

Technical Advice Note 1

Temporary dis-application of paragraph 6.2

Evidence prepared on behalf of HBF

21 June 2018

LICHTFIELDS



LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places
for over 50 years.

lichfields.uk

© 2018 Nathaniel Lichfield & Partners Ltd, trading as Lichfields. All Rights Reserved. Registered in England, no. 2778116. 14 Regent's Wharf, All Saints Street, London N1 9RL
Formatted for double sided printing.
Plans based upon Ordnance Survey mapping with the permission of Her Majesty's Stationery Office.
© Crown Copyright reserved. Licence number AL50684A
31696/GW/SC
16117161v1

Key Messages

- 01 The proposal will result in reduced house building including affordable housing
- 02 The proposal is contrary to the goals of the Well-being of Future Generations Act
- 03 Local Development Plans are currently failing to provide a five-year land supply as identified by the Joint Housing Land Availability Studies with the application of paragraph 6.2 of TAN1 being the only sanction holding local planning authorities to account
- 04 The proposed wide-ranging review of the delivery of housing through the planning system should be completed prior to a decision being made on this proposal
- 05 The reduction in house building will have a significant and detrimental impact on the Welsh economy

Contents

1.0	Introduction	1
	Background	1
	Structure	2
	The consultation process	3
2.0	Context	5
	The importance of housing	5
	Housing delivery in Wales	6
	LDP preparation	8
	Five-year supply position	10
3.0	Methodology of the research	13
4.0	Q1: Do you agree with the proposed temporary dis-application of paragraph 6.2 of TAN 1 to remove the reference to attaching “considerable” weight to the lack of a five-year housing land supply as a material consideration in determining planning applications for housing?	15
	Reliance on windfalls in LDPs	15
	Impact	17
	Sustainable outcomes	23
5.0	Q2: Do you consider the proposed temporary dis-application of paragraph 6.2 of TAN 1 will be effective in relieving pressure on local planning authorities when dealing with speculative planning applications for housing?	27
	Local planning authorities budgets	28
	Time taken to determine applications	30
	LDP preparation and review	31
6.0	Well-being of Future Generations	33
7.0	Conclusion	36
	An alternative way forward	36
	Summary of evidence	38
	Appendix 1: Definition of windfall sites	41

Figures

Figure 2.1 The value of planning in Wales 2016/17	5
Figure 2.2 Housing completions in Wales, 1974-75 to 2017-18	7
Figure 2.3 Housing land supply in Wales	8
Figure 2.4 LDP status in Wales	9
Figure 2.5 Comparison of LDP coverage and five-year supply position	11
Figure 4.1 Proportion of LDP housing supply expected to come forward from windfall sites	16
Figure 4.2 Proportion of completions in 2016/17 on unallocated sites	18
Figure 4.3 Assessment of planning applications for 50+ dwellings submitted since May 2015	19
Figure 4.4 Economic impacts of dwellings completed in 2016/17	21
Figure 4.5 Economic impacts of dwellings approved at appeal in Caerphilly	22
Figure 4.6 Assessment of planning appeals	24
Figure 4.7 Assessment of Ministerial decisions	25
Figure 4.8 Key considerations in determination of planning appeals	26
Figure 5.1 Local authority departmental budgets	28
Figure 5.2 Local planning authority budget change, 2011/12-2017/18	29
Figure 5.3 National average planning approval period	30

Tables

Table 2.1 Status of LDP Reviews	10
Table 5.1 Average planning approval period for applications contained in this analysis	30
Table 5.2 Welsh local planning authority efficiency performance	31
Table 6.1 Alignment between proposed dis-application of paragraph 6.2 and Well-being Objectives	33

1.0 Introduction

- 1.1 The Welsh Government issued a Consultation Document on 10 May 2018 in respect of the proposed temporary dis-application of paragraph 6.2 of TAN1.
- 1.2 This report has been prepared by Lichfields on behalf of Home Builders Federation (HBF) in order to provide an evidence-based response to the two consultation questions that have been posed by Welsh Government.
- 1.3 HBF is the representative body of the home building industry in England and Wales. The HBF's member firms account for some 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national, household names through regionally based businesses to small local companies.

Background

- 1.4 There is a longstanding planning policy in Wales that requires all local planning authorities to be able to demonstrate a rolling five-year supply of housing land. This is clearly articulated in paragraph 9.2.3 of the current version of Planning Policy Wales (PPW, version 9):
- “Local planning authorities must **ensure that sufficient land is genuinely available or will become available to provide a five-year supply of land for housing** judged against the general objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types. For land to be regarded as genuinely available it must be a site included in a Joint Housing Land Availability Study.”*
- 1.5 It is also reflected in paragraph 3.32 of the draft version 10 of PPW:
- “Planning authorities must ensure that sufficient land is genuinely available or will become available to provide a five-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints and be economically viable, so as to create and support sustainable communities where people want to live. For land to be regarded as genuinely available it must be a site included in either a Joint Housing Land Availability Study (JHLAS) or, until a JHLAS is required to inform the first Annual Monitoring Report, in the housing trajectory agreed as part of an adopted development plan. The housing trajectory demonstrates how the planning authority will maintain a five-year supply of housing land over the plan period.”*
- 1.6 The purpose of this policy is to ensure that there is a constant supply of housing land to meet the identified needs of each local authority, as set out in adopted Local Development Plans (LDPs). Joint Housing Land Availability Studies (JHLAS) provide the mechanism for local planning authorities to demonstrate that they have a five-year supply of housing by setting out an agreed statement of housing land availability.
- 1.7 Guidance on the preparation of JHLASs is contained in Technical Advice Note (TAN) 1. This details:
- 1 The required frequency of JHLASs;
 - 2 The timetable for the preparation of JHLASs;

- 3 The criteria that must be met by any site included in the JHLAS;
- 4 The approach that is to be taken in the calculation of the housing land supply; and,
- 5 The implications of not being able to demonstrate a five-year supply of housing. Paragraph 6.1 states that:

“where a shortfall in the housing land supply is identified the local planning authority should consider the reasons for the shortfall and whether the LDP should be reviewed either in whole or in part”.

1.8 Paragraph 6.2 goes on to state:

“The housing land supply figure should also be treated as a material consideration in determining planning applications for housing. Where the current study shows a land supply below the five-year requirement or where the local planning authority has been unable to undertake a study (see 8.2 below), the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies.”

1.9 The supply of housing, and the need to demonstrate a five-year supply of housing land (as required by PPW) would remain a material consideration in the absence of this paragraph, with the weight to be applied to it a matter for the judgment of the decision maker. However, the purpose of paragraph 6.2 is to prescribe the weight (i.e. “considerable”) that is to be applied to the need to increase the supply of housing in the event that a five-year supply cannot be demonstrated.

Structure

1.10 This report is structured as follows:

- 1 The remainder of this section outlines a number of procedural concerns pertaining to the consultation process.
- 2 Section 2 considers the context to the issue of housing delivery in Wales.
- 3 Section 3 summarises the methodology that has underpinned the evidence set out in this report.
- 4 Section 4 provides a response to consultation question 1 by focusing on the following matters:
 - a The scale of housing completions through allocated and unallocated sites;
 - b The importance of development on unallocated sites to housing delivery;
 - c The extent to which the current system might result in unsustainable forms of development – and mechanisms in place to address this; and,
 - d The impact of the proposed dis-application of paragraph 6.2 in terms of:
 - i Housing supply
 - ii Economic impact
 - iii Affordable housing delivery
- 5 Section 5 provides a response to consultation question 2 by considering the extent to which paragraph 6.2 of TAN1 is creating unacceptable pressures for local planning authorities.
- 6 Section 6 considers whether the consultation proposal adequately aligns with the requirements of the Wellbeing of Future Generations Act (2015).

7 Section 7 sets out our conclusions.

The consultation process

Definition of “speculative”

- 1.11 The Consultation Document and the letter of 2 May 2018 from the Cabinet Secretary for Energy, Planning and Rural Affairs to local planning authorities refers to “speculative” planning applications. This is not a category that has been used elsewhere and is not defined in either document. Respondents to the consultation process are therefore required to establish their own definition.
- 1.12 For the purposes of these representations, we have defined “speculative applications” as those relating to sites that are not allocated in an adopted or draft LDP. This will include brownfield and greenfield sites, and those within and outwith settlement boundaries. In considering our evidence, it is important to recognise the importance of all such sites to housing supply and note that the dis-application of paragraph 6.2 of TAN1 may undermine the potential for future residential development on brownfield sites within settlement boundaries. This is because such sites may, for example, include former employment land or school sites, against which there might be policy objections and for which a housing land supply case might be an important material consideration
- 1.13 It is disappointing that the Consultation Document and Cabinet Secretary’s letter refer to “speculative” applications in a somewhat pejorative manner which appears to suggest that they do not offer any benefits and should therefore be resisted. This is unfortunate given that the evidence contained in this report clearly highlights the importance of residential development that comes forward on both allocated and unallocated land, and the need for a considerable step-change in house building in Wales to meet the needs of current and future generations.

Scope of proposed dis-application

- 1.14 Consultation question 1 refers to removal of the word “*considerable*”, whilst question 2 refers to dis-application of the whole paragraph. The Consultation Document also refers to the intention of the policy change being to remove reference to the word “*considerable*” from paragraph 6.2.
- 1.15 Whilst this lack of clarity in the consultation is regrettable, the Welsh Government has confirmed to HBF that the consultation relates to the dis-application of the whole paragraph.
- 1.16 We understand – and welcome the fact that – the Welsh Government is committed to the retention of the requirement for local planning authorities to demonstrate a five-year supply of housing land within the emerging version 10 of PPW. Accordingly, and as set out above, the outcome of this consultation process will not stop housing land supply being a material planning consideration, with the weight to be applied to it remaining a matter of judgment for the decision-maker.

Duration of proposed dis-application

- 1.17 There is a further lack of clarity in respect of the duration of the “temporary” period of dis-application. The Consultation Document states that it “*would be for the duration of a wide-ranging review of the delivery of housing through the planning system which it is proposed to undertake this summer*”. No further information has been provided in respect of the timescale for, this review. The intended scope of the review has been confirmed by the Cabinet Secretary for Energy, Planning and Rural Affairs as including the assessment of LDP housing requirements; ensuring allocations are viable; and an assessment of monitoring land supply, including the five-year supply. Given its wide-ranging remit, it is reasonable to assume that the

review will take some time to complete, and notwithstanding that the Consultation Document refers to it as being “*undertake(n) this summer*”, it is likely to extend later into the year.

- 1.18 The Cabinet Secretary and her advisors have confirmed that the dis-application is likely to be for three-and-a-half years, so as to align with the round of LDP reviews that has commenced. It has not been explained how such a long period can be described as “temporary”, nor why the Consultation Document clearly relates it to the duration of the review of the delivery of housing. It is also unclear how the paragraph would be reintroduced at the end of that period.

Evidence underpinning the proposed policy change

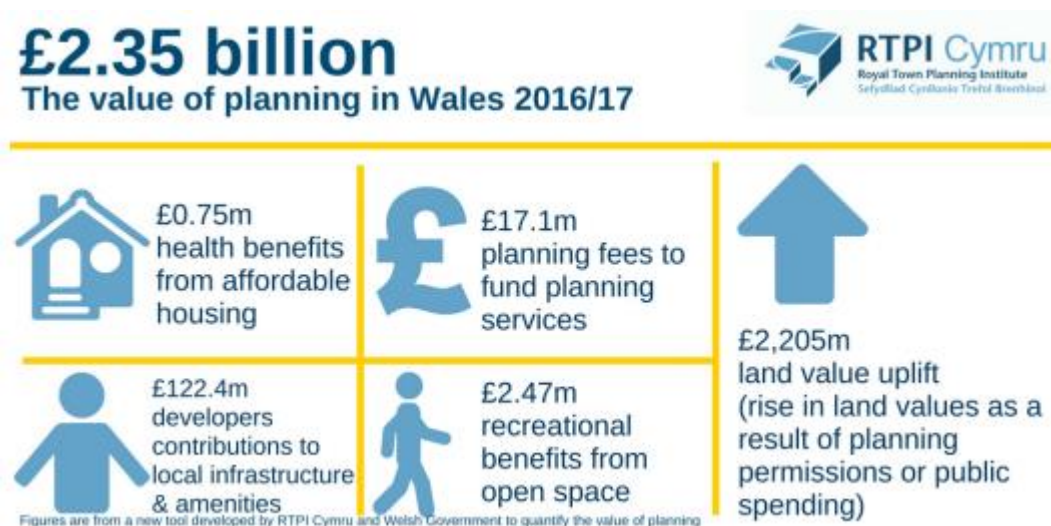
- 1.19 The planning system plays a crucial role in supporting the well-being of communities throughout Wales and the economic prosperity of the whole Country. Any changes must be firmly rooted in robust evidence and an understanding of all potential impacts. We are not aware of any evidence that has been published to underpin the proposed dis-application of paragraph 6.2 of TAN1, or any impact assessment, including an assessment of the impact in respect of the Wellbeing and Future Generations Act 2015.
- 1.20 It is now known that the Cabinet Secretary proposes to undertake a full review of the delivery of housing through the planning process, but it is unclear why such a dramatic shift in planning policy should be undertaken in advance of a process review. A more appropriate solution would be to await the findings of the review and then decide what issues need to be addressed, and how they might be most effectively resolved, working with the industry and local authorities to find an agreeable position.

2.0 Context

The importance of housing

- 2.1 The importance of housing in Wales is widely acknowledged. In addition to the obvious need to ensure that the whole population has somewhere to live, housing is inextricably linked to the wider health of the economy, and also plays an important role in relation to wider indicators of well-being. Its relationship with the wider economy can be characterised in terms of the impact of the house building industry, through the ways in which housing wealth affects consumption behaviour, and by supporting the economic competitiveness of place.
- 2.2 In respect of the first of these points, research by Lichfields in 2015 quantified the key economic benefits of the house building industry in Wales as including:
- 1 £481m p.a. in economic output;
 - 2 13,400 jobs supported;
 - 3 £101m p.a. in National Insurance and PAYE contributions from direct employment;
 - 4 £6.9m in Council Tax payments; and,
 - 5 £119m expenditure p.a. by new residents on goods and services.
- 2.3 On 7 June 2018, RTPI Cymru and the Welsh Government jointly launched a tool that captures the economic, social and environmental value of planning delivered by local planning authorities across Wales. This does not take account of investment by developers and other parties, particularly during the construction phase, or the wider influence of planning in economic development and regeneration.
- 2.4 Whilst the assessment relates to all planning activities, the contribution of housing to this total value is recognised as being very significant.

