

# LICHFIELDS



## How long is a piece of string?

The timescales for securing outline  
planning permission for housing  
between 2014 and 2024

May 2025

# Executive Summary: The Government's housing ambitions depend on more planning permissions. But since 2014 the volume of applications have been reducing, and determination times have more than doubled. Current reforms will help but more is needed across key areas of policy, process, practice and performance.

2

## The issue and research approach

### The Issue

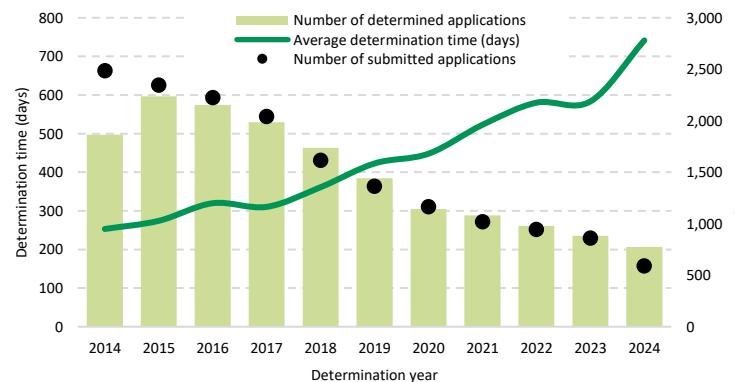
- Despite falling caseloads, determination periods for outline residential applications are reported to be extending.
- Achieving a step change in delivery requires more applications to be determined; doing this expeditiously will be central to meeting Government's target for 1.5m homes
- Official performance measures show that 90% of permissions are decided 'on time'.
- However, industry actors describe long delays in planning that load developers with uncertainty and risk, slowing delivery and acting as a barrier to SMEs.

### Research approach

- We analyse the determination period for outline planning permissions each year from 2014 to 2024, assessing how and why this has changed.
- We reviewed outline applications for 10+ unit schemes, identifying c.18,200 permissions over the decade. This timeframe has been chosen to align with the likely determination of the early major outline planning applications submitted following the 2012 National Planning Policy Framework (NPPF).

## Key findings

1. The average time taken to determine a major outline application has risen to two years, an increase of one year and 4 months since 2014 during which the flow of decisions has dropped to a third of previous levels.
2. A decade ago, 78% of outline major applications were determined in less than a year; in 2024 only 36% were.
3. In 2024, only 4% of outline permissions were granted within the required 13-week period.
4. Even excluding outliers, the longer determination periods are getting longer. The longest wait in 2014 (660 days) is shorter than the average in 2024 (710 days) and many schemes are in the system for over five years.
5. Since the Rosewell review (2019) it has been six months quicker on average for a decision at appeal than locally.



## Conclusions and recommendations

Government policy in the 2024 NPPF is already driving investment in preparing and submitting more applications. But lengthy and worsening decision times will undermine their contribution to the ambition for 1.5m homes by 2029. The problems and solutions go beyond resourcing: increased complexity and 'policy load' combined with a need to improve the approach that LPAs and statutory consultees take in considering applications. There is no silver bullet, but we set out here some ideas across **policy, process, practice** and **performance** that – if applied rapidly – could help reduce the burden, increase certainty and ultimately reduce timescales for decisions within this parliament:

1. NDMPs that codify and strengthen the presumption in favour of sustainable development.
2. More focus on allocating small and medium sites and a more permissive NDMP small sites regime
3. A 'Rosewell-type Commission' for LPA decision making and learn from the s.62A process.
4. Scale back the detail: "Let outlines be outline".
5. Introduce standard forms of Section 106 agreement.
6. Target efficiency gains from digitalisation and the use of artificial intelligence.
7. Adapt LPA working practices for the age of complexity
8. "Measure what matters".
9. Statutory Consultees to be focused on providing timely, relevant expertise.

# Introduction and Background: Too few planning permissions are being granted to deliver the homes we need. This research explains that, despite fewer applications being submitted, it is taking far longer to determine them than a decade ago, with implications for housing delivery.

To deliver on its ambitions for 1.5m homes in this parliament, and associated economic growth, Government has acted swiftly to create a more positive policy environment for the determination of planning applications. The OBR forecasts an uplift of 170,000 homes by 2029/30 based on these changes. But to realise this, planning applications need to be submitted and determined expeditiously by Local Planning Authorities (LPAs) providing investors with certainty as well as consistency and simplicity, this research shows how uncertainty has developed.

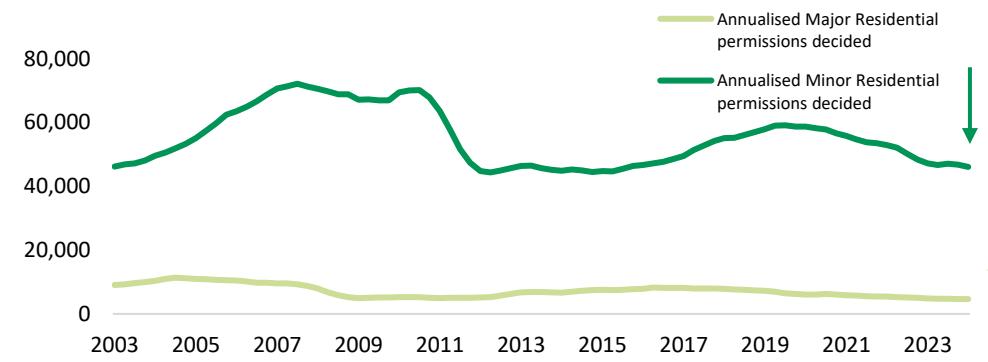
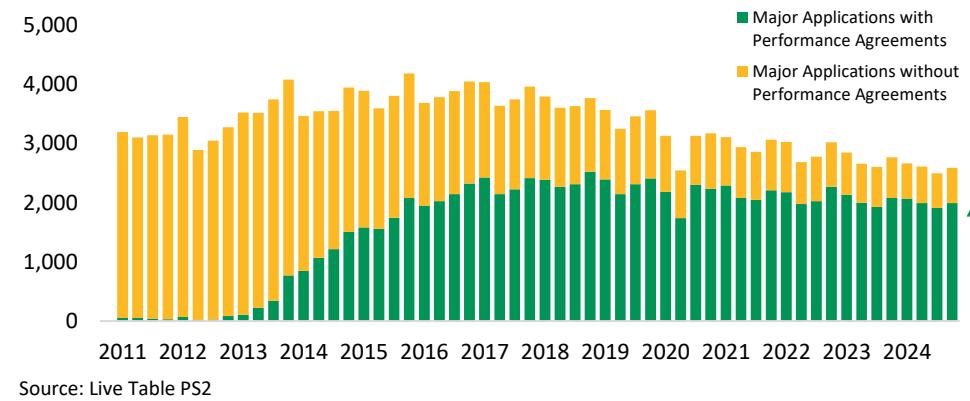
*"The government knows that extension of time agreements can also be used by authorities to compensate for delays in decision-making, which masks poor performance and does not incentivise local authorities to determine applications within the statutory time limit."<sup>2</sup> [DLUHC consultation launched by the last government]*

