

**To Joanna Averley, Chief Planner
Department for Levelling Up, Housing and Communities**

14 October 2022

Dear Joanna

I am delighted to attach a discussion paper '**What does a good local plan look like**' which has been prepared by a group of planning practitioners that currently work (or have recently worked) with and within local plan teams (all contributions made in a personal capacity). It is our shared view of what we believe local plans should be doing to create both positive frameworks within which long term place-shaping visions can be delivered and environments within which councils and communities can work more constructively together.

This is a discussion paper intended to generate debate on good plan-making and hopefully inform the Government's thinking on what is needed to support this in terms of planning reform. It is not a detailed analysis of what is wrong with the system, nor is it a detailed plan-making manual, but it hopefully helps identify some key themes and offers some suggestions which will contribute to a more positive discussion.

Whilst it has been prepared by a small group of planners, we have taken the opportunity to share a draft with a number of other planning professionals, as well as some local authority chief executives and councillors to 'sense check' our suggestions. The response so far has been very positive.

We are fully aware that there are some important issues that our paper does not address but we have deliberately kept it focused and as short as possible. These include:

- Resourcing for local authorities to support plan-making, especially in relation to working more proactively with local communities and accessing the right skills (beyond planning).
- How local plans could work within a more effective approach to strategic/joint planning, especially if the Government takes forward proposals for replacing the Duty to Cooperate.
- How this approach would work with some specific aspects of the Government's proposals for planning reform if taken forward, specifically national development management policies and Investment Zones.
- How the link between local plans and the development management function could be improved to help speed up decision-making.

- Changes to the local plan examination process and, in particular, the role of the Planning Inspectorate in plan-making (including through the proposed Gateway Checks and Local Plan Commissioner role).

We also fully acknowledge that there are some good examples of how local planning authorities are already doing some of this in their plan preparation process, particularly in terms of engaging with communities, and that there is also huge investment going into digital planning.

Above all, we hope you will accept this in the spirit it is intended – a positive contribution from some planning practitioners who are trying to make the system work much more effectively in a way that will help deliver not just good local plans, but good places for people to live and work in. With this in mind, we would be more than happy to discuss any of the suggestions set out in the paper with you and your colleagues.

Yours sincerely

A handwritten signature in black ink that reads "Catriona Riddell". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Catriona Riddell, BA (Hons) Planning, FRTPI on behalf of

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What does a good local plan look like?

A Discussion Paper

October 2022

SUMMARY

The Government embarked on an overhaul of the planning system in England in August 2020. Since then, various proposals have been considered with the overarching aim being a *faster, fairer and simpler* planning system. A key part of this is maintaining a 'plan-led' approach with a focus on more community participation, particularly through the use of digital technology and in things like design coding, making decision-making through the development management function faster and less divisive.

This discussion paper has been co-authored by a group of spatial planning professionals (on a voluntary basis) with significant experience working with and within local planning authorities. It was initiated as a result of our shared concerns about the current state of local plan making in England and the impact this is having on local communities, the development industry and planners, both in terms of professional reputation and morale.

The success of plan-making cannot be divorced from the public view of planning. 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.

Local organisations aiming to oppose almost any development only have minority support but often have a very loud voice. But the failure arising from gaps of five or ten years (or, in some cases, considerably longer) between local plans, to give communities a (genuine) say on how their areas are shaped, creates both public suspicion and development in sub-optimal locations. This in turn, results in even more division and further loss of faith in the planning system.

The suggestions set out in this paper are not a fully worked out solution to the problem or a detailed 'how to prepare a local plan' manual. Neither have we started with a blank sheet of paper. They build on what we know needs to be fixed and some of the proposals the Government has already presented over the last two years. They identify a number of themes that we believe could help deliver a faster, fairer and simpler planning system, with some suggestions on how to achieve this.

In our view, local plans should be:

- ***Community owned***
- ***Vision-led and outcome-focused***
- ***Focused and easy to understand***
- ***Clear in scope, focussing on what is appropriate to the Place and setting the highest standards***
- ***Evidence based, not evidence led***
- ***In 'general conformity' with national policy***
- ***Effectively monitored and managed***

We hope this paper will provoke positive discussion between practitioners and all those that interact with the planning system around what is actually needed to deliver a quick response to planning reform. This would then allow local authorities to get on with the job of preparing local plans and ensuring that place-making plays its full part in addressing the challenges the country faces on climate change; rebuilding our economy and making it stronger; maximising the potential from our natural environment; and delivering the homes and places we need for now and future generations.

What does a good local plan look like?

