

‘Timelining the Pipeline’
Housing Development End to End

Report to CPRE, the Countryside Charity

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by

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Executive Summary

- Little research has been carried out examining time use across the development pipeline. Letwin (2018) came closest to this but did not look at what tasks and issues were involved, or the whole pipeline and only assessed very large construction projects.
- The research aimed to investigate how time was used and by whom and on what matters in a large housing development scheme. Such work can only help better inform policy interventions targeted at stages and actors to assist in effectiveness and delivery.
- The report shows in detail what time was taken through stages and steps and what topics featured and when.
- It is clear that following the time used in the development pipeline needs further research to understand how to target change or look at incentives and sanctions across the whole pipeline.
- To avoid unsubstantiated claims of specific actors causing 'delay', more emphasis needs to be placed on understanding where decisions sit at any given point (step / stage) in the pipeline.
- The report highlights through a detailed assessment of time used across the end-to-end pipeline what time was used, when and on what topics across a 15-year period.
- The case study shows how amendments to add additional dwellings within the overall development had a knock-on effect on many aspects of the overall development, resulting in many issues being revisited and reassessed.
- Over the period studied it is possible to discern that the timeline is 'owned' by different actors and substantive control of time taken is not always in the hands of that owner and 'time loops' are present in the development process.
- Seven tentative recommendations are made, across:
 - how better **records** are needed, standardisation of **language**, and how **monitoring** of buildout could be improved.
 - Consideration of how to **organise issues better** could be pursued for the various steps / stages in the development process.
 - An **assessment of how tools such as EoTs and PPAs** are used appears to be useful.
 - That thought be given to instigating **post-development roundtable debriefs** – initially to underpin necessary **further research** purposes but possibly also as good practice for LPAs to do so selectively with key partners.

‘Timelining the Pipeline’. Housing Development End to End

1. Introduction

The research presented here was funded by CPRE: the Countryside Charity as an exploratory empirical study and undertaken by the University of Reading with LyonCPT. Given the lack of overall timeline evidence available for large housing developments - certainly ‘end to end’ information, or work which explores time use in any depth. This appears to be a significant gap given the attention paid to ‘delay’ and the pressure to develop new homes. The project was initiated to begin to address this.

The report sets out the policy context in brief before examining the timeline of a large housing development. We have taken considerable time to explore the case in fine detail to better understand both the overall timeline of a large development, but also to explore how time was used at the different steps and stages and the issues raised or tasks being performed during those phases.

As the report highlights, this work still leaves a number of unanswered questions about why time was taken by the key actors involved.

The main research questions were:

- *How is time being used across the end-to-end development pipeline?*
- *What is involved in the development timeline at different stages and steps?*
- *Who is involved during these stages and steps, and why?**
- *What time taken is unexplained or ‘delays’ are cross-cutting?*

*Thus far, getting closer to answers to the third question will require further primary data collection and the willingness of key actors to cooperate.

2. Policy Review

While government has set out an ambitious target for new homes, the supply of housing has rarely kept up with projected demand. Despite arguments over the basis for housing targets, or why supply is affected by ‘planning delay’ there has been little detailed exploration of how time is used in the development ‘pipeline’.

This section provides a very brief policy review to highlight some of the previous policy work that holds relevance for this project. In the last decade two documents stand out as the most complete recognition of, and research into, the ‘pipeline’ to date – the 2017 ‘Fixing our broken housing market’ White Paper and the related 2018 Letwin *Review of Build Out*, as well as recent governmental statements on that topic.

The 2017 ‘*Fixing our broken housing market*’ conveyed a desire to hold both local authorities *and* developers to account for increasing housing delivery. In that document the Theresa May-led Conservative government stated their aim to “...*improve transparency of the end-to-end house building process, so there is clarity about the delivery of new homes and where blockages lie. We propose to improve transparency, certainty and accountability for authorities and developers*” (DCLG, 2017, p.41). Moreover, the White Paper went into further detail:

We will require more information to be provided about the timing and pace of delivery of new housing, building on the commitment made by the Home Builders Federation to improve transparency on build out on a site by site basis...[DCLG] will increase the transparency and quality of data it publishes on delivery against plan targets, and better information on the development pipeline, so timely support can be provided. This information will be published as open data. This will empower councils and communities to challenge developers on their performance and consider what if any further action is necessary (DCLG, 2017, p.42, our emphasis).

This commitment also prompted that administration to task Oliver Letwin, a former Conservative government minister, to examine the build out of development. This review culminated in the Letwin report published in 2018. The work centred on case study research of a set of very large sites (whereas our shortlist criteria initially stayed in the c250-750-unit scale range). The report explored build out times; indicating the very long time periods taken to complete projects, and in doing so highlighting a wide range of factors that shaped the timeline.

