



planning advisory service



# **PAS Local Plan Route Mapper and Toolkit – A guide to using it**

London

18 November 2019

[www.pas.gov.uk](http://www.pas.gov.uk)

# Housekeeping

Venue Facilities

Fire Exits



Lunch at 1pm and breaks in the morning and afternoon

Reminder to put your phones off or on silent



Finishing by 4.30pm

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## Who are PAS?

**“PAS exists to support local planning authorities in providing effective and efficient planning services, to drive improvement in those services and to support the implementation of changes in the planning system”**

- Funded by the Ministry of Housing Communities and Local Government (MHCLG)
  - Part of the Local Government Association (LGA)
-

# PAS Local Plan Support

- Direct support for authorities and groups of authorities on all aspects of local plan making – and a separate programme related to strategic planning
  - Development of materials and resources that support plan making
  - Bespoke support from advice on specific plan making issues, to events linked to national policy change through to our Planning Peer Programme
-

# Purpose of the Workshop

1. Introduce you to the PAS Route Mapper and Toolkit
  2. Familiarise you with its purpose, role and content
  3. Give you an opportunity to explore it in a highly practical way
  4. Encourage its use to support plan making in your own authority
  5. Update you on further work being undertaken by PAS to support plan-making
  6. Update you on the latest position from the Planning Inspectorate
-

# Format of the day

1. Overview of the Local Plan Route Mapper and Toolkit Overview
  2. Local Plan Review
  3. Update from the Planning Inspectorate
  4. Proportionate Evidence
  5. Soundness and Quality Assessment
  6. Plan Making Round Up
  7. PAS Support and next steps
-

# The Project Team

**Our project team has been commissioned by the Planning Advisory Service (PAS) to provide advice and a programme of support to assist local planning authorities with Local Plan production.**

- David Coleman, Director DAC Planning
  - Tim Parton, Associate DAC Planning
  - Sara Dilmamode, Director Citiesmode
  - Nicky Linihan, NJL Solutions
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**We all work in local plan making practice!**

# Local Plan Route Mapper & Toolkit

**Route Mapper and toolkit to help assess soundness and legal compliance and create quality plans in an efficient and effective way.**

**This covers all stages of plan making including new requirements for plan review every 5 years.**

**It will replace existing PAS compliance checklist and soundness assessment**

Use by local authorities as part of a self assessment

Use as basis of support to authorities offered by the project team via PAS

Potential use by peers from other authorities

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# Driver: Key NPPF Changes

- The revised NPPF was published by MHCLG in July 2018 with updates in February 2019.
- The NPPF changes have particular importance for the production of Local Plans and plan making guidance – from changes to tests of soundness to plan content requirements
- **Requires plan review every 5 years**



Ministry of Housing,  
Communities &  
Local Government

National Planning Policy Framework

February 2019  
Ministry of Housing, Communities and Local Government

# Project approach

Continued emphasis on:

- Soundness
- Compliance

But also

- Quality of plans
- Best practice
- Efficiency of production
- Effectiveness of approach



**+Creativity**

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# Session 1: Overview of the Local Plan Route Mapper and Toolkit



# PAS legal / soundness check

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><b>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</b></p>		
<p><b>Vision and Objectives</b></p> <p><b>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</b></p> <p><b>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</b></p> <p><b>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</b></p>	<ul style="list-style-type: none"> <li>· Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed.</li> <li>· Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them.</li> <li>· The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another.</li> <li>· Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.</li> <li>· o provide a coherent policy structure.</li> </ul>	

# PAS legal / soundness check

1 Local Plan Review - not new but recently formalised

2. Sometimes a checklist doesn't help:  
Example: soundness and quality matters  
Response → Revise approach

3. But sometimes a checklist is just the ticket:  
Example: content and compliance with process

Response → Update – and fill gaps



# Stakeholder engagement



**RTPI**

Royal Town Planning Institute

**POS**

Planning Officers Society

**PAS**

Planning advisory service

**CATAPULT**

Connected Places



Ministry of Housing,  
Communities &  
Local Government

# Project stages

## Stakeholder engagement

1. Stakeholder Interviews
2. Technical Expert Meetings
3. Workshop with PAS team

## Development and testing

1. Pilot Workshop with 10 LPAs
2. Consultant interviews (+ review)
3. Case study interviews

## Pilot Testing

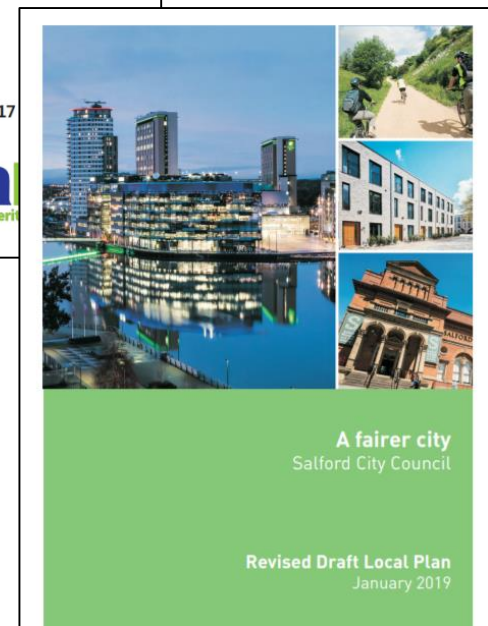
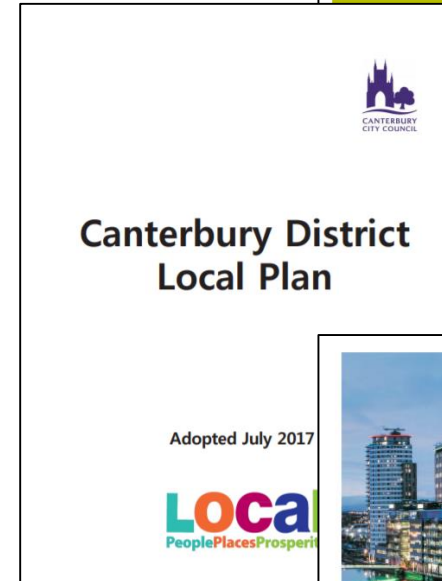
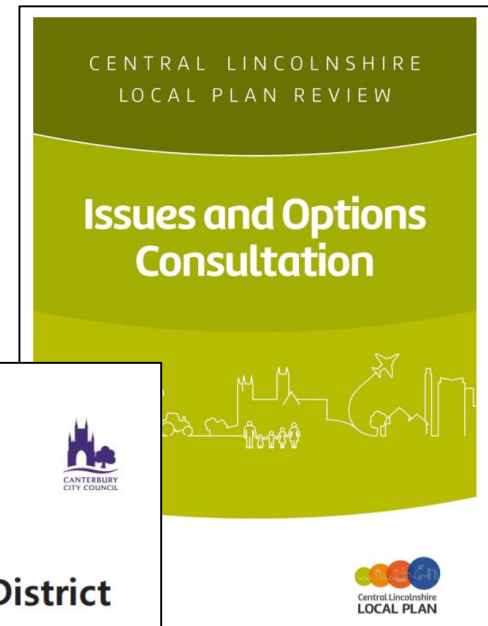
1. Pilot support 6 LPAs
2. Revisions to the approach
3. PAS Review and finalising the document

