

Planning validation requirements: Moving to a planning statement approach instead of checklists





The Housing Forum

The Housing Forum is the cross-sector membership network for housing and construction committed to a 'Quality Home for All.'

The Housing Forum is the UK housing sector's membership organisation, with 150 member organisations from across the housing sector and supply chain. Between them our members have over £24bn turnover and share our determination to drive quality in design, construction and maintenance of UK homes and a commitment to partnership working.

Local authorities represent a third of membership and are constituted as the Councils Network within The Housing Forum. The Councils Network enhances the voice of our local authority members and raises awareness of issues they face.

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Executive Summary



Local planning authorities often require a wide range of information from planning applicants at different stages of the planning process. **In particular, they are required to maintain a validation checklist and to update it at least every two years.**

We wanted to understand the extent of the evidence that is generally required to consider whether the planning system is the right 'home' for all of these requirements.

The breadth of planning policy coverage has grown significantly over the last decade or so and this has resulted in the need for a significant body of evidence to be submitted as part of major planning applications (residential schemes of 10+ homes) in particular. Government has also widened the range of issues that it expects the planning system to resolve.

What's the problem?

Our workshops found that requiring a large amount of information at an early stage can have several downsides:

- It increases the workload for planning applicants and officers.
- It can be overwhelming for communities to engage in the planning process to review the breadth of evidence.
- Having to make a 'best guess' on some aspects of a development scheme early to progress the application means that there is often a need for subsequent changes. This can be time-consuming and undermines community confidence, as people feel they were promised one thing but something different has eventually been delivered (the 'chipping away at quality to save money' perception).
- It is not always clear how a planner would be able to assess whether the planning conditions relating to specific build requirements have been met.
- The degree of evidence required for relatively small developments of 10-30 homes may be disproportional.



What's in validation checklists?

Of the 30 local planning authorities sampled, only 11 had checklists dated within the last two years (the National Planning Policy Framework requirement). A further 10 had checklists which were between 2 and 5 years old.

We also found that:

- In total, 119 different types of documents were asked for across the 21 local planning authorities whose checklists were reviewed.
- Individual local planning authorities had between 21 and 42 documents required for all planning applications. This rose to between 32 and 79 documents when including documents required for some types of application only.
- Documents such as affordable housing statements and transport assessments were almost always required. In contrast, a total of 40 different types of document were asked for by only one local planning authority each. These were things such as an air quality assessment and window plans.

Implications of these findings

It is clear from our research that the validation checklist approach is not working well.

The variations between local authorities can also create confusion for planning applicants in terms of what is required by which authority and in what form.

Recommendations

We therefore recommend that validation checklists are replaced with a system based on planning statements.

To do this:

- **Government should review and update the national information requirements** and widen their scope to provide consistency of information on key matters. This would enable the government to **remove the requirement for local planning authorities to publish a list of local validation requirements**.
- Government should build on the evidence collated by The Housing Forum in this report to undertake a **root and branch review of current local information requirements** to establish whether the planning system is the right mechanism for each.
- The government should **encourage the use of summary templates** for the submission of evidence with signposting to where in the more detailed associated evidence the justification for the findings can be found.
- There are two possible ways to reduce the disproportionate burden on small 'major' applications:
 - a) **Government could increase the threshold for the definition of 'major' and 'minor' applications.**
 - b) **Government could introduce a three-tiered structure of small, medium and large applications.**
- Both the applicant and the local planning authority should ensure that there is **consistency across the evidence base**.



Introduction to our work on planning reform

The Housing Forum's ambition is for a Quality Home For All. The planning system is vital in ensuring that we bring forward both the quantity and quality of housing needed to do this, including affordable housing for those who need it.

We know from our membership that there are many talented and passionate planners working in local authorities and in the wider housing sector who share our ambition and want to see the benefits of new housing for their local areas.

The planning system, however, is not currently working as well as it should be and we hope that the ideas set out here offer some possible ways forward.

The Housing Forum Councils Network Advisory Group identified the planning system as a key area of concern to local authorities.

Concerns about the time it can take to secure the necessary planning consents to be able to deliver new homes are echoed by our wider members. We therefore set up a working group on planning to discuss the challenges facing local planning authorities including resources and the growing 'asks' being placed on both them, and on the wider housing sector.