A Discussion Paper

INTRODUCTION

1. In August 2020 the Government published a White Paper setting out proposed reforms to the planning system which included major changes to the local planning process¹. Since then, further changes have been introduced and some earlier proposals have been abandoned. The reforms are now being progressed as part of the Levelling Up and Regeneration Bill (LURB) and through a review of national policy². However, the future of the LURB and planning reform is uncertain at this time, as it is not clear yet what the views are of the new Prime Minister and the (new) Ministerial Team responsible for planning, especially in relation to how planning fits within the wider growth agenda (especially the proposed new Investment Zones)³.
2. As it currently stands, the main proposals for reform to plan-making (as set out in the LURB and associated documents)⁴ are:

Emphasis on a 'plan-led' system

- Local plans better reflecting what local communities want, more local democratic control and discretion (e.g. street votes, design codes).
- Only one local plan for each area but more emphasis on supplementary plans which will have elevated status.
- Decisions to be made in accordance with the development plan and new (statutory) national development management policies.

Streamlining the plan-making process (and make it more accessible)

- Repealing the Duty to Cooperate (as originally proposed in the August 2020 Planning White Paper) which will be replaced by a new 'policy alignment test'.
- Investing in digital planning.
- SEA/EIA/HRA assessments to be replaced with Environmental Outcomes Reports.
- Local Development Scheme (LDS) to be replaced by a local plan timetable setting out how the plan will be prepared in 30 months. Plans will still need to be reviewed every 5 years and updated when necessary.

More checks and balances throughout plan-making process

- A series of 'Gateway Checks' on local plans to help spot and correct any problems at an early stage but it is not clear yet whether these will be focused on process as opposed to policy content.
- Local Plan Commissioners appointed by Secretary of State "to support or ultimately take over plan-making if LPAs fail to meet their statutory duties". They would also have a key role in advising on whether a plan is ready to be submitted for examination or not.

3. Meanwhile, a number of local planning authorities (LPAs) have either stopped progressing their local plans or have withdrawn draft plans, many of which are at an advanced stage in their preparation. This is largely due to the uncertainty around planning reform, especially in relation to how housing targets will be calculated in future, but some as a result of resource challenges in their planning departments.⁵
4. This discussion paper has been prepared by a small group of practicing spatial planners with extensive experience working within and with councils on local plans (see Annex 1). It aims to set out what we, as a group of professionals, think a good local plan should look like to help inform and influence the Government's thinking and next steps in terms of reform.
5. It is not a forensic analysis of what is wrong with the current system – there has been many reviews of this already - nor is it a detailed manual on how to prepare a local plan. It is a high level discussion paper with some proposals that would need to be developed further and refined, including looking at current best practice in particular parts of the process, such as in community engagement. It has been drafted to provoke discussion around the issues raised and to explore the practical implications.
6. We believe that our proposed approach will win back faith in plan making. It will create the certainty that the development sector needs. It will improve the relationship between developers and communities. It will start to rebuild pride within the Planning Profession and our critical role in supporting the sustainable development of places.
7. Our suggestions have been developed to provide a pragmatic way forward for councils regardless of wider planning reforms and have been developed within the confines of a few 'guiding principles'. These are:
 - As far as possible, our suggestions for the plan-making process reflect the high level proposals set out by the Government, although there is considered to be sufficient flexibility if the context changes. We do not believe Primary Legislation would be needed to implement any of our proposals but there is likely to be the need for some secondary legislation and national policy changes, and there would need to be a rethink/redistribution of the resources used to support plan-making.
 - All our suggestions aim to improve the current system by speeding it up and making it more accessible (including the recognition that some terms and words used by professional planners may not always be appropriate).
 - Any reforms should have a clear impact on restoring local community trust in plan making and the planning system generally.
 - The emphasis is on place-making and delivery, with infrastructure led-development, rather than 'planning by numbers'. Our definition of 'place-making' is where the places we plan for provide for people now and in future.
 - All local plans should be community led and be based on a shared vision of how a local area should be developed over a minimum of 15 years but with a clear role for the LPA to continue to make 'decisions in the interests of the greater good'.

- We fully acknowledge the need for a more effective approach to strategic planning to address many of the sub-regional matters, beyond the scope of the Duty to Cooperate (or its replacement 'policy alignment test'). The way in which we plan across local authority boundaries is not, however, addressed directly in this discussion paper.
- National policy should remain a key plank of local plans but with greater flexibility introduced to more appropriately reflect local circumstances and priorities. There is therefore an assumption in our proposals that the Examination process would be reviewed to provide greater scope for inspectors to find a plan sound if the plan is not fully in compliance with national policy.
- Local plans should be evidenced, but that evidence should be better tailored to justify the vision (and objectives), rather than the starting point for plan preparation in the current 'evidence led' system.
- There is an assumption that planning teams within LPAs would be properly resourced with the right mix of skills – or at least have access to the right skills – which inevitably means more resources but also more efficient practices including shared resources.⁶
- There is an assumption that assessment of all aspects of sustainable development (environmental, economic and social) will underpin the policies and site allocations of a local plan through the evidence, regardless of any proposed reforms to the environmental/sustainability assessment regime.