## Support roll out

1. Training for peers
2. Roll out support to 15 authorities
3. Ongoing evaluation

# Pilot Local Planning Authorities

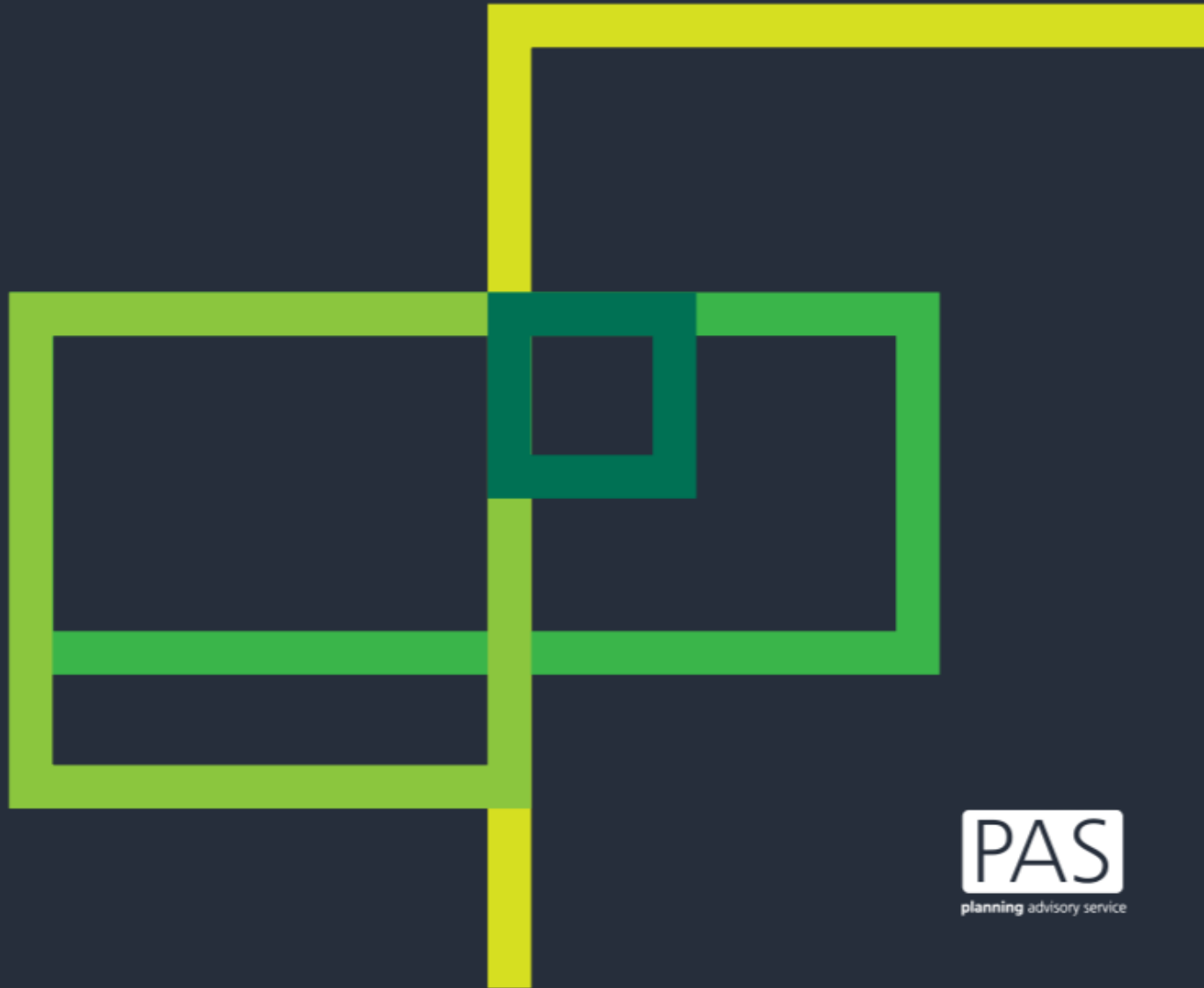
- Central Lincolnshire
- Canterbury City Council
- Salford City Council
- Torbay Council
- Gateshead Borough Council
- Newcastle City Council



PAS

# Local Plan Route Mapper

Navigating plan preparation  
efficiently to arrive at a quality plan



September 2019

# Approach

- Route map: Especially new planners – but also old ones!
  - Accessible advice for more than just LPA officers
  - Advice on undertaking a local plan review
  - Links to common examination pitfalls
  - Focus on how to avoid these – especially early on and with plan making stage
  - Plan making as creative
  - Links to other sources of advice
-

# Route Mapper Structure

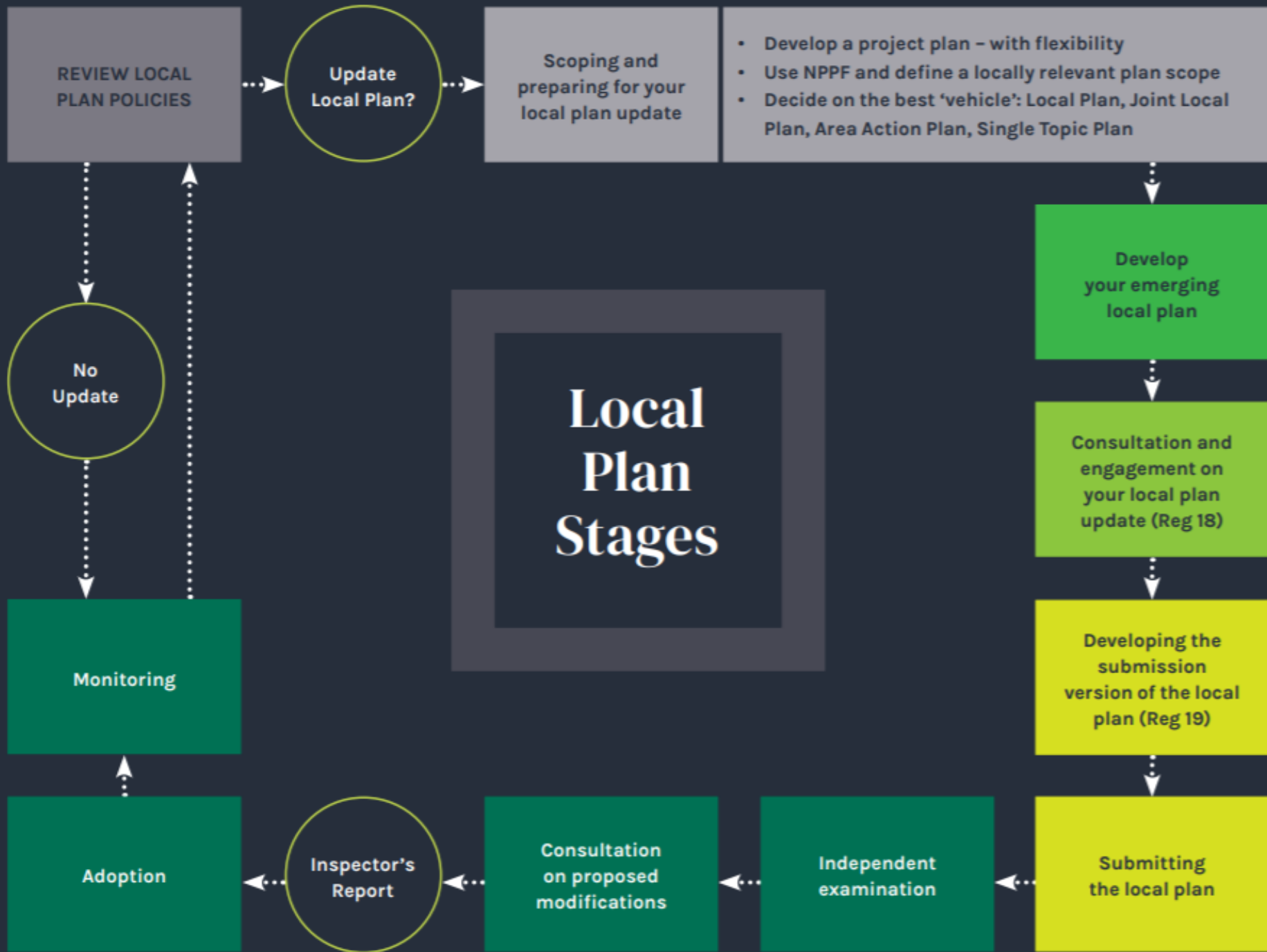
Reviewing the need to update your local plan policies	A Navigating the process of reviewing local plan policies
Project Planning and Management	B Scoping and preparing for your local plan update
Updating your local plan	C Developing your emerging local plan
	D Consulting or engaging on updates to your local plan
	E Developing the Submission version of the local plan
	F Independent Examination and Adoption

