case basis.<sup>38</sup>

## 4 Assessing the housing needs of particular groups

The standard method provides LPAs with a minimum housing need figure but does not break this down into the housing need of different groups. The NPPF advises LPAs to also assess “the size, type and tenure of housing needed for different groups in the community”, for example people who need affordable housing, families with children, older people, and people with disabilities.<sup>39</sup>

To calculate the need for affordable housing, government guidance advises that LPAs should assess past trends and current estimates of the number of homeless households, households in temporary accommodation and those living in overcrowded or unsuitable housing (among other factors). LPAs are not required to ensure that a certain percentage of new homes are affordable homes.<sup>40</sup>

Government guidance also sets out how LPAs should calculate the need for other types of housing, for example, housing for older and disabled people.

For further information, see [government guidance on the housing needs of different groups](#) and [housing for older and disabled people](#).

## 2.2

### The outcome of the standard method: A starting point, not a target?

The local housing need figure produced by the standard method is intended to be a starting point to determine the number of homes an LPA should plan for, rather than a target or a requirement. [Government guidance](#) states that “the standard method [...] does not produce a housing requirement figure”.<sup>41</sup>

Government guidance states that LPAs should weigh their local housing need figure produced by the standard method against local land constraints. LPAs are not required to meet local housing need in full if other policies in the NPPF that protect certain areas (such as green belt land) provide “a strong reason for restricting the overall scale, type or distribution of development”.<sup>42</sup>

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<sup>38</sup> HC Deb [Revised National Planning Framework](#)] 23 January 2024, c276

<sup>39</sup> DLUHC and MHCLG, [Housing needs of different groups](#), last updated May 2021, para 1; DLUHC, [National Planning Policy Framework](#), last updated September 2023, para 63

<sup>40</sup> DLUHC and MHCLG, [Housing needs of different groups](#), last updated May 2021, para 6

<sup>41</sup> DLUHC and MHCLG, [Housing and economic needs assessment](#), last updated December 2020, para 2

<sup>42</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 11; DLUHC and MHCLG, [Housing and economic land availability assessment](#), last updated July 2019, para 2

Taking local land constraints into account, the NPPF states that LPAs should include policies in their local plans to meet their assessed local housing need “as a minimum”. It also states that LPAs should also consider “any needs that cannot be met within neighbouring areas [...] in establishing the amount of housing to be planned for”.<sup>43</sup>

## Changes to the NPPF to clarify that the standard method is ‘an advisory starting point’

While the figures produced by the standard method are not formal targets, the then Housing Minister, Stuart Andrew, acknowledged in a debate in June 2022 that they are sometimes “treated rather stringently”.<sup>44</sup>

In December 2023, following consultation, the government updated the NPPF to clarify that “the outcome of the standard method is an advisory starting-point” for establishing the amount of housing LPAs should plan for.<sup>45</sup> Michael Gove, the Secretary of State for DLUHC, said that the “number was [always] supposed to be advisory” and the updated NPPF now “upholds the spirit of the original intention”.<sup>46</sup>

## Constraints that justify not meeting housing need in full

The government also updated the NPPF to clarify which local constraints may justify not meeting local housing need (as assessed by the standard method or an alternative approach) in full:

- LPAs are not required to review and alter green belt boundaries if this is the only way of meeting their assessed local housing need in full.
- LPAs are not required to meet their assessed local housing need in full if it would require significant uplifts in residential densities that are “wholly out of character” with the existing area (as evidenced through an area-wide design code, see box 6 in section 3.1 of this briefing).<sup>47</sup>

The government said the updates will “remove any ambiguity” whether LPAs should change their green belt boundaries to meet local housing need which, it said, had “previously caused confusion and often led to protracted debates during the preparation of some plans”. It noted, however, that LPAs can still choose to review and alter boundaries in “exceptional circumstances”.<sup>48</sup>

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<sup>43</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 61

<sup>44</sup> HC Deb [[Levelling-up and Regeneration Bill](#)] 8 June 2022, c910

<sup>45</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 61

<sup>46</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 130; para 145

<sup>47</sup> DLUHC, [Levelling-up and Regeneration Bill: Reforms to national planning policy](#), last updated December 2023

<sup>48</sup> HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023



## 2.3

### Identifying sites to meet local housing need: The housing land supply

The NPPF states that, in their local plans, LPAs should identify sites to deliver at least five years' worth of housing for their local housing need. This is called the 'five-year housing land supply'.

Until December 2023, all LPAs had to update their housing land supply every year.<sup>49</sup> In December 2023, the government removed the requirement for LPAs with an up-to-date local plan to update their housing land supply annually. A local plan is up to date if it was adopted less than five years ago and, at the time of adoption, identified at least a five-year supply of deliverable sites.<sup>50</sup>

LPAs that do not have an up-to-date local plan are still required to update their housing land supply annually.<sup>51</sup> If their local plan is more than five years old, LPAs must use the standard method to assess their local housing need. Further, if the housing delivery test shows that they have delivered less than 85% of their assessed local housing need (see section 2.4), LPAs must also add 20% to their local housing need figure.<sup>52</sup>

For further information about how LPAs can identify land for development, see [government guidance on housing land availability assessments](#) and on [housing supply and delivery](#).

## 2.4

### How is housing delivery enforced?

#### The standard method and the housing land supply

Before it can be adopted by the LPA and take effect, every local plan must be examined and approved by the Planning Inspectorate, an executive agency of DLUHC.<sup>53</sup> At examination, a planning inspector will assess whether the local plan was prepared in line with legal and procedural requirements and check whether meets the four tests of 'soundness'. A local plan must be "positively prepared, justified, effective and consistent with national policy" to be found 'sound'.<sup>54</sup>

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<sup>49</sup> DLUHC, [National Planning Policy Framework](#), September 2023 [available on the website of the National Archives], para 74

<sup>50</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 76

<sup>51</sup> From December 2023 to December 2025, LPAs must demonstrate only four years' worth of housing if their local plans is under examination or at the public consultation stage (under [regulation 18 or regulation 19 of the Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)).