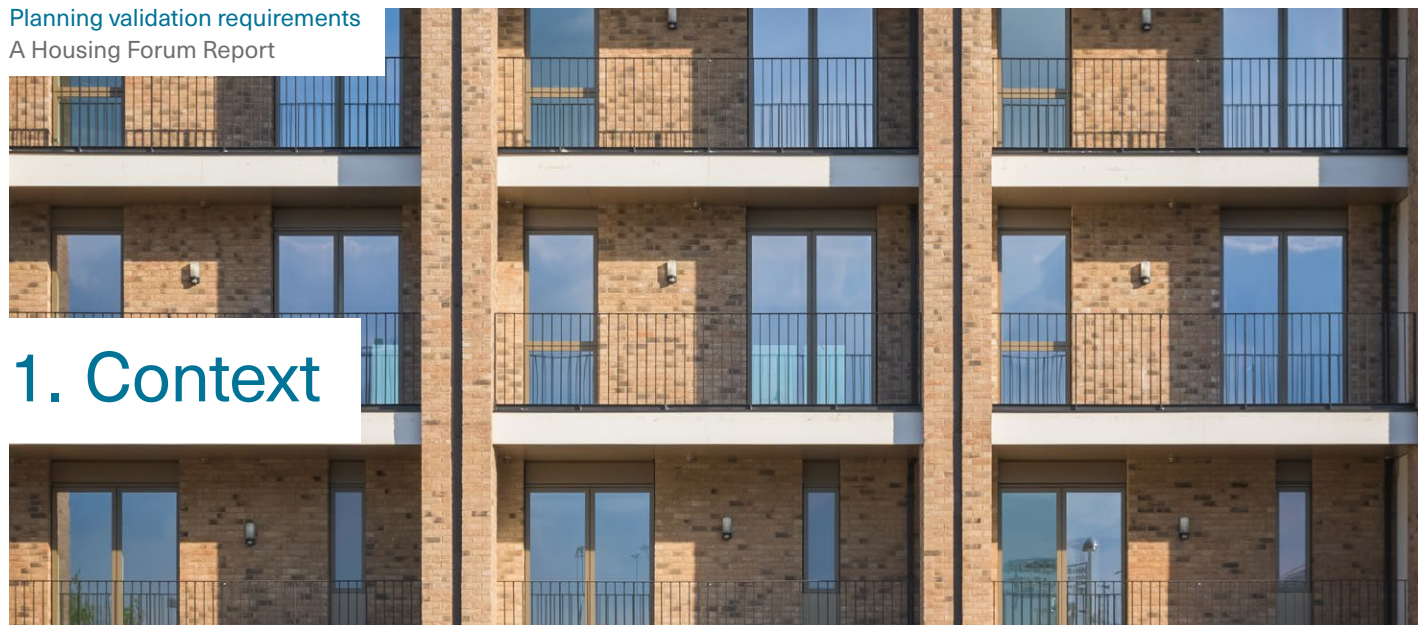
This report focuses on the extent of evidence required to support planning applications of 10 or more homes and should be read in conjunction with [Report 1: Streamlining planning to build more homes](#).



Methods

A range of meetings, discussions and two larger workshops were organised to gather the evidence for this report. These were attended by Housing Forum members drawn from housebuilders, housing associations, architects and contractors, as well as local authority officers.

The working group also commissioned a review of the evidence base being asked for in support of planning applications from planning consultancy, [DAC Planning](#). A sample selection of local planning authorities from across England was created. Further details of the methodology are provided in the Annex. DAC Planning examined the selection of local validation checklists in each of the sampled local planning authorities to map out what is required and when.



1. Context

The [National Planning Policy Framework 2023](#) provides the context for determining the level and type of information required as part of a planning application.

There are two key paragraphs:

- **43.** *The right information is crucial to good decision-making, particularly where formal assessments are required (such as an environmental impact assessment, Habitats Regulations assessment and flood risk assessment). To avoid delay, applicants should discuss what information is needed with the local planning authority and expert bodies as early as possible.*
- **44.** *Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions, and should be reviewed at least every two years. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.*

Local planning authorities often require a wide range of information from planning applicants at different stages of the planning process. **In particular, they are required to maintain a validation checklist and to update it at least every two years.**

We wanted to understand the extent of the evidence that is generally required to consider whether the planning system is the right 'home' for all these requirements and whether the information required is being asked for at a point when it would normally be known. The drivers for what is required and when are primarily governed by national planning policy and guidance and primary/secondary legislation which is then translated into local policy.