OUR SUGGESTIONS FOR GOOD PLAN-MAKING

(1) A local plan should be - *Community owned*

8. Many of the current problems in plan-making are linked to the fact that local communities feel that planning is something they have little influence on, yet the outcomes often impact on them directly. The level of trust in planning is therefore at an all-time low⁷ and the success of plan-making cannot be divorced from the public view of planning. Feedback from residents and councillors leads towards a general view that this is in part to do with the rigid way in which some aspects of national policy are applied, especially in relation to housing provision, and it is “imposed on communities.”
9. But it is also in part due to poor engagement practices, largely as a result of misdirected or limited resources invested in the engagement process and the lack of skills within LPAs. Reliable and efficient (and much more affordable) technology solutions which aid consultation and analysis afterwards are essential and can significantly impact on the overall timetable. From our experience, many support packages for consultation and engagement do not work well for local plans (often more tailored to masterplans/ site specific engagement), require specialist skills to make the best use of the platform or interrogate what it could do and are very expensive. This is a critical issue for the Government and the industry to address alongside other planning resource issues.
10. There is also a view that this is partly due to the loss of the wider community visions developed pre-2010 through community strategies. Local authorities were required to prepare these as part of their duty to improve the economic, social and environmental wellbeing of its communities and they therefore underpinned all plans and strategies, not just the local plan.⁸ The LGA described the role of a community strategy as: “... to set out the strategic vision for a place. It provides a vehicle for considering and deciding how to address difficult cross-cutting issues such as the economic future of an area, social exclusion and climate change. Building these issues into the community's vision in an integrated way is at the heart of creating sustainable development at the local level.”⁹
11. Whilst we are not necessarily endorsing a return to community strategies, the starting point for local plans should be the development of a shared vision setting out the community priorities and how these should help shape the local planning area over the next 5, 10, 15 years (see Paragraphs 22 to 25 below). The current system requires a minimum of two formal consultation stages (Regulation 18 and 19 stages) before a draft plan is submitted for Examination. This does not build the shared vision from the start and is often dictated by the technical evidence (especially the ‘Call for Sites’). It does not articulate what the ambition or desire is for change over time, and usually engages only a very small proportion of the community.
12. Our suggested approach is therefore to frontload engagement (using a mix of methods, including much more use of digital technology) prior to the two formal consultation stages (on the assumption these would remain part of the legal requirements of plan-

making) but also to continue with the conversation on an ongoing basis as the plan is prepared and implemented (and monitored – see Section on below). The aim being that more effective participatory engagement will create greater buy-in and ownership of the plan by all parts of the community. This will provide a more balanced representation, build more confidence for the councillors to see the plan through to the end and will help speed up the Examination process, especially if the vision and objectives are tested in advance (see our suggestion in Paragraph 25).

13. But this will require a rethink (and probably redistribution) of resources and skills. Most LPAs use the planning teams to manage the consultation processes, with some help from their communications team. If this is going to work effectively with the end result being that all people feel they have had an opportunity to engage and influence the plan (not just objectors¹⁰), it needs to be resourced properly. The Government's commitment to digital solutions to support planning is welcomed and must be applied to plan making but this is only one part of the solution to more effective engagement.
14. Ideally the planning officers developing the plan should be skilled to do this or given the right training, especially given the professional planner's place-making skills and ability to help local communities develop a vision with a clear set of priorities that can then be translated into the plan, addressing all aspects of sustainable development. Otherwise there may be a case for using external engagement specialists to support planning teams.
15. There should be a role for communities to be involved on an ongoing basis, helping to test the plan as it is developed and implemented (see section on Monitoring below). Some councils have community or citizen and stakeholder panels for this purpose. We believe these should not be optional but should be a mandatory part of the process. This must include local business representatives (including developers) as well as a cross spectrum of residents, as all invest in the local area, albeit to different degrees and for different reasons.¹¹
16. Engagement will be more meaningful if managed at different levels. Some discussions will be more strategic in nature, especially where there are common issues with neighbouring areas, some will be on specific topics and some will be much more local. There also needs to be a huge amount of honesty in terms of what issues local communities (and others) can influence and where there is less flexibility. This not only reflects the need to support national priorities but also the fact that LPAs work with a number of other stakeholders who have specific responsibilities (and control of funding) that impact on how places are shaped. This is especially true where there are two tiers of local authorities, with districts responsible for planning and the county councils responsible for transport and minerals and waste planning, amongst other things.
17. Plan-making should be about taking communities on a journey, managing expectations but still delivering on the key priorities with perhaps different interventions needed to what local people want. Some of these will be difficult locally but some clarity around choices and implications of those choices (and potential degrees of impact) will help. For example, the use of some underused car parks for development is often very

unpopular locally, but it may be the only way to help deliver affordable housing (because it is on public owned land) and could also be used as part of an overarching approach to building climate resilience. This does not mean that all car parks will be disposed of, however, so careful management of expectations (and avoidance of scaremongering) is essential.