In the summary chart below (Table 1) the progress of a site through the two stages was mapped. This shows the total duration for regulatory Stage 1a,b,c estimated by Letwin at 33 months (around 2 years and 9 months), compared to the total duration of 172 months (around 14 years) for the build out (Stage 2a,b) and with the longest time taken in Stage 2b. That is *'First start on dwellings on site to completion of final dwellings on site,'* which totalled 163 months (around 13 and a half years).

Table 1: Letwin Report findings - stage '1 and 2'

| Stage x2 | Sub-stage elements x5 | Time taken |
|----------------------|--|---|
| 1 'Regulatory stage' | <p>A – From application to outline permission granted</p> <p>B – From outline permission granted to first detailed application</p> <p>C – From first detailed application to first detailed permission</p> | <p>A= 3 months</p> <p>B= 5 months</p> <p>C= 25 months</p> <p>Stage total =33 months</p> |
| 2 'Build out stage' | <p>A – From first detailed permission to first start (dwelling)</p> <p>B – From first start to final completion (actual, projected)' (p.283, emphasis added).</p> | <p>A= 9 months</p> <p>B= 163 months</p> <p>Stage total= 172 months</p> |

(Source: derived from Letwin, 2018)

Notably, the final report by Letwin did *not* accuse the planning system of causing 'slow build out rates' and instead concluded that:

the homogeneity of the types and tenures of the homes on offer on these sites, and the limits on the rate at which the market will absorb such homogeneous products, are the fundamental drivers of the slow rate of build out (Letwin, 2018, p.6)

These findings validated government concern for 'diversifying the market' in the 2017 Housing White Paper, which had also stated that the *"way in which the house-building market operates constrains the supply of new homes, because there is insufficient competition and innovation"* (DCLG, 2017, p.45). In contrast to accusations of planning delay, this review emphasised market supply and demand being misaligned because of a lack of diversity in the housing types and tenures being provided on large sites by volume builders. This analysis prompted a set of policy recommendations for positive planning intervention to address these issues.

However, the 2017 White Paper and 2018 Letwin Review were overshadowed by other events, not least Brexit and the Covid Pandemic, and as such were never fully

implemented. Then by 2020, the Johnson-led Conservative government proposed a new set of planning reforms for England in the *Planning for the Future* White Paper; which again, while not fully implemented, were positioned by government as seeking to shape “a significantly simpler, faster and more predictable system” (MHCLG, 2020, p.8) and one which would deliver “results in weeks and months rather than years and decades” (MHCLG, 2020, p.6).

The Keir Starmer-led Labour government elected in 2024 continued the pressure to speed up both plans and decisions, with an emphasis on housing delivery and growth. The Chancellor, Rachel Reeves, speaking immediately after the 2024 election, stated that:

Nowhere is decisive reform needed more urgently than in the case of our planning system. Planning reform has become a byword for political timidity in the face of vested interests and a graveyard of economic ambition. Our antiquated planning system leaves too many important projects getting tied up in years and years of red tape before shovels ever get into the ground (Rachel Reeves, 2024, no pagination).

Although the government also signalled recognition of the role of developers in calibrating the supply of completed development. In May 2025, the UK government published the *Speeding up Build out* consultation, where the role of developer business models and approaches and their effect on the speed of housing build out rates was targeted¹. This aimed to introduce sanctions for developers deemed to be delaying housing. However, proposals (to compel faster housing delivery by developers via Compulsory Purchase Orders for sites with permission) and a proposed ‘Delayed Homes Penalty’ charge when developers fell materially behind pre-agreed build out schedules. As far as we can see, such measures could be difficult to apply and enforce.

Notwithstanding this series of policy options, the examination of where and how time is taken across the pipeline has been rather neglected. Such work can only help better inform policy interventions targeted at stages and actors to assist in effectiveness and delivery.

¹ Including recent work from MHCLG on build to rent:
<https://www.gov.uk/government/publications/planning-reform-working-paper-speeding-up-build-out/planning-reform-working-paper-speeding-up-build-out>

3. Methodology

The examination of one case study in-depth assists in providing standalone data to unpack where time was taken and why and provide insight on those dimensions, but also to help finesse the approach (i.e. develop the ‘proof of concept’) and see how feasible / and useful it is to map the use of time over the course of a large development. While we have been careful to select a ‘mainstream’ or broadly typical housing site, there is merit in widening the study to further sites; to provide greater confidence over issues and solutions.

We only focused on larger sites in the southeast of England, largely greenfield, allocated and they had to be completed, or very near completed by 2025, in order to meet the shortlist requirement, which itself was limited by the resources and the basis of exploring a case in some detail (and see section 7).

We have included stages/steps prior to the ‘regulatory’ stages here to map the end-to-end process. It is notable that Letwin (2018) only covered stages #4-9 below.