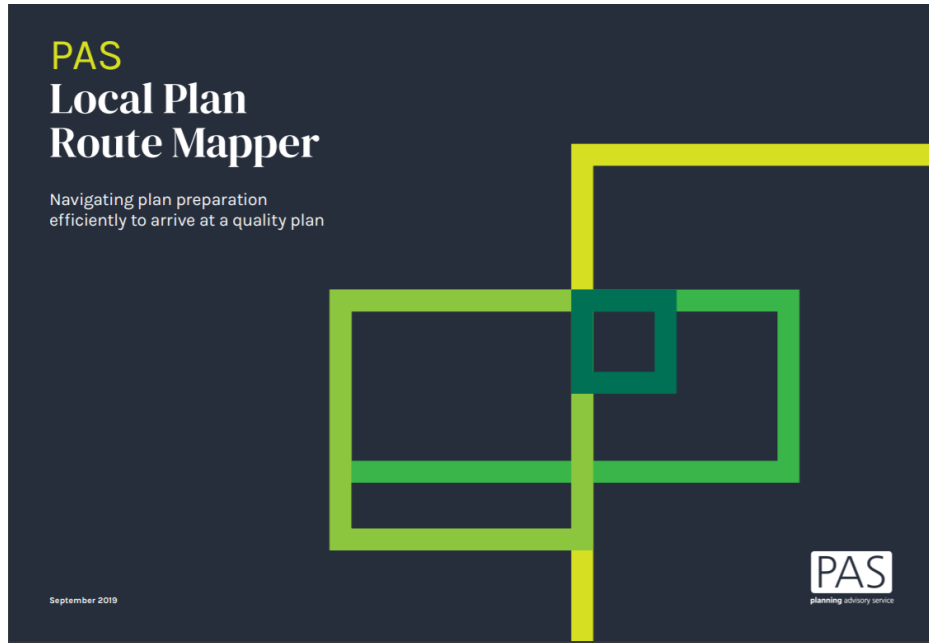
# Approach

- Encourages structured and robust approach to Local Plan Review (A)
  - Focus on project planning management, including scoping stage, to inform realistic and efficient timetable (B)
  - Advice on approaching updates to evidence base and policies, including working with stakeholders and presentation (C)
-

# Approach

- Encourages appropriate and effective approach to engagement and consultation (D)
  - Advice on developing submission version of policies update (E)
  - Practical advice on approach towards independent examination and adoption (F)
-





## **PART 1**

**LOCAL PLAN REVIEW  
ASSESSMENT**

## **PART 2**

**LOCAL PLAN FORM AND  
CONTENT CHECKLIST**

## **PART 3**

**LOCAL PLAN PROCESS  
REQUIREMENTS  
CHECKLIST**

## **PART 4**

**LOCAL PLAN  
SOUNDNESS AND  
QUALITY ASSESSMENT**

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# The Toolkit is in four parts.

## PART 1

### LOCAL PLAN REVIEW ASSESSMENT

A succinct form to help you to undertake a review of your plan policies to assess the need for a policies update.

This can be used to help you address the requirement to review the local plan policies at least every 5 years and whether you then need to update your local plan either in part or in full.

## PART 2

### LOCAL PLAN FORM AND CONTENT CHECKLIST

Helps you to assess the content requirements for local plans based on the National Planning Policy Framework (NPPF).

This can be used to check that your plan covers the matters prescribed in national planning policy (and legislation) when you are reviewing local plan policies using PART 1 above or scoping out the content for a policies update. It also provides a good final check point before you consult or engage under Regulation 18 or publish under Regulation 19 prior to its submission for independent examination.

## PART 3

### LOCAL PLAN PROCESS REQUIREMENTS CHECKLIST

A checklist of procedural requirements for preparing local plans and some of the most important project management implications arising from these.

This can help you with project planning and to check that you have complied with relevant legislation and regulations relating to how you should prepare and consult on a local plan at each stage of plan making. This is a useful tool to assist you in planning your approach to plan production and to checking along the way. You may also wish to use the checklist before you publish a draft plan or submit a local plan for independent examination.

## PART 4

### LOCAL PLAN SOUNDNESS AND QUALITY ASSESSMENT

A local plan assessment matrix.

Inspired by typical independent examination questions, this is not a checklist! It is a rigorous risk assessment tool that you can use to assess your level of confidence in your plan throughout the plan-making process. It will help you to identify and assess any problems and issues and to identify actions that may need to be taken to address these – and push beyond these to create a better plan. It is intended for use particularly in assessing the early drafts of the local plan and will also be beneficial to utilise before you publish the Regulation 19 Submission Local Plan.

# Toolkit Part 1 – Extract

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	<b>PLAN REVIEW FACTORS</b>		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p><b>PROMPT:</b> As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>		Reason (with reference to plan policies, sections and relevant evidence):
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p><b>PROMPT:</b> Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>		Reason (with reference to plan policies, sections and relevant evidence sources):