MHCLG data shows that in 2024/25 close to 90% of applications were decided 'in time', but this is only part of the story. Performance agreements including 'extensions of time' (EoT) are now used in 80% of applications. This means rather than recording whether a permission is determined within statutory timescales, the decision date is extended, often multiple times. Developers often agree to EoT agreements because without them LPAs may be more likely to refuse their applications (with an incentive to make a decision within the statutory timescales). This will reflect a range of factors, but the CMA highlights delays in receiving responses from statutory consultees as a key issue<sup>1</sup>. This research shows how long it takes to determine outline applications compared with a decade ago.

*'Under-resourced national planning systems are struggling to deliver on their expanding array of duties and traditional roles of policymaking, development control and enforcement'<sup>3</sup> [RTPI State of the Profession]*

The volume of residential applications being submitted has fallen since 2007 by 42% for major and 37% for minor applications. This indicates that even as the time taken to determine applications is increasing, the volume of applications to be determined has been decreasing and seemingly (it is difficult to make a direct comparison) to a greater extent than LPA resourcing, with the ratio of application per LPA officer reducing. Local authority expenditure on planning departments decreased by 43% between 2009/10 and 2021/22 and the quantity of public sector planners employed fell by 25% between 2013 and 2020. The explanation may lie in planning applications becoming more complex and grappling with more issues; for example, outline applications now require 30 separate supporting documents for medium-sized sites<sup>4</sup>.

*"The planning system is exerting a significant downward pressure on the overall number of planning permissions being granted across Great Britain. Over the long-term, the number of permissions being given has been insufficient to support housebuilding at the level required to meet government targets and measures of assessed need"<sup>1</sup> [CMA Housebuilding Market Study]*



# Scope of Research and Methodology: Our task was to analyse how long it takes to obtain an outline planning permission on schemes considered between 2014 to 2024 and how and why this has changed. We reviewed outline applications of >10 units, identifying c.18,200 over the decade.

Lichfields was commissioned by the Land, Planning and Development Federation (LPDF) and Richborough – a land promoter – to undertake analysis on how long it has taken to obtain an outline planning permission over the period 2014 to 2024 and to investigate what factors might impact how long this process takes.

We used Landstack – a planning data platform – to obtain details of outline planning applications for major (ten dwellings or more) residential schemes in England<sup>5</sup>. The number of dwellings granted is based on the outline permissions; it has not been practicable to ascertain exactly how many were eventually approved or delivered through various detailed stages of planning permission. Efforts were made to minimise discrepancies in the data regarding the size of schemes through manual cross-referencing against application material.

We have sought to provide a comprehensive overview of the activity associated with outline applications over the period 2014 to 2024 by collating data on all applications submitted in this period in addition to all outline applications determined between 2014 and 2017 to capture any outline applications submitted prior to 2014, as recorded by Landstack. Any duplicate entries have been removed from the assessment. This timeframe has been chosen to coincide with the determination of some of the first major outline planning applications submitted under the 2012 National Planning Policy Framework (NPPF). More recently submitted outline applications that had not been determined as of January 2025 do not inform the analysis in this research, i.e., the 8% of applications recorded as 'pending decision' as identified in the figure opposite.

The analysis excludes hybrid planning applications as it was considered to not be proportionate to the exercise to determine how many hybrid applications were comparable to an outline application for a major residential scheme. A review of the data identified that many hybrid applications included full details for the first phase of residential development, resulting in timescales more comparable to the time taken for a scheme to achieve both outline and reserved matters permission.

To ensure a standardised approach to establishing the determination timeframe we have used the time (in days) between the 'submission date' of an outline application to the determination date on its decision notice.

## Outline applications

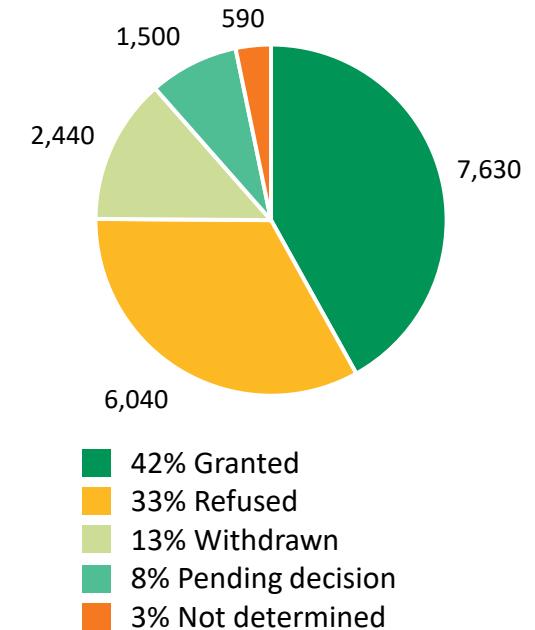
c.40,000 initial data entries identified

c.21,500 removed (<10 units or hybrid applications)

18,200 retained for analysis

c.7,600 granted by LPA + 1,300 allowed at appeal =  
8,900 approved applications

Original LPA outcomes in sample, 2014-2024 (i.e., excluding outcome of any appeal)



Source: Landstack and Lichfields analysis

## Scope of Research and Methodology: To explore how long it has been taking to obtain a detailed approval following an outline permission, the research tracks outline applications through to the determination of its first reserved matters application.