The *stages* were recognised as:

1. *Promotion* (not covered elsewhere) - the point the landowner or agent promotes the land as a development site.
2. *Site allocation* (not covered elsewhere) – formally accepted as a sustainable location and appears in the development plan.
3. *Pre-application period* – where discussions over the policy issues and factors that can be included/excluded, or need shaping are held.
4. *Planning Application* (initial) – outline or full (Letwin stage 1a,b)
5. *Decision notice* (Letwin Stage 1b) - when the LPA grants permission (outline or full)
6. *Reserved matters* (Letwin Stage 1c / 2a) - where matters of detail are agreed
7. *Conditions / obligations* – where actions required of the developer are finalised and either discharged, or a time frame set out for compliance (Letwin 2a).
8. *Buildout period* (Letwin Stage 2a, b) - the period when construction occurs on site (which may start before stage 7)
9. *Completion* (end of Letwin stage 2b) - when the development is complete (or part complete and the site (or part of) is occupied.

The approach can aid consideration of what work is necessary at key points to effectively speed-up housing delivery, what matters should be resolved at stages (rather than serially re-opened) The work as set out also helps illustrate the ownership and control of the timeline - presenting the question of whether the ownership and control need to be realigned. Our thinking embraces the following overall points:

- **Rationale** - until one understands the problem i.e. why stages or processes take time / are so slow, one cannot make effective policy interventions – and so simplified and generic speed-based solutions are put forward for planning. This takes us closer to answering ‘what is the problem?’ addresses assumptions this is largely a product of unnecessary regulation or mismanaged bureaucracy?
- **Hypothesis** - any time taken is subsumed into a generic ‘planning’ phase in current mainstream debate on the system. We should unpack what is meant by the ‘planning’ or regulatory stage? This can provide more clarity, but there will still be holes where parts of the process will be missing – a potential finding could be where are the ‘unknown blockages’ in the system (i.e. time sinks / ‘black holes’).
- **Priority** – the above raises the question about ‘what are the most important bits of the story / time taken?’ What part(s) of the pipeline will reveal the most? e.g. we might not need too much detail post-permission other than dates.
- **Time taken** - where is the ‘delay’? Which reflects a normative question in the abstract - how long should a mid-sized housing development take? Sites get stuck for all sorts of reasons (and noting that even after the first residents have moved in – so there often still issues beyond ‘practical completion’).

These selection criteria are designed to reflect a mainstream or large number of ‘industry standard if not ‘typical’ sites coming forward through the planning system. In terms of identifying sites the first portion of work is through an extensive desk review primarily web documents (LPA, Developer, Statutory agencies etc).

There were some possible methodological blockers / issues, which also conditioned the extent to which we pursued some shortlisted sites (section 4) and which need to be borne in mind for research, which would most likely include primary (qualitative) data collection (and see section 7):

- **Access to the records is a key issue** – main data collection method is desk research ‘mining’ LPA data files which is dependent on them

being available and organised enough to logically track the progress of a development. This becomes more challenging where there is poor documentation / filing or is fragmented across documents/website. Or worse they either do not exist or are lost before being digitalised. [Nb. Avoids developer records when companies merged as files might be lost]. More difficult and costly going back far in history – need for a ‘vanishing point’ i.e. beyond which time it doesn’t matter how the schemes takes if more than a few decades.

- **Digitalised files may not be available (and typically may only go back to 1974** when Councils were reorganised) – (looking further back to find information might still be on micro-fiche). For some Authorities, such files may not be held to 1974 for a variety of reasons.
- **There are no ‘typical’ sites** – all sites / schemes will exhibit some degree of uniqueness. However, avoidance of schemes that are dependent on significant infrastructure connections to unlock the site / scheme first is important (cf. Letwin), also we have decided to avoid Green Belt or where a scheme may have been held up by nutrient neutrality, Biodiversity Net Gain etc (as delay well recognised here given legal, policy and practice uncertainty).
- **Focus on standard houses** – not flats or other types of special purpose-built accommodation e.g. student accommodation, retirement living, self-build, etc.
- **Start with identifying recently completed schemes across a range c250-750 units** - possibly by identifying new dwellings currently being sold for the first time. Ideally a non-phased scheme with a single developer to avoid confusion over making the link between what documents relate to which site parcel and developer scheme / permissions on the land.
- **Create a long list by entering specific criteria** into the planning register searches on LPA websites and then cross-check those lists against our list of criteria for cases. Then use Google to check if they have been built out yet (if not ID via step 1).
- **Identify which development the applications belong to** - then check the planning history for that development to identify development size etc, start with the planning history records of LPAs within the target catchment. Sometimes concurrent applications are made on the same development scheme as it progresses over time - so relevant documents could be split across many files which makes ‘mapping’ more difficult.

- **Create a high-level overview of the site constraints and number and different types of applications made** – this will give an initial clue as to how challenging a site has been to process and build out.
- **Collaboration or need for FoI** - what matters can be obscured by ‘commercial confidentiality.’ Not all developers are the same and not all business practices are the same – but many would be reticent to release information. Some LPAs may also have information not available online.