<sup>52</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 77

<sup>53</sup> [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)

<sup>54</sup> [Section 20 of the Planning and Compulsory Purchase Act 2004](#); DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 35

Among other factors, a planning inspector will consider whether an LPA has adequately assessed its local housing need (using the standard method or, in “exceptional circumstances”, an alternative approach) and whether an LPA has put forward enough sites to meet that need in its local plan. An inspector can recommend changes to the local plan to make it ‘sound’.<sup>55</sup>

An LPA can choose whether to accept the changes or not. Because an LPA cannot have a local plan that has not been found ‘sound’ by the Planning Inspectorate, its choice is between accepting the changes or not having a local plan. If an LPA does not have a local plan, the Secretary of State for DLUHC can intervene and take over the plan-making process.<sup>56</sup>

Further, if an LPA does not have local plan in place, the ‘presumption in favour of sustainable development’ will apply.<sup>57</sup> Further information on the presumption in favour of sustainable development is set out in box 5.

For further information about the examination of local plans, see [government guidance on local plans](#) and the [Planning Inspectorate’s procedural guide](#).

## 5 Presumption in favour of sustainable development

The ‘presumption in favour of sustainable development’ applies if an LPA does not have a local plan in place, relevant policies in the local plan are “out-of-date”, or the housing delivery test shows an LPA has delivered less than 75% of its assessed local housing need. The presumption means that an LPA is expected to grant planning permission to proposed developments unless:

- The site is protected under the NPPF, for example, if it is green belt land or in a National Park or Site of Special Scientific Interest.
- The “adverse impacts” of the proposed development “would significantly and demonstrably outweigh the benefits”.<sup>58</sup>

One example of where the adverse impacts of a development might outweigh its benefits is where the development conflicts with a neighbourhood plan that allocates at least one housing site and was adopted less than five years ago. That time limit was changed from two years to five years in December 2023.<sup>59</sup>

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<sup>55</sup> DLUHC and MHCLG, [Plan-making](#), last updated October 2021, para 57

<sup>56</sup> [Sections 21 and 21A of the Planning and Compulsory Purchase Act 2004](#)

<sup>57</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 11

<sup>58</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 11

<sup>59</sup> HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023; DLUHC [Levelling-up and Regeneration Bill: Reforms to national planning policy](#), last updated December 2023; DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 14

## The housing delivery test

Since 2019, the government has carried out an annual assessment of housing delivery in each LPA's area. This is called the 'housing delivery test'.

For the test, the government compares the number of additional homes that were delivered in an LPA over the past three years with the number of homes required in that LPA.<sup>60</sup> For LPAs with an up-to-date local plan (a plan that was adopted or reviewed in the past five years), the number of homes needed is the figure set out in the local plan. For other LPAs, it is the figure produced by the standard method.<sup>61</sup>

For further information about how the number of homes 'delivered' and the number of homes 'required' are calculated, see the government's [housing delivery test measurement rule book](#).

### Consequences for under-delivery

If the housing delivery test shows that an LPA has not met its assessed local housing need over the past three years, the NPPF sets out the consequences:

- Where an LPA has delivered less than 95% of its local housing need, it must prepare an action plan. The action plan should identify the reasons for past under-delivery and set out steps to increase future delivery.
- Where an LPA has delivered less than 85% of its local housing need, it must prepare an action plan and add a 20% buffer to its housing land supply (see section 2.3 of this briefing).
  - In December 2023, the government updated the NPPF to specify that LPAs with an up-to-date local plan that are not required to update their five-year housing land supply annually are also not required to add a 20% buffer. They are still required to prepare an action plan.<sup>62</sup>
- Where an LPA has delivered less than 75% of its local housing need, the 'presumption in favour of sustainable development' will apply. An LPA must also prepare an action plan and add a 20% buffer to its housing land supply.<sup>63</sup>

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<sup>60</sup> The number of additional homes delivered is the net additional dwellings delivered in an LPA, plus the increase in bedrooms in student accommodation divided by the average students in student-only households in England and the increase in bedrooms in other communal accommodation divided by the average number of adults in households in England.

<sup>61</sup> DLUHC and MHCLG, [Housing delivery test measurement rule book](#), last updated July 2018

<sup>62</sup> HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023; DLUHC [Levelling-up and Regeneration Bill: Reforms to national planning policy](#), last updated December 2023; DLUHC and MHCLG, [Housing supply and delivery](#), last updated February 2024, para 42

<sup>63</sup> DLUHC, [National Planning Policy Framework](#), last updated December 2023, para 79

### 3 The government's recent and proposed changes to NPPF

Alongside the [Levelling Up and Regeneration Act 2023](#), which makes various changes to the planning system (see box 6), the government announced that it would update national planning policies set out in the National Planning Policy Framework (NPPF).<sup>64</sup>

As set out in section 2 of this briefing, the government updated the NPPF in December 2023, making changes to how local housing need is handled in the planning system. This section provides an overview of recent and proposed reforms to the NPPF, including proposals that were not taken forward.

#### 6 Reforms to the planning system in the Levelling Up and Regeneration Act 2023

The [Levelling Up and Regeneration Act 2023](#) (which received Royal Assent on 26 October 2023) makes various changes to the planning system. The Act:

- establishes a new category of national planning policies: national development management policies (NDMPs). NDMPs will sit alongside local plans in decision-making on planning applications.
- creates a statutory requirement for local planning authorities (LPAs) to produce a single local plan and update it every five years. Alongside the Act, the government said it will also change regulations to require LPAs to produce local plans within 30 months.<sup>65</sup>
- abolishes the 'duty to cooperate' which requires LPAs to cooperate with each other in the plan-making process. The government said a 'flexible alignment policy' will replace the duty to cooperate.
- introduces a statutory requirement for LPAs to prepare design codes, setting out design requirements for new developments in their area.<sup>66</sup>

Most of these changes have not yet taken effect; they require regulations to be brought into force.<sup>67</sup> For further information about the changes, see the

<sup>64</sup> HCWS415 [[Update on the Levelling Up Bill](#)] 6 December 2022

<sup>65</sup> DLUHC, [Plan-making reforms: Consultation on implementation](#), July 2023

<sup>66</sup> [Part 3 of the Levelling Up and Regeneration Act 2023](#); DLUHC, [Levelling Up and Regeneration: Further information](#), May 2022

<sup>67</sup> [Section 255 of the Levelling Up and Regeneration Act 2023](#)

Library briefing, [Planning reforms in England: Levelling Up and Regeneration Act 2023 and further changes](#).