Figure 2.1 The value of planning in Wales 2016/17



Source: RTPI Cymru / Welsh Government

- 2.5 The Welsh Government has long acknowledged the importance of housing. In November 2014, the (then) Minister for Communities and Tackling Poverty, Lesley Griffiths AM stated that:

“One of [Welsh Government’s] top priorities is to increase the supply of housing including both affordable homes and market homes”.

- 2.6 Under her subsequent role as Cabinet Secretary for Environment and Rural Affairs, Lesley Griffiths wrote a letter to all local planning authorities in Wales which began with the following statement:

“The delivery of housing remains one of the highest priorities of this Government”.

- 2.7 In November 2017, the First Minister, Carwen Jones AM responded to a question about Government action to increase the supply of new homes by stating that:

“House building in Wales is a key priority for this Government, reflected by our ambitious 20,000 affordable homes target. Statistics show an increasing trend in the number of new homes being completed, which we will continue to support with our successful programmes, including the social housing grant.”

- 2.8 Most recently, the Cabinet Secretary for Finance and Local Government, Mark Drakeford AM, spoke at the Hafod Housing AGM (11 June 2018). He stated that:

“Housing is a fundamental human right. It is the bedrock of wellbeing, civic engagement and economic prosperity.”

- 2.9 These views echo the position set out in the Welsh Government’s national strategy, *Prosperity for All*. The strategy is built around five areas:

“which emerged as having the greatest potential contribution to long-term prosperity and well-being. They reflect the times in people’s lives when they may be most in need of support, and when the right help can have a dramatic effect on their life course.

“They are priority areas where it has been shown that early intervention – tackling the root causes, rather than treating symptoms – pays dividends.

“...we have decided to place particular focus on five priority areas where we believe, by improving how services are delivered, there can be the greatest initial impact, paving the way for further action over the longer term.” (page 4).

- 2.10 One of these priority areas is housing, which is described as:

“the bedrock of living well is a good quality, affordable home which brings a wide range of benefits to health, learning and prosperity.”

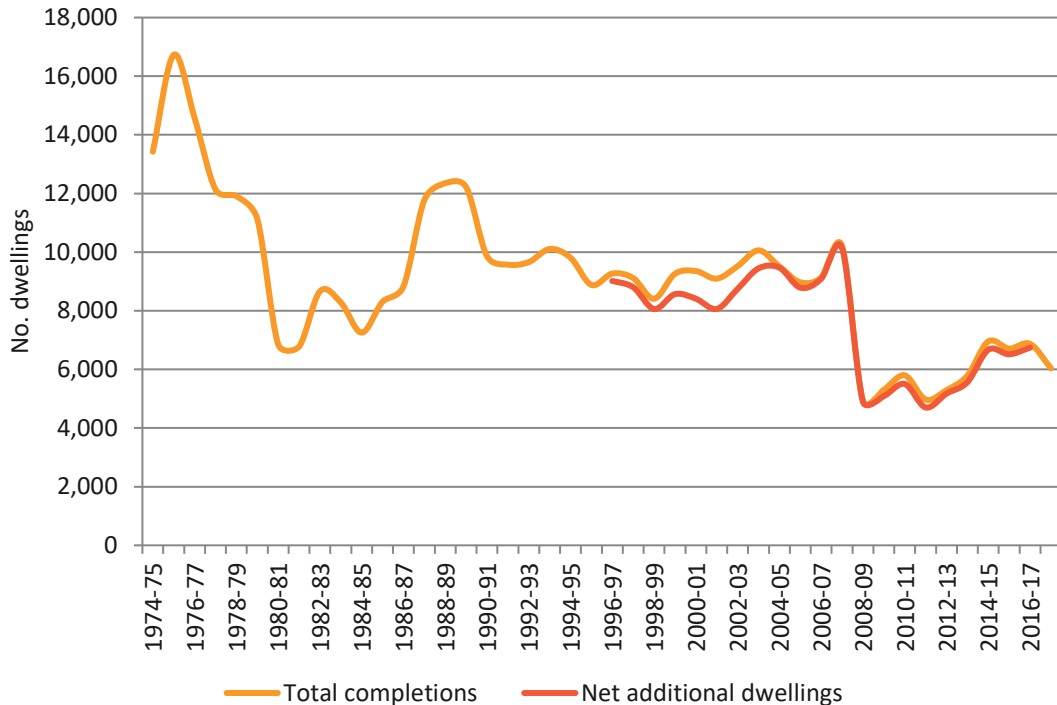
- 2.11 Housing is essential to ensuring the well-being of future generations and should be supported as such. A failure to do so will undermine the opportunities and life chances for current and future generations across Wales, whilst also undermining economic, social and cultural wellbeing, and the potential for the environmental improvements associated with the creation and enhancement of open space.

Housing delivery in Wales

- 2.12 In spite of its clear importance, the reality is that housing completions in Wales have followed a long term downward trend, from an average of 13,750 per annum between 1974 and 1979 to an average of 6,050 per annum since 2010. The lowest number of annual completions was achieved in 2008-9 and 2011-12 (c. 4,900 in each year). Taking account of demolitions, this translates to

4,900 net additional dwellings in 2008-9 and 4,700 net additional dwellings in 2011-12. This compares to the widely-accepted need for an additional 9,000-12,000 dwellings each year¹.

Figure 2.2 Housing completions in Wales, 1974-75 to 2017-18



Note that information on demolitions is only provided by the Welsh Government for the period from 1996-7 to 2016-17, so it is only possible to consider net additional dwellings over this period

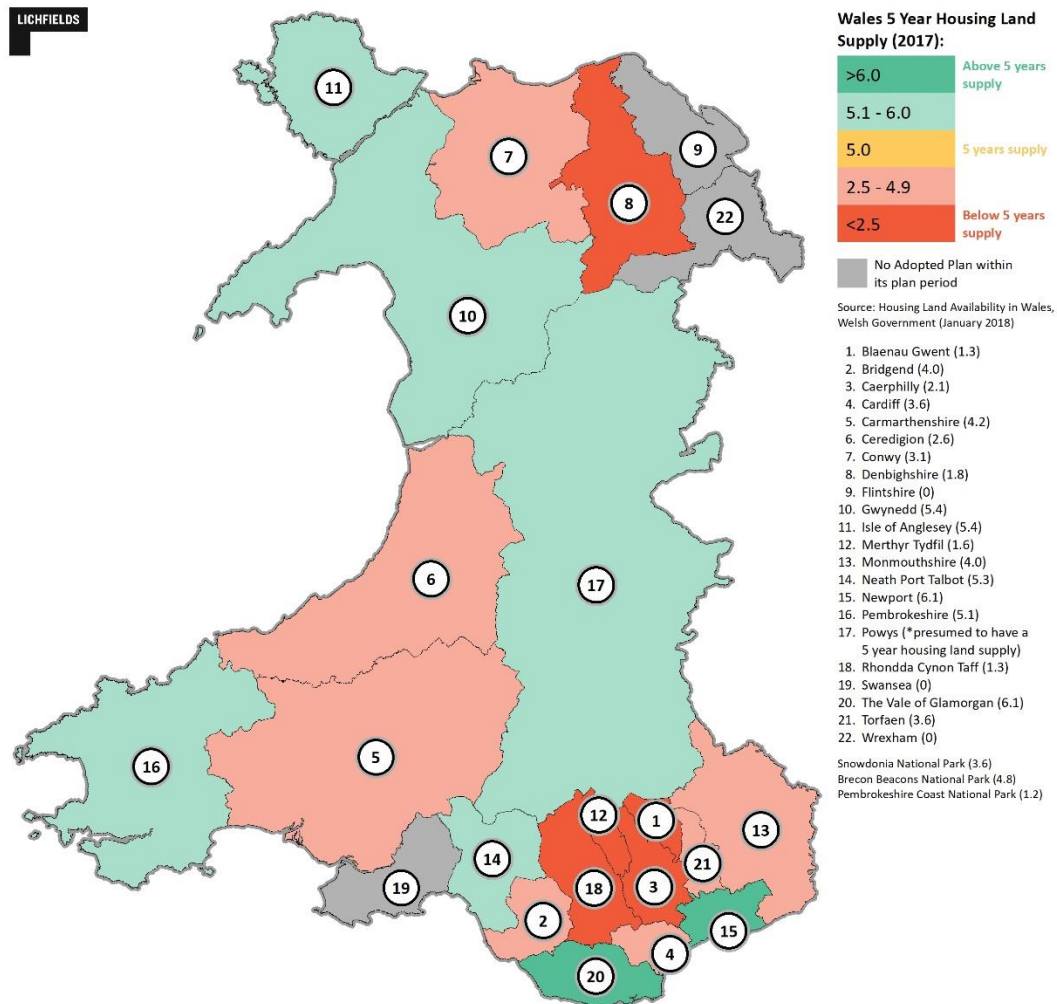
Source: Welsh Government

- 2.13 The level of net additional housing completions since 2006-7 has consistently fallen below the Welsh Government household projections. Welsh Government projections are only intended to represent the starting point in assessments of local housing need, with other factors such as economic forecasts, regeneration aspirations, and the need for affordable housing also to be taken into account. The implication of this is that housing delivery has consistently failed to meet the Welsh Government’s projections of future need (as well as LDP housing requirements).
- 2.14 As detailed in section 1, there is a longstanding policy in Wales that requires all local planning authorities to be able to demonstrate a rolling five-year supply of housing land. This is monitored through the JHLAS process, the operation of which is detailed in TAN1. Underlining the importance of housing supply, paragraph 6.2 of TAN1 states that “*considerable weight*” should be given to the need to increase housing supply when dealing with planning applications for residential development where a five-year supply cannot be demonstrated, “*provided that the development would otherwise comply with development plan and national planning policies*”.
- 2.15 However, the performance of local planning authorities is worsening in terms of their ability to demonstrate a five-year supply, having fallen from 17 authorities in 2007 to just 5 in 2017.
- 2.16 Newport City Council has performed most strongly in respect of its housing supply, having had a five-year supply for 6 consecutive years, whilst Newport and Neath Port Talbot are the only

¹ Based on analysis undertaken by the late Prof Alan Holmans in 2015, and separate research by Lichfields, also in 2015

authorities to have been able to demonstrate a five-year supply in each year since the adoption of their LDPs. By contrast, 11 local planning authorities² have not been able to demonstrate a five-year supply in any JHLAS published since the adoption of their LDPs.

Figure 2.3 Housing land supply in Wales



Source: Lichfields analysis of 2017 JHLAS

LDP preparation

2.17

Section 62 of the Planning and Compulsory Purchase Act 2004 explains that LDP preparation is a statutory function of all local planning authorities, whilst Planning Policy Wales explains that an up-to-date LDP is a fundamental part of a plan-led planning system which sets the context for rational and consistent decision making in line with national policies. Paragraph 9.2.24 of PPW states that LDPs must:

- 1 Quantify the housing requirement (both market and affordable housing); and,
- 2 Allocate housing land.

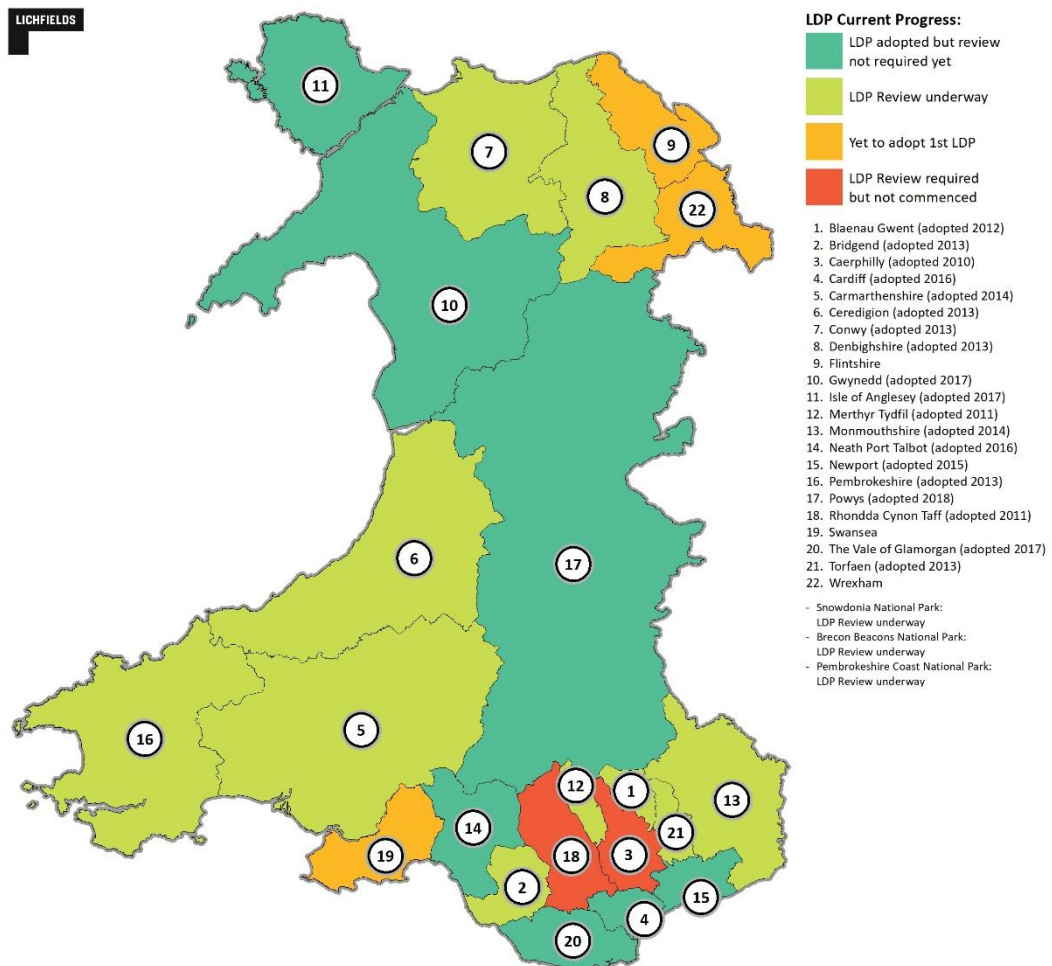
² Blaenau Gwent, Caerphilly, Cardiff, Carmarthenshire, Ceredigion, Conwy, Denbighshire, Merthyr Tydfil, Pembrokeshire Coast NPA, Rhondda Cynon Taf, Torfaen

2.18 LDPs are therefore important as they set the housing requirement as well as identify sites that are to be developed to meet the requirement. The HBF document, *Housing Delivery and the Plan-led System*, which was published in 2017, also acknowledges and underlines the “*fundamental*” importance of the LDP system in ensuring the delivery of housing. This point was echoed by the Cabinet Secretary for Energy, Planning and Rural Affairs in January 2018:

“I am absolutely committed to a plan-led approach to development across Wales. I think it's really important that local authorities bring forward their LDPs. ... I think the difficulty around LDPs is that they have to be constantly under review...”. (Lesley Griffiths AM, NAW Plenary, 17 January 2018).