To track an outline application through to a detailed planning permission requires identifying its relevant reserved matters application. Using Landstack data covering determinations within the 2014-2024 period, we have identified the first reserved matters application for approximately three quarters of the 8,900 granted outline applications within our sample.

It is not possible to obtain national data which identifies the point at which detailed approval for a scheme is granted, nor is the determination date - on which the 'final' reserved matter for a scheme is approved - recorded. Therefore, we have focused our analysis on the time it takes to gain approval of the first reserved matters application.

We searched the application references of our sample of 15,500 reserved matters applications for mention of the outline application references in their description of development within our main sample. This allowed us to match the outline applications to their reserved matters; of these, we only consider the first reserved matters application (by submission date) within our analysis. From a review of our sample, in the vast majority of entries, the first reserved matters application included a detailed element of residential.

We have not identified reserved matters applications for all granted outline applications within the sample. This can be due to the reserved matters application details not referencing the outline application number, in addition to more recent outline approvals not yet having submitted a reserved matters application or awaiting the decision. In some cases, an outline permission might be followed by a separate full application not directly linked to its outline.

### Reserved matters applications

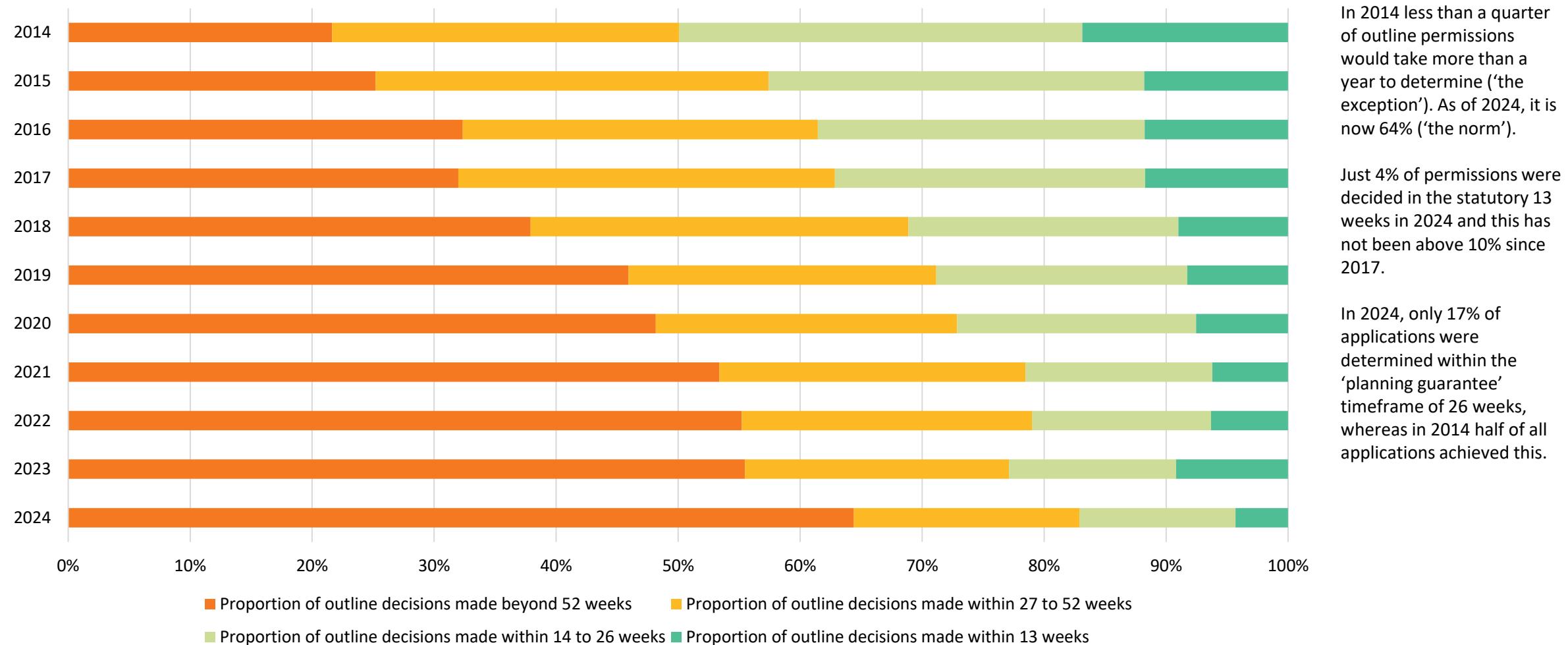
c.15,500 initial data entries identified