## 3.1 Recent updates to the NPPF (December 2023)

Following consultation, the government updated the NPPF in December 2023. In a statement, the Secretary of State for Levelling Up, Housing and Communities (DLUHC), Michael Gove, summarised the changes:

In summary, the new NPPF will: facilitate flexibility for local authorities in relation to local housing need; clarify a local lock on any changes to Green Belt boundaries; safeguard local plans from densities that would be wholly out of character; free local authorities with up-to-date local plans from annual updates to their five-year housing land supply; limit the practice of housing need being exported to neighbouring authorities without mutual agreement; bolster protections from speculative development for neighbourhoods that develop their own plans [...].<sup>68</sup>

The changes are set out below and in table 1. The government said that the updates to the NPPF would encourage local planning authorities (LPAs) to prepare local plans and, in doing so, encourage the delivery of new homes. The government said that “having plans in place unlocks land for homes”.<sup>69</sup>

**Table 1: Updates to the NPPF**

Until December 2023	Since December 2023
The government provides a standard method to assess local housing need. Supplementary guidance states that “the standard method [...] does not produce a housing requirement figure”.	No changes were made to the standard method. The NPPF now states that the standard method is an “advisory starting point in plan-making” and sets out which “exceptional circumstance” justify the use an alternative approach.
The 35% urban uplift (for LPAs with areas which contain the largest proportion of population of one of the top 20 major towns and cities) is set out in supplementary planning guidance.	The 35% urban uplift is now set out in the NPPF. The NPPF also states that urban uplift should not be exported to neighbouring areas except where LPAs have a voluntary agreement.
Supplementary planning guidance states that LPAs can take local land constraints (such as green belt land) into account in planning for local housing need, as assessed by the standard method.	The NPPF states that LPAs are not required to meet their local housing need in full if they can only do so by: <ul style="list-style-type: none"> <li>• Reviewing or altering their green belt boundaries.</li> </ul>

<sup>68</sup> HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023

<sup>69</sup> HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023

	<ul style="list-style-type: none"> <li>Building at densities “wholly out of character” with the existing area.</li> </ul>
All LPAs had to identify sites to deliver five years’ worth of housing in their local plans. All LPAs had to update their five-year housing land supply annually.	All LPAs must identify sites to deliver five years’ worth of housing in their local plans. Only LPAs that do not have an up-to-date local plan (that is less than five years old) must update their five-year housing land supply annually.
All LPAs had to add a 5% buffer to their five-year housing land supply, and a 10% buffer to their annual updates to the housing land supply. A 20% buffer was added if an LPA had delivered less than 85% of assessed local housing need in the past three years.	The government abolished the 5% and 10% buffer. It retained the 20% buffer, but only for LPAs do not have an up-to-date local plan and have delivered less than 85% of assessed local housing need.
Where the presumption in favour of sustainable development applies, an LPA can refuse planning permission if the development conflicts with a neighbourhood plan. The neighbourhood plan must have been adopted less than two years ago.	The LPA can refuse permission if the development conflicts with a neighbourhood plan that was adopted less than five years ago.

Source: HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023; DLUHC [Levelling-up and Regeneration Bill: Reforms to national planning policy](#), last updated December 2023

## 3.2 Proposed changes not taken forward

In its consultation, the government also proposed some changes to the NPPF which it decided to not take forward.<sup>70</sup> The changes are briefly set out below.

### Allowing LPAs to take account of past ‘over-delivery’

The government had proposed allowing LPAs to take account of past ‘over-delivery’. It proposed that, if LPAs had granted planning permission to more homes than proposed in the current local plan, LPAs could reduce the number of homes planned for in the local plan.

The government said respondents to its consultation had raised concerns that the change could reduce the supply of new homes and raised questions about accounting for past under-delivery. The government decided to not take the change forward.

<sup>70</sup> HCWS161 [[The Next Stage in Our Long Term Plan for Housing Update](#)] 19 December 2023; DLUHC [Levelling-up and Regeneration Bill: Reforms to national planning policy](#), last updated December 2023

## Removing the 20% buffer for the five-year housing land supply

The government proposed removing the 20% buffer added to the five-year housing land supply if an LPA delivered less than 85% of its assessed local housing need in the past three years. The government decided to retain the 20% buffer for LPAs that do not have an up-to-date local plan.

## Removing the requirement to ‘justify’ local plans

The government had also proposed removing one of the tests of ‘soundness’, namely the requirement for local plans to be “justified” to be found ‘sound’ by the Planning Inspectorate. The government had proposed that, instead, the Planning Inspectorate would assess whether housing need was met “as far as possible”.

In its [response to the consultation](#), the government said it decided to “not proceed with the changes to the tests of soundness in this update”. It said respondents to its consultation had raised concerns that, if the justified test were removed, “plans would be less likely to be robust and transparent” or that the change could cause “confusion and challenge at examination”.

## Adding a permissions-based test to the housing delivery test

In its consultation, the government proposed adding a “permissions-based test” to the housing delivery test (see section 2.4). The government said the test would consider whether an LPA had granted planning permission to enough homes to meet its local housing need (even if these homes had not yet been delivered). The government said the test would ensure LPAs were not penalised where “slow housing delivery results from developer behaviour”.

The government decided to not introduce the permissions-based test. It said that, “although the proposal offers clear benefits”, operational issues meant “it is not viable [...] at this time”. The government said it will consider how the proposal could be implemented in future updates.

### 3.3

## Reaction to the recent updates

Opinions on the changes differ. Developers and housebuilders have expressed concern that they could affect the housing delivery, while LPAs said that the changes would curb “speculative development” and help them bring forward local plans.