4. The Shortlisted Sites: Overview

Here we provide a short description of the shortlist cases initially explored (nb. some were brownfield to provide a reference point) before the eventual selection of Site C as the main in-depth study case (section 5). All eight shortlist cases have been partially anonymised with broad location kept in view to aid contextualisation (and allow for future exploration). The fuller description of the main case study Site C is set out later and forms the mainstay of this report. For that main site, the timings have been explored in detail. However, for the other seven sites we have had to make best estimates of time taken (see Table 2) based on available information – this lack of easily accessible data (notably firewalled data on stages of development are held by NHBC but this is not accessible to non-members) and lack of recording of key stage completion is a gap. We stopped investigation of the other shortlisted sites when blockers emerged (section 3). This also underscores the need for detailed examination of cases, as well as the lack of publicly available information about on-site completions of housing developments.

Thumbnail narratives of sites²

All sites listed are located in the South-East region, where housing pressure is typically regarded as high and the examples had to be large developments - primarily housing in order to meet our criteria and ensure that the case selected can be safely regarded as industry standard' at the time of its implementation. Table 2 provides the snapshot for stage 4 (planning application) to stage 9 - completion.

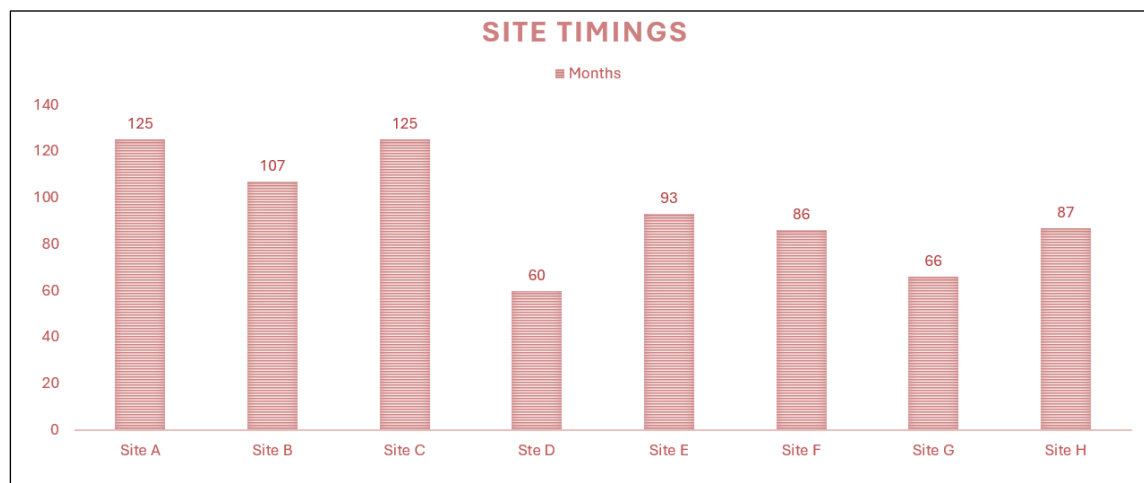
Site A – Hampshire

The site was subject to a development proposal for approx. 750 homes. The site was promoted and an outline application was made in 2017, with the site having been allocated in the local plan - which was adopted in two years earlier. The development proposal was accepted and after outline consent was given the site was sold to a different developer. Thereupon the work to build out completion was split into seven phases, across four land parcels. The first phase was commenced 2021, with the last

² Details of these sites have been withheld as the research team may wish to do more work on the cases in the future.

phase due to be completed in 2026. Estimated duration (outline to completion) = 125 months.

Table 2: Planning plus build out times (stages 4-9) of shortlisted sites (x8)



Site B - Hampshire

This site was allocated and subject to a development brief SPD 8 years ago. Outline permission for phase 1-3 was granted for approx. 225 housing units in 9 years ago (2016) but a latter fourth phase involving approx. 100 units was in planning at the time of writing (application for phase 4 was made this year). Phases 1, 2 and 3 were to be completed next year. First three phases duration is estimated at: 107 months.

Site C* – Buckinghamshire

This was the *main case study site centring on what was eventually approx. 400 unit development in Buckinghamshire. The overall time taken was around 15 years, including pre-planning stages, but outline to completion was estimated at: 125 months. The overall pipeline time and detail is set out in the full case description below.

Site D - Surrey

This was a site for approx. 250 units. The location was part of a former minerals extraction site (i.e. brownfield). Outline planning was granted in 2018 years ago but the site was only formally allocated in the local plan of December 2019 years ago. Completion of the development was in two years ago. Estimated time from outline to completion was: 60 months.

Site E – Surrey

This site was a brownfield location on a former hospital. The development was proposed via outline planning application for approx. 230 housing units, plus medical facility. While the site was allocated in the local plan 2021, outline permission was granted in several years prior and build-out completion was this 2025. Outline to completion estimated at: 93 months.