18. There also needs to be much more visibility in the role of councillors in this. There have been too many local plans that have been labelled 'officer led' when a local plan must be owned by the 'council' representing the community. Of course, in an ideal world, the local plan would be prepared on non-partisan lines so that it does not become the focus of election campaigns, especially when many councils have elections most years.
19. Councillors may change and with them their political allegiances but the community that lives within an area does not change much from year to year and therefore is likely to have the same views and priorities on what they want for their area. It is recognised, however, that the interventions and tools available to deliver plans will inevitably change over time (e.g. due to advancing technology or changes to funding availability) and there will be rare occasions when the wider context changes drastically (e.g. as we have recently experienced with the Covid Pandemic or economic recessions).
20. The bottom line is that there needs to be much more stability in the process and in the absence of any wider electoral reforms with mandatory four year election cycles, there should be a clear programme set out with limited ability to change this. The Government's current proposal is for the Local Development Scheme to be replaced by a local plan timetable which sets out how the plan will be prepared over a 30 month period. Regardless of how realistic this is or whether this proposal will survive through the process of reform, there still needs to be a clear programme from start to finish which is set in stone unless there are very clear (technical or legal) reasons for changes. This will help manage expectations around the whole process for all involved, including the Planning Inspectorate in relation to managing its input throughout the process and specifically Examinations.
21. Finally, in our view public engagement should not be restricted to the plan-making process itself as local people also have an important role to play in monitoring the Plan's effectiveness post adoption (see Paragraph 55 for our suggestion on this).

(2) A local plan should be - Vision led and outcome focused

“A strong vision provides a chance to agree on a future for a place without predetermining the means by which you will get there, it is the foundation of any policies or plans that follow. It allows for a much wider discussion than those we have in plan making and the process of setting a strong vision can be the best place to engage the public and others with a role in delivery and implementation. Asking any individual how they want a place to work, look and feel in 20-30 years allows for a wide ranging and creative process which doesn’t happen if you start the conversation with constraints and rules. The vision is what all policies and plans should be designed to deliver and yet it is often an afterthought, agreed only within the Council.”

Anna Rose, Head of the Planning Advisory Service

22. In our experience, local plans are prepared too often with the end game being how it will pass the ‘Tests of Soundness’ at Examination and particularly how it will meet housing needs, and not how the plan will shape a place and deliver the priorities for that particular community. National policy is treated as a requirement, with little flexibility to prepare a plan that is locally specific and potentially innovative in the way the policies are attempting to deliver the priorities (see comments regarding ‘general conformity with national policy below). The system is simply too rigid or is considered to be inflexible in the way that it is applied.
23. There obviously has to be a clear response to national priorities, such as housing delivery, building economic and climate resilience and managing the natural and built environment. But if we are to have locally specific place-making plans for each area, the starting point must be the locally specific place-making vision developed to deliver the priorities of the community that lives and works in the area. The vision should be supported by tangible outcomes over the plan-period, with clear objectives setting out what the plan is trying to achieve through the spatial strategy, policies and site allocations. The anticipated outcomes should also be measurable to help demonstrate whether they have been achieved (or not) and therefore help inform the direction of future policy and decision-making.
24. The vision will be influenced by a number of different factors (see Diagram in Annex 2). Ultimately it needs to clearly articulate what the spatial priorities are for that specific place, with all options around delivery considered as the vision is developed. This should include exploration of the challenges and opportunities arising from different spatial options and through the use of different policy interventions (and other interventions such as fiscal measures), as well as the implications of wider partnership ‘strategic visions’.¹²
25. In our view, the vision and objectives should be tested separately early on in the process to ensure it is ‘place and people’ specific to the plan area and that it has reflected the wider sub-regional vision, where relevant. Policies and site allocations could then be

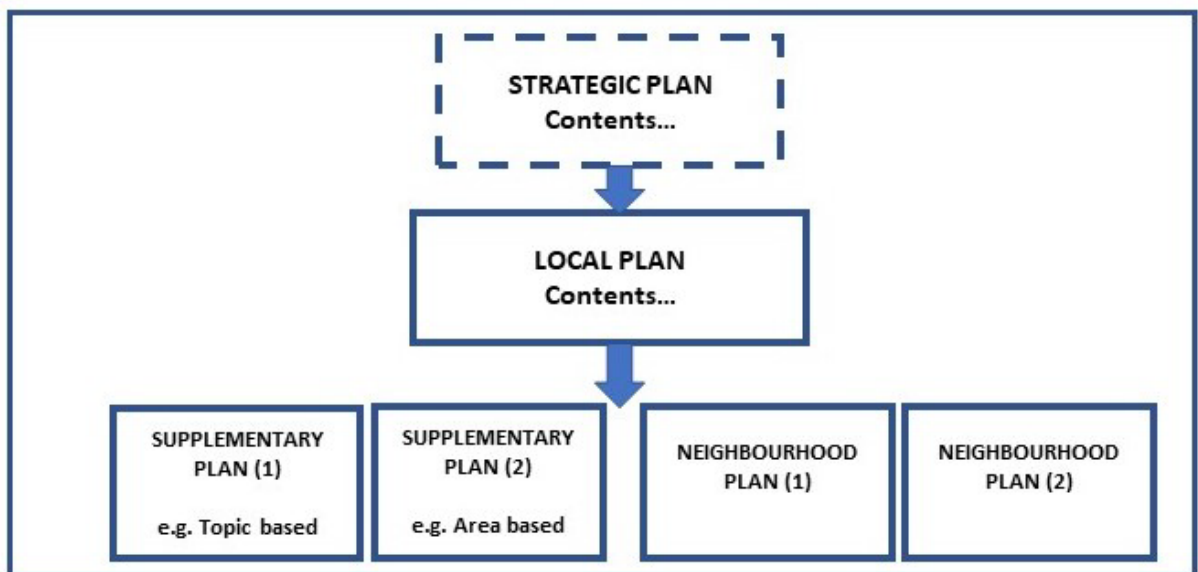
tested later in the process and assessed against a sound vision, as well as to ensure that the plan as a whole is in general conformity with national policy and priorities. This would provide an opportunity for the community to engage early on in the assessment of whether a council-derived vision was correct before years and potentially millions of pounds are spent on policies supporting it. One suggestion is that this could form a key part of the proposed “Gateway Checks” or a ‘Part 1’ of the Examination.