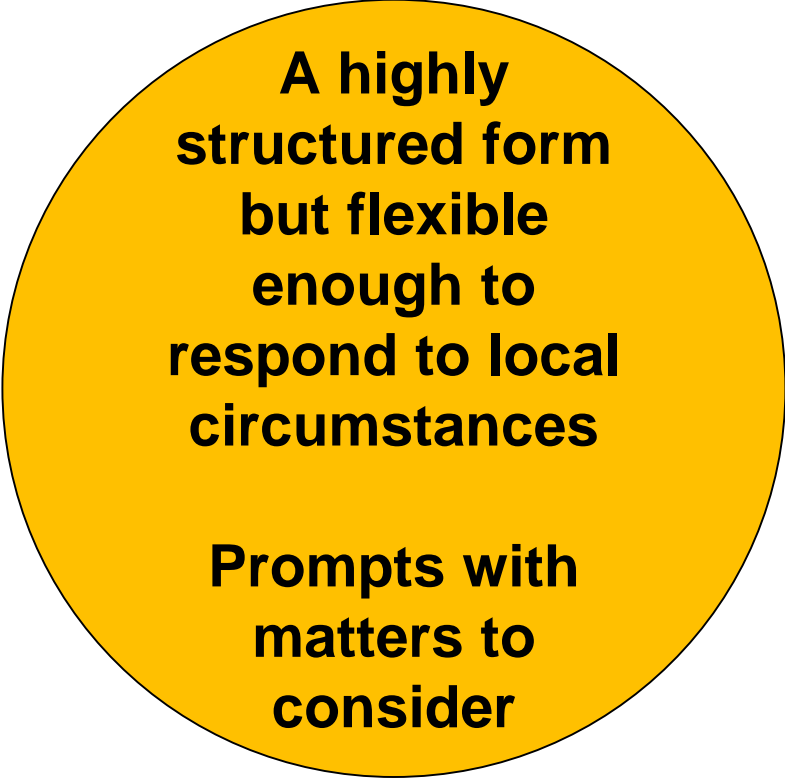
# Toolkit Part 1 - Format

## 1. Do I need to update policies based on current / emerging circumstances?

- How do my current development plan policies stack up against a range of factors

## 2. Based on this do I need to update all my policies (a full update) or just some (partial)?

## 3. Capture decision

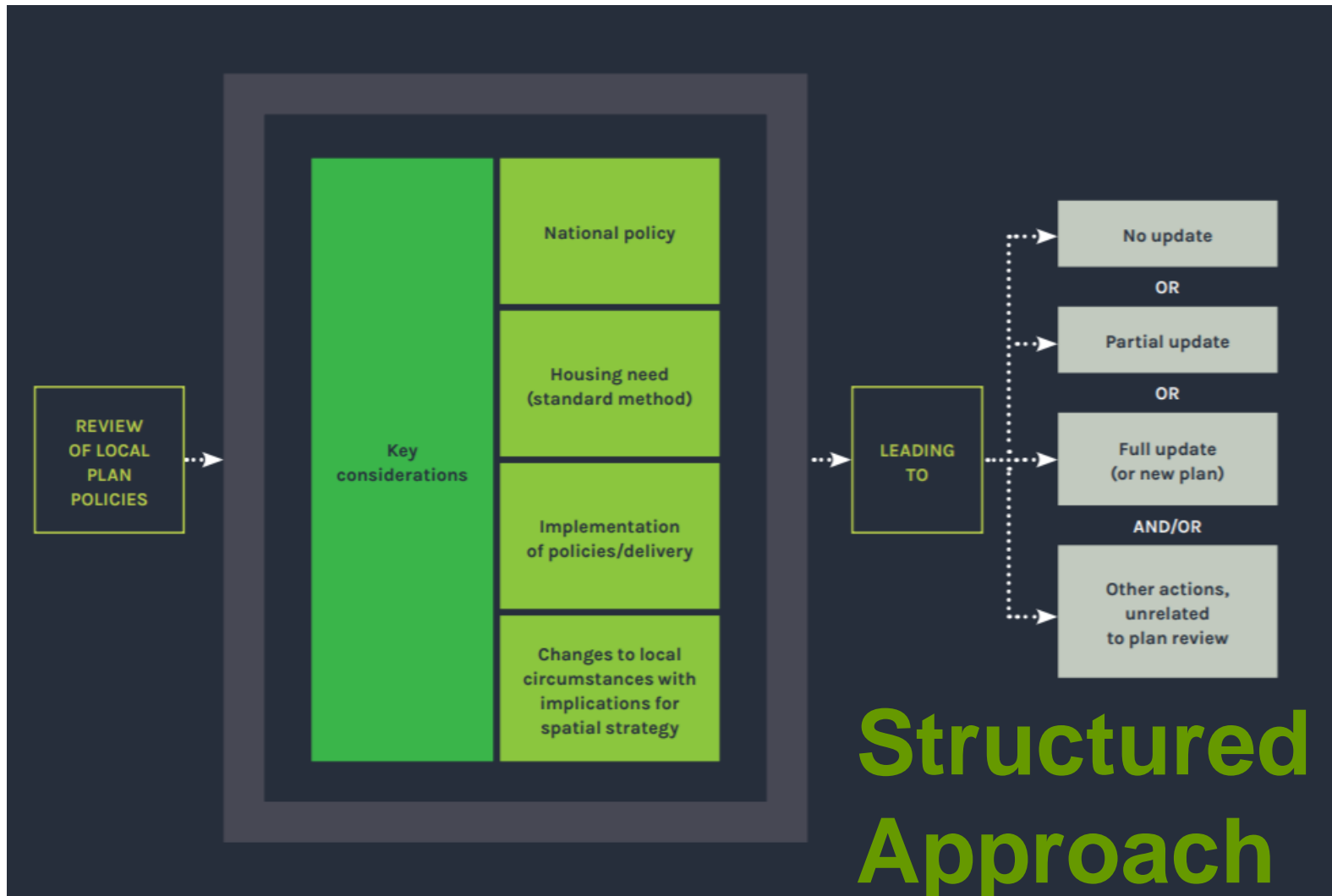


**A highly structured form but flexible enough to respond to local circumstances**

**Prompts with matters to consider**

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# Toolkit Part 3 - Approach



# Toolkit Part 2 – Extract

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	
2.	Contribute to the achievement of sustainable development.	NPPF Para 8, 9, 16	
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	
5.	Plans should be: Aspirational and deliverable Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication	NPPF Para 16	
6.	<i>Plan Content</i>		
7.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and quality of development.	NPPF Para 17, 20	

# Toolkit Part 2 - Format

- Lists NPPF content related to plan requirements
  - Requirement and Section
  - Highlight NPPF 2019 changes to 2012 to aid usability
-

# Approach: Headline content check

- Related to plan content requirements NOT process
  - Reference but not detail PPG and no case law reference
    - Dates too quickly
    - Concern re missing key changes (or lag with updates)
-

# Toolkit Part 3 – Extract

	REF	Key questions	Legislation /Policy Source	Y/N	Examples of documents in which this might be found	Documents demonstrating compliance
12.	L	Have you identified the “strategic matters” that will be included in the updated local plan policies and which have / would have a significant impact on your area and at least one other planning area and on which you are required to engage constructively, actively and on an ongoing basis?	P&CPA Section 20 and Section 33A		<ul style="list-style-type: none"> <li>Published report and decision on review of local plan policies</li> <li><u>5 year</u> plan review assessment (See Part 1 of this toolkit)</li> <li>Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements</li> </ul>	
13.	L	In addition to the legally prescribed bodies does your Statement of Community Involvement and project plan identify any additional bodies / person(s) who you will engage with on strategic cross-boundary matters and who will be party to your Statement(s) of common ground?	NPPF para 27 and para 35		<ul style="list-style-type: none"> <li>Statement of Community Involvement</li> <li>Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements</li> </ul>	
14.	PM	Have you designed a template to record the progress made with the above bodies / person(s). This should document where effective co-operation is and is not happening throughout the plan making process, and the outcomes from engagement. This will also be required as	<p>P&amp;CPA Section 20 and Section 33A</p> <p>NPPF para 27 and para 35</p>		<ul style="list-style-type: none"> <li>Duty to Cooperate Statement(s) of Common Ground / Duty to Cooperate Statements</li> <li>Template documents</li> </ul>	