2.19 The first LDP to be adopted was Pembrokeshire Coast National Park Authority in September 2010. Since then all planning authorities in Wales with the exception of Wrexham, Flintshire and Swansea have adopted LDPs. It is anticipated that these three remaining LDPs will be adopted in 2019.

Figure 2.4 LDP status in Wales



Source: Lichfields analysis of LDPs

2.20 A number of authorities are now in a position to review their LDPs, and a number have already commenced this process.

Table 2.1 Status of LDP Reviews

Local authority	LDP end date	Date of review commencement	Status of LDP Review	Anticipated LDP Review adoption date
Blaneau Gwent	2021	22 November 2016	2017 AMR states that the LDP revision process could take up to 4 years. Delivery agreement to be prepared	September 2021
Bridgend	2021	18 September 2017	Draft Review Report consultation concluded on 25 May 2018	Currently unknown
Carmarthenshire	2021	10 December 2018	Council resolved to prepare a revised LDP on 10 January 2018. Draft Delivery Agreement not yet approved	September 2021
Ceredigion	2022	25 April 2017	Delivery Agreement submitted to Welsh Government in February 2018	July 2021
Conwy	2022	24 October 2017	Delivery Agreement has not yet been approved	September 2021
Denbighshire	2021	04 June 2017	Delivery Agreement approved 22 May 2018	Autumn 2021
Merthyr Tydfil	2021	25 May 2015	Consultation on the pre-deposit (preferred strategy) closed in October 2017. Consultation on the Replacement Deposit Plan is scheduled for June/July 2018	December 2019
Monmouthshire	2021	27 February 2018	Delivery Agreement approved by Welsh Government on 14 May 2018	December 2021
Pembrokeshire	2021	28 February 2017	Draft Delivery Agreement approved by Welsh Government 7 June 2018	Late summer / autumn 2019
Torfaen	2021	03 December 2017	Draft Delivery Agreement consultation concluded 16 May 2018	April 2022
Brecon Beacons NPA	2022	17 December 2017	Draft Review Report consultation anticipated June 2018	Currently unknown
Pembrokeshire Coast NPA	2021	29 September 2014	Deposit Replacement LDP consultation concluded on 1 June 2018	End of 2019/Early 2020
Snowdonia NPA	2022	13 July 2015	Submitted 25 January 2018	Summer 2018

Source: Lichfields analysis

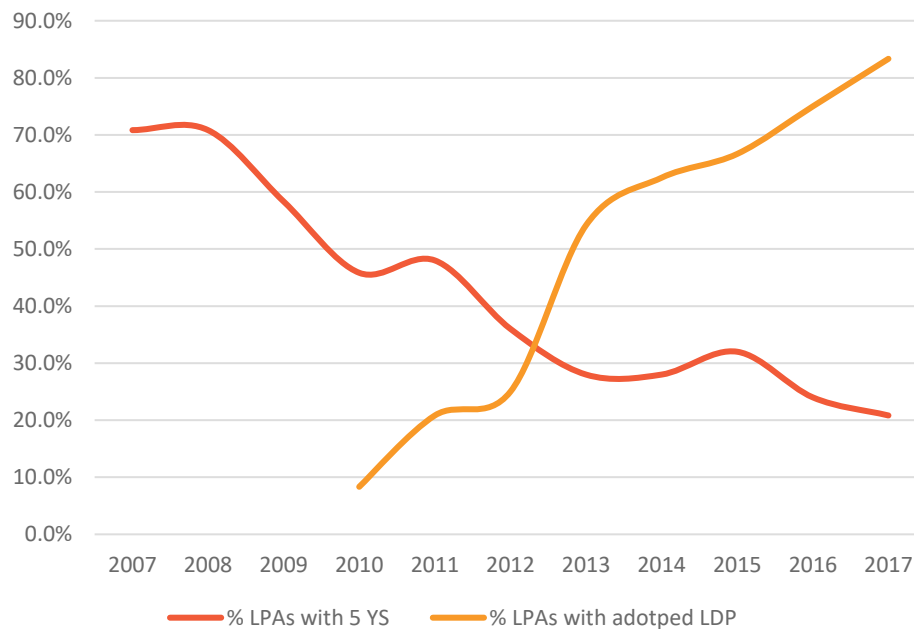
- 2.21 Caerphilly Council commenced work on its replacement LDP but has subsequently decided to withdraw the document. We understand that the authority is waiting for clarity regarding Strategic Development Plans (SDP) prior to making further progress. This is a matter of great concern given the uncertainty and lack of progress on SDPs, and it looks increasingly likely that Caerphilly will be left without a development plan after November 2021. This policy vacuum will mean that it will not be possible to meet the authority's housing needs in a planned manner. We understand that Rhondda Cynon Taf is maintaining a similar position.

Five-year supply position

- 2.22 Whilst 21 of 24 local planning authorities in Wales now have an adopted LDP in place, this has not resulted in a commensurate improvement in the number of authorities that are able to demonstrate a five-year housing supply. Indeed, a review of JHLAS studies since 2007 indicates

an inverse relationship between LDP coverage and the performance in respect of five-year supply coverage.

Figure 2.5 Comparison of LDP coverage and five-year supply position



Source: Lichfields of LDPs and JHLAS reports

- 2.23 The *Longitudinal Viability Study of the Planning Process* (February 2017) found that there is a significant problem regarding the non-delivery of LDP allocations. Viability challenges were repeatedly noted as being the primary reason for this. Paragraph 3.2.1 states that:
- “Ultimately, a lack of certainty about how and when sites may come forward for development may undermine the robustness of the development plan process, creating uncertainty and prolonged negotiations for later development management stages, making the JHLAS process a less effective tool for monitoring housing land supply, and with knock-on effects on housing delivery.”*
- 2.24 The Welsh Government is clearly aware of the difficulties that exist and is taking steps through the draft version 10 of PPW towards an increased focus on viability as part of Plan preparation. However, this will take time to translate into action and will have no bearing on the implementation of currently adopted LDPs. The current failure of allocated sites to come forward is resulting in an increased burden being placed upon unallocated sites to contribute towards housing supply. The proposed change to TAN1, which seeks to make it more difficult for such sites to come forward, will serve only to reduce the overall housing supply.
- 2.25 There has been considerable debate over time regarding the methodological basis of TAN1. This was addressed through the drafting of the current version of TAN1 which was published in January 2015 and states that the supply of sites for residential development should be compared *“with the remaining housing requirement in the adopted LDP – the residual method”* (paragraph 5.2). This reflects the approach of PPW which requires local planning authorities to *“ensure that sufficient land is genuinely available or will become available to provide a five-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan”*. The *Longitudinal Viability Study of the Planning Process* describes the residual method as *“the only appropriate means of*

calculating (the) housing requirement” (paragraph 3.6.2). TAN1 is entirely appropriate in adopting this emphasis.

2.26 The (then) Cabinet Secretary for the Environment and Rural Affairs provided an appropriately strong defence of the system in response to a Written Assembly question in September 2017:

“As part of the revisions to TAN 1 in 2015, the use of the alternative methodology for calculating housing land supply, based on past build rates, was removed. This methodology was based on the past underperformance of the house-building industry and does not relate to delivery against the housing requirements established by Local Planning Authorities in their Local Development Plans to meet the needs of their communities”.

2.27 However, a number of local planning authorities have continued to maintain that TAN1 should apply the alternative approach of testing housing supply against past trends, on the basis that this would result in an improved supply position. The only reason why this would be so is because of the historically low levels of housing delivery in Wales. It is important to recognise that this consultation is not about the mechanism underpinning TAN1, which was agreed by Welsh Government in 2015.

2.28 The Welsh Government ambition of driving up house building in Wales is essential to the economic and social well-being of communities across the country. This fundamental principle lies at the heart of the current consultation but it is clear from the evidence contained within this report that the proposed dis-application of paragraph 6.2 of TAN1 would go against the important aim of increasing housing supply. No evidence has been provided by the Welsh Government to explain the problem that paragraph 6.2 is apparently creating, nor to demonstrate how the change will align with, and support, its policy agenda.

3.0 **Methodology of the research**

3.1 These representations have been informed by the following research:

Review of windfalls

3.2 An overview of the anticipated contribution of windfall sites to the LDP housing supply.

Housing land supply review

3.3 Review of LDP preparation and the housing land supply position for all local authorities in Wales since 2007.

JHLAS review

3.4 A review of the 17 published JHLAS reports that cover the 2016/17 period³. The sites contained in the JHLAS report for each local planning authority were cross-referenced with the housing allocations in each respective LDP (and UDP where the information was available) to identify which sites were, and which were not, allocated. The number of dwellings completed in 2016/17 were identified for all unallocated sites.

3.5 TAN¹ notes that the JHLAS process typically applies a minimum size threshold of 5 or 10 units. This analysis therefore only records completions on sites of this scale.

Planning application review

3.6 A review of outline and full planning applications submitted for 50 or more dwellings since 1 May 2015. This assessment was undertaken for the following 10 authorities with an “advanced search” function on their websites that allowed us to search for major residential applications.

- 1 Bridgend;
- 2 Caerphilly;
- 3 Cardiff;
- 4 Conwy;
- 5 Flintshire;
- 6 Merthyr Tydfil;
- 7 Rhondda Cynon Taf;
- 8 Swansea;
- 9 Torfaen; and,
- 10 Vale of Glamorgan

3.7 Lichfields recognise that this review only covers part of Wales but consider that our methodology represents a proportionate response guided by the functionality constraints of the Council’s websites. These local authorities account for 55% of the Welsh population and

³ In the absence of an adopted LDP and JHLAS, Flintshire, Swansea and Wrexham have not been included in this analysis. The Vale of Glamorgan LDP, Anglesey and Gwynedd Joint LDP and Powys LDP were adopted 28 June 2017, 31 July 2017 and 17 April 2018 respectively. In accordance with TAN 1, the next formal JHLAS for these local authorities will be published by 31 October 2019. Nevertheless, authorities without an up-to-date JHLAS should carry out an objective assessment of their housing land supply on annual basis. Although this study does not carry the same weight for planning purposes as a formal study, such studies have been included in this analysis where available. Consequently, Isle of Anglesey and Gwynedd have been included in this analysis.

approximately 60% of housing completions since 1996-7. The evidence obtained from this research provides an indication of the importance of unallocated sites across these local authorities. No attempt has been made to adjust the findings to indicate a Wales-wide figure, although the overall supply of housing on unallocated sites across Wales as a whole will clearly be greater than the level we have identified, as will the economic benefits associated with such housing.

3.8 Lichfields has reviewed these applications to identify:

- 1 The number of dwellings proposed (total and affordable);
- 2 Whether the application has been determined, and whether it was allowed or refused;
- 3 The policy status of the site in terms of whether it is allocated in the statutory development plan (or proposed for allocation in a draft LDP);
- 4 The time taken for the local planning authority to determine the application; and,
- 5 The application fee payable.

Review of appeal decisions

3.9 Analysis of the outcomes of the 71 appeals for proposed developments of 10 or more dwellings that were determined by the Planning Inspectorate between January 2015 and June 2018, together with 14 Ministerial decisions between January 2011 and June 2018. Lichfields reviewed the decisions associated with these schemes and identified whether:

- 1 The appeal was allowed or refused;
- 2 The site is allocated in the statutory development plan;
- 3 The local planning authority has demonstrated a five-year housing land supply in its 2017 JHLAS (if it has published one);
- 4 The Planning Inspector or Minister has specifically cited the considerable weight to be given to a lack of five-year housing land supply (where this is the case); and,
- 5 The Planning Inspector or Minister has identified the proposed development as being located within a sustainable location, i.e. whether it broadly represents sustainable development (even if site-specific issues mean that the site is not suitable for development).

3.10 Based on this analysis, we have reviewed the extent to which paragraph 6.2 is being applied and the claim that it is delivering unsustainable outcomes.

3.11 This assessment also identifies the key reasons for the decisions in these appeal cases and explores how different factors are being weighed in the overall planning balance when compared to the considerable weight applied to a lack of a five-year supply.

Assessment of economic impact

3.12 Application of Lichfields' Evaluate methodology, which provides a framework for assessing the economic impact of new development. This approach focuses on the key quantifiable economic impacts of development during the construction phase and upon completion.

3.13 Our assessment of economic impact draws upon the JHLAS analysis of completions on sites of more than 10 units across 17 Welsh authorities in 2016/17.

Budget review

3.14 Review of changes to local authority departmental budgets between 2011/12 and 2017/18.

4.0 **Q1: Do you agree with the proposed temporary dis-application of paragraph 6.2 of TAN 1 to remove the reference to attaching “considerable” weight to the lack of a five-year housing land supply as a material consideration in determining planning applications for housing?**

4.1 The intended purpose of the proposed change to TAN1 is understood to be to reduce policy support for “speculative” residential development proposals and thereby discourage the submission of unsustainable planning applications relating to sites that are not allocated in LDPs. This is a significant change to a long-established policy position whereby paragraph 6.2 of TAN1 provides a mechanism to ensure the continuation of land supply in local authorities where LDPs are not delivering. It has provided an effective sanction to ensure plans were in place and sustainable developments were permitted.

4.2 We have structured our response to this question by considering the contribution of development on unallocated sites to the housing supply in Wales and the impact of this in terms of social and economic well-being. We then move on to consider the claim made by the Cabinet Secretary in her letter of local planning authorities of 2 May 2018 that “*absolute adherence to the 5 year land methodology in some cases is working against the achievement of good sustainable outcomes*”.