Site F – Hampshire

A greenfield site, this development was allocated for approx. 300 dwellings in the local plan. The full application for approx. 300 dwellings was submitted 18 years ago and permission granted later the same year and 3 subsequent amendment applications were made two years later. The final s106 agreement was completed 8 years ago. The build out dates appear to span until the first legal agreement was signed. Time taken overall to build out was: 86 months.

Site G – Hampshire

The site was an allocated site and the development involved approx. 275 dwellings. The initial planning application was made 23 years ago and full Permission granted the following year; there were 3 subsequent amendment applications made. The s106 agreement was only signed off 3 years ago, and in the intervening period subjects such as drainage were being discussed and remedied throughout. The physical construction of the homes was completed at some point in 19 years ago and this is taken as our substantive completion date. Time overall, without pre-planning stages, was: 66 months.

Site H – Kent

This was a greenfield site. There was an outline application for approx. 200 dwellings submitted. This was received 7 years ago and the decision was issued 5 years ago. The build out phase started at some point in the last 4 years with an estimated completion this year. Time overall was: 87 months.

5. Case Study Site ‘C’: Stages / steps

Here we set out the overall story of how the development on ‘Site C’ evolved. The site was a greenfield site located on the edge of a small town in southern England owned by a large landowner. In 2010 the landowner decided to allow the site to be proposed under the local plan ‘call for sites’ process.

The site was promoted by a specialist firm and pre-application discussions began in 2013 with the neighbourhood/consultees/LPA. Prior to this (and continuing through this period) the land promoter carried out various site investigations and survey works. That work started in early 2011. By 2014 the Local Plan was withdrawn at an advanced stage – but the site had been included in that emerging Plan. Then the relevant Neighbourhood Development Plan allocated the site in 2015 – for around 400 homes. The development proposal was submitted for outline approval in 2015, with outline permission granted in 2017 for 400 homes plus open space. At this point the site was sold to a developer.

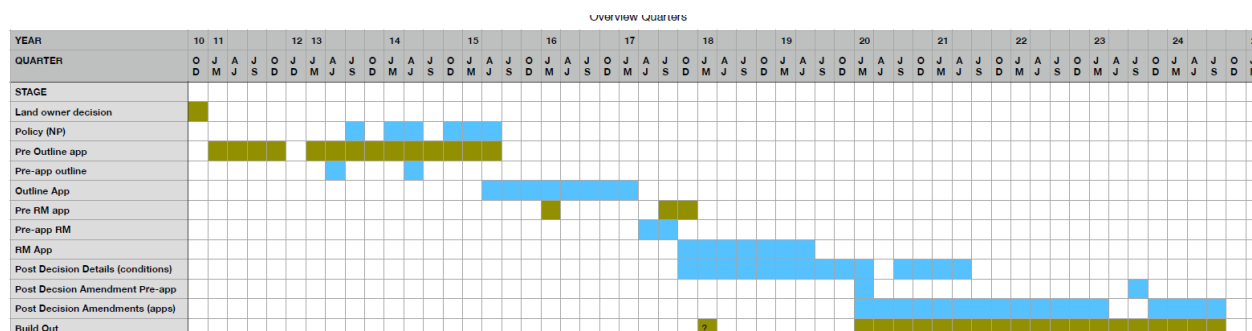
Over the following period of 8 years, reserved matters were discussed and decided (see Tables 6-8), amendments were considered and negotiated; with some of this happening during build out, which was going on from 2019 until 2024. It is notable that among the main issues during the outline application stage was a highways matter that took some time to conclude; centring on the need for a roundabout. During the reserved matters stage there is a more complex picture of a number of interconnected constraints and design issues as well as extra houses proposed. These were negotiated and took some time to reach resolution. As far as the research team could discern from available online data the development did not involve a Planning Performance Agreement (PPA) and three different case officers were involved over the period 2015-2024.

Substantive completion of the development was at the end of 2024 – around 15 years since the site was recognised as a potential sustainable location for housing development. This was 10 years after its formal allocation in the development plan for the area. At no point did the formal planning process ‘stop’ during this period.

What became clear was there are many ‘steps’ within each stage (see Tables 3-9 below) and that many steps require re-rehearsal as issues reappear or are presented for discussion or negotiation on numerous occasions. The supposed ‘stages and

steps' of development become permeable and unfixed; as a result this prompted a reopening of numerous matters (see Table 9).

Table 3: Overall timeline of Site 'C' by Quarter (2010-2024)



Predominant ownership of the timeline is indicated in Table 3; with green indicating the landowner, promoter, developer and blue the LPA and measured in quarters between 2010-2024.

Detailed breakdown of time taken across Stages and Steps

We explored the progress of the site and development through the stages of development - starting with the pre-outline application stage which ran from February 2011 – April 2015, through to amendments proposed during the build out.

i. Pre-outline stage

This stage starts from the land promoter/landowner agreeing to pursue developing the site for housing, up until an outline planning application is submitted. Table 4 dissects what time was spent on in this period, including site investigations, survey work, gathering data (some from regulators/consultees), and modelling the impact of a development for approximately 400 houses, analysis of data gathered and drafting reports for a future planning application. Some public consultation and finalising the application documents for submission took place. This was happening alongside promotion of the site through the Development Plan process.