# Toolkit Part 3 - Structure

- Key legal (or NPPF) requirements related to process of plan preparation
  - Project management actions that arise directly from requirements
  - Potential sources of this information
  - Set out by plan making stage (links to Route Mapper)
-

# Toolkit Part 3 - Approach

- Helps with project planning
  - Provides check that you have complied with relevant legislation and regulations relating to how you should prepare and consult on a local plan
  - Assists in planning approach to plan production and to checking along the way
-

# Toolkit Part 4 – Format

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>1.</b>	Overall does the local plan update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is 'an appropriate strategy' within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
Reviewer Comments:						
<b>2.</b>	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
Reviewer Comments:						
<b>3.</b>	Is it clear that the local plan update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?  If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?  Does the level of housing provide for an appropriate and justified buffer?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
Reviewer Comments:						

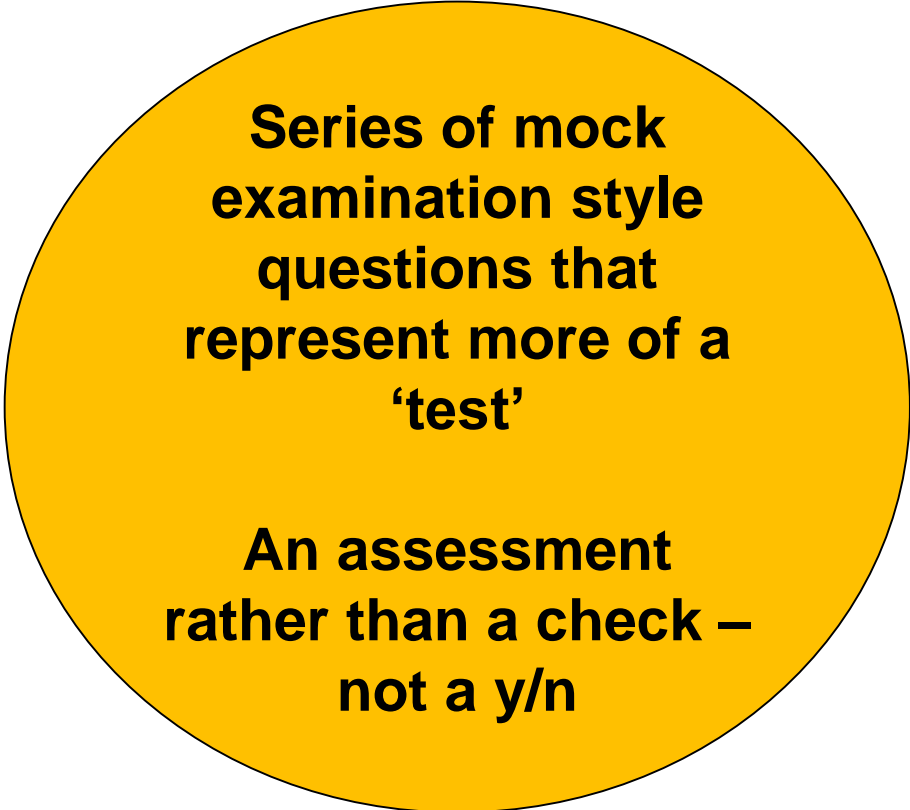
# Toolkit Part 4 - Structure

Questions linked to plan requirements

By category

- Growth Strategy, Process and Outcomes , Housing Strategy, Justified approaches to plan policy and content, Deliverability, Policy effectiveness and clarity

Capture degree to which you meet the requirements – and risks/ actions



**Series of mock examination style questions that represent more of a 'test'**

**An assessment rather than a check – not a y/n**

---

# Toolkit Part 4 - Approach

- Focus on exam style questions rather than the high-level criteria for assessment
  - Informed by actual examination questions
  - More direct / challenging style of question
-

# Approach – direct versus indirect

Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirement....

Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning.

**List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery**

**Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?**

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# Session 2: Local Plan Review



# Recap of toolkit Parts 1 and 2

Copies on your tables:

1. Toolkit Part 1 Local Plan Review Assessment
  2. Toolkit Part 2 Local Plan Form and Content Checklist (The NPPF Checklist )
-

# Exercise 1: Trigger Points and Red Herrings

## In groups on tables:

For each of the scenarios provided please utilise the relevant extracts from toolkit part 1 in order to identify:

- Where a policies update might be needed (a trigger), or an update might not be the answer (a red herring)
- Your reasons for this view

*See worksheet on your tables*



# Some scenarios to consider

1. Housing need calculated under the standard method has dramatically fallen. Delivery is on target but has been primarily public sector driven to date
2. Funding has been pulled for a key piece of transport infrastructure serving a proposed growth area accommodating 10,000 new dwellings
3. Employment growth (and employment floorspace) has not kept pace with targets



# **Session 3: Examinations Update**

**PINS Jonathan Bore**

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The Planning Inspectorate  
Yr Arolygiaeth Gynllunio