c.6,500 removed as they were not matched to an outline

c.2,300 removed as not the first RM for an identified outline

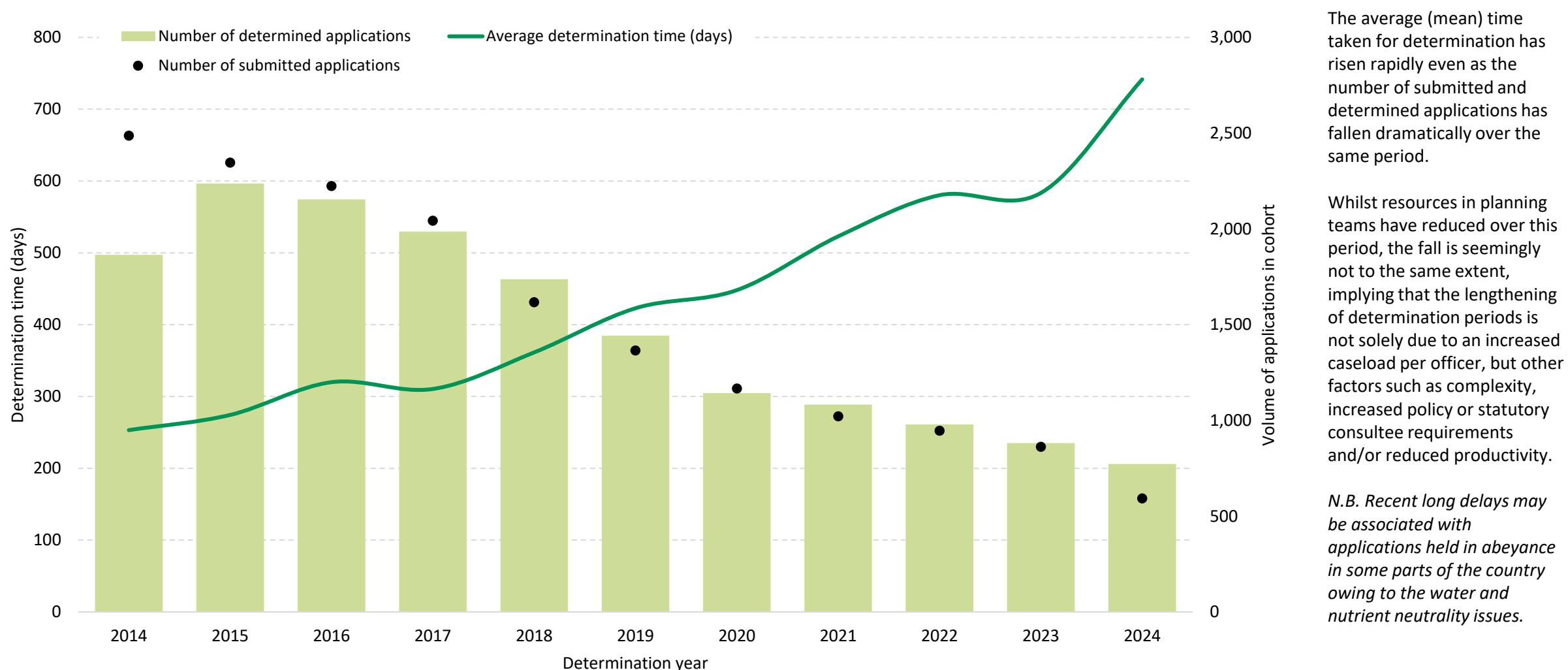
c.6,700 entries retained for analysis

**Key Findings:** In 64% of cases, it now takes more than a year to get outline permission, up from 22% in 2014. Most of the rest now take more than six months. Just 4% were determined within the statutory 13-week timeframe.



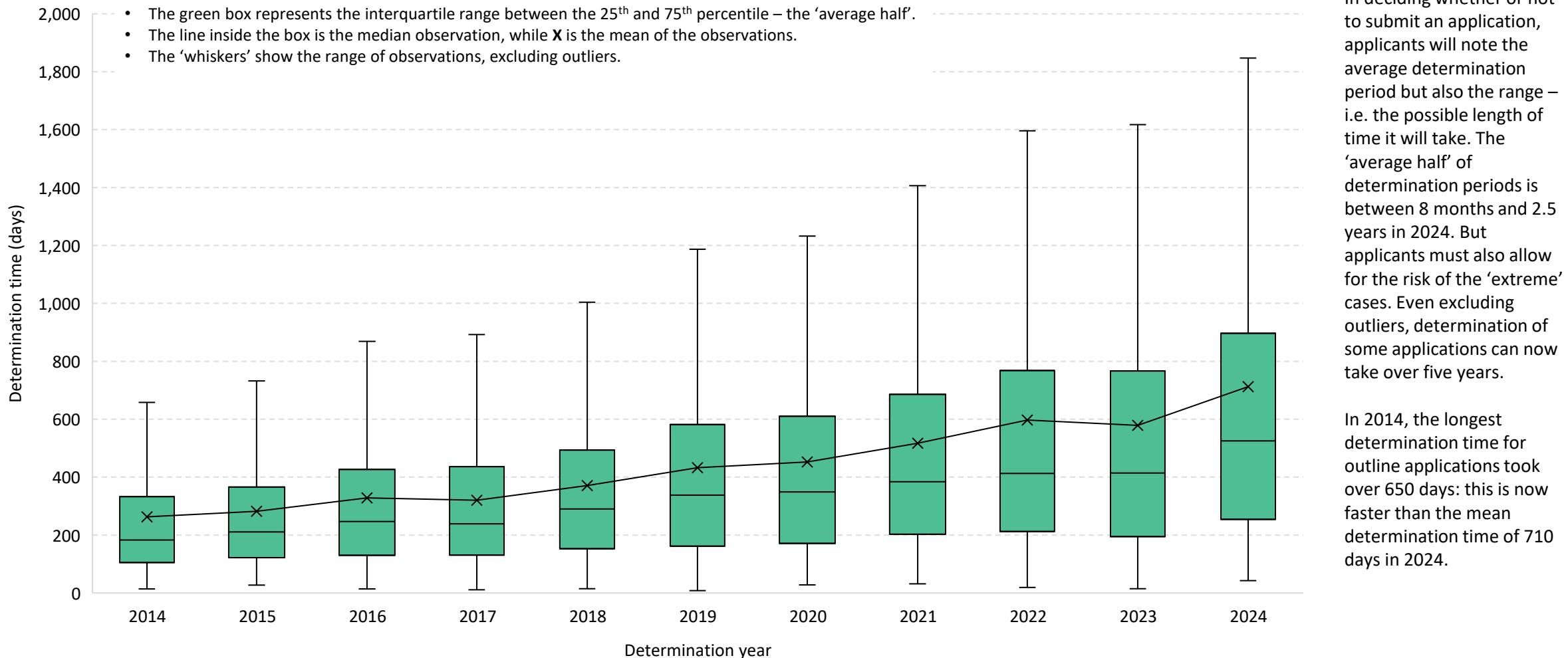
Source: Landstack and Lichfields analysis

**Key Findings:** Over the course of a decade, average timescales for determining a major outline application have increased by a year and four months, while the volume of decisions is a third of what it was. The number of submitted applications has fallen by three quarters and in 2024 averaged just two per LPA.



