



# Data Is Evidence

Why Live Open Data is the Only Model  
That Can Deliver the New Generation  
of England's Plan-Led System

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# Executive Summary

**England is preparing to implement the most significant structural reform of its planning system in over a decade. The Planning and Infrastructure Act 2025 has re-introduced sub-regional planning, placing Spatial Development Strategies alongside a new generation of Local Plans, and requiring general conformity between the two tiers.**

The government has set a 30-month timetable for Local Plan preparation and has committed to delivering the first round of SDSs from summer 2026. The ambition is universal coverage of both tiers, delivered at pace.

That ambition is being pursued despite inefficiencies with the way the evidence is gathered to support plan making, which make it structurally incompatible with the demands of the new two-tier architecture. Evidence commissioned on the prevailing model: static, single-use, produced over 18 to 24 months per plan cycle, cannot deliver the conformity relationship between SDSs and Local Plans that the legislation requires. It will generate evidential inconsistency between the tiers, conformity disputes at examination, and a pattern of delay that the reform programme cannot afford.

This paper advances a single, central proposition: the simultaneous introduction of mandatory SDSs and a new generation of Local Plans at unitary authority level creates a once-in-a-generation opportunity to establish shared, live evidence infrastructure at sub-regional scale. That infrastructure, if designed correctly, can serve both tiers simultaneously, resolve the conformity problem before it becomes an examination problem, and reduce the aggregate cost of evidence commissioning substantially.

The operating principle is straightforward: replace static evidence base documents with shared, live, open evidence infrastructure held at sub-regional scale and reused across SDS and Local Plan processes alike; pair this with a policy-drafting approach that makes policies determinative where objective datasets exist, channels genuinely subjective questions into a defined discretionary route, and requires monitoring clauses that generate any missing data over time.

The principal recommendations in this report are addressed to two audiences.

To strategic planning authorities and unitary policy officers: begin evidence scoping now, ahead of the formal commencement of the SDS duty. Engage the SDS geographies process with evidence architecture explicitly in mind; and resist the urge to default back to static commissioning under time pressure.

MHCLG is urged to define a minimum viable evidence standard for SDSs in secondary legislation before summer 2026.

To design that standard explicitly for compatibility with Local Plan evidence requirements; to establish live open data as the default evidence architecture in guidance; and to include evidence infrastructure within the SDS funding package.

Modelling undertaken for this paper suggests that early-mover SDSs adopting the proposed approach could realise reductions in evidence commissioning cost of 25 to 40 per cent per plan cycle, alongside material reductions in cycle time and examination dispute risk.



# Introduction

England is building a new planning system. The legislation is in place. The geographies are being agreed. The funding is being prepared. Within months, dozens of strategic planning bodies across England will begin the work of producing Spatial Development Strategies that will shape development, infrastructure, and growth across their areas for the next two decades.

Currently, England's 'plan - led' planning system can only demonstrate an 'in-date', enforceable, local plan, in about 20% of planning authorities. With reforms to the system anticipated to deliver an uptick in plan preparation, we need to look again at how evidence is collected and delivered.

This paper is not a critique of the reform programme, it is an argument that those ambitions cannot be achieved if the new statutory architecture is built on an evidence model designed for a simpler, slower, and less integrated world.

This paper sets out an option for what the right approach could look like.

# A Plan-Led System

Over 80 per cent of LPAs currently trigger the Presumption in Favour of Sustainable Development, either due to the age of their Local Plan, or the failure of LPA to plan for, or deliver, sufficient new homes in the face of growing housing target

numbers. Re-introducing the Development Plans and Spatial Development Strategies at the centre of our plan led system at this scale will require a fresh approach to gathering evidence.



# A New Architecture, An Old Evidence Model

England's planning system has just been fundamentally redesigned. The Planning and Infrastructure Act, which received Royal Assent in December 2025, has created a mandatory two-tier planning framework for the first time since Regional Spatial Strategies were abolished in 2011.

At the strategic tier, approximately 40 Spatial Development Strategy areas have been proposed, covering the whole of England, each with a duty to produce a high-level spatial plan looking at least 20 years ahead. At the local tier, around 170 unitary authorities will be required to produce a new generation of Local Plans, each of which must be in general conformity with the relevant SDS above it.

The government has been explicit about the pace it expects. The new Local Plan system introduces a 30-month preparation timetable from commencement to adoption. MHCLG has committed to making the SDS duty operational from summer 2026, with secondary legislation to be laid before Parliament breaks for recess. Funding has been identified to support SDS preparation across every area up to 2028-29.

## 2.1 The Evidence Model That Built the Current Crisis

Under the current system, each local planning authority would normally commission its own evidence base independently. Necessary evidence could include a Strategic Housing Market Assessment, a Housing and Economic Land Availability Assessment, a transport model, a retail study, an infrastructure capacity study, a viability assessment, along with numerous other reports.

Each is produced by a specialist consultant, delivered as a static document, valid at the point of production and depreciating from that moment forward. When a plan takes seven years to prepare, the evidence base commissioned at the outset could be materially stale before the plan reaches examination. When the plan is eventually adopted and a review cycle begins, the entire commissioning process starts again.