However, some legal experts questioned the significance of the changes. For example, Christopher Young KC, a barrister in No5 Barristers Chambers, said “it’s not a radical change”, and a barrister at Landmark Chambers also said

the changes did not amount to a substantive change in policy and were “more about messaging”.<sup>71</sup> The conservation charity CPRE (formerly the Campaign to Protect Rural England) said that, although “there’s probably a less clear presumption that the standard method should be followed, [...] it’s still very difficult for local authorities to get away from using the standard method”.<sup>72</sup>

## Developers and housebuilders

In its [report on the reforms](#) (July 2023), the LUHC Committee said that “many stakeholders” expressed concern that the changes could affect local housing delivery and make the national housing target “impossible to achieve”.<sup>73</sup>

For example, the British Property Federation argued that “the government is watering down its own national targets and creating more obstacles and delays to housing delivery”. The Home Builders Federation also argued that the changes to the NPPF will significantly reduce housing supply.<sup>74</sup>

Similarly, the Chartered Institute of Housing said that “the cumulative effect” of the changes was “a watering down” of the idea that LPAs should meet local housing need.<sup>75</sup> The Royal Town and Planning Institute (RTPI) argued that, as a result of the changes, LPAs faced fewer incentives to plan for development and “housing supply is likely to fall most where it is most needed”.<sup>76</sup>

In its report, the LUHC Committee concluded that it was “difficult to see” how the government would achieve its target of building 300,000 new homes per year by the mid-2020s “if local targets are only advisory”.<sup>77</sup>

Research by the planning consultancy Lichfields commissioned by the Home Builders Federation and by the Land, Planning and Development Federation estimated that the changes, as proposed in the consultation, could reduce the number of homes delivered annually by 77,000 homes. Lichfields has not

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<sup>71</sup> [Why a national policy tweak is likely to lead to councils planning for fewer homes](#), Planning Resources Magazine [subscription required], 18 January 2024 [accessed 4 March 2024]; [How the revised NPPF will make it easier for councils to avoid allocating green belt sites in plans](#), Planning Resources Magazine [subscription required], 18 January 2024 [accessed 4 March 2024]

<sup>72</sup> [Why a national policy tweak is likely to lead to councils planning for fewer homes](#), Planning Resources Magazine [subscription required], 18 January 2024 [accessed 4 March 2024]

<sup>73</sup> LUHC Committee, [Reforms to national planning policy](#) (PDF), HC 1122 2022-23, July 2023, p.3

<sup>74</sup> Home Builders Federation (HBF), [Response: Announcement of revised NPPF](#), December 2023; [NPPF revision and Gove’s RIBA speech: The sector reacts](#), Planning Resources Magazine [subscription required], 20 December 2023 [accessed 4 March 2024]

<sup>75</sup> [Consultation responses warn home building will slow under proposed National Planning Policy Framework changes](#), Local Government Lawyer, 9 March 2023 [accessed 4 March 2023]

<sup>76</sup> [NPPF revision and Gove’s RIBA speech: the sector reacts](#), Planning Resource Magazine [subscription required], 20 December 2023 [accessed 4 March 2023]; Royal Town Planning Institute (RTPI), [The new NPPF: Headliners, support acts, and surprises](#), December 2023

<sup>77</sup> LUHC Committee, [Reforms to national planning policy](#) (PDF), HC 1122 2022-23, July 2023, para 33



published an updated calculation, estimating the impact of the changes the government made to the NPPF.<sup>78</sup>

Lichfields expressed particular concern that the shortfall in housing delivery would be concentrated in areas “where it is already most difficult for people to rent and buy homes”. The housing association G15 raised concerns about the impact of the changes on the delivery of social and affordable homes.<sup>79</sup>

The LUHC Committee said it was “sceptical” whether the greater local plan coverage that the government predicted would come to fruition and whether it would benefit housebuilding.<sup>80</sup> Similarly, the RTPI also questioned whether “increasing the proportion of local authorities that have an adopted and up-to-date local plan would in itself lead to an increase in homes delivered”.<sup>81</sup>

### Removing the requirement to update five-year housing land annually

Industry organisations expressed particular concern that LPAs with an up-to-date local plan will no longer have to update their five-year housing land supply annually, and about the removal of the buffers.

The real estate service company Savills highlighted the importance of buffers to account for “site constraints that are unforeseen at the allocation stage”. The housebuilding company Vistry Group said buffers were needed to identify “reserve sites” and to ensure “a sufficient variety of sites are planned for, and come forward”.<sup>82</sup>

### Greater flexibility to meet local housing need in full

Further, developers and housebuilders expressed concern that LPAs would no longer be required to review their green belt boundaries or build at densities they deem to be “wholly out of character” with the existing area to meet local housing need in full. The National Housing Federation argued that, “given the chronic shortage of homes in England”, green belt land that is of low quality and limited value should be released to deliver housing. The RTPI also called on the government to support “proportionate reviews of the green belt”.<sup>83</sup>

## Local planning authorities

On the other hand, LPAs and groups representing their interests welcomed the changes to the NPPF. For example, the Local Government Association

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<sup>78</sup> Lichfields, [Making a bad situation worse? The impact of the proposed NPPF changes on housing supply](#), February 2023

<sup>79</sup> LUHC Committee, [Written evidence: Reforms to national planning policy](#) (PDF), April 2023, HC 1122 2022-23, RNP 13 [G15]

<sup>80</sup> LUHC Committee, [Reforms to national planning policy](#) (PDF), HC 1122 2022-23, July 2023, para 34

<sup>81</sup> RTPI, [NPPF Consultation Response](#), March 2023

<sup>82</sup> LUHC Committee, [Written evidence: Reforms to national planning policy](#) (PDF), February 2023, HC 1122 2022-23, RNP 1 [Savills]; LUHC Committee, [Written evidence: Reforms to national planning policy](#) (PDF), April 2023, HC 1122 2022-23, RNP 18 [Vistry Group]

<sup>83</sup> National Housing Federation (NHF), [NHF response to Secretary of State's speech on housing and planning](#), December 2023; RTPI, [NPPF Consultation Response](#), March 2023

(LGA) expressed support that the standard method will be “a starting point with a flexibility to take account of local circumstances”.<sup>84</sup>

The LGA and District Councils’ Network also welcomed that LPAs with an up-to-date local plan are no longer required to update their five-year housing land supply annually and the removal of the 5% and 10% buffers. The LGA said these measures had “done little or nothing” to provide affordable homes and, instead, had enabled “speculative development”. The District Councils’ Network said the changes will reduce “inappropriate developments”.<sup>85</sup>

The Planning Officers Society, which represents planning practitioners, also welcomed the changes. It argued that the issue with housing supply was not that LPAs did not allocate enough land for housing but delivery.<sup>86</sup>