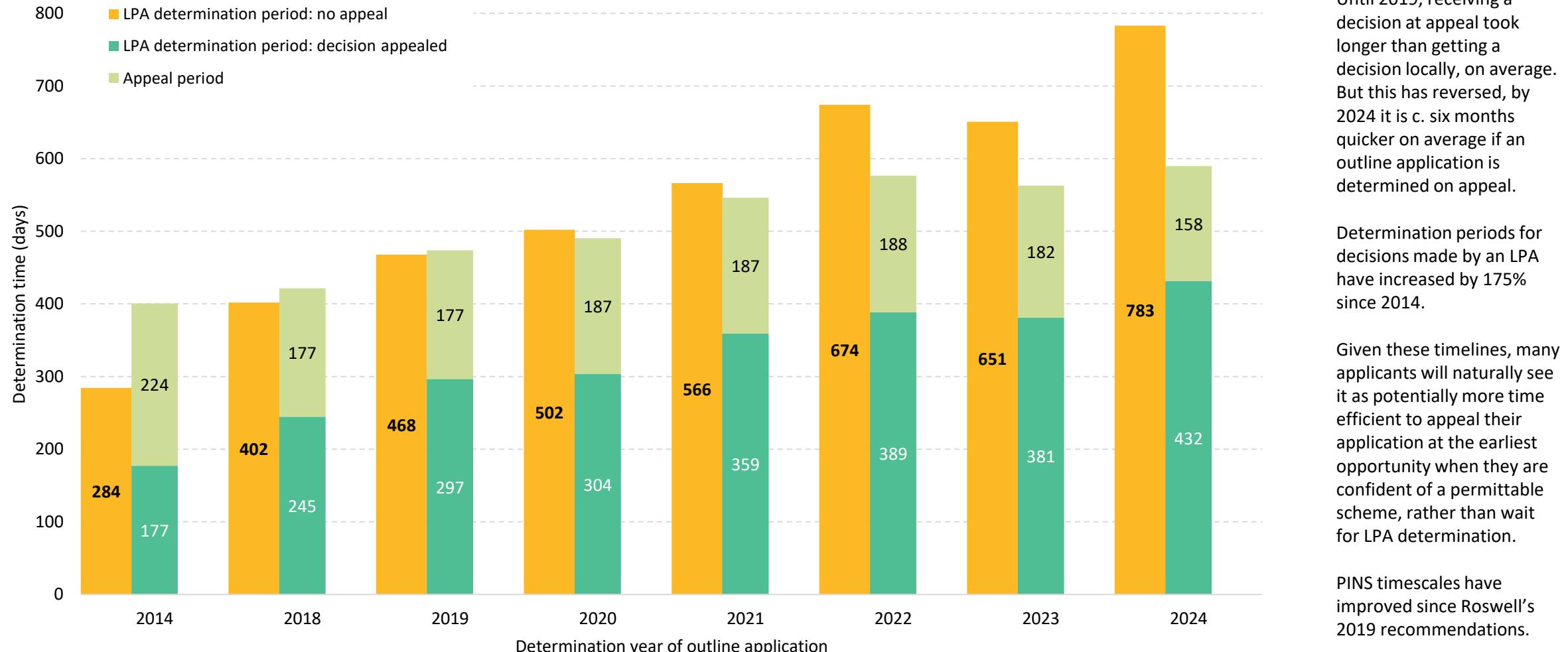
Source: Landstack and Lichfields analysis

**Key Findings:** The longer determination periods are getting longer still. Discarding outliers, what was the longest in 2014 (660 days) is now quicker than the 710 day average in 2024, with many applications held in the system for five years or more. The ‘average half’ of determination periods is 8 months to 2.5 years.



Source: Landstack and Lichfields analysis

**Key Findings:** Application timescales have extended, but since 2019, it has on average been quicker to get an application determined by going to appeal than relying on the LPA, with PINS timescales demonstrably improved post-Rosewell. This will make appeals more attractive to applicants.