This model has three structural defects that are well understood.

- First, it is slow: evidence commissioned for a Local Plan review is typically produced over 18 to 24 months before it can inform spatial options, let alone policy choices.
- Second, it is expensive: a full evidence base suite for a medium-sized unitary authority runs to tens of thousands of pounds per plan cycle, a cost that falls entirely on already-stretched local authorities.
- Third, it is single-use: evidence produced for one authority's Local Plan cannot straightforwardly be used by a neighbouring authority, even where the underlying geography (a housing market area, a functional economic area, a travel-to-work zone) is shared.

The result is multiple parallel commissions of overlapping evidence, producing outputs that may be mutually inconsistent at the boundary, at a combined cost that would fund a shared evidence infrastructure many times over.

## 2.2 Why the Two-Tier Architecture Makes the Old Model Unworkable

The introduction of mandatory SDSs does not simply add a new layer of plan-making above the existing local system. It creates a statutory conformity relationship between the two tiers that makes the structural defects of the commissioned evidence model critically damaging rather than merely expensive and slow.

Consider what general conformity between an SDS and a Local Plan actually requires in evidential terms. The SDS must make strategic decisions about the distribution of housing need across its area, the identification of broad locations for growth, the coordination of strategic infrastructure, and the framework for economic and environmental policy. Each constituent Local Plan must then demonstrate, at examination, that its policies and allocations are consistent with those strategic decisions.

If the SDS evidence base and the Local Plan evidence base are commissioned separately (at different times, by different bodies, from different consultants, using different data vintages and different geographic cuts of the same underlying information) the conformity requirement becomes a source of perpetual evidential tension rather than a mechanism for coherent spatial planning.

That tension will not be resolved at the level of political goodwill between a strategic planning board and its constituent authorities. It will be resolved, expensively and slowly, at examination.

The geographic instability of the SDS system compounds this further. MHCLG's own consultation on SDS geographies, published in February 2026, is explicit that the proposed areas may need to change to reflect future devolution arrangements, and that some parts of England have no agreed geography at all.

A static evidence base commissioned for a specific geographic footprint becomes partially or wholly redundant the moment that footprint changes. Evidence held at fine-grained spatial resolution, capable of reaggregation to any administrative geography, survives that instability. Evidence that exists as a PDF produced for a boundary that no longer exists does not.

The same logic applies to local government reorganisation. The abolition of district councils and the creation of new unitary authorities is already under way, with implementation dates running from April 2027. The number of Local Plan-producing bodies is itself in flux.

## 2.3 The Undefined Evidence Standard: The Most Consequential Gap in the SDS Implementation Programme

The secondary legislation that will make the SDS duty operational has not yet defined what evidence an SDS must be based upon. The draft NPPF sets out proposed policy on the content of an SDS. However, the evidence standard (the question of what data, at what currency, produced by what methodology, is sufficient to support an SDS at examination) remains undefined.

This is not a technical detail to be resolved in guidance after the fact. It is the most consequential policy decision in the entire SDS implementation programme. If the evidence standard is left undefined, each of the approximately 40 strategic planning bodies will make its own commissioning decisions independently, procuring evidence in the way that is most familiar rather than most fit for purpose.

The result, at national scale, will be 40 separate static evidence commissions, producing outputs in different formats, to different methodological standards, at different points in time, none of which is designed to interoperate with the Local Plan evidence bases being produced below them.

## 2.4 The Quantified Case: Cost, Time, and Risk

Under the prevailing commissioned model, a full Local Plan evidence suite typically takes 18 to 24 months to produce and costs hundreds of thousands of pounds per plan cycle. With plans sometimes taking more than seven years from commencement to adoption, ageing evidence routinely triggers re-commissioning before the plan has even reached examination.



This baseline establishes the cost against which the proposed alternative must be measured. The adoption of a Minimum Viable Evidence Base (MVEB) approach, supported by shared, live evidence infrastructure at SDS scale, materially alters this position across four dimensions.

1. Evidence readiness is accelerated: where approximately 80 per cent of evidence requirements can be met from existing national and regionally maintained datasets, commissioning is limited to the critical last 20 per cent that cannot be sourced elsewhere, reducing overall evidence production lead times by an estimated 30 to 45 per cent.
2. Expenditure is reduced: joint ownership and systematic reuse of evidence across the SDS and constituent Local Plans eliminates the parallel commissioning of duplicative studies, generating estimated savings of 25 to 40 per cent in evidence spend per plan cycle.

3. Examination risk is reduced: a single source of truth, shared across both tiers, removes the evidential inconsistency that currently generates general-conformity disputes, with associated reductions in delay and legal cost.
4. Investment certainty is improved: policies bound to nationally standardised, determinative datasets de-risk planning decisions and provide the certainty that public and institutional capital requires to commit at pace.