Some LPAs, such as East Herts Council and Cotswold District Council, also expressed support for the changes. Cotswold District Council said that the requirement to update the five-year housing supply annually was “illogical” and buffers added unnecessary “complexity”. East Herts Council argued that the changes will provide “genuine incentives” for LPAs to prepare and adopt local plans and reduce speculative development.<sup>87</sup>

Organisations which have called for greater protection for the green belt, such as CPRE, also welcomed the changes. For example, the London Green Belt Council said that “there should be no obligation to consider Green Belt for housing purposes”.<sup>88</sup>

## 3.4 Further proposed changes (February 2024)

A [review of housing delivery in London](#) commissioned by the government expressed concern that “the supply of new homes has not kept pace with increases in jobs, population and housing demand” in London. The review recommended the introduction of a presumption in favour of residential development on brownfield sites in London.<sup>89</sup>

In response, the government published a consultation (opened on 13 February 2024, and closes on 26 March 2024) in which it proposed:

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<sup>84</sup> Local Government Association (LGA), [Levelling-up and Regeneration Bill: reforms to National Planning Policy Consultation](#), last updated March 2023

<sup>85</sup> District Councils Network (DCN), [NPPF response: We want to deliver the right homes for our communities](#), December 2023; County Councils Network (CCN), [Revised National Planning Policy Framework](#), December 2023

<sup>86</sup> Planning Officers Society (POS), [Response to NPPF/LURB Consultation](#), February 2023

<sup>87</sup> East Herts Council, [Levelling-up and Regeneration Bill: Reforms to National Planning Policy \(Consultation Response\)](#), February 2023; Cotswold District Council, [Response to consultation on the Levelling-up and Regeneration Bill: reforms to national planning policy](#), March 2023

<sup>88</sup> London Green Belt Council, [LGBC response to NPPF consultation](#), March 2023; CPRE, [National Planning Policy Framework consultation response](#), March 2023

<sup>89</sup> DLUHC, [Housebuilding in London: London Plan Review – Report of expert advisers](#), February 2024

- Introducing a presumption in favour of sustainable development on brownfield land for LPAs which are subject to the 35% urban uplift, and which have delivered less than 95% of their assessed local housing need (as determined by the housing delivery test).
  - The presumption in favour of sustainable development applies to other LPAs if they have delivered less than 75% of their assessed local housing need.
- Updating the NPPF to require all LPAs to “give significant weight” to the benefits of “delivering as many homes as possible”, especially on brownfield land.<sup>90</sup>

The government said the change was a “major shake-up” of planning rules and would “turbocharge” the delivery of homes on brownfield land. It said a presumption in favour of sustainable development on brownfield land would also help regenerate high streets and town centres, support economic growth in major cities, and maximise the use of existing infrastructure.<sup>91</sup>

## 3.5 Reaction to the proposed changes

Developers and housebuilders expressed support for the proposals. The Home Builders Federation welcomed “moves to bring brownfield land through for development more quickly” and the British Property Federation welcomed the “focus on the potential for urban brownfield sites to unlock millions of pounds of investment and deliver homes”.<sup>92</sup>

However, some groups argued that the proposed changes would not go far enough to meet housing need. The chief executive of PlaceShapers, a network of housing organisations, expressed concern that the proposed changes will not “ease the housing crisis outside of these [urban] areas or where building on brownfield is not the right solution”. The National Housing Federation also argued that “brownfield land alone cannot not provide nearly enough homes to address the current shortage”.<sup>93</sup>

LPAs and groups representing their interests expressed concern about the proposals. The head of planning at Nottingham City Council, Matt Gregory, criticised the housing delivery test as a “blunt tool” and argued that the 95%

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<sup>90</sup> DLUHC, [Strengthening planning policy for brownfield development](#), February 2024

<sup>91</sup> DLUHC, [Strengthening planning policy for brownfield development](#), February 2024; DLUHC and Prime Minister’s Office, [Build on brownfield now. Gove tells underperforming councils](#), February 2024

<sup>92</sup> HBF, [HBF responds to Government’s latest announcement on changes to planning policy to support brownfield development](#), February 2024; [Reaction blog: Brownfield development push ‘may increase councils’ financial burden’](#) Planning Resources Magazine [subscription required], 13 February 2024 [accessed 8 March 2024]

<sup>93</sup> [Underperforming councils to follow ‘brownfield presumption’](#), Gove says, Inside Housing [subscription required], 13 February 2024 [accessed 8 March 2024]

threshold, for where the presumption of sustainable development would apply to urban LPAs, was “unrealistically high”.<sup>94</sup> The LGA said LPAs needed “flexibility” to make decisions on competing land uses for their areas.<sup>95</sup>

Responding to the changes, a spokesperson for the Mayor of London and the organisation London Councils, which represents LPAs in London, highlighted that most housing development in London already takes place on brownfield land. They implied the government’s focus was misplaced.<sup>96</sup>

London Councils said that nearly 290,000 homes had been granted planning permission in London but had not yet been built. It argued that development was held back by a lack of capital funding and infrastructure investment and skills shortages (rather than a lack of planning permission granted by LPAs).

## 3.6

## Past proposals for reform

### Proposed revisions in 2020 consultation

In a 2020 consultation, the government proposed [revisions to the standard method to make it “is more agile in using up-to-date data”](#) and “achieve a better distribution of homes [...] across the country”. It proposed:

- Changing the baseline: The government proposed that the baseline for the standard method should be either 0.5% of the [existing housing stock in an area](#) or the latest ONS’s household projections (whichever figure is higher).
- Changing the affordability adjustment: The government also proposed accounting for changes in an area’s affordability over the last ten years, in addition to adjusting the housing need figure for current affordability.
- Removing the cap: Unlike the current standard method, the government proposed that the revised standard method should not include a cap at 40% above the baseline or the housing need figure in the local plan.<sup>97</sup>

The government calculated that the revised standard method would have resulted in a national local housing need figure of 337,000 homes. It said that the revisions to the standard method would therefore make it consistent with its ambition of delivering 300,000 new homes per year by the mid-2020s.