(3) A local plan should be – *Focused and easy to understand*

26. Local plans should be strategic documents with more policies and interventions managed through supplementary plans, where possible. This will be helped by the provisions proposed in the LURB which affords supplementary plans higher status than currently. This would allow the vision in the main local plan document to be delivered over time with a relatively good degree of stability. It would also allow a more responsive approach to some of its interventions, for example, to deal with climate change, technological advancement, or changes to fiscal measures/access to funding opportunities.
27. Where site allocations are concerned, our view is that local plans should identify only the strategic sites but set out the conditions and rules needed for other sites to come forward at a more local/ neighbourhood scale. This could then pick up other issues such as character assessment and local infrastructure needs. The key point here is that all would be prepared under a clear vision and context set out in the local plan (and reflected in the over-arching strategic vision for the sub-region, where appropriate).
28. Plans should be allowed to set out policies for densification within existing urban levels on an ‘area by area’ basis rather than a ‘site by site’ basis. This will provide greater choice and flexibility for developers, particularly SMEs, to deliver creative solutions that are good development and more appropriate to the place or the future vision for a place where significant change is proposed (e.g. town centres). This could be done through design coding.
29. Plans at present are generally very wordy, are repetitive and their length often makes them indigestible and inaccessible. Words by themselves cannot adequately convey what the intention of a whole plan or a policy is. This leads to misunderstanding and interpretation of words through the development management process (sometimes to appeal) causing delay and uncertainty.
30. The government’s reforms need to address this and highlight short and robust plans, with a focus on graphics to illustrate what can be achieved. Place-shaping plans should be much more visual. Plans need to set in motion a commitment from plan-making through site master planning, to the application and its decision and then the commitment to deliver. Illustrating this and explaining the interactions between strategic policies and local growth areas or areas of change via maps (preferably interactive) with data, needs to be a priority, as a tool to keep local communities informed and involved.

31. The Government is already encouraging the use of digital technology for plan-making (and access to local authority services more generally). Digital graphics will help residents access and understand the plan as it is prepared but there must also be a clear path for those that would prefer to access the plan through more traditional analogue routes, as some are not digitally literate or access to digital platforms is limited, for example, due to cost.
32. As with everything related to plan-making, there needs to be some flexibility in what is included in the core local plan and what is managed through supplementary plans (and strategic and neighbourhood plans, where relevant). However, for each area, the plan portfolio should be clear from the start of the local plan-making process to help manage the expectations of communities and other stakeholders. This is particularly important where a shared strategic plan (or spatial development strategy) is being prepared by a group of LPAs or through a combined authority. A hierarchy of plans, setting out (in summary) what each one will be addressing should therefore be required at the start of the process but with some flexibility to change this if necessary (e.g. to elevate something to another plan in response to the engagement process).

The Plan Hierarchy



(4) A local plan should be – *clear in scope, focussing on what is appropriate to the Place and setting the highest standards*

33. It is not possible for a plan to do everything. The Government has proposed new national development management policies¹³ and there is already national policy (through the NPPF) which is a material consideration in plan-making and planning decisions. This establishes a common set of policies, which if applied, ensures consistency in certain policy areas, such as green belt. The Planning Inspectorate’s advice is that plans should not merely be a repeat of the NPPF and therefore can in

some areas (theoretically) be silent. However, silence creates risk and the compliance with national policy leads many LPAs towards ensuring that as many relevant policy areas as possible are captured in their own local plans.