The methodology for realising and evidencing these savings is set out in Appendix A



# The Case for Shared Evidence Infrastructure

The proposition is this: the simultaneous introduction of mandatory Spatial Development Strategies and a new generation of Local Plans at unitary authority level creates a once-in-a-generation opportunity to establish shared, live evidence infrastructure at regional scale.

That infrastructure, if built correctly, can serve both tiers of the new planning system simultaneously, resolve the conformity problem before it becomes an examination problem, and reduce the aggregate cost of evidence commissioning substantially. It can do so because it is built on a fundamentally different model of what planning evidence is.



## 3.1 From Data Products to Data Infrastructure

The current commissioned evidence model treats planning evidence as a product. A brief is written, a consultant is appointed, a report is produced, a PDF is published. The product has a production date, a shelf life, and a retirement date. It answers the questions that were asked of it at the moment it was commissioned, in the geographic frame that was specified, at the data vintage that was available. It cannot be

updated without recommissioning. It cannot be interrogated at a different geographic scale without re-running the underlying analysis. It cannot be shared across boundaries without bespoke reconciliation work. It begins depreciating from the moment it is delivered.

Live open data infrastructure treats planning evidence as an asset. The underlying data (on housing land availability, employment land supply, demographic change, infrastructure capacity, environmental constraints, economic performance, and development activity) is held in machine-readable, standardised, openly licensed form, maintained continuously, and accessible via application programming interfaces that allow it to be interrogated at any geographic scale.

An SPA can aggregate data to its strategic footprint. A constituent unitary authority can disaggregate it to its local plan area. Both are drawing from the same source, at the same data vintage, using the same underlying methodology. The conformity relationship between the two tiers becomes a question of geographic aggregation rather than evidential conflict.

## 3.2 The Economic and Technical Case for Shared Infrastructure

The economic case for this approach is straightforward. Where housing market areas, functional economic areas, and travel-to-work zones span multiple local authority boundaries, as they invariably do, the current model requires each constituent authority to commission its own study of the same underlying geography.

A single SDS-scale commission for a shared functional geography can replace three to nine separate local commissions covering identical analytical ground, at a fraction of the combined cost.

The technical case is equally clear. Evidence assets held at fine-grained spatial resolution (at the level of a land parcel, an output area, or a development site) can be reaggregated to any administrative geography as boundaries evolve. This makes the evidence base inherently reorganisation-proof: it does not become redundant when an SDS boundary

is adjusted to reflect new devolution arrangements, or when a district council is abolished and replaced by a new unitary authority. Evidence that exists as a PDF produced for a boundary that no longer exists has no such resilience.

The governance model that underlies this approach treats evidence as a maintained public asset rather than a depreciating consultant product. Responsibility for the currency and accuracy of the shared evidence infrastructure sits with the SPA and its constituent local planning authorities, operating under agreed standards and licences formalised through a memorandum of understanding and a Policy-Data Design Community of Practice. This is not a novel governance model; it has precedents in the management of shared data assets across other parts of the public sector. What is new is its application to the planning evidence context.

Finally, the approach changes the relationship between evidence and policy over the plan lifecycle. Where policies are drafted with explicit monitoring clauses that require data returns against standardised metrics, those returns generate the very evidence that future plan reviews will need.

The evidence base does not simply support the current plan cycle; it constructs the foundation for the next one. This is the most significant structural advantage of the data lifecycle approach over the commissioned product model, and it is the one most consistently absent from the current system.

### 3.3 From Data Products to Data Infrastructure

The case for shared evidence infrastructure is strongest precisely where the planning system is most complex: at the interface between the SDS and the Local Plans it governs. An SDS must make strategic decisions about housing distribution, infrastructure coordination, economic growth, and environmental resilience across a sub-regional geography that may contain anywhere from two to nine or more constituent unitary authorities. Each of those authorities must then prepare a Local Plan that is in general conformity with those strategic decisions, while also responding to local conditions, constraints, and political priorities. That requires the two tiers to be working from a shared understanding of the underlying facts: how many homes are needed, where infrastructure capacity exists, what environmental constraints apply, how economic demand is distributed.

Under a shared live data infrastructure, that shared understanding exists by design. The strategic planning body and its constituent local planning authorities are not reconciling competing datasets produced at different times by different

consultants. They are applying different spatial lenses to the same data. Disagreements about strategic priorities remain (and should remain, because they are political rather than evidential) but they are not compounded by evidential inconsistency that creates examination risk for both tiers.

This also resolves the geographic instability problem identified in Section 2. SDS boundaries may need to change as devolution arrangements evolve, and local government reorganisation will alter the number and geography of Local Plan-producing bodies before the current round of plan-making is complete. Evidence held at granular spatial resolution can be reaggregated to whatever administrative geography is current at the moment of use. It does not need to be recommissioned when a boundary moves. It does not become redundant when a district council is abolished, and a new unitary authority takes its place.

### 3.4 The Relationship Between the SDS and the Local Growth Plan

The case for shared live evidence infrastructure extends beyond the relationship between SDSs and Local Plans. The same logic applies with equal force to the relationship between the SDS and the Local Growth Plan<sup>1</sup> and to the wider network of infrastructure delivery partners, utilities providers, and environmental bodies that must act on the spatial choices the SDS makes.