The stage is led by the promoter and landowner, with the regulatory authorities and consultees feeding in as and when requested.

Table 4: Pre-outline stage

| YEAR | 11 | | | | | | | | | | | | 12 13 | | | | | | | | | | | | 14 | | | | | | | | | | | | 15 | | | | | | | | | | | |
|--|----|---|---|---|---|---|---|---|---|---|---|--|-------|---|---|---|---|---|---|---|---|---|---|---|----|---|---|---|---|---|---|---|---|---|---|---|----|---|---|---|---|--|--|--|--|--|--|--|
| MONTH | F | M | A | M | J | J | A | S | O | N | D | | J | F | M | A | M | J | J | A | S | O | N | D | | J | F | M | A | M | J | J | A | S | O | N | D | J | F | M | A | | | | | | | |
| STEPS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Initial Site Scoping Investigations | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Surveys | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Data Gathering (Consulting) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Modelling | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Analysis/Drafting | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Avertising/ Presenting | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Finalising | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| From 124 online documents generated 298 rows of data | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 161 rows pre outline application | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 137 rows outline application | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

(Note: blue does not indicate single party timeline 'ownership'; ? = unclear in files)

ii. Outline stage

This stage covers the processing of the outline planning application from submission until variation of the s106 agreement shortly after the decision was issued. The next stage was the outline stage (see Table 5) which took 23 months, running from April 2015 – March 2017.

Table 5: Outline planning stage

| YEAR | 15 | | | | | | | | | | | | 16 | | | | | | | | | | | | 17 | | | | | | | | | | | |
|--|----|---|---|---|---|---|---|---|---|---|---|---|----|---|---|---|---|---|---|---|---|---|---|---|----|--|--|--|--|--|--|--|--|--|--|--|
| MONTH | A | M | J | J | A | S | O | N | D | J | F | M | A | M | J | J | A | S | O | N | D | J | F | M | | | | | | | | | | | | |
| STEPS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Submitted | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Consultation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Negotiation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Amendments/ Additional Info | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| S106 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Decision | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| S106 Variation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| From 124 online documents generated 298 rows of data | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 161 rows pre outline application | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 137 rows outline application | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

Table 5 dissects what time was spent on during the processing of the outline planning application. For the first year this involved consultation, negotiation, and amendments to improve the scheme/address issues of concern. Following this there was nearly 8 months spent resolving highway matters alongside a Local Highway Authority process and drafting, negotiating and then agreeing a s106 agreement to cover a number of matters. Shortly after the permission was issued the s106 was varied due to the request of a consultee regarding changed requirements.

The stage is directed by the statutory process for planning applications, site constraints, consultee requirements, LPA assessment, and the land promoter's response to the matters raised in the process.

iii. Reserved Matters Stage

This stage covers the processing of the reserved matters application from submission to decision. This reserved matters (RM) stage (Table 6) spanned the period December 2017 – April 2019 (16 months). Table 6 dissects what time was spent on showing how the RM application was submitted by the developer a matter of months after the land promoter had received outline planning permission. The developer had their own team of consultants supporting them, therefore the applicant and team pursuing permissions changed at this point.

Table 6: Reserved matters stage

| YEAR | 17 18 | | | | | | | | | | | | 19 | | | | |
|--------------------------------|-------|---|---|---|---|---|---|---|---|---|---|---|----|---|---|---|---|
| MONTH | D | J | F | M | A | M | J | J | A | S | O | N | D | J | F | M | A |
| STEPS | | | | | | | | | | | | | | | | | |
| Submitted | | | | | | | | | | | | | | | | | |
| Consultation | | | | | | | | | | | | | | | | | |
| Negotiation | | | | | | | | | | | | | | | | | |
| Amendments/ Additional Info | | | | | | | | | | | | | | | | | |
| Decision | | | | | | | | | | | | | | | | | |

The majority of the time is spent here on a recurring cycle of consultation, negotiation, amendments, and assessment, with the decision issued soon after this was completed. Through this recurring cycle, constraints and design issues were

being negotiated and resolved to improve the development. This is a complex picture of interconnected matters where the LPA, consultees and the developer and their consultants were liaising and negotiating with each other until solutions that were satisfactory to all parties were reached and agreed.

The stage is led by the statutory process for planning applications, site constraints, consultee requirements, LPA assessment, and the developer and their consultants response to the matters raised in the process.

iv. Conditions stage

This stage covers the period over which applications for matters covered by conditions on the outline, reserved matters and amendments are being processed. This spanned the period from December 2017 to June 2021, a period of 42 months. Table 7 dissects what time was spent on during the processing of applications to discharge conditions, noting that this overlaps with the RM application stage in Table 6, the amendments in Table 8 and the build out.