# Examining Plans – a perspective from the Planning Inspectorate

Jonathan Bore

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Autumn 2019



# Overall position

Between 1 April 2016 – 31 July 2019



**218** Local plans submitted



**185** Found sound



**1** Found unsound



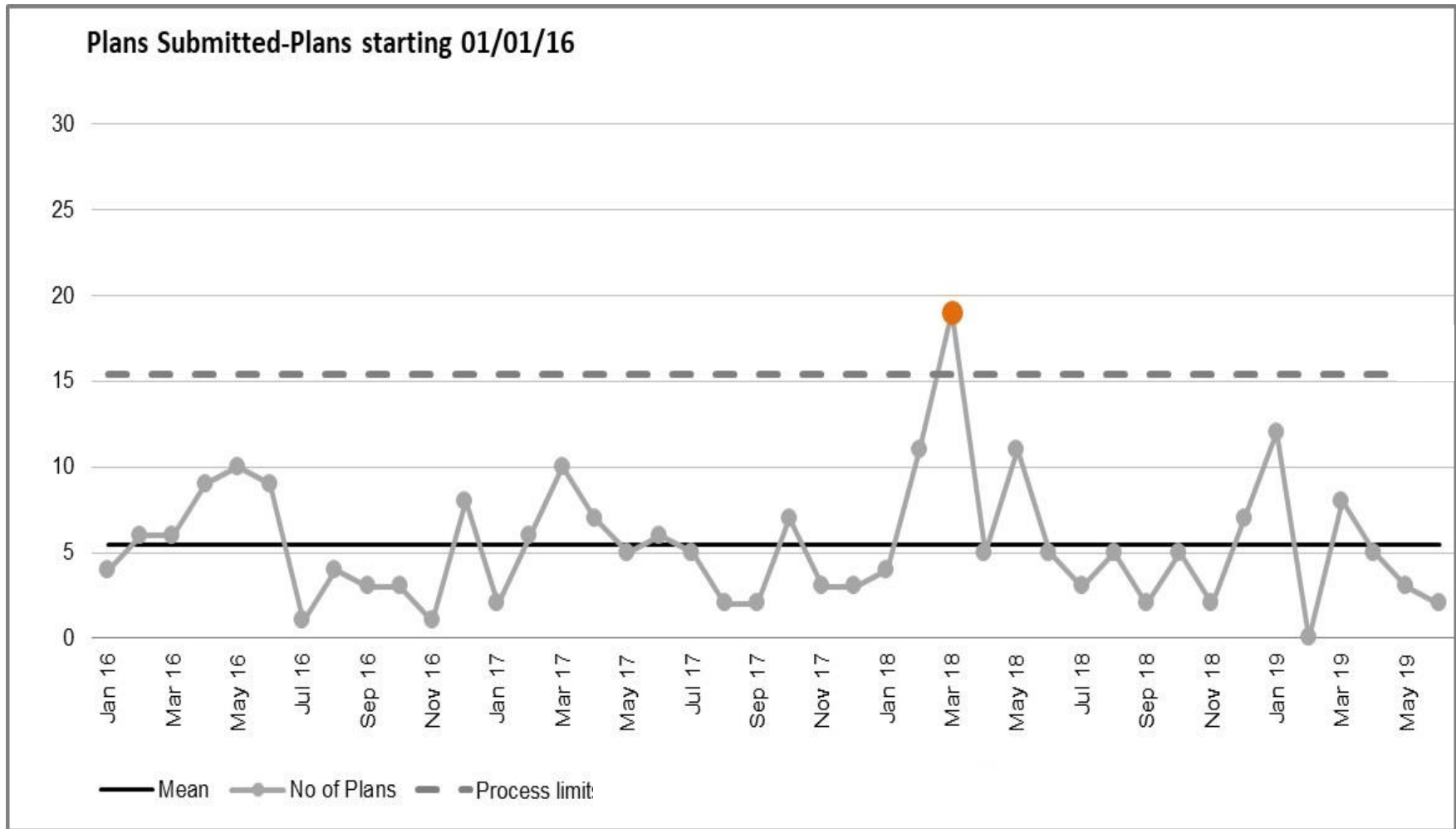
**6** Withdrawn by LPA



**88** Currently in examination (58 Inspectors)

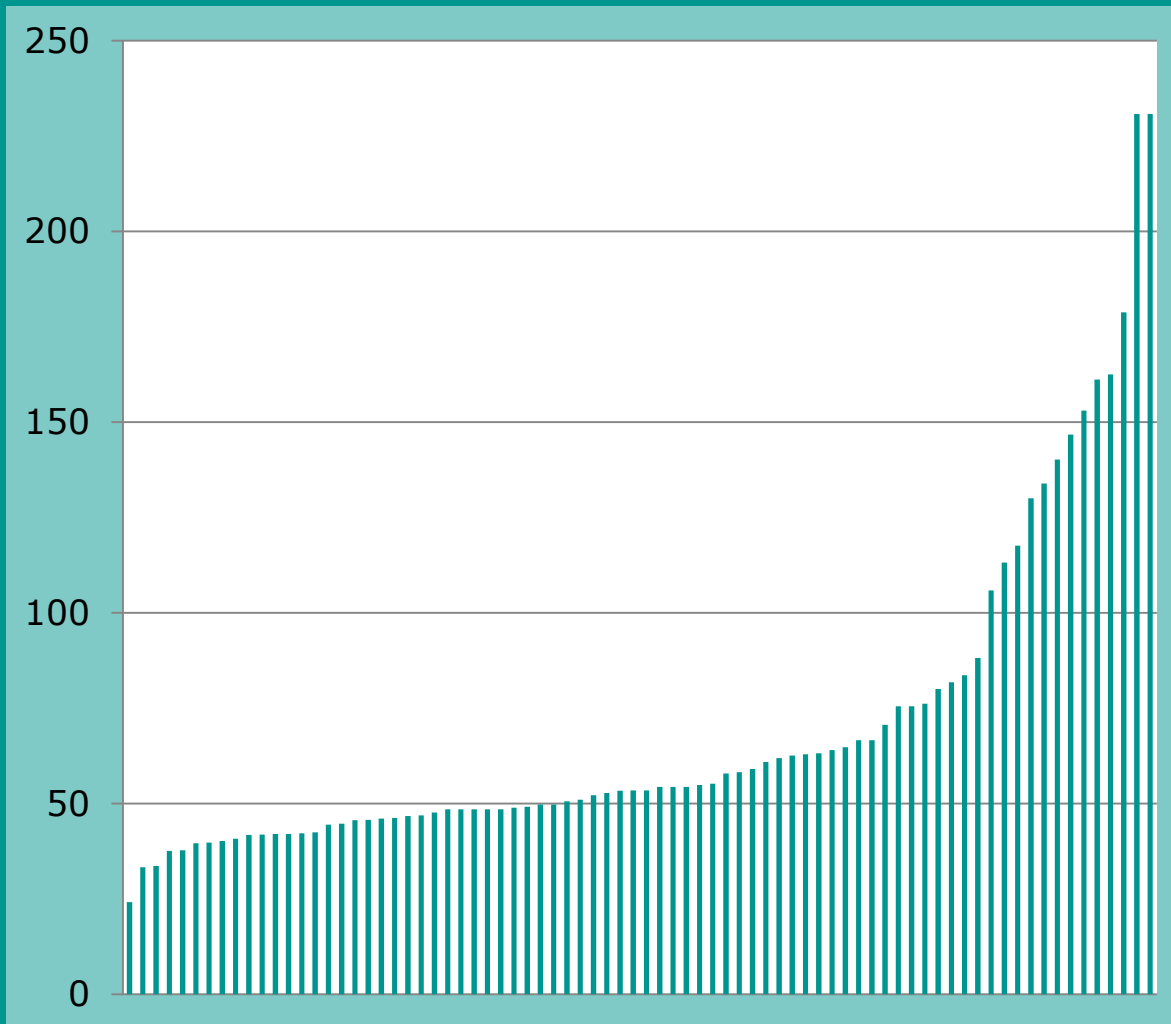


# Plans submitted



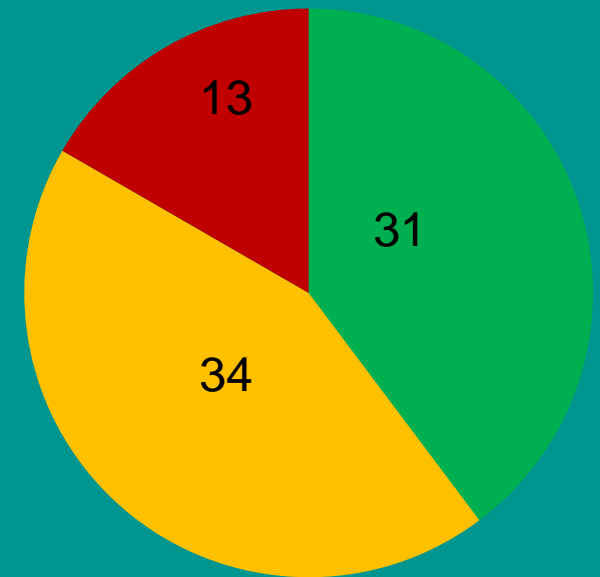


# Time in examination



Over 100 weeks

Under 50 weeks

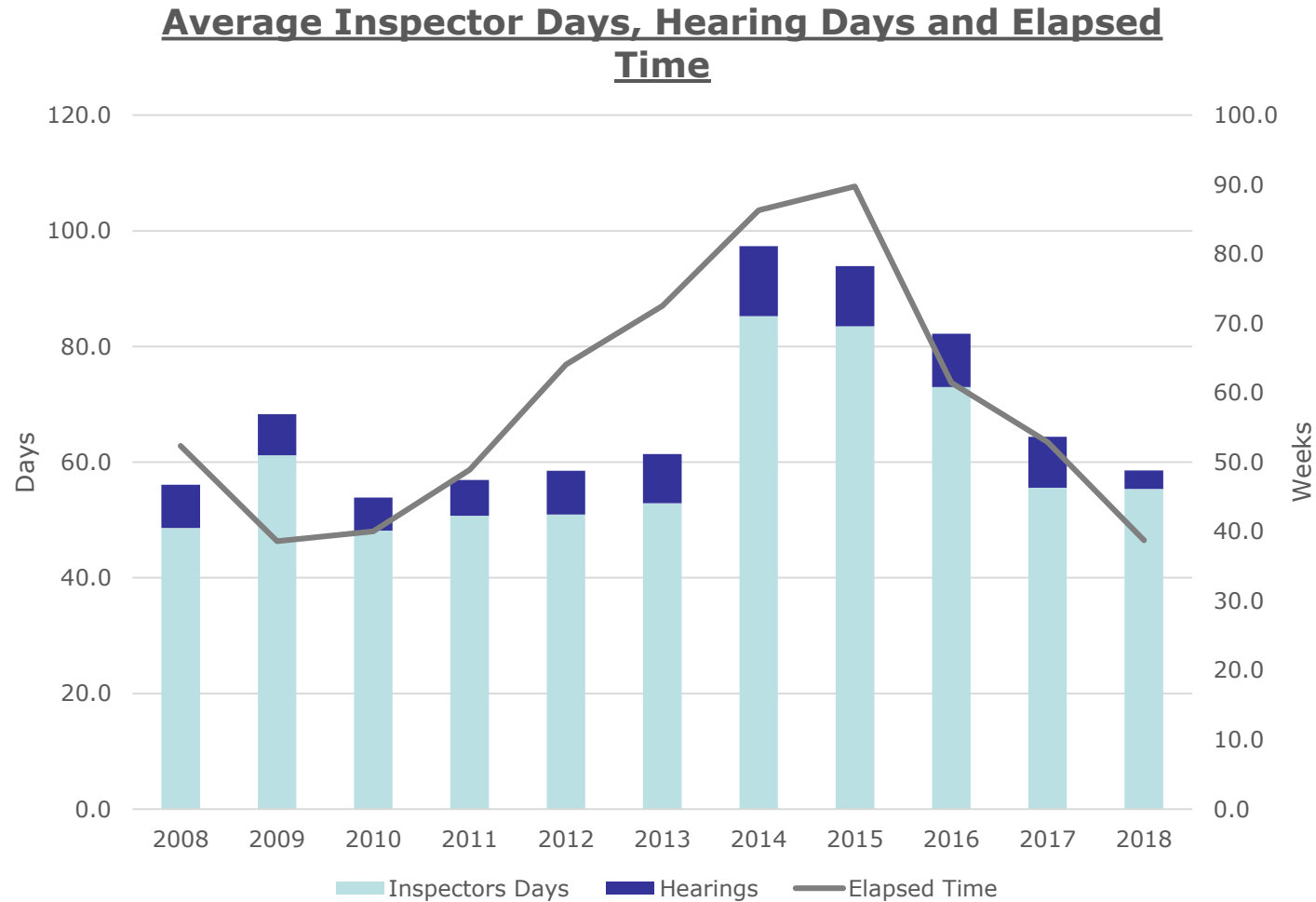


50 to 100 weeks

Average = 70 weeks



## Are strategic/full plan examinations getting more difficult?





## 88 examinations – how does it feel?





## Performance improvement?

- Training more of our Inspectors in local plans
- Recruiting more Inspectors – some direct into local plans
- Revised gov.uk local plans site (July 2019)
  - Updated Procedural Practice in the Examination of Local Plans (reflecting best practice)
  - Updated training materials for Programme Officers
  - List of plans to be submitted in the next 6 months
  - Secretary of State's letter of 18 June 2019
- Workshop with LPAs



# The role of the examining Inspector?

- S20(7C)- 2004 Act
  - the person appointed must recommend modifications that would make the plan sound – *if asked to do so by the LPA*
- Procedural Practice (2019)
  - The Planning Inspectorate will seek to ensure that plans are taken through the examination as quickly and efficiently as possible.
  - The Inspector will be conscious of the benefits of having a robust and up-to-date plan adopted as quickly as possible.
  - The Inspector will raise any potential problems with the LPA as soon as they become apparent, and will give the LPA the opportunity to overcome them wherever this is possible.
  - The Inspector will always bear in mind that the plan belongs to the LPA, and subject to the duty to ensure the plan's soundness, will not seek to impose his or her own views on its vision or its content.
  - The Inspector will aim to ensure that the LPA has a reasonable understanding of why all the potential main modifications are likely to be needed.



## Secretary of State's letter of 18 June 2019

- Published here: <https://www.gov.uk/guidance/local-plans>
- 'I wanted to stress to Inspectors – who are doing a challenging job – the importance of being pragmatic in getting plans in place ... We support and expect Inspectors to work with LPAs to achieve a sound plan, including by recommending constructive main modifications in line with national policy.'