Source: Landstack and Lichfields analysis

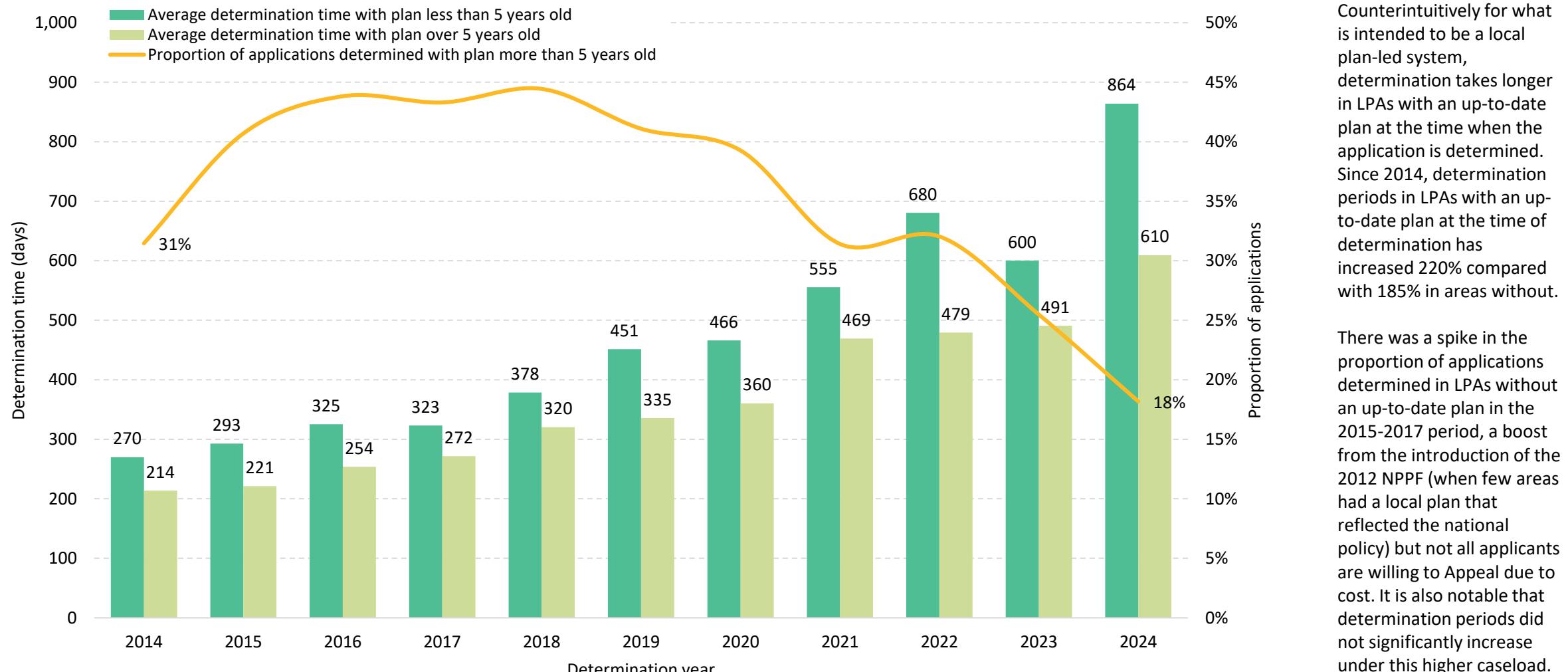
Until 2019, receiving a decision at appeal took longer than getting a decision locally, on average. But this has reversed, by 2024 it is c. six months quicker on average if an outline application is determined on appeal.

Determination periods for decisions made by an LPA have increased by 175% since 2014.

Given these timelines, many applicants will naturally see it as potentially more time efficient to appeal their application at the earliest opportunity when they are confident of a permissible scheme, rather than wait for LPA determination.

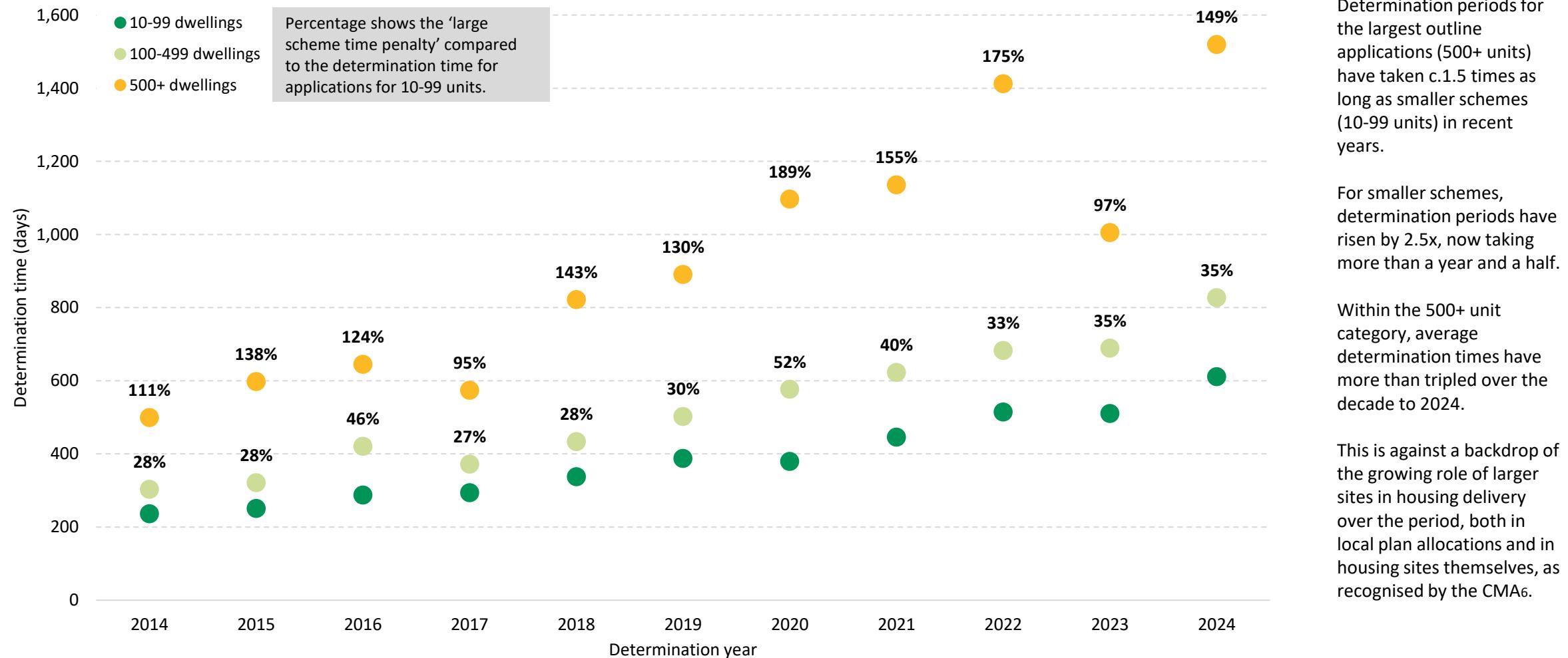
PINS timescales have improved since Roswell's 2019 recommendations.