4.3 Our very clear conclusion is that the proposed dis-application of paragraph 6.2 of TAN1 is not appropriate. It would:

- 1 Undermine the Welsh Government’s important policy objective of increasing housing delivery;
- 2 Harm the Welsh economy;
- 3 Undermine the delivery of affordable housing;
- 4 Jeopardise the achievement of well-being goals; and,
- 5 In no way “*aid the achievement of good sustainable outcomes*”.

Reliance on windfalls in LDPs

4.4 Given the important contribution that unallocated sites make to the housing land supply across Wales, their loss will have a significant impact on housing delivery rates. Moreover, we note that all LDPs in Wales rely on unallocated sites to contribute to their housing requirements, as evidenced by the presence of a windfall component (i.e. unallocated and currently unknown sites that are expected to be released for housing in the future) to the housing supply. This component ranges from 8.4% of total housing supply in Pembrokeshire to 21.8% in Gwynedd and Anglesey. Across the authorities in Wales that have an adopted LDP in place, windfall completions are expected to account for an average of 16.5% of total housing supply.

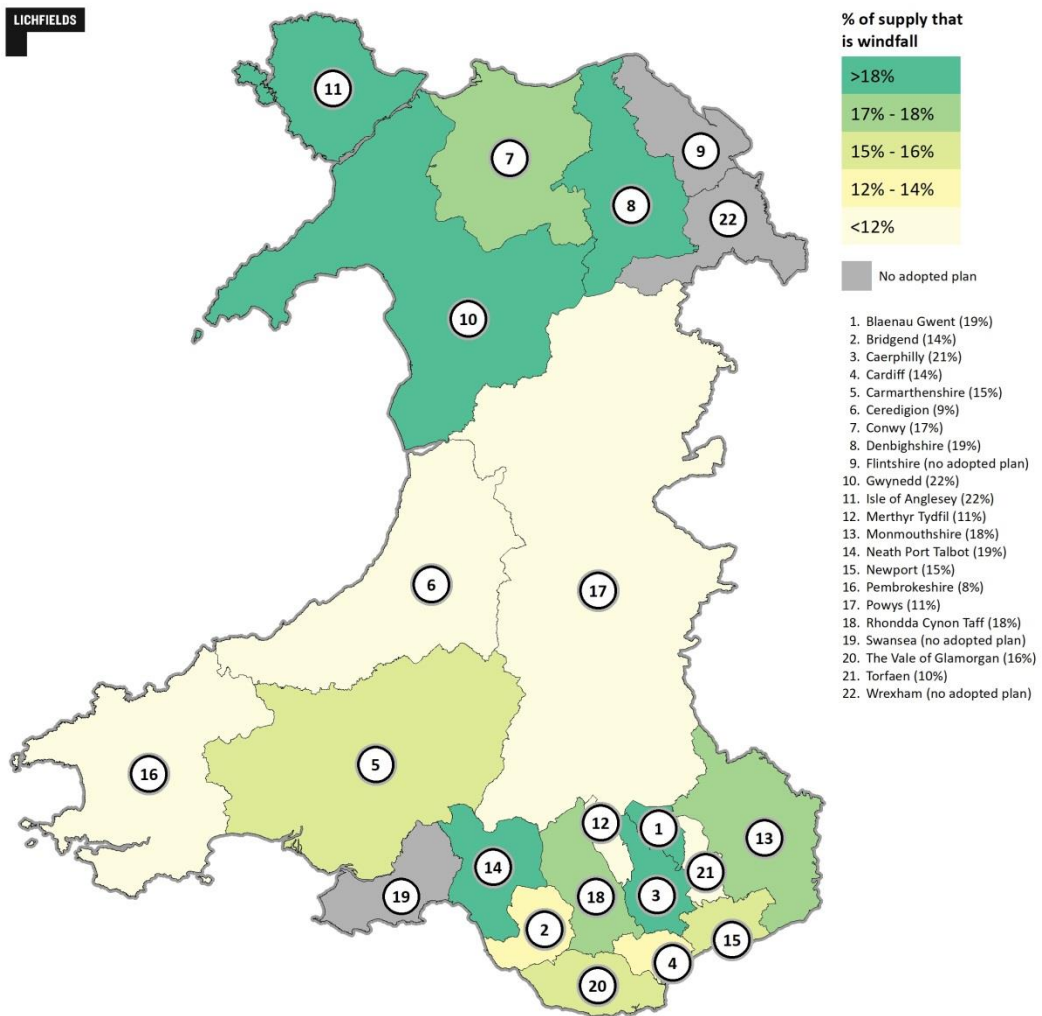
4.5 Windfalls are not defined within PPW or TAN1. As detailed in Appendix 1, the majority of LDPs define them as sites that unexpectedly come forward, despite not being allocated in the plan.

Only two LDPs (Flintshire and Pembrokeshire Coast National Park Authority) include any reference to windfall sites being solely located within settlement boundaries.

4.6 The definition that has been applied by local planning authorities in respect of windfall sites is important because it affects the allowance that would have been made for windfalls in their LDPs. A key theme underlying the Consultation Document and the Cabinet Secretary’s letter of 2 May 2018 is the suggestion that applications for residential development on unallocated sites are contrary to the effective implementation and operation of the LDP process. The fact that all LDPs in Wales anticipate, and are reliant, on unallocated windfall sites coming forward indicates that this is not the case.

4.7 Moreover, the limited level of delivery of many LDP allocations, as evidenced in the *Longitudinal Study of the Planning Process*, further increases the importance of housing supply coming forward on other sites.

Figure 4.1 Proportion of LDP housing supply expected to come forward from windfall sites



Source: Lichfields analysis of LDPs

Impact

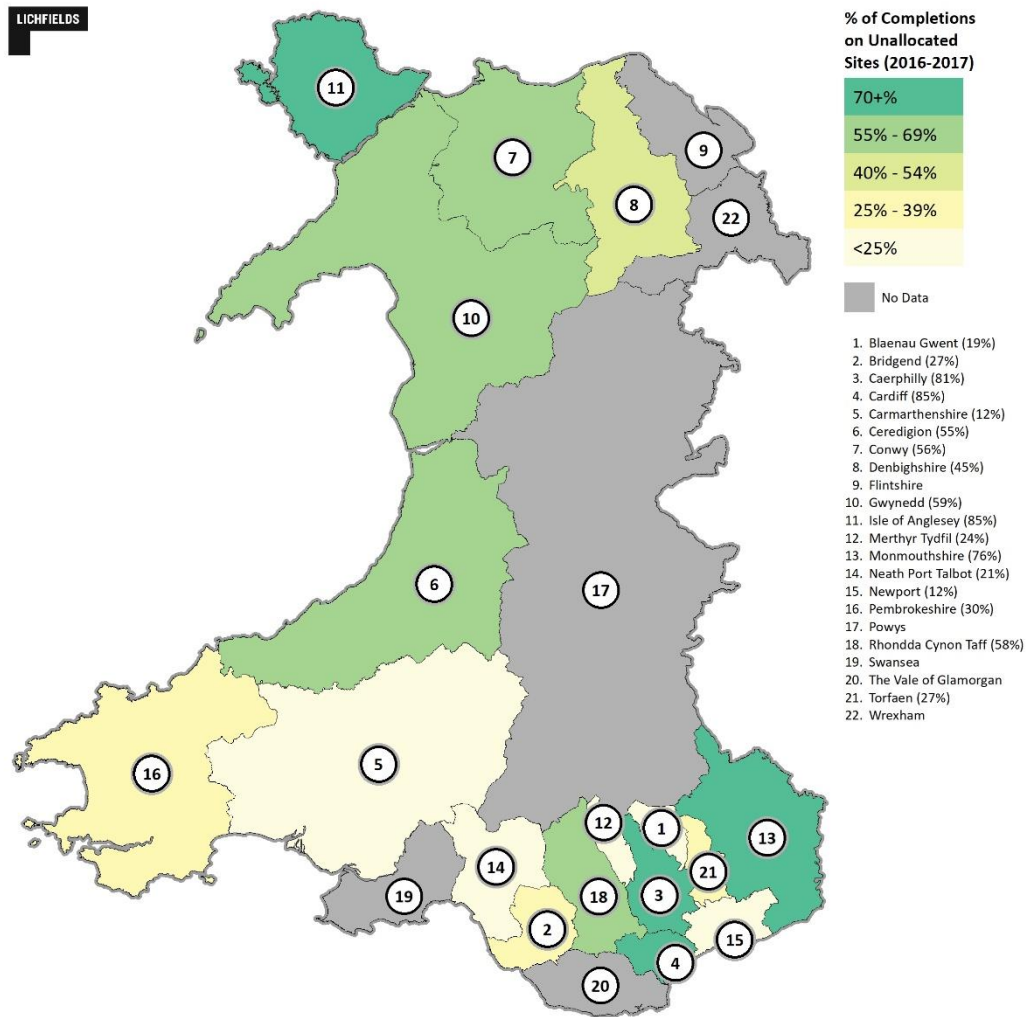
Contribution to housing supply

- 4.8 Lichfields has sought to quantify the contribution that the development on unallocated sites makes to the overall level of housing delivery in Wales through a review of the 17 JHLAS studies that were completed for 2016/17, a review of planning applications submitted since May 2015 for more than 50 units, and a review of planning appeals determined since January 2015 and Ministerial decisions since January 2011.
- 4.9 The key finding from this research is that unallocated sites make a very significant contribution to housing supply in Wales. A significant reduction in the number of planning applications that are submitted in relation of unallocated sites (and approved) would have a deleterious effect on housing supply in Wales.

JHLAS review

- 4.10 Our analysis of the 17 JHLAS studies that were published in 2017 has revealed that a total of 1,889 dwellings were completed on unallocated sites in the year to March 2017. This represents 41% of the 4,594 completions on developments recorded in the JHLASs. It is acknowledged that this represents a snapshot taken at a specific point in time. Some authorities with recently adopted LDPs may start to see a reduction in the number of completions on unallocated sites as delivery begins on allocated sites (e.g. Cardiff). However, this will not be the case for all areas.

Figure 4.2 Proportion of completions in 2016/17 on unallocated sites

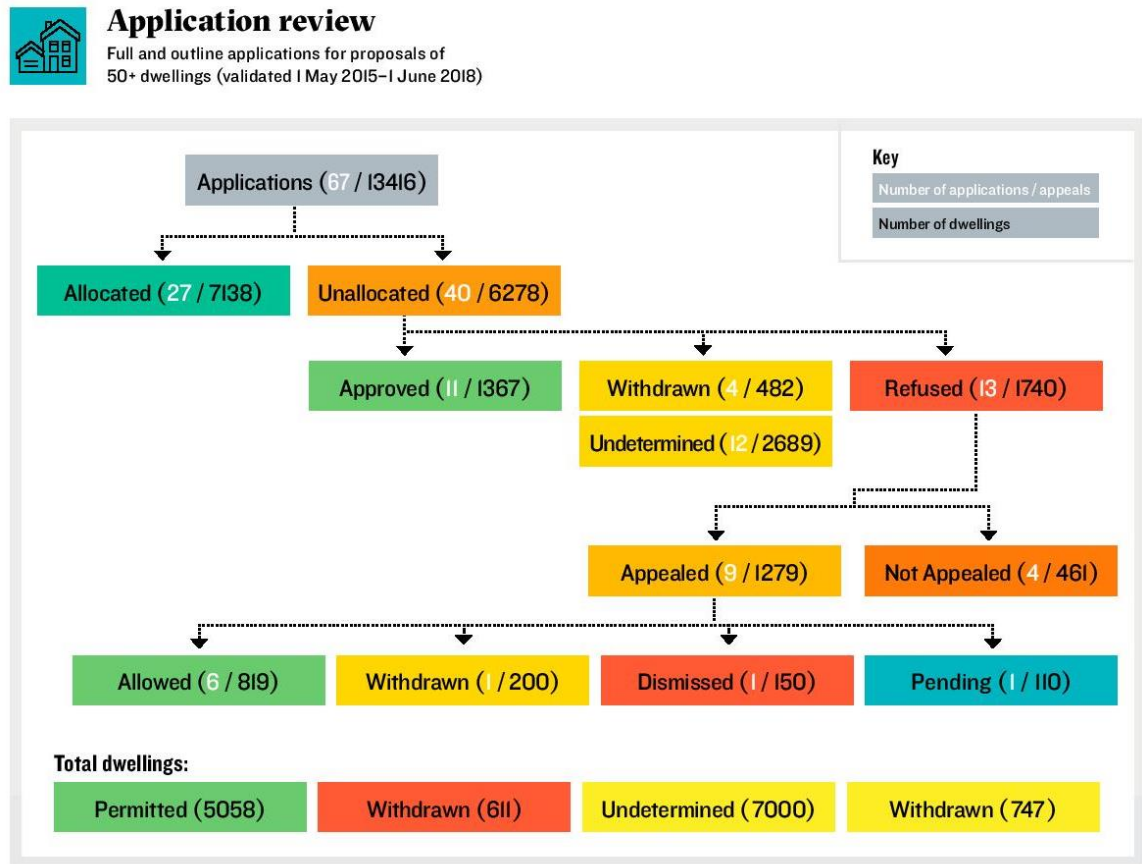


Source: Lichfields analysis of 2016/17 JHLAS

Planning application review

- 4.11 Our review of planning applications relating to more than 50 dwellings that have been submitted since May 2015 has shown that, of the 4,239 dwellings that have been approved by the local planning authority, 1,367 (32%) were on unallocated sites. A further 819 dwellings on unallocated sites were subsequently approved at appeal. This equates to 43% of all dwellings granted planning permission being on unallocated sites.
- 4.12 Of the 13,416 dwellings for which planning permission was sought, 6,278 (40%) were on unallocated sites, 2,186 of which were approved. This equates to 16.3% of the number of dwellings for which planning permission was sought.