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<sup>94</sup> [Why the new presumption in favour of brownfield development is set to enable denser development in urban areas](#), Planning Resources Magazine [subscription required], 22 February 2024 [accessed 8 March 2024]

<sup>95</sup> [Underperforming councils to follow ‘brownfield presumption’, Gove says](#), Inside Housing [subscription required], 13 February 2024 [accessed 8 March 2024]

<sup>96</sup> London Councils, [Boroughs respond to ‘brownfield presumption’ planning reform proposals](#), February 2024; [Gove’s London Plan review says Khan’s strategy ‘frustrates brownfield delivery’](#), Housing Today, 13 February 2024 [accessed 8 March 2024]

<sup>97</sup> MHCLG, [Changes to the current planning system](#), last updated April 2021

The government decided to not proceed with the proposed revisions. In its [response to the consultation](#), the government said it had “heard concerns that the distribution of need was not right” and that the proposed revisions put “too much strain ... on our rural areas and not enough focus ... on the renewal of our towns and cities”.<sup>98</sup>

The government said it decided that “the most appropriate approach is to retain the standard method in its current form”. However, to meet its goal of delivering more homes on brownfield land, the government introduced the 35% urban uplift for LPAs with areas which contain the largest proportion of population of one of the top 20 major towns and cities.

## Planning for the Future White Paper

In its [2020 Planning for the Future White Paper](#), the government proposed introducing a nationally determined housing target of 300,000 new homes annually. The government proposed that the standard method would be a means of distributing the national housebuilding target to individual LPAs.

In the White Paper, the government did not set out in detail how it intended to enforce the national housing target. It implied, however, that the government would set local housing targets for LPAs. The White Paper proposed that LPAs would have continued to be responsible for allocating land for development in their local plans and, in doing so, could have factored in land constraints.<sup>99</sup>

The government consulted on changes proposed in the White Paper between August and October 2020. It did not respond to the consultation; instead, it pointed to the [Levelling Up and Regeneration Bill 2022-23](#) and accompanying reforms. It said these were informed by responses to the consultation.<sup>100</sup>

The [Levelling Up and Regeneration Bill 2022-23 \(now Act\)](#) did not include provisions for a nationally determined, binding housing target. Although the government retained its commitment to delivering 300,000 new homes per year by the mid-2020s, provisions giving that target statutory weight were not included in the Bill.

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<sup>98</sup> MHCLG, [Changes to the current planning system](#), last updated April 2021

<sup>99</sup> DLUHC and MHCLG, [Planning for the future](#), last updated January 2023

<sup>100</sup> DLUHC and MHCLG, [Planning for the future](#), last updated January 2023; DLUHC, [Levelling Up and Regeneration: Further information](#), May 2022

## 4 Calls for further reforms

In its [inquiry on the future of the planning system in England](#) (June 2021), the Housing, Communities and Local Government (HCLG) Committee notes that views on the standard method fall into three categories: those who supported the standard method, those who approved of a national approach in principle but disagreed with the current formula, and those who called for decisions to be made locally.<sup>101</sup>

This section sets out different views that commentators have expressed on the current approach to calculating local housing need and their calls for reform. It also discusses how local housing need was assessed in the past.

### 4.1 Calls to reform the standard method

Some commentators support a national approach to assessing local housing need but have called for reforms to the standard method. They have raised specific concerns about the use of the government's 2014-based household projections and about the 35% urban uplift.

In its [report on reforms to national planning policy](#) (July 2023), the Levelling Up, Housing and Communities (LUHC) Committee echoed concerns that the current approach was not “fit for purpose”. The committee criticised the use of the 2014-based household projections which, it said, focus “housebuilding in areas where economic activity is already high”. It also said the urban uplift was “arbitrary”.<sup>102</sup>

The LUHC Committee called for revisions to the standard method to focus it “on regenerating local areas and delivering more affordable housing”.

#### Baseline figure

The baseline of the standard method is calculated using projected household growth figures, which are themselves calculated using the [Department for Levelling Up, Housing and Communities' \(DLUHC\) 2014 household projections for England](#).

<sup>101</sup> HCLG Committee, [The future of the planning system in England](#) (PDF), HC 38 2020-21, June 2021, para 95

<sup>102</sup> LUHC Committee, [Reforms to national planning policy](#) (PDF), HC 1122 2022-23, July 2023, p.3/4

The ONS published updated household projections in 2018 and 2020, based on figures from 2016 and 2018 respectively. Both projections predicted a lower level of household growth than DLUHC's 2014-based household projections.<sup>103</sup>

In 2018, the government [consulted on whether to use the ONS's 2016-based household projections instead of its 2014-based ones](#). It decided to retain the 2014-based household projections to provide stability for LPAs. In its 2022/23 consultation, the government said it would "[consider the implications" of the 2021 census and the ONS's updated household projections](#), to be published in 2025, and review its approach once the data is available.<sup>104</sup>

## 7 What are household projections?

The ONS publishes household projections which set out how the number of households in each local authority is expected to change, year-on-year.

Household projections are based on data about past trends. The ONS uses its own population projections (which are based on census data and estimates of births, deaths and migration) and data about household formation to develop its household projections.<sup>105</sup>

These projections do not attempt to predict the impact of future changes, such as the impact of immigration policy on migration patterns.

Responsibility for household projections moved from the Ministry for Housing, Communities and Local Government (MHCLG) to the ONS in 2018. Since then, the ONS has published two updated sets of projections (based on trends from 2016 and 2018). The 2018-based projections are the latest available.

The 2021 census provides updated data on how the population has changed, and the ONS' next set of household projections will account for these findings. Publication is scheduled for April or May 2025.<sup>106</sup>

A report by the homelessness charity Crisis expressed concern that the use of household projections to assess housing need present a "circularity problem", because they draw on data on new household formation, which is constrained by the availability of suitable housing. The report argued that basing housing need estimates on past household growth could "underestimate the scale of housing requirements".<sup>107</sup>

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<sup>103</sup> ONS, [Household projections in England: 2016-based](#), September 2018; ONS, [Household projections for England: 2018-based](#), June 2020

<sup>104</sup> MHCLG, [Changes to planning policy and guidance including the standard method for assessing local housing need](#), February 2019; DLUHC [Levelling-up and Regeneration Bill: Reforms to national planning policy](#), last updated December 2023

<sup>105</sup> ONS, [Household projections for England: 2018-based](#), June 2020

<sup>106</sup> ONS, [Release calendar: Household projections: 2022-based](#), undated [accessed 11 March 2024]

<sup>107</sup> Crisis, [Housing supply requirements: Low-income households & homeless people](#), December 2018



Organisations representing developers and those representing LPAs have both argued that the government should revise how the baseline figure is calculated.