Treating the SDS and the Local Growth Plan as a single operating model in terms of evidence and data is structurally necessary if strategy is to be translated into deliverable programmes rather than a set of disconnected analytical documents.



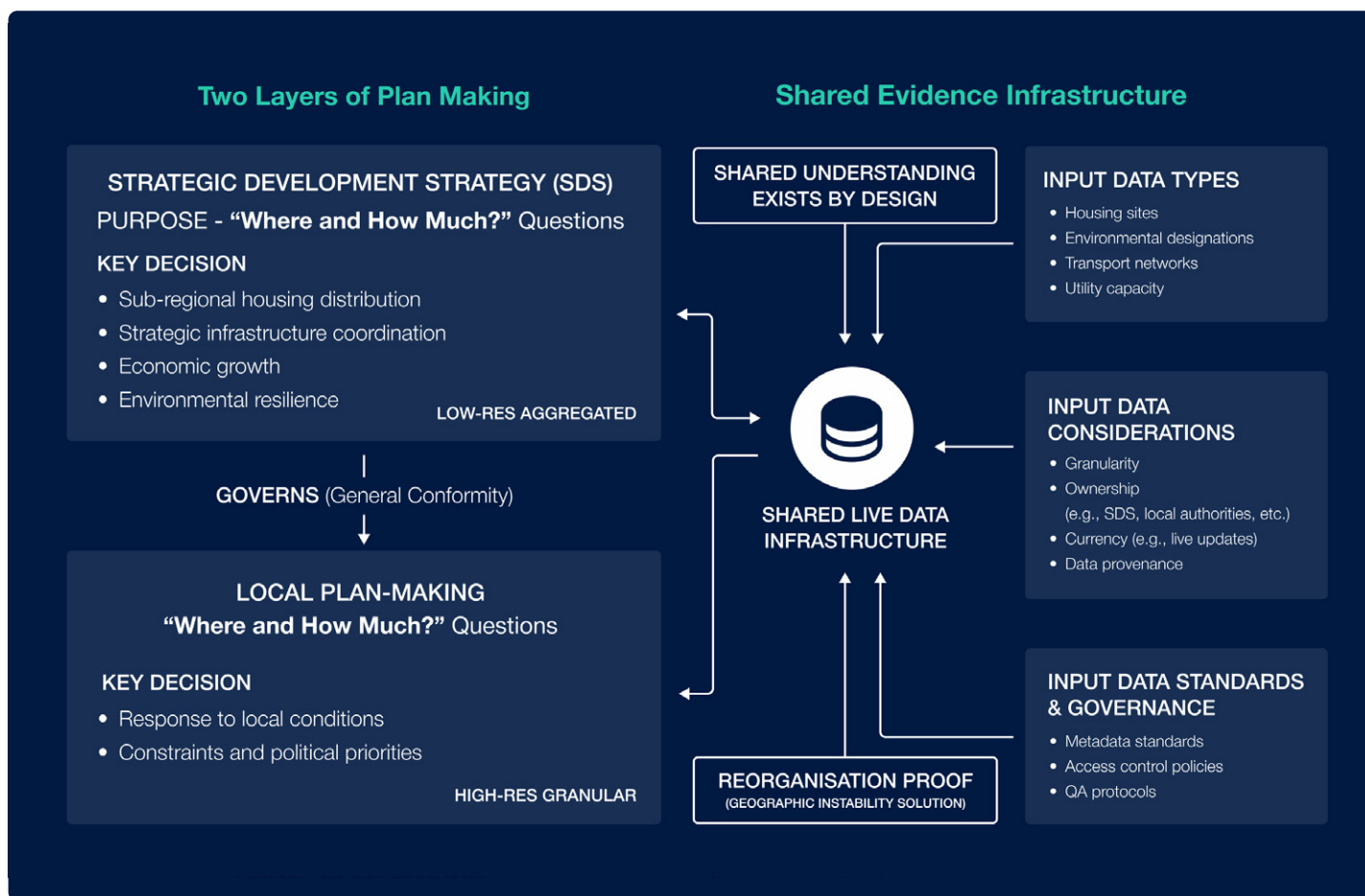
<sup>1</sup> \*The SDS sets where and why we grow; Local Growth Plans translate those choices into what gets built, financed and monitored. They are two halves of one system, joined by a golden thread of live evidence, shared data infrastructure, a single infrastructure pipeline, and common monitoring standards.

Where those two instruments are grounded in a shared evidence infrastructure (a single, live, openly accessible data environment) the connection between strategic intent and operational delivery is maintained continuously, not reconstructed at each plan review. The burden of monitoring, delivery data collection, and policy lifecycle management can be shared across both instruments, reducing duplication and concentrating analytical resource where it has greatest effect.

The delivery partners on whom the SDS must rely (energy and grid providers, water utilities, transport operators, biodiversity net gain administrators) can only contribute effectively to the SDS process if they are able to access and contribute to the data environment on which that process depends. Evidence infrastructure that is designed from the outset to be open, interoperable, and extensible creates the conditions for genuine whole-system coordination. Evidence infrastructure that is static, siloed, and proprietary does not.

## The Shared Infrastructure Argument:

The relationship between SDS and local plans governed by shared evidence infrastructure



### 3.5 The Governance Argument

It would be naive to present live open data infrastructure as a frictionless solution. The shift from commissioned evidence products to maintained evidence infrastructure requires a different set of governance questions to be answered, and they need to be answered explicitly rather than left to emerge from practice.

- Who is responsible for the currency and accuracy of the underlying data?
- What is the legal standard to which it must be maintained?
- How is liability handled where a planning decision is challenged on the grounds that the evidence infrastructure was inaccurate or out of date?
- How is the infrastructure funded on a continuing basis, and by whom?
- How are open data standards set and enforced across the multiple bodies that would contribute to and draw from a shared infrastructure?
- And critically, how does the statutory plan-making process, with its tests of soundness, its examination requirements, and its legal basis in secondary legislation, formally recognise live open data as a valid evidential foundation?

None of these questions is unanswerable. Several have precedents in adjacent fields: the governance of national spatial data infrastructure in other jurisdictions, the management of shared data assets by Integrated Care Boards in the NHS, and the licensing frameworks developed for open government data more broadly. But they require deliberate design, not improvisation. They require leadership from the government, and buy in from SPAs and the consultants on whom they rely to produce evidence.

The existence of governance questions is not an argument against shared infrastructure. It is an argument for designing it properly, and designing it now, before 40 separate commissioning decisions have locked in a generation of fragmented, incompatible, depreciating evidence products.

### 3.6 The Timing Argument

The secondary legislation that will make the SDS duty operational is expected soon. The evidence standard for SDSs has not yet been defined. The SDS geographies consultation closed on 26 March 2026. Strategic planning authorities are being told they can begin preparatory work immediately, and some are already doing so.

Every week that passes without a clear policy steer on evidence architecture is a week in which strategic planning bodies default to the commissioning model they know. By the time secondary legislation is laid in summer 2026, procurement decisions will already be in motion across multiple SDS areas. By the time those commissions are complete, the opportunity to establish shared infrastructure from the outset will have passed.

The cost of establishing a live open data evidence standard at this stage is negligible. The cost of retrofitting it after a generation of static commissions has already been made, and after the conformity conflicts those commissions will generate have worked their way through the examination system, is very large indeed.



# What This Means in Practice



The argument made in the preceding sections is a policy argument. This section addresses what it means operationally for the authorities and officers who will be preparing SDSs and Local Plans over the next three to five years.

## 4.1 For Strategic Planning Authorities Beginning SDS Preparation

MHCLG has confirmed that strategic planning authorities can begin preparatory work on their SDSs now, ahead of the duty formally commencing in summer 2026. The kinds of activities explicitly envisaged include building the strategic planning team, engaging with constituent local planning authorities, understanding infrastructure provider plans, and collating existing evidence.

This preparatory period is more significant than it might appear. The decisions made during it about what evidence to commission, in what form, to what standard, and through what governance arrangements will shape the character of the SDS and its relationship with constituent Local Plans for the entirety of the first plan cycle.

Authorities that use this period to commission traditional static evidence studies will find themselves, when the statutory duty commences, in possession of evidence that is already partially stale and entirely siloed. Authorities that use it to establish a shared data governance framework, map existing evidence assets across their constituent local planning authorities, and agree the geographic and methodological standards against

which live data will be held will begin the formal SDS process with an infrastructure advantage that compounds over time. The practical steps available now are concrete.

- A strategic planning body can map what evidence already exists across its constituent authorities, identify what is current and what is not, and establish where the genuine gaps are before commissioning anything.
- It can engage with data providers (including the national spatial data infrastructure being developed through MHCLG's digital planning programme) to understand what live data assets are already available and what standards they conform to.
- It can open a governance conversation with constituent local planning authorities about how shared evidence will be managed, who is responsible for it, and how it will relate to the Local Plan evidence requirements each authority faces individually.
- And it can engage with the SDS geographies process with evidence architecture explicitly in mind, not solely boundary alignment.

None of this requires waiting for secondary legislation.

All of it makes the formal SDS process, when it commences, considerably more likely to succeed.

## 4.2 The Minimum Viable Evidence Base Framework

The Minimum Viable Evidence Base (MVEB) framework is the operational mechanism through which the policy argument of this paper is translated into commissioning decisions. It is built on a single disciplinary principle: evidence effort should be proportionate to the policy decision it is required to support, and commissioning should be limited to what cannot be sourced from existing data assets. Its purpose is not to reduce the quality of evidence, but to ensure that quality is concentrated where it is genuinely needed.

### The framework operates through six sequenced stages:

#### 1 The starting point is a clear articulation of the SDS vision and strategic outcomes:

Typically three to five objectives of sufficient specificity to be examinable, such as station-oriented growth, energy-ready places, or net-zero delivery corridors. Where no Mayoral or combined authority vision yet exists, this stage involves designing cross-cutting principles that are sufficiently robust to inform policy choices without foreclosing the options a future political settlement may require.

#### 2 The second stage derives the specific policy questions that the evidence must answer:

What must be demonstrated, to what standard, in order for each objective to withstand examination. This stage disciplines the subsequent commissioning process by establishing what the evidence is actually for, rather than commissioning by category.

#### 3 The third stage is an evidence scan.

Using existing open and government datasets (including the Department for Transport Connectivity Tool, Nista's ALIGN tool, the [planning.data.gov.uk](https://planning.data.gov.uk) data schemas, Local Nature Recovery Strategy mapping, and grid capacity proxies). A register is built of what already exists at sufficient geographic granularity and currency to answer the policy questions identified in stage two. This scan could resolve approximately 80 per cent of evidence requirements without any bespoke commissioning<sup>2</sup>.

#### 4 The fourth stage applies a discipline of proportionality to the remaining requirements.

Evidence is commissioned only where a specific policy decision is blocked by a genuine data gap, and only where commissioning a gap-filling study is more effective than designing a monitoring clause to generate the missing data over time. Where commissioning is necessary, the brief specifies an open data deliverable, with a defined schema and licence, rather than a static report.

#### 5 The fifth stage governs policy drafting itself.

Policies are structured to distinguish between determinative tests (i.e. those that can be bound to objective, nationally standardised metrics and resolved by reference to data) and discretionary matters, for which a ring-fenced route is established with a defined service-level target and appropriate resourcing. This distinction is not merely a drafting convenience; it is the mechanism by which the evidence framework maintains its tractability as the plan is implemented. This distinction helps maintain the 'discretion' in our discretionary planning system, while turbo-charging elements of the system that do not require opinion or subjectivity.

#### 6 The sixth and final stage closes the evidence loop.

Standard planning conditions and obligations require data returns to the SDS data hub or monitoring observatory. Such evidence could include build-out rates, transport mode share, biodiversity net gain delivery, and connection or readiness metrics; all aligned to approved planning data standards. These returns generate, over time, the evidence that future SDS reviews and Local Plan updates will need, converting the plan monitoring function from a compliance exercise into a genuine evidence-creation mechanism.

<sup>2</sup> The MVEB framework references a suite of core datasets including the DfT Connectivity Tool, [planning.data.gov.uk](https://planning.data.gov.uk) schemas, Local Nature Recovery Strategy layers, Local Area Energy Planning datasets, and the UKIB investment-readiness metrics. The full dataset register, with coverage notes and known limitations, is subject to ongoing development and will be published separately. Authorities and officers should also be aware of the emerging NERC Digital Solutions Hub, which provides relevant environmental evidence at sub-regional scale.

### 4.3 For Unitary Authority Policy Officers Preparing Local Plans

The 30-month Local Plan timetable is government policy. It is also, under the current evidence commissioning model, extremely difficult to achieve. Live open data infrastructure changes that arithmetic. Where a shared evidence base is already maintained at SDS level, the Local Plan authority is not starting from scratch. It is applying a local lens to an existing data asset, supplementing it with locally specific intelligence where needed, and demonstrating at examination that its evidence is current, standardised, and consistent with the strategic evidence above it.

It also changes the relationship between evidence and plan-making in a way that matters for plan quality, not only plan speed. Static evidence bases are commissioned at the beginning of the plan-making process and then frozen. If conditions change during the years it takes to get from commission to adoption the evidence base cannot easily respond. Live data infrastructure can. It means that a plan submitted for examination can be supported by evidence that reflects current conditions, not conditions at the point the commission was placed.



### 4.4 The Capacity Question

There is a legitimate concern that live data infrastructure requires skills that many local planning authorities and strategic planning bodies do not currently have in house: data governance expertise, spatial data analysis capability, and the technical literacy to commission and quality-assure data assets rather than reports.

If each of the approximately 40 strategic planning bodies is expected to develop its own data governance capability independently, the aggregate capacity requirement is very large and the outcome is likely to be 40 different approaches of variable quality.

If shared infrastructure is built once, governed centrally, and made available to strategic planning bodies and their constituent authorities as a service, the capacity requirement is concentrated where it can be most effectively resourced and the benefits are distributed to the full network of plan-making bodies.

This is, in essence, the same logic that has driven shared service models across other areas of local government. It does not eliminate the need for local capability. It means that local capability can be focused on local interpretation and application of shared evidence, rather than on the technical production of that evidence from scratch.





## SECTION 05

# Funding and Costing

The cost of the current model is not difficult to estimate in broad terms, even without a definitive published benchmark. A full Local Plan evidence base for a medium-sized unitary authority (covering housing needs, land availability, transport modelling, economic land use, viability, and infrastructure capacity) runs to tens of thousands of pounds per plan cycle, on a seven-year average preparation timeline. Multiplied across approximately 170 unitary authorities, each expected to produce a new Local Plan within the 30-month timetable, the aggregate national cost of evidence commissioning under the current model is very substantial.