Figure 4.3 Assessment of planning applications for 50+ dwellings submitted since May 2015



Source: Lichfields analysis

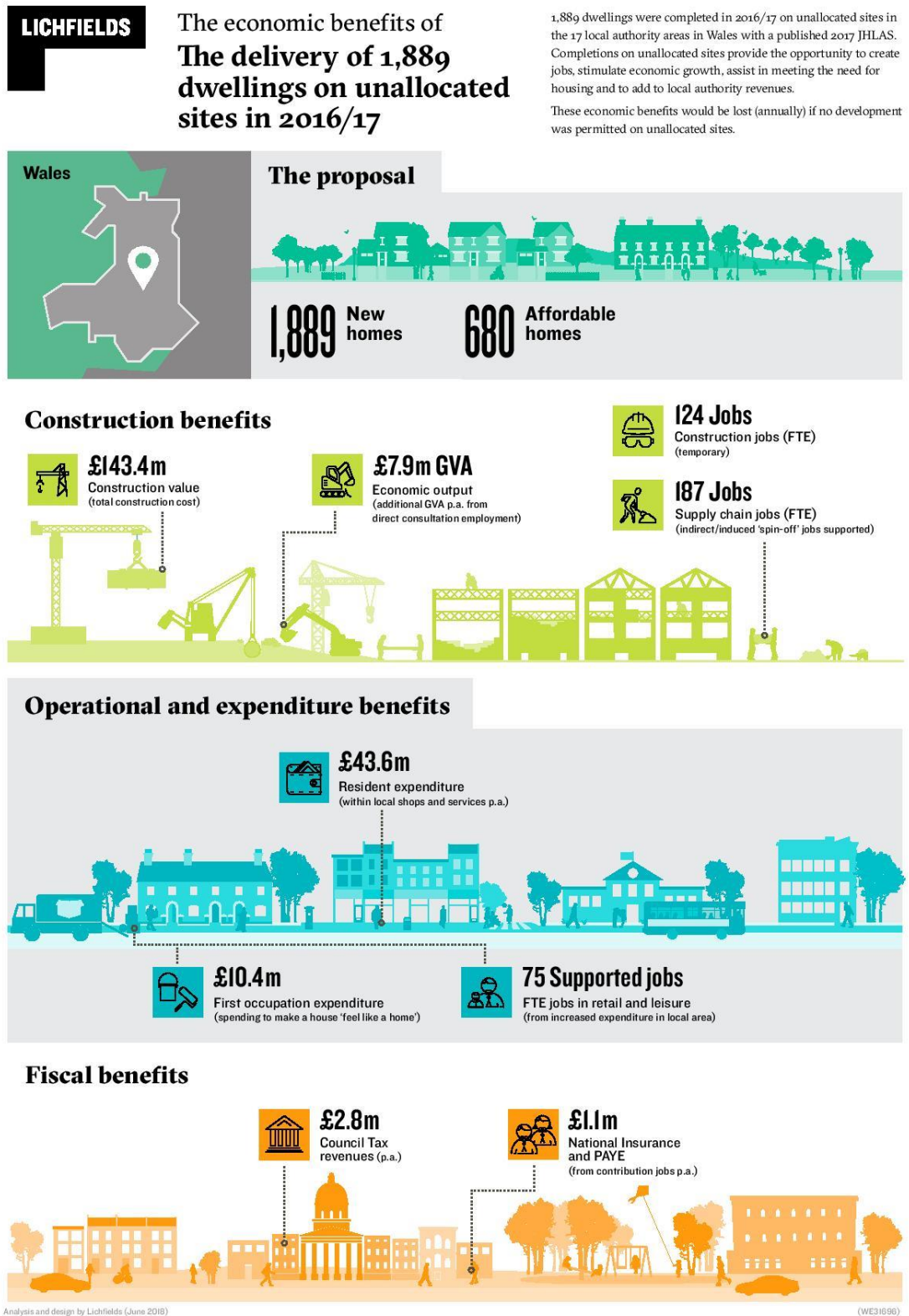
Appeal review

- 4.13 Our analysis of appeal decisions since January 2015 has shown that Inspectors have granted planning permission for 740 dwellings on unallocated sites (63% of all units approved).
- 4.14 Our review of Ministerial decisions since 2011 has shown that planning permission has been granted for 1,053 dwellings on unallocated sites (47% of all units approved by the Minister).
- 4.15 Decision makers have clearly considered development proposals on such sites to be compliant with the suite of relevant policies.
- 4.16 Central both to the overall low levels of housing delivery and the relative importance of unallocated sites is the fact that many sites allocated in LDPs have failed to come forward for development. As recognised by the *Longitudinal Viability Study of the Planning Process*, issues relating to the viability of allocated sites have often been the key cause of non-delivery. In the context of allocated sites not coming forward, ensuring the continuation of housing delivery has been dependant to a significant degree on the release of unallocated sites, although overall delivery has still been between 50% and 66% of anticipated need. This is likely to continue to be an on-going issue until the LDP reviews have been completed and new sites have been allocated. Viability and deliverability of proposed allocation sites are already known to be key issues that will need to be addressed during the LDP review process, as has been proposed by the draft version 10 of PPW.

Economic impact

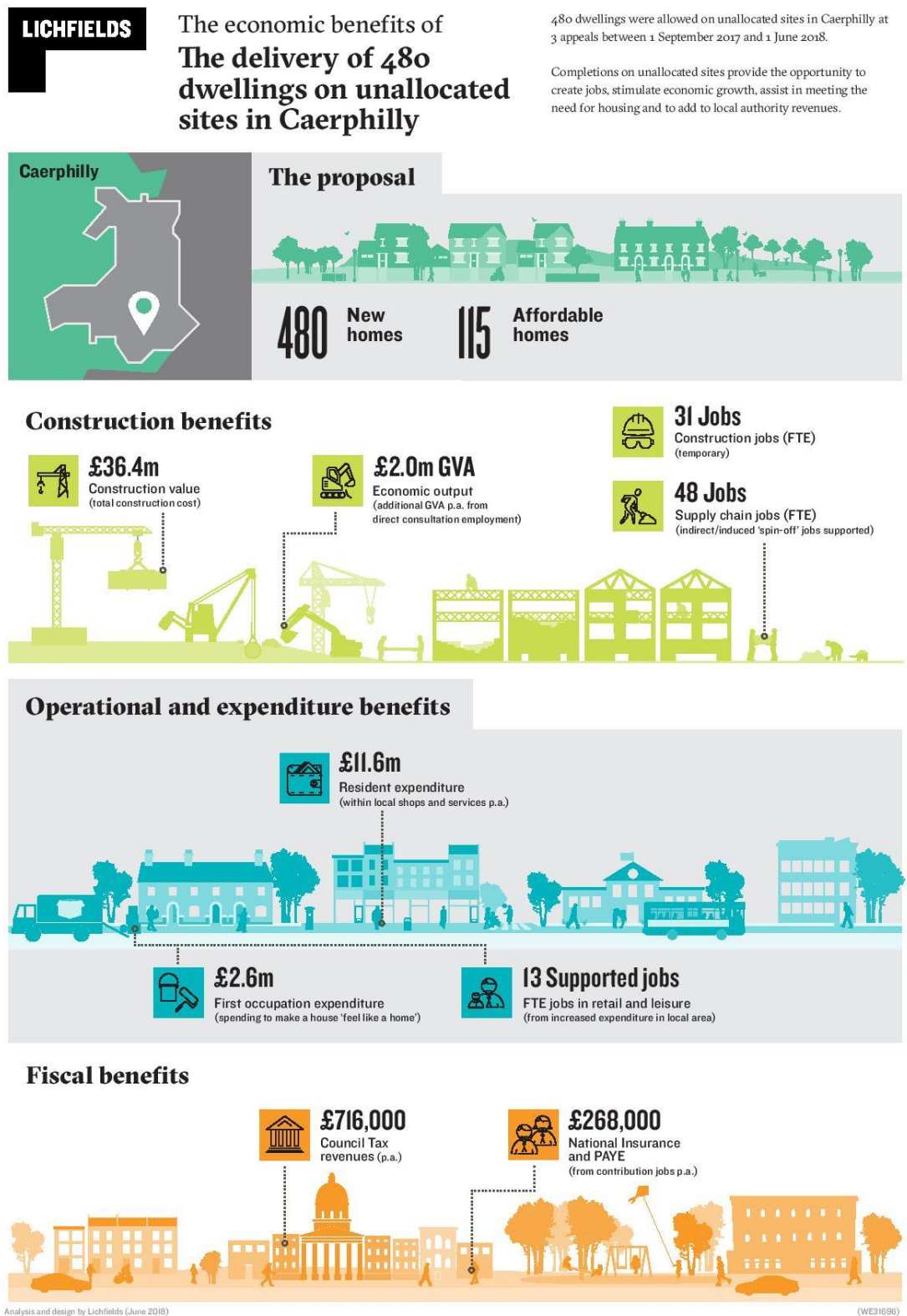
- 4.17 Supporting economic growth is a fundamental priority for Welsh Government and a core objective of planning policy. PPW (version 9) states at paragraph 7.1.3:
- “The planning system should support economic and employment growth alongside social and environmental considerations within the context of sustainable development.”*
- 4.18 As outlined in Section 2, residential development is widely recognised as having a major role to play in driving economic growth. The house building industry comprises a variety of different types of organisation – from large-scale national volume house builders to medium size and regional companies, as well as local builders and housing associations. These organisations employ large numbers of people in different roles and provide income for a wide-ranging network of suppliers.
- 4.19 The development of new housing on unallocated sites makes a significant contribution to the Welsh economy, which will generate a range of direct, indirect and induced effects, including the creation of new jobs, the generation of fiscal receipts, and additional spending in local businesses.
- 4.20 Past housing completions on unallocated sites have provided significant economic benefits to the Welsh economy. Lichfields’ analysis of the 1,889 dwellings that were completed on unallocated sites in 2016/17 has identified the following key economic benefits:
- 1 311 direct and indirect full-time equivalent jobs in the construction industry and suppliers;
 - 2 £143.3 million p.a. in economic output from direct construction jobs;
 - 3 £43.6 million p.a. expenditure by new residents on goods and services; and,
 - 4 £2.8 million p.a. in Council Tax revenue.
- 4.21 As highlighted by this report, the delivery of homes in Wales to meet housing need is heavily reliant upon unallocated sites. Therefore, if these sites are prevented from coming forward, the economic benefits associated with these developments will be lost, resulting in a significant detrimental impact on the local economy. The figures set out above represent the scale of economic benefits that would be lost if no unallocated sites came forward.
- 4.22 We note that the figures set out above and in Figure 4.4 will include some brownfield sites in the urban area that might not be subject to any policy objections following the dis-application of paragraph 6.2 of TAN1.
- 4.23 An additional example of the potential economic impact of the proposed policy change is by reference to the 3 appeal decisions in Caerphilly that have resulted in the grant of planning permission for 480 dwellings (including 115 affordable) since September 2017 (see Figure 4.5). It is noted that in each of these appeals:
- 1 The severe deficiency of the housing land supply; together with
 - 2 The failure of the LDP to deliver the necessary housing, and absence of any measure to address it following the withdrawal of the LDP review; and
 - 3 The fact that the schemes were sustainable and offered a wide range of benefits (including economic benefits); but without
 - 4 Causing any unacceptable harm
- weighed in favour of the grant of planning permission.

Figure 4.4 Economic impacts of dwellings completed in 2016/17



Source: Lichfields analysis of 2016/17 JHLAS

Figure 4.5 Economic impacts of dwellings approved at appeal in Caerphilly



Source: Lichfields analysis

Affordable housing

- 4.24 Our review of the planning applications identified that a total of 574 approved units on unallocated sites are to be provided as affordable dwellings. This equates to 26% of the 2,186 dwellings that were permitted by the relevant local planning authority or at appeal on unallocated sites.
- 4.25 Of the 1,889 new dwellings that were identified through our JHLAS review as having been delivered on unallocated sites in 2016/17, 680 (36%) were affordable.
- 4.26 It is clear from both our review of a sample planning applications and the JHLAS analysis that development on unallocated sites represent an important source of affordable housing and will make a tangible and beneficial contribution towards the Welsh Government's target of 20,000 additional affordable homes by March 2021.
- 4.27 In seeking to prevent the submission of "speculative" planning applications, the dis-application of paragraph 6.2 of TAN1 would reduce the delivery of affordable housing, to the detriment of communities throughout Wales.

Sustainable outcomes


- 4.28 In her letter of 2 May 2018, the Cabinet Secretary stated that:
- "absolute adherence to the 5 year land methodology in some cases is working against the achievement of good sustainable outcomes"*
- 4.29 This point is not reflected in the Consultation Document and no evidence is provided to substantiate the claim.
- 4.30 The purpose of paragraph 6.2 of TAN1 is to prescribe the weight that is to be applied to the need to increase housing supply in the event of a local planning authority being unable to demonstrate a five-year housing supply. However, that is not to suggest that all planning applications would be approved in such circumstances, as is clearly recognised by the important caveat in the paragraph and demonstrated by our analysis of appeal decisions set out above:
- "the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies"* (Lichfields emphasis).
- 4.31 The actual requirement is therefore to give considerable weight to proposals if, and only if, they comply with development plan and national planning policies. This provides an important safeguard against unsustainable outcomes, potentially at the expense of supporting the important aim of increasing housing delivery.
- 4.32 The ability of the planning system to safeguard against unsustainable forms of development on inappropriate sites was recently explained by the First Minister and the Cabinet Secretary:
- "If there are planning applications that are coming forward on land where that land is not allocated for that particular use in the LDP, the council isn't obliged to give planning permission."* (Carwyn Jones AM, NAW Plenary, 21 November 2017; Lichfields emphasis).
- "...if a local planning authority hasn't got a five-year housing land supply, they are open to speculative planning applications for housing development. However, all such applications should be assessed against all relevant policy considerations, including the need to increase housing land supply, and the principle of sustainable development".* (Lesley Griffiths AM, NAW Plenary, 29 November 2017; Lichfields emphasis).

Evidence that speculative applications undermine sustainable outcomes

4.33

We have used our analysis of appeal decisions to explore whether the current planning policy context is supporting the aim to achieve “good sustainable outcomes” decisions, or whether paragraph 6.2 is leading to planning decisions at appeal that allow development on “unsustainable” sites. We have also considered what it means to apply “considerable weight” to a lack of five-year housing land supply when considered in the overall planning balance.

Figure 4.6 Assessment of planning appeals

 Appeals: Planning Inspectorate decisions Appeals determined by Planning Inspectors: appeals of 10+ dwellings (1 January 2015–1 June 2018)		Allowed	Dismissed	Total	% Allowed
All		32	39	71	45.1%
• Allocated		9	4	13	69.2%
• Unallocated:		23	35	58	39.7%
— With 5 year housing land supply		1	5	6	16.7%
— Without 5 year housing land supply:		22	30	52	42.3%
◦ Cited lack of 5 year housing land supply as a significant consideration		14	23	37	37.8%
◦ Sustainable development		22	22	44	50.0%
◦ Unsustainable development		0	8	8	0.0%

Source: Lichfields analysis

4.34

The key findings from this analysis are illustrated in Figure 4.6 and summarised below:

- 1 Just under half (45%) of all of the identified appeals were allowed.
- 2 A significantly higher proportion of allocated sites were allowed than unallocated sites (69% compared to 40%).