The Planning Officers Society expressed concern that the standard method did not reflect “the actual level of housing need in a locality” because it was used 2014-based household projections.<sup>108</sup> The Home Builders Federation also argued that the standard method was “not fit for purpose” if it was based on outdated household projections. It expressed concern that these could “bake in” historic underperformance.<sup>109</sup>

Some commentators have also expressed concern that the standard method focused housing delivery on the South of England. The planning consultancy Turley and the Land, Planning and Development Federation (LDPF) said the use of household projections led to “unrealistically high figures in parts of the South of England” and “low figures in the North and Midlands”.<sup>110</sup> Homes for North, an alliance of housing associations, argued that this was not line with the government’s levelling-up goals.<sup>111</sup>

The Local Government Association (LGA) and the Community Planning Alliance have called for the use of updated figures.<sup>112</sup>

Some industry organisations have said the baseline should be based on a different measure. For example, Turley and the LDPF have argued that the standard method should be based on “occupied housing stock” which, they said, provides “a reliable and stable indicator” of housing need and is more “responsive to evidence of labour-force pressures”.<sup>113</sup> The Home Builders Federation also called for the use of housing stock as a baseline.<sup>114</sup>

## Urban uplift

In December 2020, the government [updated the standard method to add a 35% urban uplift](#) for LPAs with areas which contain the largest proportion of population of one of the top 20 major towns and cities.<sup>115</sup>

LPAs have raised concerns about the urban uplift and their ability to meet it. The Planning Officers Society and the Community Planning Alliance have also

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<sup>108</sup> POS, [Response to NPPF/LURB Consultation](#), February 2023

<sup>109</sup> HBF, [Response to Government’s NPPF consultation](#), March 2023

<sup>110</sup> Turley, [A standard method that works for all](#), August 2020; LDPF, [Housebuilding market study: Planning working paper](#) (PDF), November 2023

<sup>111</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 107 [Homes for North]

<sup>112</sup> LGA, [Levelling-up and Regeneration Bill: Reforms to National Planning Policy Consultation](#), March 2023; LUHC Committee, [Written evidence: Reforms to national planning policy](#) (PDF), February 2023, HC 1122 2022-23, RNP 12 [Community Planning Alliance]

<sup>113</sup> Turley, [A standard method that works for all](#), August 2020; LDPF, [Housebuilding market study: Planning working paper](#) (PDF), November 2023

<sup>114</sup> LUHC Committee, [Written evidence: Reforms to national planning policy](#) (PDF), April 2023, HC 1122 2022-23, RNP 16 [HBF]

<sup>115</sup> MHCLG, [Changes to the current planning system](#), last updated April 2021



said the urban uplift was “completely arbitrary”.<sup>116</sup> Similarly, the LPDF and the Home Builders Federation said the 35% urban uplift was “arbitrary, not based on evidence and [...] undeliverable”.<sup>117</sup>

The planning consultancy Lichfields argued that the 35% urban uplift could “pile up need in cities that do not realistically have the urban capacity to meet it”. The consultancy Turley highlighted land constraints, noting that 13 of the 20 cities subject to the 35% urban uplift are surrounded by green belt land.<sup>118</sup> The Greater London Authority expressed concern that opportunities were “quite limited” for development because London was already “heavily urbanised”.<sup>119</sup>

In its [report on the future of the planning system in England](#) (June 2021), the HCLG Committee also raised concerns about the ability of LPAs to deliver the urban uplift, given “geographical barriers such as the seas and rivers, Green Belt and other protected places, and the availability of brownfield sites”. In its subsequent [report on reforms to national planning policy](#) (July 2023), the LUHC Committee called on the government to abolish the urban uplift.<sup>120</sup>

## LPA boundaries

Some organisations, such as the Royal Town Planning Institute, highlighted that “administrative boundaries often do not correspond to employment / labour market or housing market areas”. The housebuilding company Vistry Group noted that urban areas were not “isolated islands but connected to a hinterland and broader economic geography”.<sup>121</sup>

The Vistry Group argued that the urban uplift should be applied “collectively to the core area and the broader economic geography/travel to work area”, rather than to individual LPAs. The Home Builders Federation and the LDPF also said that housing should be distributed at the housing market level.<sup>122</sup>

These organisations have raised related concerns about the abolition of the duty to cooperate through the [Levelling Up and Regeneration Act 2023](#) (see

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<sup>116</sup> LUHC Committee, [Written evidence: Reforms to national planning policy](#) (PDF), April 2023, HC 1122 2022-23, RNP 12 [Community Planning Alliance, CPA]; POS, [Response to NPPF/LURB Consultation](#), February 2023

<sup>117</sup> LDPF, [Levelling-up and Regeneration Bill: Reforms to National Planning Policy](#) (PDF), March 2023; HBF, [Response to Government's NPPF consultation](#), March 2023

<sup>118</sup> Lichfields, [Mangling the mutant: Change to the standard method for local housing need](#), December 2020; Turley, [Is the cities and urban centres uplift over before it starts?](#), June 2022

<sup>119</sup> HCLG Committee, [Oral evidence: The Future of the Planning System in England](#) (PDF), HC 858 2020-21, 9 November 2020, Q35

<sup>120</sup> HCLG Committee, [The future of the planning system in England](#) (PDF), HC 38 2020-21, June 2021, para 111; LUHC Committee, [Reforms to national planning policy](#) (PDF), HC 1122 2022-23, July 2023, para 58

<sup>121</sup> LUHC Committee, [Written evidence: Reforms to national planning policy](#) (PDF), April 2023, HC 1122 2022-23, RNP 18 [Vistry Group]; RTPI, [NPPF Consultation Response](#), March 2023

<sup>122</sup> LUHC Committee, [Written evidence: Reforms to national planning policy](#) (PDF), April 2023, HC 1122 2022-23, RNP 16 [HBF]; LDPF, [Levelling-up and Regeneration Bill: Reforms to National Planning Policy](#) (PDF), March 2023

box 6). The Home Builders Federation said there needs to be “a mechanism for distributing unmet need across a housing market area”. The LDPF argued that “there needs to be a robust and binding mechanism in place” to require LPAs “to work with their neighbours”.<sup>123</sup> Some LPAs, such as East Herts Council and Cheltenham Borough Council, raised similar concerns.<sup>124</sup>

## 8 How was local housing need assessed in the past?

Between 2004 and 2010, under the then Labour Government, housing targets were calculated by the government and then distributed to regional planning authorities. These divided targets between LPAs, which had to allocate land in their local plans.

In 2010, the Coalition Government announced that it would abolish regional spatial strategies and “return decision-making powers [...] to local councils”. The [Localism Act 2011](#) then abolished regional planning authorities.<sup>125</sup>

The government set out national planning policy in the NPPF, first introduced in 2012. The [2012 NPPF](#) stated that LPAs should use strategic housing market assessments to “identify the scale and mix of housing and the range of tenure that the local population is likely to need over the plan period”.<sup>126</sup> LPAs could decide which approach they used to calculate local housing need.

In 2017, the government expressed concern that some LPAs were not “honest about the level of housing they need in their area”. It announced that it would introduce a new “consistent” approach to ensure that LPAs were “assessing housing need properly and fairly”. The government argued that the standard method would provide greater consistency and transparency.<sup>127</sup>

Following consultation, the government incorporated the standard method in its [2018 update to the NPPF](#). It has been part of the NPPF since then.<sup>128</sup>

<sup>123</sup> LUHC Committee, [Written evidence: Reforms to national planning policy](#) (PDF), April 2023, HC 1122 2022-23, RNP 16 [HBF]; LDPF, [Levelling-up and Regeneration Bill: Reforms to National Planning Policy](#) (PDF), March 2023

<sup>124</sup> East Herts Council, [Levelling-up and Regeneration Bill: Reforms to National Planning Policy \(Consultation Response\)](#), February 2023; Cheltenham Borough Council, [Response: Levelling Up and Regeneration Bill: Reforms to National Planning Policy Consultation](#) (PDF), March 2023

<sup>125</sup> Communities and Local Government (CLG) Committee, [Abolition of Regional Spatial Strategies: A planning vacuum](#) (PDF), HC 517 2010-11, February 2011; [Section 109 of the Localism Act 2011](#)

<sup>126</sup> DLUHC, [National Planning Policy Framework](#), March 2012 [accessed through the National Archives]

<sup>127</sup> MHCLG, [Sajid Javid's speech to the LGA conference 2017](#), July 2017; MHCLG, [White Paper: Fixing our broken housing market](#), February 2017

<sup>128</sup> DLUHC, [National Planning Policy Framework](#), July 2018 [accessed through the National Archives]

## 4.2

## Calls to replace the standard method

## Calls for locally determined approach

In its [report on the future of the planning system in England](#) (June 2021), the HCLG Committee found that LPAs and groups representing their interests are generally opposed to the standard method. These groups have argued that “housing need should be predominantly or exclusively decided” by LPAs as “they were best placed to take account of local circumstances”.<sup>129</sup>

For example, the LGA has said “a nationally set formula will always struggle to reflect local need”. It said the standard method could not “reflect the wide range of constraints” that impact the ability of LPAs to deliver homes.<sup>130</sup>

Similarly, the District Councils’ Network has also argued that the “one size fits all” of the standard method was “not fit for purpose”. It said the method led to “some areas being set requirements that are either too low to meet local ambitions [...] or that are undeliverable”.<sup>131</sup> Newcastle City Council said the method “leads to at best crude estimates of need, and at worst would require authorities to plan for homes that are not needed”.<sup>132</sup>

The LGA has argued that “algorithms and formulas can never be a substitute for local knowledge and decision-making”. It said that the standard method should be optional for LPAs.<sup>133</sup> The District Councils’ Network and the National Association of Local Councils have also said that the standard method should be optional and that LPAs should be able to use a local approach instead.<sup>134</sup>

## Opposition to a locally determined approach

Other organisations have opposed a local approach. For example, the Centre for Cities highlighted that, prior to the introduction of the standard method, “housing supply was lower in part as housing need was more contested and complex”.<sup>135</sup> The Home Builders Federation also opposed a return to a locally

<sup>129</sup> HCLG Committee, [The future of the planning system in England](#) (PDF), HC 38 2020-21, June 2021

<sup>130</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 56 [LGA]; LGA, [Levelling-up and Regeneration Bill: Reforms to National Planning Policy Consultation](#), March 2023

<sup>131</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 82 [DCN]

<sup>132</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 159 [Newcastle City Council]

<sup>133</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 56 [LGA]; LGA, [Levelling-up and Regeneration Bill: Reforms to National Planning Policy Consultation](#), March 2023

<sup>134</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 82 [DCN]; HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 21 [National Association of Local Councils, NALC]

<sup>135</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), November 2020, HC 38 2020-21, FPS 144 [Centre for Cities]

determined approach, arguing that it had resulted in “protracted debates about housing need” and “difficulties and delays” in adopting local plans.<sup>136</sup>

Some organisations have called for a return to a regional approach instead. For example, the Home Builders Federation said a regional approach would allow opportunities and constraints to be dealt with at a wider geographic level. The Royal Town Planning Institute also argued that housing should be distributed at the housing market level.<sup>137</sup>

Some organisations have also expressed for a national approach with binding local housing targets. For example, the Home Builders Federation called for a national spatial strategy with subnational housing requirements, and Barratt Homes, a developer, supported local binding housing targets.<sup>138</sup>

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<sup>136</sup> HBF, [Locally derived housing need - Considering an alternative to the “standard method”](#), October 2022

<sup>137</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 73 [HBF]; RTPI, [NPPF Consultation Response](#), March 2023

<sup>138</sup> HCLG Committee, [Written evidence: Future of the planning system in England](#) (PDF), October 2020, HC 38 2020-21, FPS 73 [HBF]; HCLG Committee, [Oral evidence: The Future of the Planning System in England](#) (PDF), HC 858 2020-21, 9 November 2020, Q2

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