The SDS layer adds a further tier of commissioning. Approximately 40 strategic planning bodies, each required to produce an evidence base sufficient to support an SDS covering housing distribution, infrastructure coordination, economic strategy, and environmental resilience across a sub-regional geography, represent a significant additional evidence cost above the local tier.

Where SDS evidence and Local Plan evidence are commissioned independently, much of the underlying analysis will be duplicated: the same housing market data, transport modelling, and economic geography will be purchased twice, processed twice, and presented twice, at a combined cost that substantially exceeds the cost of the shared infrastructure it is replacing.

# Recommendations

The argument made in this paper leads to a specific set of actions, addressed to two audiences. The recommendations are underpinned by seven principles designed to provide strategic planning authorities with sufficient flexibility to adapt the approach to local circumstances while maintaining the shared standards that make the evidence infrastructure function at system level.

Those principles are:

- That shared, live evidence should be the default rather than the exception;
- That policies should be bound to objective, nationally consistent datasets wherever those datasets exist;
- That evidence effort should be proportionate to the policy decision it supports, with the remainder to be generated through monitoring over time;
- That thresholds and metrics should be capable of updating through updates to Planning Practice Guidance as government datasets and the final NPPF are confirmed;
- That general conformity between SDSs and Local Plans must be designed as a shared data question rather than a post-hoc reconciliation exercise;
- That spatial choices should be translated into standardised, investment-ready project packs capable of attracting both public and institutional capital; and
- That Biodiversity Net Gain and Local Nature Recovery Strategy requirements should function as determinative compliance gates, with delivery monitored as open data.



## 6.1 For Strategic Planning Authorities and Unitary Policy Officers

The following five recommendations are addressed to strategic planning authorities and unitary policy officers. They are sequenced to reflect the preparatory work that should begin immediately, ahead of the SDS duty formally commencing, and the ongoing disciplines that should govern evidence commissioning throughout the plan-making process.

### Recommendations to strategic planning authorities and unitary policy officers

#### 1 **Begin evidence scoping now, not when the duty commences.**

MHCLG has confirmed that preparatory work on SDSs can begin immediately. Use this period to map existing evidence assets across the SDS area and constituent local planning authorities. Establish what is current, what is stale, what is genuinely shared, and where the real gaps are before a single procurement decision is made. This mapping exercise is the foundation on which a coherent evidence strategy can be built. Without it, commissioning decisions will be made reactively and expensively.

#### 2 **Engage the SDS geographies process with evidence architecture in mind.**

Boundary decisions being made now will shape the evidence commissioning decisions that follow. Where a proposed SDS geography creates an awkward relationship with housing market areas, functional economic areas, or existing cross-boundary evidence work, that is relevant to the boundary discussion and should be part of it. Evidence architecture is not a technical afterthought to spatial boundary-setting. It is integral to whether the SDS can be prepared successfully and defended at examination.

#### 3 **Establish data governance as a foundation of SDS team-building, not an afterthought.**

The conversations that need to happen about data ownership, data standards, data currency, and data liability are governance conversations, not technical ones. They need to involve senior officers and members, not only GIS specialists. Build them into the SDS preparation framework from the outset.

#### 4 **Resist the default to commission static evidence under time pressure.**

The pressure to show progress quickly will be real, and the most familiar response to that pressure is to commission a traditional evidence study. A static evidence commission made in haste in 2026 will be partially stale by 2027, inconsistent with the Local Plan evidence bases being produced below it, and difficult to defend at examination against a live data challenge. The short-term comfort of a familiar procurement route is not worth the long-term cost.

#### 5 **Engage with open data providers about what live evidence assets are already available.**

Significant national spatial data infrastructure already exists. Housing land supply data, development activity data, planning application data, and demographic data are available at fine-grained spatial resolution, in standardised formats, with national coverage. Before commissioning bespoke studies, establish what is already available, at what currency, and to what standard. The gap between what already exists and what needs to be commissioned may be considerably smaller than a traditional scoping exercise would suggest.

## 6.2 For Government

The following five recommendations are addressed to Government (MHCLG and Plns). They are framed as actions to be taken before summer 2026, when the SDS duty is due to commence.

### Recommendations to Government (MHCLG and Plns)

#### 1 Define a minimum viable evidence standard for SDSs in secondary legislation and guidance, and do so before summer 2026.

The absence of a defined evidence standard is not a neutral position. It is an active invitation to repeat the failures of the current model at greater scale and greater cost. Each of the approximately 40 strategic planning bodies will make its own commissioning decisions in the absence of a standard. Define the standard now, while the secondary legislation is being drafted and while the policy window is open.

#### 2 Design that standard explicitly for compatibility with Local Plan evidence requirements.

The conformity requirement between SDSs and Local Plans is a statutory requirement. It must be evidentially deliverable, not only politically aspirational. A minimum viable evidence standard designed for SDS preparation alone, without explicit regard for its relationship to Local Plan evidence at unitary authority level, will generate the examination conflicts it is intended to prevent. The standard must be designed for both tiers simultaneously.