This shows that plan-led proposals are more likely to be successful than unallocated schemes, and that the planning system is functioning to reflect the aim to be plan-led⁴.

- 3 A total of 42% of appeals were allowed in local planning authorities without a five-year supply, suggesting that the **weight is being given to lack of five-year supply, albeit that this is not overwhelming.**

- 4 By comparison, only 17% of appeals were allowed in areas with a five-year supply.

- 5 Of those appeal decisions where the Planning Inspector specifically cited the attribution of considerable weight to a lack of five-year supply, only 38% were allowed.

This indicates that, even in the context of this weight to be applied **under paragraph 6.2, other material considerations still outweigh this factor in a large proportion (62%) of cases** when taken in the overall planning balance.

- 6 Just half (50%) of appeals on sites located in sustainable locations in local authorities without a five-year supply were allowed.

This shows that, even in sustainable locations and taking into account the weight to be given to a lack of five-year supply, there are often (site specific) reasons why a decision-

⁴ Planning Policy Wales, section 2.1

maker may conclude that development should not go ahead. However, it is emphasised that these decisions are a matter of planning judgment and the weight to be given to each material consideration will vary according to the specific circumstances of each development proposal.

7 No appeals were allowed on unsustainable sites even where there was a lack of five-year supply.

Crucially, this demonstrates that paragraph 6.2 as it stands has not led to the development of unsustainable sites, even when considerable weight has been applied to a lack of five-year supply.

Figure 4.7 Assessment of Ministerial decisions

 Appeals: Ministerial decisions Appeals determined by Planning Inspectors: appeals of 10+ dwellings (1 January 2011-1 June 2018)		Allowed	Dismissed	Total	% Allowed
All		6	8	14	42.9%
• Allocated		1	1	2	50.0%
• Unallocated:		5	7	12	41.7%
— With 5 year housing land supply		0	1	1	0.0%
— Without 5 year housing land supply:		5	6	11	45.5%
◦ Cited lack of 5 year housing land supply as a significant consideration		4	3	7	57.1%
◦ Sustainable development		5	4	9	55.6%
◦ Unsustainable development		0	3	3	0.0%

Source: Lichfields analysis

4.35 Our analysis of Ministerial decisions has identified similar trends:

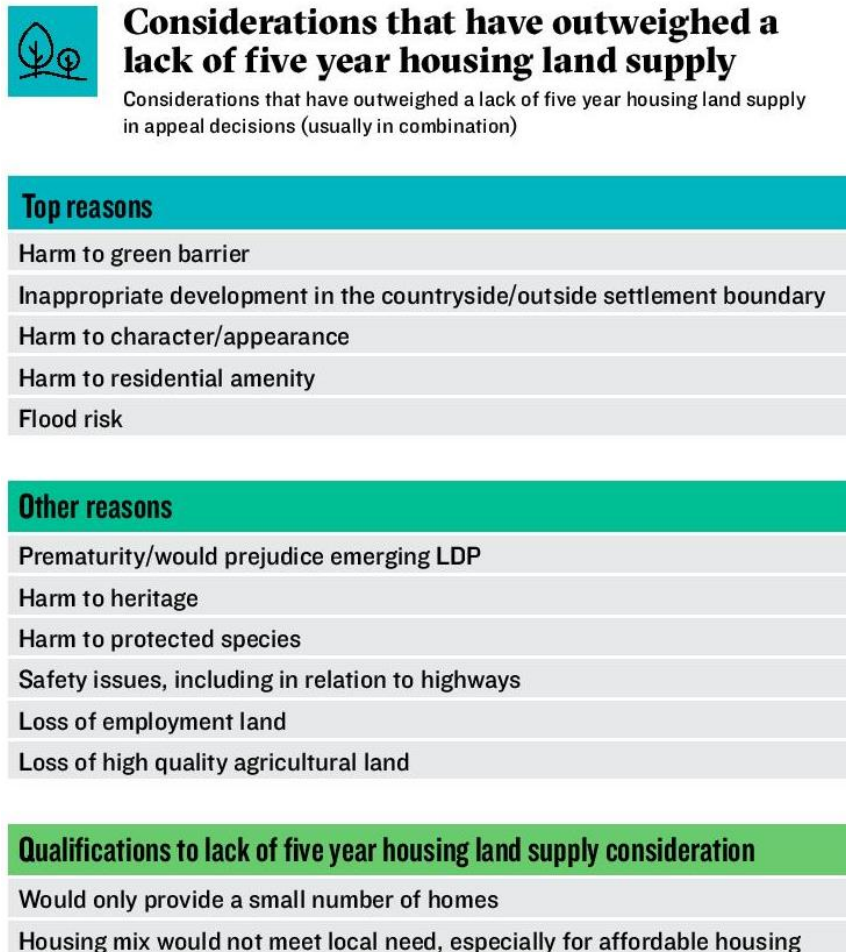
- 1 43% of cases before the Minister were approved.
- 2 50% of cases relating to allocated sites were approved by the Minister, compared to 42% of unallocated sites.
- 3 **45% of appeals were allowed by the Minister in local planning authorities without a five-year supply**; none were allowed in areas with a five-year supply.
- 4 **The Minister approved 56% of appeals on sites located in sustainable locations in local authorities without a five-year supply, but no appeals on unsustainable sites.**

4.36 This analysis supports the finding of paragraph 3.6.3 of the *Longitudinal Viability Study of the Planning Process* that:

“LPAs without a five year land supply feel that they are more vulnerable to challenges at appeal for sites not allocated within their LDP, although there is little evidence to suggest at present that this may be the case.”

4.37 The types of consideration that have outweighed a lack of five-year supply in appeal decisions (usually in combination) are summarised in Figure 4.8.

Figure 4.8 Key considerations in determination of planning appeals



Source: Lichfields analysis

- 4.38 This analysis demonstrates how the planning balance functions in practice. It highlights that Planning Inspectors are giving predominant weight to a wide range of material considerations in different cases and that their decisions are not applying an interpretation of paragraph 6.2 that applies considerable weight to housing land supply at the expense of other factors.
- 4.39 It is also useful to note that some Inspectors are qualifying the weight to be given to a lack of five-year supply in some cases where they conclude that the development proposal would not serve to substantially address the shortage of homes in the area or would not provide a suitable housing mix to meet the needs of an area. The fact that Inspectors are able to take this reasoned position in the context of paragraph 6.2 again shows that this requirement is not stifling the appropriate functioning of the planning appeal system.
- 4.40 In conclusion, it is clear that the planning system is working very effectively to resist unsustainable development proposals and there is no evidence at all to support the Cabinet Secretary’s claim that adherence to the approach contained within TAN1 is working against the achievement of good sustainable outcomes.

5.0 **Q2: Do you consider the proposed temporary dis-application of paragraph 6.2 of TAN 1 will be effective in relieving pressure on local planning authorities when dealing with speculative planning applications for housing?**

5.1 The justification for the dis-application of paragraph 6.2 of TAN1 is understood to be a reduction in the number of “speculative” planning applications for housing. However, in the context of the failure of allocated sites to come forward for development, the unintended consequence of this will be a significant reduction in housing delivery – which lies in conflict with one of the Welsh Government’s primary objectives.

5.2 Two key points emerge from this:

- 1 Whether the Welsh Government considers this to be a price worth paying to relieve pressure on local planning authorities; and,
- 2 Whether the determination of planning applications for “speculative” planning applications represents a significant source of pressure for local planning authorities in Wales.

5.3 It is unclear whether the pressure referred to in question 2 relates to political or resource pressure. For the purposes of this research, Lichfields has assumed the latter.

5.4 Whilst there is no doubt that local planning authorities are subject to on-going financial and resource pressures, no evidence has been included within the Consultation Document to show that the determination of planning applications for residential development on unallocated sites represents a source of additional pressure.

5.5 The Consultation Document suggests that the proposed dis-application of paragraph 6.2 will ease pressure and allow local planning authorities to focus on plan preparation and review:

“To alleviate some of the immediate pressures on local planning authorities when dealing with speculative planning applications for housing and to allow them the capacity to focus on LDP preparation and review.”

5.6 In her letter of 2 May 2018 to local planning authorities, the Cabinet Secretary suggested that the dis-application of paragraph 6.2 is also intended to allow them to *“focus on LDP preparation and the ‘call for evidence’”*.

5.7 If there is pressure on local planning authorities, the conclusion ought to be that resources should be increased rather than the number of planning applications reduced, particularly given the policy aspiration of increasing housing delivery.

5.8 No evidence is provided to demonstrate whether the proposed dis-application of paragraph 6.2 would represent an appropriate response. In addressing this issue, Lichfields has considered three key metrics:

- 1 Local planning authority budgets;
- 2 The time taken to determine planning applications as an indicator of pressure; and,
- 3 The need for local planning authorities to increase capacity to focus on LDP preparation.

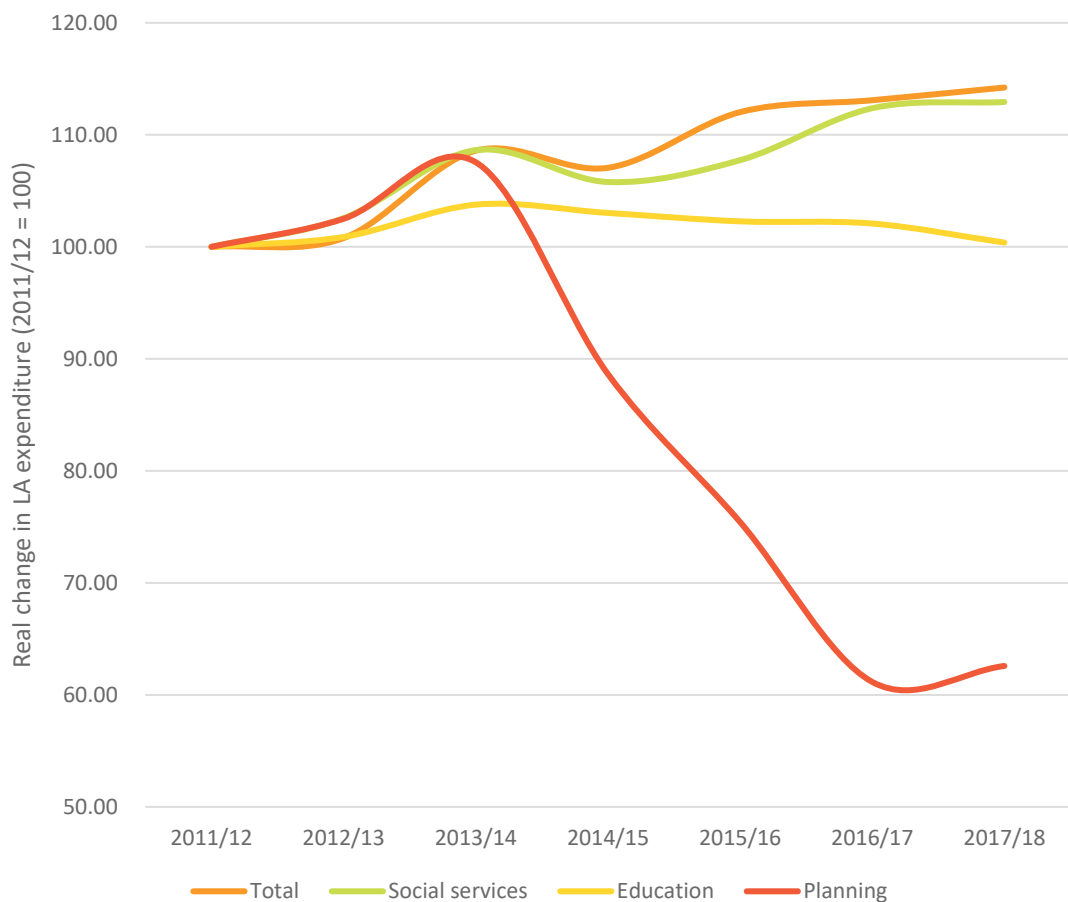
Local planning authorities budgets

5.9 The Local Government White Paper (2017) states:

“Between 2009/10 and 2016/17 resources devoted to the planning function declined by 53%, the largest reduction of any Local Authority service area” (Paragraph 2.3.8).

5.10 This decline is further evidenced by a review of local government capital and revenue settlement figures for 2011/12 to 2017/18. This highlights the reality that planning department budgets have been cut by almost 40% since 2011/12 in the face of other local budgetary priorities. This has resulted in the loss of £14.8m from planning department budgets in the context of a 14% increase in overall local authority budgets (equivalent to an additional £682.3m). This represents a significant pressure on local planning authority resources.