- 'The Planning Inspectorate will share all post-hearing advice letters, letters containing interim findings, and any other letters which raise soundness or significant legal compliance issues, as well as fact check reports, with my department on a for information basis, at least 48 hours in advance of them being sent to the LPA'



## Getting through the examination?

- Is the plan consistent with national policy?
- Are the policies well written and clear?
- Is all the evidence base and SA work complete? Adequate and proportionate? Understandable? Does it justify the plan? Reasonable alternatives assessed? Overall strategy justified? Housing needs met? Duty to cooperate met?
- 'The authority must not submit unless they think the document is ready for independent examination' - S20(2)



## 2019 NPPF – applies to plans submitted after 24 Jan

- Interesting areas?
  - Local housing need assessment (para 60) and PPG Housing and economic needs assessment - para 010 (20 February 2019)
  - Requests to confirm ('fix') 5 year HLS (para 74) – through the plan and subsequent annual position statements
  - Assessing 5 year HLS - the revised definition of deliverable
  - 'Planning policies for housing should make use of the optional technical standards for accessible and adaptable housing where this would address an identified need ...' (footnote 46)
  - 10% of housing requirement on sites no larger than one hectare
  - Removing land from the Green Belt – offset by compensatory improvements to environmental quality and accessibility of remaining Green Belt land
  - Strategic and non-strategic policies
  - Redaction of representations (data protection – not NPPF)



## How does it feel?



# Lunch and a challenge

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# Exercise 2: Articulating your spatial strategy

Ahead of Session 5 when we will return to soundness/ exam issues

1. Please find a few moments to write your answer to the first question included within Part 4 of the Toolkit relating to your spatial strategy as far as it relates to your plan (adopted or emerging).
  2. This should take no longer than 1 minute to read out.
-

# **Session 4: Proportionate Evidence**

**IPE – Andrew Seaman**

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# A Proportionate Evidence Base

*“The most savage controversies are about matters as to which there is no good evidence either way”*

Andrew Seaman

Lead Advisor – Intelligent Plans and Examinations

# What is proportion?





Evidence for Plan Making  
A focus upon proportionality

Rectangular Snip

## Content of the Advice Guide

1) Overview and Background

2) The Evidence

3) Stages for Evidence Consideration

4) Conclusion/Appendices



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# 1. Overview and Background