34. The scope of a plan must therefore be a balance between national policy set out in the NPPF (and in future the national development management policies if taken forward) and what else is needed to deliver the local vision through quality place-making and development (see also our comments on 'general conformity' with national policy in).
35. Currently local plans should include strategic policies that establish the standards of development expected within the area (although there should be national standards, for example, around energy efficiency, that all councils should aspire to). There should then be flexibility on how councils identify sites, either very specific (e.g. for multi-phase or where green belt boundary changes are proposed) or area based (e.g. town centres).
36. Alongside the policy framework, local plans should also include:
 - **A clearly articulated and presented spatial strategy**, which is map based and illustrates how the strategy works cross boundaries.
 - **Strategic site allocations**, with clarity around how other sites will be brought forward.
 - **A Delivery Framework**, including the role of key partners and stewardship as a consideration from the plan making stage.
 - **A Monitoring Framework** which clearly measures the success of the vision and objectives and is supported with a robust risk management plan to manage change over time (see below).
37. Although the scope of a plan should therefore be flexible to all for policies to be based on the issues an area faces and local priorities (as well as some specific prescribed national priorities), it would be useful for greater clarity on this in the form of a best practice guide. In our view, a local plan should ideally include policies to support:
 - **Improving the quality of development**, taking into account local characteristics.
 - **Tackling climate change**, including delivering on net zero commitments.
 - **Delivery of infrastructure**, supported by a funding infrastructure delivery plan, with clear strategic priorities developed in partnership with a relevant county council or combined authority.
 - **Meeting local needs**, but not focussed totally on housing targets (although this should be done within a clear strategic context to ensure that cross-boundary needs are addressed properly).

(5) A local plan should be – Evidence based, not evidence led

38. Once the vision and objectives have been developed, it will need to be tested against the technical evidence with options for how it could be delivered, what this actually means in practice and making it clear where areas of compromise (or choice) are likely to be. Our view is that too often local plans are 'led' by the technical evidence and not necessarily 'evidence-based'.
39. Technical evidence is rarely black and white and what answer is provided from one consultancy or through one methodology may be very different from another. For example, many local plan spatial strategies are based on the 'call for sites' rather than priorities supporting delivery of the overarching vision, with development directed to sites that have been put forward by developers or land owners rather than the most sustainable locations or those sites that will help deliver the place-making vision (although it is obviously recognised that some sites offered will do this). All local plan allocations and sites coming forward through the development management process should be required to demonstrate how the proposed development will help deliver the vision and objectives or priorities for the area.
40. The Government has promised a review of the technical evidence base, accepting that the preparation process is overburdened with the need for evidence to support all aspects of the plan, as opposed to a 'proportionate' evidence base.¹⁴ Whilst some standardisation in the core evidence required and methodologies used would be welcome, there are clear lessons to be learned from the use of the 'standard methodology' for assessing housing needs and the need for some flexibility to respond to local circumstances.
41. Evidence is considered as a means to an end, the end being a sound plan. For example, an economic needs assessment should draw conclusions from the technical evidence that directly defines policy, but also sets in place a plan for economic growth within the plan making area (and within the sub-region) and helps deliver the plan's overall vision. Site allocations alone do not deliver economic growth. The supporting evidence or strategy should therefore demonstrate how non land-use policies and measures will help deliver the plan's objectives.
42. Whilst there is clearly a role for local evidence in developing the plan, the focus should be on maximising the preparation of sub-regional evidence. This will build cooperation across local authority boundaries, reflecting the spatial relationships and common markets operating across sub-regions. This would also provide efficiency savings for individual councils through developing a shared evidence base, with greater confidence in the robustness of the evidence as a result.
43. The downside, of course, is that often the timetables for plan making between councils within sub-regions is out of kilter and needs realignment. A more effective approach to strategic planning would improve this significantly (see our 'guiding principles' in Paragraph 7) but in the absence of this, all LPAs within sub-regional areas should be encouraged to co-ordinate their plan timetables, where possible. If the Government

continues with its requirement that local plans should be prepared within 30 months, some flexibility should be allowed for this re-alignment in order to reap the benefits set out above.