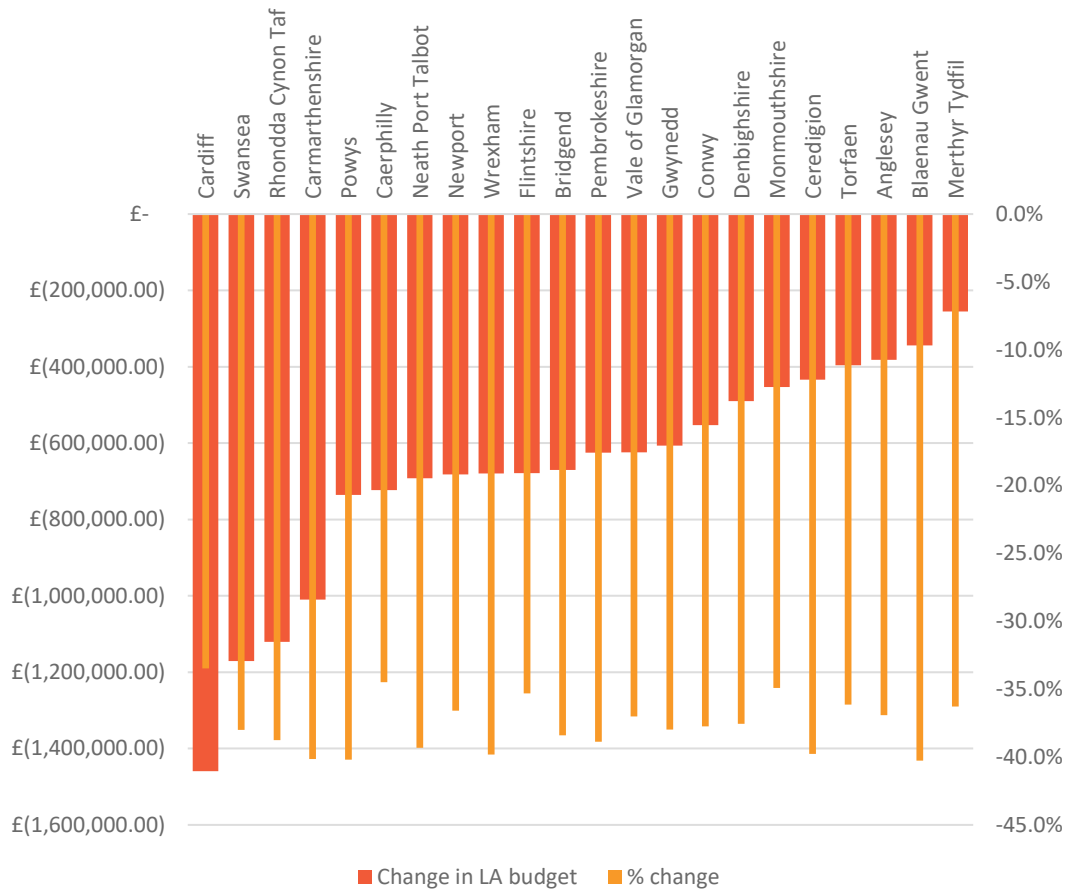
Figure 5.1 Local authority departmental budgets



Source: Welsh Government Local Government Capital and Revenue Settlement figures 2011/12 to 2017/18

5.11 The largest absolute and relative losses by local authority are set out below:

Figure 5.2 Local planning authority budget change, 2011/12-2017/18



Source: Welsh Government Local Government Capital and Revenue Settlement figures 2011/12 to 2017/18

5.12 These budget settlement figures exclude the additional income from planning applications. The minimum planning application fee that would have been payable in respect of the applications for more than 50 dwellings that we have considered as part of these representations would have been £2.15m⁵. Approximately half of the income from planning applications was associated with applications on unallocated sites. Whilst this only accounts for a proportion of total application fees payable to local planning authorities in Wales, in the context of the budgetary pressures that exist, it represents an important and much needed additional source of income that supplements Welsh Government funding.

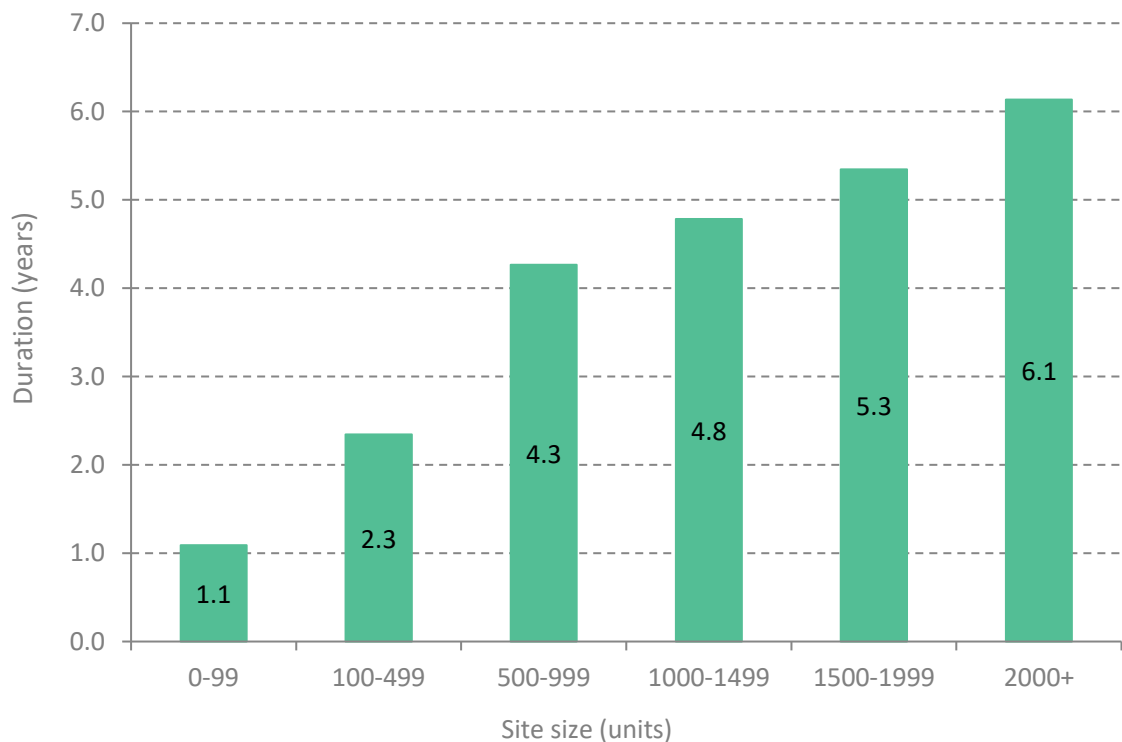
5.13 The clear implication of this is that planning applications for large-scale residential developments on unallocated sites represent an important source of income for local planning authorities. The proposed dis-application of paragraph 6.2 of TAN1 would significantly reduce the number of such applications and thereby further reduce the level of income to local planning authorities. Whilst there would be a reduction in the number of applications, the loss of revenue would be expected to have a disproportionate impact and increase the financial pressure felt by local planning authorities.

⁵ This is based upon the fee payable for Full or Reserved Matters applications. It does not take account of the fee for Outline applications or pre-application discussions.

Time taken to determine applications

- 5.14 We have undertaken a review of timescales for applications determined and compared this against the average planning approval period identified in Lichfields' *Start to Finish* research (which was published in 2016 and comprised of a review of 70 strategic sites (above 500) and 83 small sites across the country) in order to show the extent to which local planning authorities are under pressure as a result of the number of planning applications that were submitted.
- 5.15 Where pressure does exist, we would expect slower decision making. The *Start to Finish* research paper⁶ identified the determination period of between 1.1 and 6.1 years for residential applications of different sizes, as illustrated below.

Figure 5.3 National average planning approval period



Source: Lichfields "Start to Finish", November 2016

- 5.16 By comparison, the average determination period for the applications that have informed this research is summarised below. Whilst it should be noted that this does not include time taken for the determination of reserved matters applications or the discharge of conditions, it is not indicative of severe levels of pressure stemming from the submission of planning applications.

Table 5.1 Average planning approval period for applications contained in this analysis

Site size (units)	Duration of determination period (years)
50-99	0.6
100-499	0.8
500-999	1.7

Source: Lichfields analysis

⁶ Winner of 2017 RTPI award for excellence in planning research

5.17 The Welsh Government published its Planning Annual Performance Report 2016-17 in February 2018. This includes statistics on all local planning authorities, including in respect of the efficiency of their decision making. As summarised below, it reveals an improvement in performance over recent years:

Table 5.2 Welsh local planning authority efficiency performance

	2014/15	2015/16	2016/17
Percentage of “major” applications determined within time periods required	24.0%	35.3%	59.0%
Percentage of all applications determined within time periods required	72.7%	76.6%	86.7%
Average time taken to determine all applications (days)	76.4	77.2	75.9
Improvement required	Fair performance		Good performance

Source: Welsh Government Planning Annual Performance Report 2016-17

LDP preparation and review

5.18 As set out in paragraph 5.4 above, the Consultation Document indicates that the proposed dis-application of paragraph 6.2 of TAN1 would increase the capacity for local planning authorities to focus on LDP preparation and review.

5.19 In respect of this, it should be noted that the separation of plan making and development management responsibilities on the part of local planning authorities has been in place since the establishment of the town and country planning system, and we are not aware of any situation in which any government policy has sought to actively discourage the submission of planning applications so that local planning authorities might concentrate on their plan making responsibilities.

5.20 We set out in Section 2 the status of LDP preparation and review across Wales:

- 1 3 authorities are yet to adopt their first LDP, although all are at a late stage of preparation;
- 2 7 authorities do not yet need to review their LDP;
- 3 13 authorities are currently undertaking a review, and will need to complete this process by 2021 or 2022 in order to avoid a policy vacuum following the expiration of their current LDPs; and,
- 4 2 authorities should be undertaking a review, but have elected not to do so in advance of the preparation of an SDP.

5.21 The Welsh Government has suggested that it wishes to create some “breathing space” to assist local planning authorities in their LDP review process. But the truth is that not all local authorities are required to undertake a review at this time, whilst some that should be reviewing their plans have unilaterally decided not to do so, without any meaningful sanctions from the Welsh Government.

5.22 Whilst the Welsh Government might present the proposed policy change in terms of easing pressure on local planning authorities, the impact is likely to be that a greater proportion of people in Wales are unable to access the housing market.

5.23 A further dynamic relates to the implication of reduced housing delivery in areas that benefit from City Deal/Growth Deal funding. Achieving the agreed objectives of each Deal is of very considerable importance, and will depend on the delivery of new housing to support the needs of the workers that will fill the new jobs. The planning system has a critical role to play in this

process and any actions that might reduce the supply of housing, even in the short term, should be taken into consideration in the realisation of the City Deal/Growth Deal objectives.

- 5.24 It is evident from Welsh Government's studies that the LDP system in Wales is not working effectively and requires urgent attention. However, it would be a matter of concern if the Welsh Government were to suggest that the preparation of evidence to the non-statutory review is of greater importance than the statutory duty of determining planning applications. Furthermore, whilst the timescales for the review have not been announced, the call for evidence would typically take place early on in the process. It is not considered to be acceptable to justify the proposed dis-application of paragraph 6.2 on this basis.

6.0 Well-being of Future Generations

6.1 The Well-being of Future Generations (Wales) Act (2015) seeks to bring about a change in the way that public bodies – including the Welsh Government – work. It makes sustainability a guiding principle and requires action in respect of seven well-being goals through the introduction of five defined “ways of working”. The Welsh Government is seeking to introduce these into planning policy through the draft Version 10 of Planning Policy Wales.

6.2 The five ways of working that make up the sustainable development principle are as follows:

- 1 Thinking long term;
- 2 Taking an integrated approach;
- 3 Involving a diversity of population;
- 4 Working in a collaborative way; and,
- 5 Understanding and prevention.

6.3 It is not known what, if any, assessment has been undertaken of the proposed dis-application of paragraph 6.2 of TAN1 against these ways of working, nor what input the Future Generations Commissioner has had into the proposals. No impact assessment has been published. In order to consider whether the policy would accord with the sustainable development principles, we set out our assessment below:

Table 6.1 Alignment between proposed dis-application of paragraph 6.2 and Well-being Objectives

Objectives	Comment
Thinking long term	The need for housing is a long-term issue which has a direct impact on the prospects and life chances of future generations, as well as upon the strength of the economy. Given the contribution of unallocated sites to housing supply in Wales, the proposed dis-application of paragraph 6.2 will result in a significant reduction in housing delivery. This will serve to exacerbate the current housing shortage and deepen the crisis that exists. The implication will be felt in respect of increasing house prices and worsening affordability, together with a reduction in household formation as fewer people are able to access the housing they need. This will have a long-term impact upon future household projections, and consequent housing requirements, resulting in a long-term pattern of underestimating housing need and under-supplying against the true level of need. Breaking the inevitable vicious cycle will become an absolute necessity for future generations, but made even worse if the policy context shifts away from providing a supportive environmental for residential development, in the manner that is currently being proposed.
Taking an integrated approach	This refers to the need to make connections between economic, social, environmental and cultural challenges, as well as the impact of a policy or project on the achievement of other objectives. Any changes to TAN1 should be viewed in the context of the Welsh Government’s objectives regarding the importance of ensuring an adequate supply of housing, and the construction of 20,000 affordable homes. The evidence contained in this report shows that proposed amendment to TAN1 is not integrated with the Welsh Government’s wider goals. The economic and social importance of housing have been outlined elsewhere in this report and are widely acknowledged. In helping to support local communities, and through the maintenance and creation of areas of public open

	<p>space, vegetation and wildlife corridors, housing developments also offer important cultural and environmental benefits. The fact that no Inspector or Ministerial decisions have permitted any housing that is deemed to be unsustainable, regardless of the five-year land supply position, demonstrates that the current planning policy system is sufficiently effective to achieve sustainable development, and ensures that proposals for unsustainable forms of development are resisted.</p> <p>A further failure to adopt an integrated approach is evident in respect of the fact that no measures are in place to ensure that there is an adequate supply of housing in the short term following the dis-application of paragraph 6.2 of TAN1 and ahead of the review of LDPs.</p>
Involving a diversity of population	<p>The Welsh Government’s guidance on the 2015 Act states that “<i>effective involvement of people and communities is at the heart of improving well-being</i>” (paragraph 78). The people involved must reflect the diversity of the population served. This means that consideration should be given to the large number of people that are seeking to access the housing market, but being denied the opportunity due to a shortage of supply. Further consideration should also be given to the even larger number of people that would find themselves in this position in the future as a result of a continued under-delivery of housing.</p>
Working in a collaborative way	<p>The Welsh Government is required to work collaboratively with all partners in order to ensure that well-being goals are achieved. The house building industry supports the need to boost housing supply in order to assist the existing and future population, and is keen to work with the Welsh Government to achieve this aim. It is not, however, considered that the current proposal will do so, and the approach to the implementation of the policy change is neither collaborative nor inclusive.</p>
Understanding and prevention	<p>The 2015 Act requires public bodies to take account of how deploying resources to prevent problems occurring or getting worse may contribute to well-being objectives. The Welsh Government should look to support, and invest in means that will boost housing delivery. The proposed dis-application of paragraph 6.2 will not prevent existing problems in respect of housing supply from occurring and measures should be taken that will boost housing delivery.</p>

Source: Lichfields

6.4 The Welsh Government’s National Strategy 2017 includes 12 well-being objectives. Whilst the proposed dis-application of paragraph 6.2 of TAN1 does not have a bearing on all of these, we are concerned that it would undermine achievement of the following:

- 1 **Support people and businesses to drive prosperity:** an adequate local housing supply drives economic growth and is essential to ensuring an appropriate level of workers in the local area, which itself is critical for healthy businesses and increasing prosperity.
- 2 **Tackle regional inequality and promote fair work:** a supply of housing across Wales is critical to ensuring that no area gets left behind.
- 3 **Drive sustainable growth and combat climate change:** a failure to acknowledge – and respond to – the need for housing undermines the aspirations of sustainable growth, to the very significant disadvantage of current and future generations.
- 4 **Build healthier communities and healthier environments:** residential development is critical to the health and well-being of local communities and, by virtue of its contribution to the natural environment and open spaces, is also essential to the health of the environment.