Table 7: Conditions stage

| YEAR | 17 | | 17 | 18 | 19 | | | | | | | | | | | | 20 | | | | | | | | | | | | 21 | | | | |
|--|----|---|-----|----|----|---|---|---|---|---|---|---|---|---|---|---|----|---|---|---|---|---|---|---|---|---|---|---|----|---|---|---|--|
| MONTH | J | D | J-D | J | F | M | A | M | J | J | A | S | O | N | D | J | F | M | A | M | J | J | A | S | O | N | D | J | F | M | M | J | |
| STEPS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Outline 2, 6, 7, 8, 9, 11, 12, 13, 14, 17, 20, 25 and 28 | O | S | | | | | | | D | | | | | | | | | | | | | | | | | | | | | | | | |
| RM 4 | | | | | | | | R | S | | | | | | D | | | | | | | | | | | | | | | | | | |
| RM 2 | | | | | | | | R | S | | | | | | | D | | | | | | | | | | | | | | | | | |
| RM 1, 3, 5, 6, 7 | | | | | | | | | S | | | | | | | | | | | | | | | | | | | | | | | | |
| Amendment 3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| From documents generated | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| rows application | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| rows application | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

Conditions also ran alongside the amendments stage for a short period (see Table 8 below).

The details submitted and considered alongside the RM application addressed a number of the conditions on the outline planning permission. Following the RM

approval, the details required by the conditions on the RM were submitted, assessed, negotiated, amended and reassessed over an approximately 10-month period until deemed satisfactory. Approximately 5 months after the final one was determined, a further condition details application was submitted in respect of approved amendments to the originally approved scheme. This prompted a further process of submission, assessment, negotiation, amendment and reassessment until deemed satisfactory over an approximately 9-month period.

v. Amendments stage

This stage covers the period over which applications for amendments to the approved scheme are being processed. Eight categories of amendments featured from February 2020 through to July 2024 (53 months) (see Table 8). The build out was proceeding during most of that period. Table 8 dissects what time was spent on during the processing of applications for amendments, noting this overlaps with the conditions stage in Table 7 and the build out.

Table 8: Amendments Stage

[illegible]

Initially, in early 2020 there were a couple of applications to update paperwork and change some house types on 8 plots. These were dealt within the statutory timescale for such applications. From late Quarter 1 2020 the developer was seeking amendments to add additional dwellings within the overall development; this had a knock-on effect on many aspects of the overall development, resulting in many of the

issues previously considered at outline and reserved matters stages having to be revisited and assessed. The scheme remained within the overall number approved at the outline stage but led to a higher overall number of dwellings than the reserved matters details had provided for. Later on, there were two further amendment applications to deal with implications of the additional dwellings.

These tables and accompanying narrative help indicate just how many tasks or steps are involved in each stage. During the story of this development a considerable number of issues, typical to the planning system, surfaced and resurfaced.

A list of the main constraints / matters to address (issues) by stage across case study Site C is displayed in Table 9. It is notable that many issues resurfaced on multiple occasions. Some of this is due to the scheme gradually being developed in greater detail as it moved through the stages.

Table 9: Key issues through the development

| Stage | Matters | | | | | | | | | | | | | | | | | | | |
|------------------------------------|-------------|---------------|-------------|--------------|-------------|------------------|-------------------------|--------|----------|-------------------|-----------|--------------|------------|-------------------|--------------|--------------------------|----------|--------------------------|--------------|-------------------|
| | Air Quality | Arboriculture | Archaeology | Biodiversity | Bureaucracy | Crime Prevention | Construction Management | Design | Drainage | Economic Benefits | Education | Existing Use | Flood Risk | Ground conditions | Ground Water | Health Service provision | Heritage | Highway Network / access | Housing Need | Landscape Setting |
| Land Owner Decision | | | | | | | | | | | | | | | | | | | | |
| Policy (NP) | | | | | | | | | | | | | | | | | | | | |
| Pre Outline App | | | | | | | | | | | | | | | | | | | | |
| Pre-app Outline | | | | | | | | | | | | | | | | | | | | |
| Outline App | | | | | | | | | | | | | | | | | | | | |
| Pre RM App | | | | | | | | | | | | | | | | | | | | |
| RM App | | | | | | | | | | | | | | | | | | | | |
| Post Decision details (conditions) | | | | | | | | | | | | | | | | | | | | |
| Post Decision Amendments Pre App | | | | | | | | | | | | | | | | | | | | |
| Post Decision Amendments Apps | | | | | | | | | | | | | | | | | | | | |
| Build Out | | | | | | | | | | | | | | | | | | | | |

For example, the need for off-site highway works to accommodate additional traffic on the existing road network and the means of access to the site are considered at outline stage. Then at reserved matters stage the full details of the road layout and parking were considered. Similarly, for issues such as drainage (i.e. strategic site drainage, down to detailed plot and road drainage), and affordable housing (numbers and

principles, then details of individual house types and plots) reappear given the unfixing of another issues, primarily at the amendments stage. Each of the matters listed in Table 9 may cover a number of aspects and more than one consultee.