#### 3 Establish live open data as the default evidence architecture in guidance.

Where live, standardised, open data is available and sufficient to support a planning decision, it should be the expected approach. Static commissioned evidence should be permitted where live data is genuinely unavailable, but authorities should be required to demonstrate why before defaulting to the commissioned model. This does not require live data to be perfect. It requires the policy framework to stop treating static evidence as the default and live data as the exception.

#### 4 Include evidence infrastructure within the SDS funding package.

MHCLG has identified a funding package to support SDS preparation across every area up to 2028-29. Evidence infrastructure should be an explicit and funded component of that package. A proportion of the national SDS funding envelope should be directed at shared data infrastructure that serves the full network of strategic planning bodies and their constituent local planning authorities.

#### 5 Publish clear and immediate guidance on SDS evidence requirements.

The planning sector cannot wait for secondary legislation to understand what evidence an SDS will need to be based upon. Preparatory work is already under way in multiple SDS areas. Commissioning decisions are already being considered. Interim guidance on evidence expectations, even in draft form, subject to revision as the legislative framework develops, would prevent a generation of commissioning decisions being made in a policy vacuum. That guidance should explicitly address the relationship between SDS evidence and Local Plan evidence, the role of live open data, and the governance expectations for shared evidence infrastructure.

## Appendix A: Methodology for Savings Estimation

The savings estimates cited in Section 2.4 are derived from a five-stage methodology, designed to be replicable within any SDS area and to generate evidence-based savings figures that can be tracked and reported over time.

1. The first stage involves cataloguing the current evidence commissions across all constituent local planning authorities within the SDS area and the strategic planning body itself. Each commission should be documented with its scope, its estimated cost, and its expected delivery timeline.
2. The second stage involves tagging duplicated analytical inputs: commissions that draw on the same underlying data, analyse the same geographic area, or answer the same policy question as another commission elsewhere in the network. These represent the most direct source of avoidable cost.
3. The third stage maps the existing commission portfolio against the MVEB framework, distinguishing commissions

that could be met from existing open or government datasets from those that represent a genuine gap requiring bespoke work. This stage typically reveals a significantly higher proportion of redundant commissioning than the commissioning authority would initially expect.

4. The fourth stage applies a unit-cost and lead-time differential to the identified duplicates and redundant commissions, yielding a savings range for the transition from the current model to the MVEB approach.
5. The fifth stage tracks realised savings over a 12-month period through the SDS commission register, comparing actual commissioning spend and lead times against the baseline catalogue produced in stage one. This provides the empirical confirmation that the modelled savings have been realised in practice.

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## Appendix B: Straw-Man Case Study: The Rail-and-Heat Corridor SDS

This composite illustration draws on a hypothetical SDS area of three to five local planning authorities, characterised by mixed Green Belt, two higher-frequency railway stations, and a designated heat-network zone in prospect.

### Objective

Deliver 20,000 homes and 7,000 jobs with station-oriented growth and low-carbon heat provision, within a 30-month SDS preparation timetable.

### Determinative Policy Pilots

The SDS tests two determinative policy pilots. The first is a stations policy, using a reasonable walking distance isochrone combined with minimum service frequency thresholds — or a Department for Transport Connectivity score above a defined minimum — to establish minimum density bands (at least 50 dwellings per hectare within the inner isochrone; at least 40 within the outer). The second is a heat-ready growth areas policy, requiring developments within the future district heating zone to meet a compatibility or connect-when-available test with standard data returns to the SDS monitoring hub.

### Minimum Viable Evidence Base Applied

The MVEB for this SDS area draws on the DfT Connectivity Tool, [planning.data.gov.uk](https://planning.data.gov.uk) schemas, Local Nature Recovery

Strategy mapping, local land supply registers, and Local Area Energy Planning proxies. A published Data Gaps Schedule identifies the residual commissions required: viability calibration studies and targeted transport modelling elements to be aligned with the Local Growth Plan. All gap-filling commissions specify an open data deliverable.

### Monitoring That Creates Evidence

Standard planning conditions and obligations require build-out and transport mode share returns, biodiversity net gain delivery data, and district heating connection and readiness metrics to be submitted to the SDS monitoring hub on a quarterly basis, aligned to approved planning data standards.

### Expected Benefits

Based on the savings methodology set out in Appendix A, this SDS area would expect determinative policy to cover at least 60 per cent of planning decisions within the SDS area, evidence commissioning savings of 25 to 40 per cent relative to the baseline, and a material reduction in general-conformity disputes at examination.

NOTE: This is an anonymised composite illustration, not a confirmed case study. It is included here to demonstrate how the MVEB framework would apply in practice, pending the availability of confirmed named examples for Section 5. It should be clearly distinguished from confirmed material in any published version of this paper.



## LandTech

This paper was produced in collaboration with leading voices across planning, data, and place-making. Together, we believe live open data infrastructure is the foundation England's new planning system needs.