- 5 **Support young people to make the most of their potential:** the provision of an adequate supply of housing is vital in creating the opportunity for people to enter the housing market at a time of their choosing.
- 6 **Build resilient communities, culture and language:** achieving an appropriate supply of housing is critical to ensuring the strength of local communities and the integrity of the Welsh culture and language. A failure to grow communities in a sustainable manner will undermine the long-term health of communities as younger people are forced to move away.
- 7 **Promote and protect Wales' place in the world:** a failure to deliver the level of housing that is required, both now and in the future, will cause significant harm to Wales and will undermine its reputation as a welcoming and attractive place to live, with inclusive economies and an expanding economy.

7.0

Conclusion

An alternative way forward

7.1

As an alternative to the proposed dis-application of paragraph 6.2, we set out below three alternative options for the consideration of Welsh Government.

7.2

The Welsh Government has repeatedly emphasised its support for housing delivery, and it clearly acknowledges the economic and social imperative for maintaining and increasing the construction of new homes. Whilst the planning system is centred around development plans, the reality is that the LDP process is not performing in the way that it ought to:

- 1 LDPs are too slow to prepare;
- 2 Not all LDP reviews are happening: some authorities have stated that they will not undertake a LDP review, preferring instead to wait until they can commence work on a SDP after 2021, regardless of the fact that this will result in a medium-term policy vacuum;
- 3 Some sub-optimal sites have been allocated without adequate consideration of viability and deliverability;
- 4 Such sites are now not coming forward; and,
- 5 The development industry is unable to fully engage in the plan preparation system.

7.3

Against this context, the recently announced review of the delivery of housing through the planning process is welcomed. However, it simply is not appropriate to hold residential development in abeyance for an undefined period of time until that review is complete:

- 1 As time goes by, the non-delivery of allocated sites becomes increasingly acute; but,
- 2 The need for housing cannot be paused, and there is no luxury of “breathing space” for those people trying to get a foothold on the housing ladder; such that,
- 3 The important contribution of unallocated sites to housing delivery cannot be underestimated;
- 4 Any attempt to restrict delivery on such sites will serve only to significantly reduce the level of new housing that is available to communities in Wales.

7.4

Any changes to the planning system should be based on clear evidence and an understanding of all potential impacts. The proposed dis-application of paragraph 6.2 of TAN1 appears not be based on any such evidence and the consequences appear not to have been thought through. There is no substitute for reasoned decision making and no good reason to implement a major policy change before the start of a process review.

7.5

In the light of our research, no changes are considered to be required to TAN1, and certainly no action should be taken in advance of the forthcoming review. However, in the expectation that change is being sought by the Welsh Government in the short term, we have sought to identify a series of alternative actions:

- 1 **Amendment to paragraph 6.2 in respect of development on unallocated sites to read:**

“The weight to be given to the need to increase housing land supply is a matter for the decision maker, having regard to the number of years supply in the JHLAS, the extent to which the LDP is up to date, and the realistic prospect of the shortfall being remedied through the LDP process.”

This provides a basis by which the weight to be applied might be graduated, depending on the severity of the shortfall and the local planning authority's proposed response. It reflects the reality that a shortfall may have arisen for a number of reasons and that different solutions might be appropriate. For example, in some areas a solution might be to encourage short term sites that have the potential to be delivered in advance of strategic sites, with measures in place to encourage early delivery, albeit that the imposition of prescribed implementation rates should be avoided given how sensitive these are to facts on the ground and the risks inherent in land promotion. Elsewhere, the failure of LDP sites to come forward has been so severe that a mix of sites is required and should be encouraged in sustainable locations

This approach also reflects that taken by the Minister and Planning Inspectors at the appeals in Caerphilly, as summarised below:

"The Council can only demonstrate a 1.9 year housing land supply. This is well short of what should be provided and the proposed development would provide much needed housing and affordable housing. The emerging LDP is seeking to address the current housing shortfall but, if found sound, won't be adopted for at least 18 months. It is acknowledged that the site lies in a sustainable location and I consider that the development can proceed without causing unacceptable harm to its surroundings. In my view, there is an overriding need for this development and these factors combine to constitute the very exceptional circumstances to outweigh the conflict with national and local policies described above." (Appeal reference APP/K6920/A/15/3137884, paragraph 20)

"The Council cannot demonstrate a five year housing land supply. Whether it be 1.5, 2.0, or 2.2 years, there can be no question that the shortfall is significant.

"As agreed between the parties in the SoCG42 there is no emerging development plan to address the shortfall; there is no mechanism to increase housing land supply in the short term and there does not appear to be any possibility of a development plan solution any time soon". (Appeal reference APP/ K6920/A/16/3160099, paragraphs 194 and 198)

- 2 **An alternative option would be to expand paragraph 6.2 to give examples of criteria in which proposals on unallocated sites would be acceptable.**
- 3 **More broadly, we would suggest the following actions that might also be taken:**
 - a **Recognise where local planning authorities are working to deliver housing and reward those that are implementing robust LDPs with an appropriate housing requirement figure and deliverable housing sites, as well as those that are meeting housing requirement, rather than rewarding failure;**
 - b **In the future, a greater focus should be placed on the deliverability of LDP sites, albeit that any testing of viability needs to be undertaken at an appropriate stage in the process, following the implementation of a preferred strategy and once affordable housing and other policy requirements are adequately understood; and,**
 - c **The Welsh Government should have the power, and take the action, to compel local planning authorities to undertake a review of their LDPs in a timely manner so as to avoid the creation of a policy vacuum.**

Summary of evidence

- 7.6 There is a longstanding planning policy in Wales that requires all local planning authorities to be able to demonstrate a rolling five-year supply of housing land. This is monitored through the Joint Housing Land Availability Study (JHLAS) process.
- 7.7 Paragraph 6.2 of TAN1 states that “*considerable weight*” should be given to the need to increase housing supply when dealing with planning applications for residential development where a five-year supply cannot be demonstrated, “*provided that the development would otherwise comply with development plan and national planning policies*”.
- 7.8 The number of annual completions has followed a long term downward trend, from an average of 13,750 per annum between 1974 and 1979 to an average of 6,050 per annum since 2010. 6,037 dwellings were completed in 2017/18, compared to a requirement for between 9,000 and 12,000dpa.
- 7.9 21 of 24 local planning authorities in Wales now have an adopted LDP in place, but this has not resulted in a commensurate improvement in the number of authorities that are able to demonstrate a five-year housing supply. A review of JHLAS studies since 2007 indicates an inverse relationship between LDP coverage and the performance in respect of five-year supply coverage.
- 7.10 All LDPs in Wales rely on unallocated sites to contribute to their housing requirements. These account for an average of 16.5% of the total housing supply across all authorities with an adopted LDP. The fact that all LDPs are reliant on unallocated windfall sites coming forward proves that the development of these sites is supporting, rather than undermining, the planned approach.
- 7.11 The *Longitudinal Viability Study of the Planning Process*, commissioned by the Welsh Government, found that many allocated LDP housing sites considered deliverable at LDP preparation stage did not subsequently come forward. It is a matter of concern that the Welsh Government should now expect short-term housing delivery to be dependent upon the LDP allocations it acknowledges are unlikely to be delivered.
- 7.12 Unallocated sites make a very significant contribution to housing supply in Wales, as evidenced by:
- 1 41% of dwellings completed in 2016/17 recorded in the 17 JHLAS studies undertaken for that period were on unallocated sites;
 - 2 43% of units approved in pursuance to the planning applications reviewed by this study (equivalent to 16.3% dwellings for which planning permission was sought) were on unallocated sites;
 - 3 63% of dwellings approved by Inspectors (May 2015 – June 2018) were on unallocated sites; and,
 - 4 47% of homes approved by the Minister (May 2011 – June 2018) were on unallocated sites.
- 7.13 Past housing completions on unallocated sites have provided significant economic benefits to the Welsh economy. Our analysis of the 1,889 dwellings that were completed on unallocated sites in 2016/17 has identified the following key economic benefits:
- 1 311 direct and indirect full-time equivalent jobs in the construction industry and its suppliers;
 - 2 £143.3 million p.a. in economic output from direct construction jobs;
 - 3 £43.6 million p.a. expenditure by new residents on goods and services; and,

4 £2.8 million p.a. in Council Tax revenue.

- 7.14 A total of 574 of the 2,186 dwellings on unallocated sites identified by our review of planning applications as being on unallocated sites are to be provided as affordable homes. This equates to 26% of the total number of dwellings permitted on unallocated sites. Furthermore, 36% of the dwellings that were identified through our review of JHLASs as having been delivered on unallocated sites were affordable; this equates to 680 affordable homes. This will make a tangible contribution towards the Welsh Government’s target of 20,000 additional affordable homes.
- 7.15 As previously acknowledged by the First Minister and the Cabinet Secretary for Energy, Planning and Rural Affairs, the operation of paragraph 6.2 of TAN1 does not result in unsustainable forms of development.
- 7.16 The research that has informed this report has shown that no appeals have been allowed by the Minister since 2011 or any Planning Inspector since 2015 on unsustainable sites, regardless of the housing land supply position:
- 1 Of those appeal decisions where the Planning Inspector specifically cited the attribution of considerable weight to a lack of five-year supply, only 38% were allowed;
 - 2 Just half (50%) of appeals on sites located in sustainable locations in local authorities without a five-year supply were allowed by Inspectors;
 - 3 No appeals were allowed on unsustainable sites even where there was a lack of five-year supply;
 - 4 45% of appeals were allowed by the Minister in local planning authorities without a five-year supply; none were allowed in areas with a five-year supply; and,
 - 5 The Minister approved 56% of appeals on sites located in sustainable locations in local authorities without a five-year supply, but no appeals on unsustainable sites.
- 7.17 The Local Government White Paper (2017) states “*between 2009/10 and 2016/17 resources devoted to the planning function declined by 53%, the largest reduction of any Local Authority service area*” (paragraph 2.3.8). This represents the key source of pressure on local planning authorities, and not any claim regarding a recent increase in the number of planning applications, for which we have not found any evidence. By reducing the number of applications on unallocated sites, a further outcome of the proposed dis-application of paragraph 6.2 would be to increase financial pressure on local planning authorities as a result of a loss of application fees.
- 7.18 In the event that paragraph 6.2 of TAN1 was dis-applied, housing land supply and a shortfall against the required five-year supply would remain a material consideration, but the weight to apply to it would be a matter for the judgment of the decision maker. Unfortunately, however, the proposed policy change will send a message from Welsh Government that a failure to deliver housing in accordance with LDP requirements is acceptable even where windfall housing proposals otherwise comply with development and national planning policies.
- 7.19 The proposed dis-application of paragraph 6.2 is contrary to the goals of the Well-being of Future Generations Act, even though this is required to underpin the actions of all public bodies, including the Welsh Government.
- 7.20 All parties involved in the delivery of housing need to work together to ensure that this overarching policy imperative can be achieved. The forthcoming review provides a welcome opportunity to identify improvements to the planning system that are based on a clear understanding of the existing challenges and serve to deliver the increase in housing delivery

that is required at this time. It would underline the clear fact that the proposed dis-application of paragraph 6.2:

- 1 Will not help achieve the Welsh Government's objectives;
- 2 Will not support sustainable development;
- 3 Will work against wellbeing objectives; and,
- 4 Will not address issues relating to underfunding and limited resources in LPAs.

Appendix 1: Definition of windfall sites

The following definitions of windfall sites are contained within LDPs:

- 1 Blaenau Gwent: Housing sites not previously identified by the Council that are suitable for development and arise through planning applications.
- 2 Bridgend: A site for new housing development which is currently unallocated but has the potential to come forward for development for 10 or more dwellings during the plan period.
- 3 Cardiff: A site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of a plan. Most "windfalls" are referred to in a housing context.
- 4 Carmarthenshire: A site not specifically allocated for development which becomes available for development during the lifetime of the plan.
- 5 Ceredigion: A site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of a plan, referred to also as non-allocated sites. Most "windfalls" are referred to in a housing context. They tend to be very small sites for one or a small number of homes.
- 6 Conwy: A site not specifically allocated for development in a development plan, but which unexpectedly becomes available during the lifetime of a plan.
- 7 Flintshire: Making an allowance for large sites (10 or more units) that are likely to arise over the Plan period based on settlement capacity study (avoiding double counting).
- 8 Gwyneth/ Anglesey: A site not specifically allocated for development in the Plan, but which becomes available for development during the lifetime of the Plan. Most "windfalls" are referred to in a housing context.
- 9 Neath Port Talbot: A site for new housing development which is currently unallocated but has the potential to come forward for development during the Plan period.
- 10 Newport: Sites that have not been identified within the Plan as by definition they are development opportunities that come forward unexpectedly.
- 11 Pembrokeshire: A site for new development which is unallocated but has the potential to come forward for development during the Plan period.
- 12 Pembrokeshire National Park: Sites which become available for development unexpectedly and are therefore not included as allocated land in a planning authority's development plan.
- 13 Powys: A site for new development that was unallocated by an adopted Development Plan but has come forward for development during the plan period.
- 14 Rhondda Cynon Taff: Housing sites not previously identified by the Council that are suitable for development and arise through planning applications.
- 15 Snowdonia National Park: Sites within the Housing Development boundaries which do not currently enjoy the benefit of a planning permission but could be considered favourably for housing.
- 16 Swansea: Sites not allocated in the Plan where residential development is subsequently granted planning permission.
- 17 Torfaen: Housing sites of 10 or more units that are not formally identified by the Council in the LDP but are subsequently deemed suitable for development through the granting of planning permission. The LDP makes provision for a windfall allowance in order to cater

for potential sites that may come forward during the LDP period but are not allocated in the LDP.

- 18 Vale of Glamorgan: A site not specifically allocated for development in a development plan, but which unexpectedly becomes available during the lifetime of a plan.
- 19 Wrexham: Development which could take place outside of allocated sites, contributing to the overall growth of the County Borough over then Plan Period.

There is no definition of “windfall” within the Brecon Beacons National Park, Caerphilly, Denbighshire, Merthyr Tydfil and Monmouthshire LDPs.

Bristol
0117 403 1980
bristol@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk