

Local Plan Preparation

RTPI Briefing – October 2023

In England's plan-led system, the rules about what can be built and where are set out principally in Local Plans prepared by councils. However, the speed, coverage and quality of these preparations have been inconsistent across the country and have received significant attention in recent planning reforms.

In a 2023 consultation, Government said:

"We want them to be prepared more quickly and updated more frequently to ensure more authorities have up-to-date plans that reflect local needs."

These concerns have been echoed by members of the profession. A <u>recent discussion paper</u> submitted to the Chief Planner suggested:

"The public finds it difficult to understand local plan processes when they are overly complex and protracted. They are even more alienated when decisions by councils being made to deliver imposed targets and 'soundness' as the priority, are made with the apparent disregard for the community input. When plans are withdrawn or delayed, it cuts off communication on proposed development promoted in the draft plan and affecting them and their communities. Up to date plans and effective engagement reaching all age groups and sections of the community are essential if we are to secure consent for well-considered, sustainable development."

However, the RTPI are aware of relatively little analysis of why Local Plans can be difficult to prepare or what causes delays in the first place.

Local Plans Analysis

The RTPI commissioned independent research from DLP Planning to assess how the plan-making system has operated in a cross-section of cases, highlight good practice and outline the barriers to plan-making. This investigation included data from the Planning Inspectorate and considers 28 detailed case studies.

It found evidence that the national and strategic context for plan-making can have a significant drag on the preparation of Local Plans because:

- Changes in national planning policy typically cause delay. Fewer plans were adopted in 2012 (the first following the introduction of the NPPF) and in 2019 (the first under transitional arrangements introduced in the NPPF in 2018). Each dip follows a peak year where councils have adopted plans more quickly to avoid expected changes taking effect.
- Complex allocations processes and a need to determine the overall level of development requirements in Local Plans from 2012 have been a drag on plan preparation. Plans adopted before the introduction of the 2012 NPPF did not have to establish an overall level of development because this was done by regional plans. The researchers suggest that this meant they moved more quickly from submission to adoption than plans considered under the later policy regimes, which could take a year longer to progress through these stages. Pre-2012 plans also rarely contained policies identifying allocations for development, reducing their complexity.
- The Duty to Cooperate can have uneven effects on local plan preparations across a region, for example, allowing Local Plan prepared by one council to proceed while placing additional burdens in plans in neighbouring areas to find additional sites for development.
- Local plans can be delayed or withdrawn when the major transport projects become uncertain or are scrapped by central government. This analysis found evidence that



decisions on major infrastructure like the CamOx Arc or the relief roads in Durham can the undermine plan-making process.

• Local factors can also influence plan-making speed. Progress is made where strong and consistent support for the process by both the Council and Elected Members.

This research can be read in full here.

Other factors

In support of our consultation response, RTPI members have suggested other potential factors frustrating the plan-making process based on their experience, including:

- **Declining capacity and resources of Local Planning Authorities.** RTPI analysis has previously suggested that non-income generating planning services like plan-making have become particularly vulnerable to the financial strains on councils.
- Capacity and involvement of the Planning Inspectorate and Statutory Consultees. Various government bodies and agencies, including the Planning Inspectorate, are required to input at various stages of the preparation and examination process. Examples have been given where the lack of ongoing engagement (possibly on both sides) has led to delays in plan and evidence preparation and examination.
- Local political contestation. Councils with 'No Overall Control' by a single party may struggle to reach the agreements needed to begin Local Plan preparation. Councils that elect by thirds annually may need to pause preparations for regular elections or may be subject to greater political uncertainty.
- Quality of public consultation and engagement. Poor consultation at the early stages of Local Plans may exclude communities from participation or not translate their views into later documents. High levels of dissatisfaction, controversy and a greater number of representations may result, slowing down the final submission and adoption of plans.
- **Governance considerations.** The scheduling of council meetings and long lead-in times for councillor consideration can hinder progress, extending the amount of time taken to prepare plans. This can be extended further with joint local plans involving multiple districts who're governed differently.

This independent research commissioned by the RTPI has suggested "further investigation is required into the circumstances that prevail in those Councils which are not progressing a plan through the system in any meaningful way." This list may offer researchers, practitioners and officials a starting point for further investigation.

RTPI Assessment

In our consultation response, the RTPI questioned if proposed reforms like the introduction of a 30month timetable for plan-making can be successful without other accompanying national and local changes in our politics and approach to plan-making.

<u>We've argued that</u> "England's planning system needs more than just better processes to deliver the economic, social and environmental benefits that Local Plans can secure for communities."

Resources for Planners and Councillors

Councils in the process of preparing Local Plans can benefit from the resources, encouragement and support available from:

- The RTPI's Politicians in Planning Network: <u>https://www.rtpi.org.uk/find-your-</u><u>rtpi/networks/politicians-in-planning-network-pipn/</u>
- The Planning Advisory Service: https://www.local.gov.uk/pas/welcome-plan-making-support