**Key Findings:** Despite what is purportedly a plan-led system, applications are determined more quickly in LPAs without an up-to-date local plan, and the difference has appreciably increased since 2014. The power of national policy to boost applications is shown by the spike of decisions 2015-2017 following the 2012 NPPF.



Source: Landstack and Lichfields analysis

**Key Findings:** Bigger schemes take longer to determine. Schemes of all size have seen determination periods increase since 2014, but average times for the largest (500+ homes) have tripled, taking 1.5 times longer than smaller schemes. SMEs will be undermined by even small schemes taking more than 18 months on average. 11



Source: Landstack and Lichfields analysis

**Key Findings:** The determination period for the first reserved matters has remained stable, but the total average planning period has increased by almost a year since 2014 due to the extended period for outline determination.



Source: Landstack and Lichfields analysis

N.B. This chart relates only to outline applications which were ultimately approved locally or allowed on appeal. Any other outcome would not have led to a reserved matters application.

While average (mean) outline determination periods have increased appreciably over the period, the time for determination of the first reserved matters application has remained relatively stable between 2014 and 2024, and has in fact declined since 2020. Plans for the national scheme of delegation are poised to improve things further.

Overall, between submitting the outline application to getting an implementable residential consent now takes c.2.5 years

# Conclusions and Recommendations: Outline permissions are the foundation for housing supply but have fallen in number and take longer than ever to secure. Boosting consents is crucial to hitting the 1.5m target: rapid action is needed, including strengthening the policy presumption in favour of sustainable development.

13

## Conclusions

To deliver on its ambitions for 1.5m homes in this parliament, Government has acted swiftly to create a more positive policy environment for bringing forward housing development. The sector is responding: LPDF evidence identifies a 160% increase in the number of planning applications that its members intend to submit in first half of 2025. But to move the dial on delivery, those applications will need expeditious determination.

MHCLG data shows that, in 2024/25, almost 90% of applications were decided 'in time' but this is not the same as 'quickly'. Performance agreements are now used in 80% of applications, meaning the decision date is typically extended, often multiple times. Our research shows only 4% of outline applications for major residential development were decided in the statutory 13 weeks in 2024 and the time it really takes has extended dramatically. A decade ago, 78% were determined in less than a year, but in 2024, only 36% were. The longest determination time (excluding outliers) in 2014 was over 650 days: this is now less than the current average (mean) period of 710 days.

Until 2019 (prior to the Rosewell Review), receiving a decision at appeal took longer than getting a decision locally, on average. But this has reversed. In 2024, decisions were circa six months quicker on average at appeal than locally, suggesting the former will be seen as increasingly attractive for applicants.

A plan-led system is supposed to increase certainty, but areas with up-to-date plans have slower periods for determination. Interestingly, the time for determination of the first reserved matters application has remained relatively stable.

The challenges are not due to increased volume. In fact, the number of major residential applications of all types has fallen by 42% since 2007, with similar falls across other application types. As an indicator of how inauspicious has been the planning environment for residential development over recent years, the volume of outline major residential decisions in 2024 was a third of what it was in 2015, and submissions were less than a quarter of the 2014 figure. Fewer than 600 submitted outline applications were recorded in 2024, equivalent to just two per LPA.

Nor is resourcing the sole explanation for what is going on. The data does not allow for a direct comparison over our assessment period, but although there have been material reductions in the number of public sector planners (25% between 2013 and 2020) and funding of LPA planning departments (43% 2009/10 – 2021/22) the fall in the volume of applications is probably more.

Productivity – certainly as measured against application volume – appears to have deteriorated. But equally the 'policy-load' and range of issues to be addressed in decisions has increased. This includes nitrates and water neutrality, flood risk, BNG, and affordable housing deliverability.

There is no silver bullet, but we set out here some ideas across **policy, process, practice and performance** that – if applied rapidly – could help reduce the burden on the determination of applications, increase certainty of outcomes and ultimately reduce timescales for decisions.

## Policy

### 1. NDMPs to codify and strengthen the presumption in favour

In deciding on applications, LPAs are grappling with a greater number of issues, for longer than they used to, often requiring external technical input. In doing so, they must resolve trade offs within increased political contestation, creating a stalemate. Each policy or technical issue may individually be legitimate, but in combination adds uncertainty for how applications are determined despite the NPPF's presumption in favour of sustainable development, and its 'tilted balance'. The policy (NPPF para 11) has seemingly become less potent as a means of driving positive decision taking since its 2012 introduction. Some matters – e.g. on nature recovery – will be addressed to some extent by the Planning and Infrastructure Bill. But what is needed is a way to cut through the increasing policy load.

A codified set of rules set out through National Development Management Policies (NDMPs) to direct when a consent should be granted and the weight to be attached to specific considerations in applying a more positively tilted 'balance' could add certainty and timeliness in decision making by giving confidence to LPAs that they can determine applications even with some outstanding issues or objections that are not central to the scheme's acceptability.

### 2. More focus on allocating small and medium sites and a more permissive NDMP small sites regime

To increase diversity and support allow more SMEs to enter the market, the Government could use NDMPs to create a more 'permissive' regime for small and medium sites and review the NPPF small sites policy (currently para 73) to drive local plans to allocate more in delivering the homes required.

# Conclusions and Recommendations: More efficient and positive decision taking on applications can flow if the strengthened policy framework combines with improvements that straddle process, practice and performance management, drawing on best practice, system design, technology and team working.

14

## Process

### 3. A 'Rosewell-type Commission' for LPA decision making and learn from the s.62A process

Worsening timelines for LPA decisions has moved in the opposite direction to PINS appeals. The Rosewell commission made 22 recommendations to streamline and expedite the PINS appeal process. These helped relatively better performance. S.62A applications (to PINS) are also streamlined. A similar process for LPAs might help, perhaps sector-wide or prioritised in newly-created LPAs designing new processes and systems.

### 4. Scale back the detail: "Let outlines be outline"

As recently as the early 2000s, outline applications could be focused on the principle of development, with simple red line plans and a description of development. It may not be possible to return to those days, but there has certainly been 'detail creep'. NDMPs can be used to scale back and simplify the policy tests – especially for small and medium-sized sites, the allocation of which ought to feature more in local plans (see recommendation no.2) – and thus the evidence and issues required at outline stage.

### 5. Introduce standard forms of Section 106 agreement

Currently, much delay is likely attributable to the protracted negotiations around Section 106 agreements and time taken in legal drafting. The Government could introduce a new standardised form of S106 to speed up drafting in a similar means to 'model' conditions, for example to deal with what happens when a developer is unable to find a registered provider that will take on affordable housing (a significant current issue) so that the "cascade mechanism" kicks in.

## Practice

### 6. Target efficiency gains from digitalisation and the use of artificial intelligence.

Government and the investing in 'plantech' can use digitalisation to reduce the workload in processing applications. By sharing best practice and embracing AI it will be possible to reduce the demand on applicants for excessive evidence requirements, and supporting improvements in how officers process and determine applications, whilst properly allowing them to make planning judgements. This could help LPAs (many of whom will be redesigning systems to reflect reorganisation) to focus resources on handling specific challenges.

### 7. Adapt LPA working practices for the age of complexity

More complexity in planning makes it less likely an individual planner – particularly one in the early stages of their career – will possess the full body of knowledge and experience they might need to grapple effectively with all issues on an application, particularly one that is large or complicated.

Working practices within LPAs need to ensure that – in an era of hybrid working and thinned out teams – officers can quickly access (formally and informally) the support, expertise and tacit knowledge from specialists and/or senior colleagues to help them exercise proportionate judgement – for example in interpreting the responses of statutory consultees – and help them cut to the chase in making/recommending a decision. This requirement for clarity will be amplified with new policy changes and local government reorganisation, MHCLG will also need to be alive to how national policies are interpreted locally in performance assessments and make rapid changes where evidence shows they are not working as intended.

## Performance

### 8. "Measure what matters"

Currently, the statistics for 'on time' includes extensions of time and performance agreements which allows for gaming and hides the 'real world' performance of the system. Improving data on the true time taken to determine planning applications will better assess the 'user experience' and performance of LPAs and help target improvements both within LPAs and by Government, potentially with adapted intervention thresholds.

### 9. Statutory Consultees to be focused on providing timely, relevant expertise.

The newly-introduced performance framework is aimed at improving statutory consultees arrangements in England. Making this part of the system more effective is crucial for LPAs to consider the planning balance for outline applications in a more timely manner, without the need to agree 'Extension of Time' waiting for the comments. Lessons can be drawn from the way that the timelines for statutory consultees are constrained by the appeal processes, which have less scope for deadlines to be extended (appeals have fixed dates); expediting discussions and decisions.

But this also means proportionate planning judgement (linked to recommendations 1 and 6) so the quicker default answer is not simply 'no'. Equally, statutory consultees and LPAs should scale back the tendency for statutory consultees to try and use planning conditions to enforce other regulatory regimes. The latter means empowering planning officers to exercise their judgement more effectively (see recommendation no.7)

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#### Data Disclaimer

This material is produced by Nathaniel Lichfield & Partners Ltd ("Lichfields"). It has been prepared for the Land, Planning and Development Federation ("LPDF") and Richborough Ltd ("Richborough").

There is no publicly-available dataset on the length that outline permissions take to be determined over time. The analysis undertaken for this report therefore uses data downloaded from Landstack – a digital planning data platform - and we have engaged with the data provider at length. The below sets out what planning application data is held by Landstack and the methodology adopted in obtaining it.

#### Landstack Statement

*"We monitor each individual local authority planning portal on a daily basis across the whole of England, Wales and Scotland. This is 384 authorities in total. For the majority of websites that allow, this involves automated systems (web crawlers) that identify any new planning applications that have been submitted and check any outstanding planning applications for updates. In a specific number of cases this is not possible and so these sites and associated planning applications are manually monitored. These are namely for Shropshire, Barnet, City of Edinburgh, Hammersmith & Fulham, Southwark, North East Derbyshire and Loch Lomond & The Trossachs National Park."*

*Once collected, either manually or automatically, each individual planning application is then passed through a series of automated data cleaning, standardisation and data classification steps. This will be to classify application use classes and application types, to standardise decisions into a standard and to quantify the number of units in each application.*

*Once automatically processed any residential application of 1 unit+ or any commercial planning application of 0.06 hectares plus is then manually verified for correctness and the specific boundaries of the development are extracted from the relevant location plan. This ensures that for the major applications we know each one is automatically processed and then manually checked for correctness.*

#### Some notes on limitation of the data:

*We do rely on each local authority providing the data on their portals. This data is subject to human error and so this should always be factored in. Likewise, our own data, although largely automated does go through human checks and these are also subject to the same.*

*There are also some data entries where we have to infer specific classifications from the data. To illustrate for this specific use case, some local authorities do not specifically state the Application Type of each planning applications on their portal. As a result, this has to be inferred from the associated information (planning notes, application forms etc) and can be a 'best guess'. This is not frequent but worth mentioning as a reason one might see an Outline application categorised as a full. Where recorded as "non determination" these are applications which are neither 'pending' nor refused, the application has not been decided within the legally required time limit and the authority has not notified the applicant they need more time"*

Whilst the information in this publication is believed to be reliable and comprehensive for the purposes of drawing conclusions about the determination of applications for major residential development submitted and/or determined over the period 2014 to 2024 in England, the accuracy of the data cannot be guaranteed.

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