44. Evidence and the methodology used to develop it may be very different depending on the location of the area (i.e. a more rural area versus a large metropolitan area with very different transport infrastructure and/ or environmental assets). Too often the methodology for one local plan examination is endorsed as 'best practice' or used as a benchmark against which other LPAs are tested at examination, especially if a number of LPAs use the same consultancy to develop the evidence. Flexibility to support local circumstances through different approaches to the evidence base becomes even more challenging if included in National Planning Guidance. Not only is this squashing distinctiveness of place and preventing us understanding our places better, it is stifling technical innovation and new practices.
45. We also live in a world where technology is changing all the time and therefore the options around how we address key issues such as climate change and how we access services need to be much more responsive. A clear risk management framework underpinning any approach set out in the plan to ensure that it can remain relevant and receptive to external change and influences over time must be a core part of the plan-making and implementation process.
46. One area that the Government could provide more support to local councils on is resourcing the establishment of authoritative data banks. These need to be accessible in formats that can both be effectively used to support a plan, but also used by communities to inform their views on their neighbourhoods. Platforms do exist (and we are pleased to see the Government's new planning and housing data platform finally launched¹⁵) but because of the evidence led approach, LPAs are already committing considerable resource to the evidence and therefore do not feel the need or have the justification for acquiring additional data. This is a false economy, as immediate access to data prepares the LPA to act as the intelligent client, tailoring consultancy contracts to meet more specific rather than general evidence.
47. Many areas of local planning require a level of expertise that is not necessarily within the LPA because it is a new area of policy and there is developing thinking around practice, such as on climate change, health and well-being, flood-risk or biodiversity net gain. Some of these policy areas also require more challenge in terms of the potential policy responses in local plans. We therefore suggest that all local planning areas should have 'Challenge Panels' with a mix of experts which can test planning policies as they are developed and offer advice on different options which can deliver the same outcome, as well as drive innovative thinking around solutions and practice.
48. Challenge Panels could be established on a wider than local basis (e.g. sub-regional/ county-wide) and would only be used at key stages of the process but could offer a level of external scrutiny and support that is severely lacking in the current system, helping to inform decision-makers. The Government is proposing that local plans be subject to a number of 'Gateway Checks' as they are proposed. Although there is little in the way

of information about what these would provide, we are concerned that they would focus on process as opposed to the policy content. We believe that Challenge Panels could provide a much more effective approach to 'checks and balances' as the plan is prepared, ensuring that these move beyond simply process.

49. All of our suggestions above will help to refocus the examination process. That process should be about improving the plan to deliver local aspirations rather than a rigid test of soundness or a forensic analysis of the evidence base. Simply because a plan does not meet all national policy requirements, and in particular, the standard methodology for assessing housing need, does not make it a bad or unsound plan. Housing numbers are not the be all and end all. It will be a better-functioning plan making system if other priorities are fully recognised to enable councils to deliver better places, beautiful development and sustainable development that meets the government's commitment to tackle climate change.

(6) A local plan should be – *in general conformity with national policy*

50. Although there is a clear rule book by which the Inspectors conduct an Examination, the application of the rules depends very much on the individual Inspector(s) appointed. In our experience, some scrutinise a plan and its evidence much more than others and some apply national policy more rigidly than others.
51. In our view there should be a clear set of outcomes/targets set out by government around national priorities (e.g. for housing, the economy and climate change) but more local flexibility in terms of how these are supported in local plans. One size does not fit all and target setting needs to be nuanced to the capacity and ability for development growth in an area. This means local plans should be tested in terms of 'general conformity' with national policy, with only a few specific matters tested through the Examination process. This would mean that the current 'Tests of Soundness' would be replaced with a set of high level requirements.
52. Although one of the roles of Examinations is to allow objectors to have a voice, our hope is that with the upfront and ongoing investment in engagement suggested in this paper, many of the locally contentious issues will have been ironed out before the Examination (although there should still be an open door for this to happen, for example if there is a strategic site that continues to generate a lot of objections).
53. Regardless of the matters addressed through the Examination process, we believe the role of the Inspectors is vital as the final arbitrator in how a local plan is contributing to national priorities and meeting local needs, albeit based on a higher level of testing. However, this could be improved significantly by using a panel comprising a representative of the Planning Inspectorate and up to two other 'experts' who are appointed through a separate process. The overarching aim of the examination must be to make a plan better to achieve national and local objectives, not through the current test of soundness to endorse a plan's compliance.

(7) A local plan should be – *effectively monitored and managed*

54. A vision led/outcome focused plan should have clear metrics demonstrating what success looks like. Although LPAs have to prepare an annual report setting out how they are performing, the metrics around success should be more focused on how the plan is delivering on the vision over time, including being clear what successful outcomes are.¹⁶ It needs to be focused on a few key local issues which would be helped significantly if there was also a national monitoring regime to monitor and manage national priorities and objectives. These are what any future annual monitoring reports to government should be focused on and would help comparisons between areas and adjustments to national policy and interventions, including funding priorities (i.e. to support the 'levelling up' agenda).
55. The monitoring framework should also be underpinned by a clear risk management plan setting out how the council will respond to changing context or if the plan's policies are not delivering the outcomes expected. The suggested citizens panels and developer/stakeholder forums (see Paragraph 15) could play an important role in this. It is local people that will experience first-hand the changes being delivered as a result of the local plan and an ongoing role will therefore help keep or gain buy-in to delivery of the outcomes originally sought. This would also help develop a public advocacy which at least understands the areas of plan success and failure before setting out on another plan and help break the cyclical nature of plan-making and keep people involved and engaged in its delivery. Allowing open and transparent monitoring will lead to greater accountability and action or revised action.
56. Having more focus on the 'management' of a plan in response to its monitoring and the ability to quickly deal with any anomalies through supplementary plans and other potential interventions, will allow a much more responsive approach than currently, which often requires a full review of the plan as opposed to specific aspects of it. This should be the default position of the five yearly review, allowing LPAs to continue with their journey in delivering the overall vision and priorities for the area which will usually require longer than five years. As part of the monitor and manage regime, it should be clear what the triggers will be for the plan's strategy to be reviewed in full, as opposed to individual policies that are not performing well.
57. Finally, effective monitoring and successful delivery of a place-making plan involves understanding, interpretation and analysis of data. This should be undertaken by people with the right skillset and the ability to help councils and local communities (including professional planners) understand the impact of the plan and where future changes may be needed, for example, in response to changing demographic needs, economic circumstances or technological changes. Many LPAs do not currently have this resource in-house, or even have access to it, but if we are to have a more responsive and streamlined approach to plan-making, this resource will be essential.