The principle in planning is that the applicant must demonstrate that the scheme is in accordance with policy, or that there are material considerations that should be taken into account.

The breadth of planning policy coverage has grown significantly over the last decade or so and this has resulted in the need for a significant body of evidence to be submitted as part of major planning applications (residential schemes of 10+ homes) in particular.

It is important to have enough information to enable the local planning authority to be satisfied that a scheme is 'policy compliant' and to minimise wherever possible the use of planning conditions which require the submission of further details at a later date. There is also a need to provide community confidence in both the acceptability of individual schemes and in the planning system itself, and that a range of statutory bodies are satisfied.

Government has also widened the range of issues that it expects the planning system to resolve. There is often pressure to include conditions to give certainty to local communities that a range of issues will be controlled through planning, including issues which are not necessarily a matter for planning – construction management conditions being one such example.

We therefore feel that it is worth sense-checking whether the breadth of matters that are now covered through the planning system are appropriate.

2. What's the problem?

Our workshops found that requiring a large amount of information at an early stage can have several downsides:

- It increases the workload for planning applicants, adding significantly to the costs of development, and uncertainty (as all these costs are incurred whether or not the application is granted).
 - It involves a huge amount of information for local authority planning officers to assess. This results in a significant draw on resources and reduces the time for officers to focus on core elements such as the quality of a scheme and its relationship with its physical context. The resources taken up in this activity by officers reduces the time available to properly engage with applicants, communities and other interested parties.
 - It can be overwhelming for communities who want to engage in the planning process to review the breadth of evidence.
 - Having to make a 'best guess' on some aspects of a development scheme early to progress the application means that there is often a need for subsequent changes. There are mechanisms for doing this but it can be time-consuming, leads to uncertainty and undermines community confidence, as people feel they were promised one thing but something different has eventually been delivered (the 'chipping away at quality to save money' perception).
 - It is not clear how a planner would be able to assess whether the planning conditions relating to specific build requirements have been met. Prime examples of this relate to achieving carbon efficiency levels and achieving optional Building Regulation accessibility standards.
- A large volume of evidence is needed to support large-scale applications. Local planning authorities commonly treat all major residential applications (ie those for 10 or more homes) as 'large'. This means that the same degree of evidence may be required for relatively small developments of 10-30 homes, which may be disproportional.

In addition, there was concern that local planning authorities need to ensure that validation checklists are up to date and include recent requirements such as biodiversity net gain.

Clarity and detail are needed so that applicants can provide all the information required to allow planning applications to be quickly validated. Applicants would prefer that there is a single, national validation checklist without local variation.



3. Findings from the review of local validation checklists

Do all local planning authorities have an up-to-date validation checklist?

Of the 30 local planning authorities sampled:

- **Eleven** had checklists dated within the last two years (the NPPF requirement).
- **Ten** had checklists which were between two and five years old.

Both groups were included in the analysis.

Nine local planning authorities were excluded from the analysis:

- **Three** had checklists which were more than five years old.
- **One** had an undated checklist.
- **Three** had checklists which provided only scant information with no thresholds for when different information was required.
- **Two** had no lists available. These were contacted, but were unable to provide a list.

What documents are asked for in validation checklists?

- In total, 119 different types of documents were asked for across the 21 local planning authorities whose checklists were reviewed.
- Individual local planning authorities had **between 21 and 42 documents required** for all planning applications. This rose to **between 32 and 79 documents** when including documents required for some types of application only.



The following documents were asked for by nearly all local planning authorities:

Document	Required	Sometimes required	Not mentioned
Tree survey	2	19	0
Drainage plans, strategy or assessment	15	5	1
Transport assessment	16	3	2
Land contamination assessment	8	11	2
Noise or vibration assessment	1	18	2
Affordable housing statement	18	0	3
Air quality assessment	3	15	3
Flood risk assessment	3	15	3
Heritage statement, strategy or assessment	1	17	3
Lighting assessment, statement or strategy	0	18	3
Travel plan	14	3	4

The following documents are commonly required:

Document	Required	Sometimes required	Not mentioned
Parking and access arrangements	15	0	6
Arboriculture impact assessment	1	14	6
Viability information	1	13	7
Planning statement	13	0	8
Biodiversity survey	4	9	8
Statement of community involvement	11	1	9
Transport statement	11	1	9
General open space, sports or green infrastructure assessment	3	9	9
Environmental impact assessment or environmental statement information	1	11	9
Planning obligations / S106 draft agreement	11	0	10
Landscape and visual impact assessment	3	8	10
Marketing information	0	11	10

The following documents
are sometimes required:

Document	Required	Sometimes required	Not mentioned
Energy statement	10	0	11
Waste management plan	10	0	11
Ecological assessment	4	6	11
Sustainability statement	9	0	12
Landscaping details	7	2	12
Foul drainage	4	5	12
Structural survey	0	9	12
Daylight or sunlight assessment	2	6	13
Archaeological assessment	1	7	13
Existing and proposed site sections (and finished floor and site levels)	4	3	14
Minerals assessment	0	7	14
Community infrastructure levy information	6	0	15
Floor plans	6	0	15
Refuse disposal or storage information	6	0	15
Visual guides	4	2	15
Biodiversity net gain plan	5	0	16
Design information	5	0	16
Elevation plans	5	0	16
Roof plans	5	0	16
Utilities or services strategy or assessment	4	1	16
Landscape character assessment	3	2	16
Sports and pitches statement or assessment	1	4	16
3D modelling	4	0	17
Block plans	4	0	17
Crime impact statement	3	1	17
Health impact assessment	2	2	17
Agricultural appraisal or statement	0	4	17
Construction management plan	3	0	18

Document	Required	Sometimes required	Not mentioned
Electric vehicle information	3	0	18
Housing space standards information	3	0	18
Telecommunication information	3	0	18
Street scene or street view elevations	2	1	18
Neutrality strategy or information	1	2	18
Bat survey	0	3	18
Coal risk assessment	0	3	18
Flood risk sequential test	0	3	18
Geological assessment	0	3	18
Habitats Regulations assessment information	0	3	18
Odour assessment	0	3	18
Townscape and visual impact assessment	0	3	18
Design code	2	0	19
Employment skills statement	2	0	19
Fire statement	2	0	19
Housing mix statement	2	0	19
Infrastructure provision information	2	0	19
Masterplan	2	0	19
Schedule of accommodation	2	0	19
Topographical survey/cross section	1	1	19
Existing and proposed site levels	1	1	19
Materials information	1	1	19
Sustainable drainage pro-forma	1	1	19
Coastal vulnerability assessment	0	2	19
Micro-climate assessment	0	2	19
Tall buildings assessment	0	2	19
Traffic management plan	0	2	19
Wind study	0	2	19

The following documents were requested by only one local planning authority:

Document	Required	Sometimes required	Not mentioned
Accessible and adaptable housing statement	1	0	20
Air quality positive assessment	1	0	20
Be seen monitoring spreadsheet *	1	0	20
Carbon assessment	1	0	20
Climate mitigation statement – solar	1	0	20
Climate mitigation statement – water butts	1	0	20
Ecosystem services statement	1	0	20
Equalities impact assessment	1	0	20
Green infrastructure plans and statement	1	0	20
Hardstanding information	1	0	20
Self and custom build plans or design brief	1	0	20
Tree canopy calculation	1	0	20
Urban greening factor	1	0	20
Water efficiency statement	1	0	20
Window plans	1	0	20
Aerodrome safeguarding assessment	0	1	20
Amphibian survey	0	1	20
Archaeological evaluation report	0	1	20
Area of outstanding natural beauty (AONB) assessment	0	1	20
Basement impact assessment	0	1	20
Business relocation strategy	0	1	20

Document	Required	Sometimes required	Not mentioned
Coal recovery report	0	1	20
Educational needs assessment	0	1	20
Gateway 1 form (fire info for high rise development)	0	1	20
Glint and glare assessment	0	1	20
Green belt justification statement	0	1	20
Houses in multiple occupation (HMO) information	0	1	20
Hydrogeological risk assessment	0	1	20
Land stability assessments	0	1	20
Mineral recovery report	0	1	20
Navigational risk assessment	0	1	20
Noise or vibration assessment additional information	0	1	20
Old Kent Road Schedule of Development form	0	1	20
Protected species assessment	0	1	20
Protected view assessment	0	1	20
Public rights of way information	0	1	20
Soils management plan	0	1	20
Town centre / retail impact assessment	0	1	20
Tree works specification and structural survey	0	1	20
Ventilation and extraction statement	0	1	20

The lists on pages 9, 10 and 11 relate to the range of evidence sought through local validation checklists. In addition, there are nationally defined information requirements where a planning application must be accompanied by the following:

- Plans and drawings.
- Ownership certificate and agricultural land declaration.
- Design and access statement (for some planning applications).
- Fire Statement (for some planning applications made on or after 1 August 2021)

There are also specific requirements in relation to:

- Outline planning applications.
- Applications that are subject to environmental impact assessments.

Design and access statements must be accompanied by:

- Applications for major development, as defined in [article 2 of the Town and Country Planning \(Development Management Procedure \(England\) Order 2015](#);
- Applications for development in a designated area, where the proposed development consists of:
 - one or more dwellings; or
 - a building or buildings with a floor space of 100 square metres or more.
- Applications for listed building consent.

For the purposes of design and access statements, a designated area means a world heritage site or a conservation area.

* Greater London Authority operational energy performance monitoring requirement



4. Implications of these findings



It is clear from our research that the validation checklist approach is not working well. Only 11 of the 30 local planning authorities sampled had checklists published within the last two years as required.

The evidence required by local planning authorities to be submitted as part of a planning application is diverse. This reflects the ever-widening matters that the planning system is expected to address at either national and/or local level. This places burdens on both the development industry and local authorities and becomes difficult for local residents to navigate.

The variations between local authorities can also create confusion for planning applicants in terms of what is required by which authority and in what form.

The extent of evidence required also places burdens on local authorities in terms of the resources needed to validate applications. If that resource is not provided then delays occur which can have a significant impact on an applicant both contractually and financially.



Recommendations

We recommend that validation checklists are replaced with a system based on planning statements.

To do this:

- Government should review and update the national information requirements and widen their scope to provide consistency of information on key matters. In particular it is recommended that the [Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#) is amended to include a requirement for major planning applications to be supported by a planning statement. This would be the main mechanism by which an applicant would set out how the submitted scheme was 'policy compliant'. It would signpost the relevant national and local policies applying to the scheme and the evidence base required.

This would enable the government to **remove the requirement for local planning authorities to publish a list of local validation requirements**. Instead, local planning authorities could be encouraged to simply publish a summary list of local plan policies and associated guidance which has 'planning weight'. This would include the evidence needed to demonstrate policy compliance.

- Government should build on the evidence collated by The Housing Forum in this report to undertake a **root and branch review of current local information requirements**. This would entail engaging with the industry to determine the most appropriate regime to deliver the policy outcomes required and to ensure that the planning system is not being used to regulate issues better addressed by other means.

The review would ensure that information is not requested at a stage in the development process when it is unlikely to be available. The findings of this review should then inform an update of national planning policy and guidance. It may also require the government to amend other legislation such as Building Regulations, environmental health or licensing regimes.

- The government should **encourage the use of summary templates** for the submission of evidence with signposting to more detailed associated evidence for the justification for the findings.

This would have several benefits:

- It would help to keep the more detailed evidence produced focused on the key elements required to support an application.
- It would reduce the time needed for the planning officer or a consultee to be able to find the information they require.
- It would also make what can often be very technical evidence more accessible to both councillors and local residents.

An example of such an approach is that taken by the London Borough of Richmond upon Thames in relation to [Flood risk assessments](#).

- Local planning authorities often specify the scale of development to which policies apply. However, this can place a disproportionate burden on those submitting smaller 'major' applications (who are often SMEs), and on the planning authority dealing with them. There are two possible ways to address this:
 - Government could increase the threshold for the definition of 'major' and 'minor' applications.**
 - Government could introduce a three-tiered structure of small, medium and large applications.**

Local planning authorities would still be able to identify further thresholds for certain types of evidence needed by certain sizes of development and use a different threshold as necessary, and should be encouraged to do so.

- Some pieces of evidence are interdependent on one another, but they are often developed by different consultants, sometimes creating inconsistencies which can result in subsequent challenges. Both the applicant and the local planning authority should ensure that there is **consistency across the evidence base**.

Annex: Methodology

A selection of local planning authorities from across England were sampled. This included a spread of authorities from across England with a range of:

- Political control
- Region
- Size in terms of population and area.

Stratified random sampling was undertaken based on this framework to produce a shortlist, which was then reduced to the sample of 21 using professional judgement and knowledge from working with local planning authorities across England to ensure that the sample represented a relative balance and included one national park authority.

The validation checklists of the sampled planning authorities were then reviewed. Any local planning authority that did not have a validation checklist in the public domain dated within the last five years, or where the validation checklist did not have clear thresholds defining when information should be provided with an application, were replaced by similar authorities.

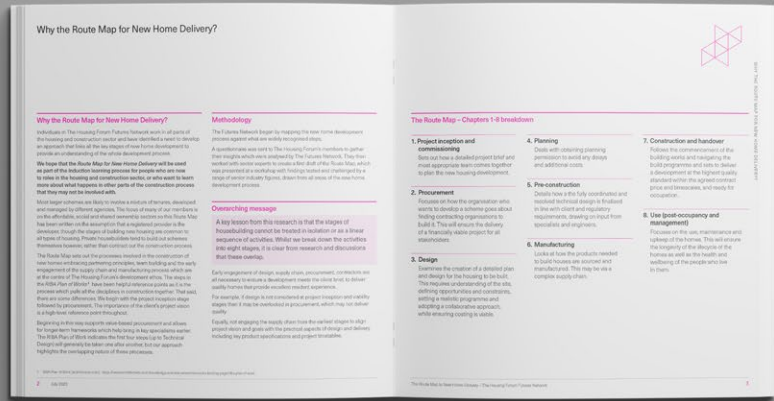
Each checklist was then analysed for the list of local information requirements for full applications. The name of the information requirement and threshold (or, for example, 'when the information is required') data were recorded. Only checklist and information requirement items that were denoted as 'local' requirements (rather than national requirements) by the local planning authority were recorded, though this includes the local planning authority's interpretation of some national requirements.

The focus was on evidence that would be required for an application for a major residential development (ie use class C3, greater than 10 units). Local planning authorities sometimes used different terminology for what was essentially the same item of evidence. Any duplicates identified were grouped together as a single type of evidence.

Each piece of evidence was then categorised as:

- **Required**, if the information requirement would *definitely* be needed for all applications for major residential development.
- **Sometimes required**, if the information requirement *could* be needed by applications for major residential development, dependent on factors such as its design or surrounding geography.
- **Not mentioned**, if the information requirement *would not* be needed for applications for major residential development.

The spreadsheet was supplied by DAC Planning to The Housing Forum. The Housing Forum is willing to share it with researchers or other interested parties on request.



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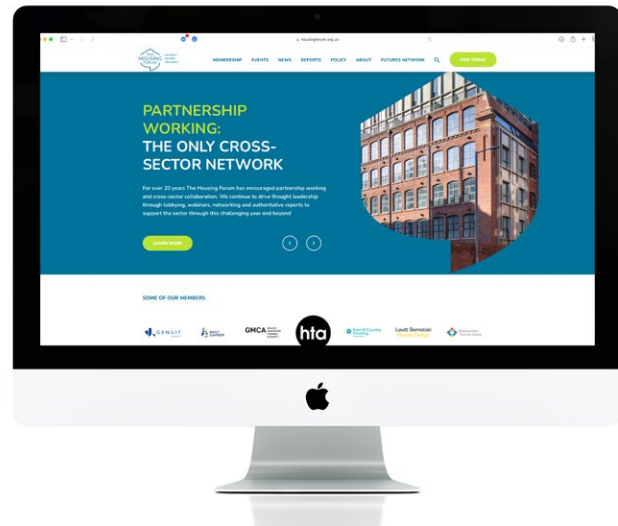


The Housing Forum Membership

The Housing Forum is the cross-sector membership network for housing and construction committed to a 'Quality Home for All'.

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