Time ownership of the process changes hands (between the land promoter/developer and the LPA and consultees) and the timeline is never in the control of one party throughout the process (multiple other actors have a degree of control and can influence the speed of a stage/step). The case helps underline how time ownership does not necessarily mean that any actor has control over the timeline and will also be subject to their own institutional/organisational pressures, processes and resourcing, or indeed deliberate strategising.

6. Conclusion

It is known that a multiplicity of *actors* are implicated in housing delivering at different times and in various ways. Yet, the discussion of this, alongside the potential *issues* to consider and resolve on any given site, produces significant complexity. The work reveals a considerable period was taken in Site C to establish land as a potential site from the developer perspective, even before outline or pre-outline. We highlight also how there are very many issues being *re-considered* throughout the development of that Site, as Table 9 has shown.

It also highlights how the pipeline end to end is not '*owned*' by any single actor throughout (in the sense of responsibility) and indeed the pipeline across stages and steps is not in the *control* of a single party. This highlights how large housing development projects are both a complex and multi-actor environment, especially so for large housing schemes, and such circumstances cast some doubt on the effectiveness of planning reform agendas based on addressing time / behaviour in a single stage or for a single actor group. As such, the timing and sequencing of deliberations is one important element for consideration in this work, and it would be of interest to understand where and how Planning Performance Agreements have assisted in such developments or not.

Development sites pass through multiple phases, and planning applications are re-negotiated and amended. In the case of Site C, some of the planning amendments were because the developer wanted to put more houses on the site than originally agreed - which then had a knock-on effect on many previously agreed points.

This is more than a concern for the construction phase; it is also a question of legitimacy and public interest by all those involved in and with the planning system (i.e. 'an inspector calls' scenario where all parties bear some responsibility). An effective planning system requires – even depends on - transparency and defensibility of process and decisions, and this first necessitates understanding of all of the system and the problems being claimed / faced. Such time may well be the product of needing to 'chip away' at issues that have no immediate ownership or resolution / 'quick fix'. In Site C we have issues revisited at a different level of detail, or because something else has changed.

It is apparent that keeping not just the whole planning system in view, but what happens before and after the regulatory stage too – that is the end-to-end of the development pipeline.

7. Recommendations

The work discussed here has obvious limitations not least its focus on one site – a necessity of time and resource and the desire to look closely at the pipeline in a way not attempted in the past. The focus on the south-east as a high demand area was intended to highlight that even where there is strong demand (and market incentive) large developments have considerable timelines.

So, beyond needing further research to extend the empirical evidence, based on our work we have developed an interim set of **seven** recommendations, as follows:

1. **Need to ‘follow the time’ in the development pipeline** – this perspective allows for more understanding of who is responsible and when in the process. Much is written about time taken, but very little about the how, why and when of development – and that draws on empirical evidence and based on records and testimony from those involved.
2. **Pipeline ownership and control** - Linked to the above it is apparent how ‘time ownership’ and ‘time loops’ are present in the development process. To avoid unsubstantiated claims of specific actors causing ‘delay’, more emphasis needs to be placed on understanding where decisions sit at any given point (step / stage) in the pipeline.
3. **Better records** - are needed for build-out rates and negotiations/amendments given there is a lack of transparency in the system means it is unclear what has been recorded and where.
4. **Lack of standardised language** - which could help clarity and ease of reference for all parties. Standardised language would make it easier for everyone to follow the story.
5. **Monitoring and recording** – there is very little apparent recording of completions – this prompts the idea that a greater role for planning enforcement in monitoring / recording build-out and delivery. This could allow for better information on build out timing and recording accurately phasing and completion.
6. **Bespoke timings** – consideration of how to organise issues better could be pursued for the various steps / stages in the development process and which may include a review of the effectiveness of pre-application discussions / EoT

(Extensions of Time) / PPA (Planning Performance Agreement) design and use in the system.

- 7. Post-development roundtable debriefs** – organised to assess what happened and how each party could improve or organise themselves better in relation to major development. These could be annual, local and feature a hand picked set of sites, or be presided over in a national forum (and possibly be a new focus of work for PAS).

These seven recommendations are interconnected and provide a first attempt to set out the implications and lessons from this study. Overall, this report has highlighted that the development process and end-to-end pipeline is more complex than is often presented in mainstream political and economic discourse on the planning system and housing delivery. This emphasises the need for more research to provide a deeper understanding of what and who is involved. Such work would aid policymakers in producing evidence-based planning reforms that consider the system as a whole and in light of the multi-actor environment, existing process and the main pressures, needs and requirements.

We see that time used in planning is ostensibly deployed to make things work and better – this does not always mean that time is being used efficiently or effectively. Rather, we need to know what time(s) and practices actually improve an application and overall subsequent development and what time makes very little difference to the actual outcome, or are actions which slow the pipeline to little effect.

Further information:

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