ANNEX 1: Contributing Authors

All those involved in writing this discussion paper either work (or have recently worked) within or with local planning authorities on plan-making. They have shared their extensive knowledge and experience from their current and past roles on a personal capacity and these do not therefore necessarily reflect the view of their employers. They are:

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The proposals in the paper have also been ‘sense- checked’ with a number of chief executives, councillors and other planners from local authorities across England and we thank them all for their helpful contributions and advice.

ANNEX 2



DEVELOPING YOUR VISION AND OBJECTIVES

What are your **shared values and guiding principles**?

What **makes your 'place' different** from others/ what's your USP?

What are **your priorities over the next 5, 10, 15 years**?
e.g. set out in election manifestos, corporate plan/ priorities, community engagement responses, other 'Influencers'

What **outcomes are you trying to achieve** as a council and what other influencers are there that you have to take account of?

What **interventions (e.g. funding, tools and policies) are needed** to deliver these outcomes and what control do you have over these?

What **role will other plans and strategies** play in delivery of the Vision, including those shared or with others partners?

Do you have the **right internal arrangements** in place to deliver the Vision and ensure a 'systems' approach? (i.e. cross departmental approach, integrated solutions to 'place')

How will success be measured?

References

¹ [Planning for the future - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/planning-for-the-future)

² [Levelling Up and Regeneration Bill - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill)

³ [The Growth Plan 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/the-growth-plan-2022)

⁴ This paper does not address the proposals set out in the Government's latest Growth Plan (e.g. Investment Zones) as the detail was not yet available as to how these would fit within the wider proposals for planning reform.

⁵ As of September 2022, the following local planning authorities have either withdrawn or (formally) delayed preparation of their local plans: **Arun** (Delayed); **Ashfield** (Delayed); **Basildon** (Withdrawn); **Bournemouth, Christchurch and Poole** (Delayed); **Bromsgrove** (Delayed); **Castle Point** (Withdrawn pre-adoption); **Dacorum** (Delayed); **Dorset** (Delayed); **East Hants** (Delayed); **Havant** (Withdrawn at examination); **Hertsmere** (Withdrawn); **Hinckley & Bosworth** (Delayed); **Medway** (Delayed); **Mid Sussex** (Delayed); **St Albans** (Delayed); **Sheffield** (Delayed); **Stockport** (Delayed); **Thanet** (Delayed); **Three Rivers** (Delayed); **Wealden** (Delayed); **Welwyn Hatfield** (Delayed - at examination)

⁶ The need for more resources to support LPAs is a key issue for both Local and Central Government to address and there are a number of different options currently being explored, including the RTPI's suggested local planning agencies - [RTPI | Planning Agencies](#)

⁷ [Building trust \(grosvenor.com\)](https://www.grosvenor.com/building-trust)

⁸ **Sustainable Community Strategies** were introduced through the 2000 Local Government Act which required councils to prepare a strategy for improving the economic, social and environmental wellbeing of its communities. This requirement was abolished post 2010 as part of the Government's approach to Localism.

⁹ [Sustainable community strategies and local development frameworks | Local Government Association](#)

¹⁰ The consultation and Examination processes perversely favour those who are objecting to the plan and not those that support it (or at least some aspects of it. This is particularly the case at the Examination as it is only those that object that are usually invited to participate.

¹¹ It is worth looking at best practice in this such as Citizens Assemblies which reflect the population in terms of age, gender, ethnicity and social class (and even attitudes) - <https://involve.org.uk/resources/methods/citizens-assembly>

¹² Examples of 'place specific' visions are – Buckinghamshire - [Recovery and growth | Buckinghamshire Council](#) and Oxfordshire - [Oxfordshire Strategic Vision - Future Oxfordshire Partnership](#)

¹³ We have not commented in this paper about the merits or otherwise of the proposed new national development management policies.

¹⁴ The Planning Advisory Service (PAS) has already done some work on what a proportionate evidence base is as part of its advice on plan-making - <https://www.local.gov.uk/pas/plan-making/local-plan-review-update/evidence-base/evidence-plan-making-focus-upon>

¹⁵ [Planning Data](#)

¹⁶ A good example of an 'outcomes-led' approach to monitoring is linked to the role of the Welsh Government's Future Generations Commissioner - [The Future Generations Commissioner for Wales – Acting today for a better tomorrow](#)