## National Planning Policy:

- *The planning system should be genuinely plan-led.*
- *The preparation and review of all policies should be underpinned by **relevant** and **up-to-date** evidence. This should be **adequate** and **proportionate, focused tightly** on supporting and justifying the policies concerned, and take into account **relevant market signals**.*
- *Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound...ie positively prepared, justified, effective, consistent with national policy*

# 1. Overview and Background

## Planning Inspectorate

- *only evidence that informs the content of the plan is needed.*
- *The evidence base will be subject to scrutiny only to the extent of how adequate it is to justify what is in the plan. It should answer the 'what, where, when and how' effectiveness questions about delivery of development.*
- *Local circumstances will be directly relevant.*
- *Evidence base documents that date from 2 or more years before the submission date are at risk of having been overtaken by events.*
- *Has the Duty to Cooperate been met?*

## 2. The Evidence

# The Plan Making Process

There can be 5 stages in the preparation of a plan:

1. Early stages – planning the production of the plan
  2. Preparation – frontloading phase
  3. Preparation – formulation phase
  4. Publication – to enable representations to be made
  5. Submission – to the SoS/examining body
- Evidence is required for all but will evolve over the course of the plan preparation process

## 2. The Evidence

# Good evidence

Good evidence will contain a well-defined focus, reliable, objectively collected recent data and cogent analysis. It will be clearly presented, contain a summary and use plain English as far as possible.

- Baseline data – what is the situation in the plan area at a given point in time
- Trend data – what have been the trends within the plan area over a preceding time period (eg rates of migration)
- Assumptions – logical and transparent assumptions should be clearly identified within any evidence analysis (eg economic forecasting)
- Predictive data – what are the anticipated outcomes of change over time (eg infrastructure requirements)
- Descriptive data – often narrative in style with professional assessments of the subject matter (eg characterisation studies).
- Recommendations – good evidence will often incorporate recommendations and/or options for setting strategy or policy making.

## 2. The Evidence

# The purpose and content of evidence.

Key questions for plan making authorities to consider:

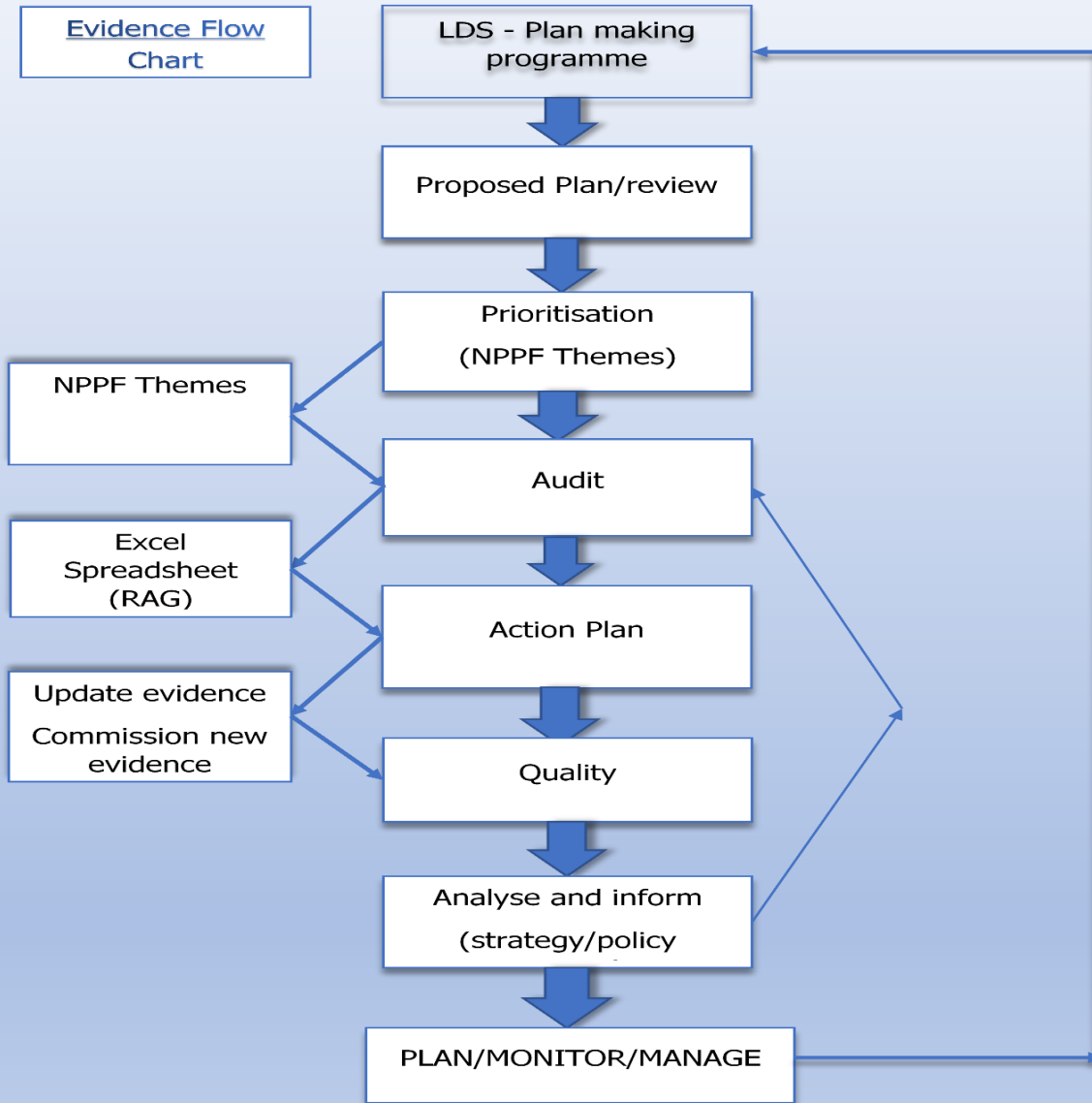
- 1) Why is evidence required on a particular matter?
- 2) What evidence is consequently necessary?
- 3) Does it fulfil NPPF requirements (para 31)?
  - relevant?
  - up to date?
  - adequate?
  - proportionate?
  - an appropriate focus?
  - market signals?
- 4) Is there a project plan with appropriate risk management?

## 2. The Evidence

# Project planning and risk management

- How is the LDS to be developed into a project plan?
- What are the authority objectives and timescale for the Plan and its overall risk appetite?
- How does the authority manage risk - risk register and methodology?
- How is the quantifiable level of risk for the Plan production to be gauged and managed?
- What reasonable mitigation/contingency is available?
- Is there a need for a Risk Management Plan?
- How is risk to be reviewed and reported?

# Evidence Flow



### 3. Stages for Evidence Consideration



### 3. Stages for Evidence Consideration

- 1. Prioritise topics for evidence gathering relevant to the plan under production**
2. Evidence audit
3. Develop action plan for evidence gathering
4. Seek to quality control evidence sources
5. Analyse evidence to inform plan options/content

## 3. Stages for Evidence Consideration

### Stages for Evidence Consideration

1. Prioritise topics for evidence gathering relevant to the plan under production
2. **Evidence audit – necessary, desirable, unnecessary**
3. Develop action plan for evidence gathering
4. Seek to quality control evidence sources
5. Analyse evidence to inform plan options/content

NPPF Topic and key issues for the Plan area	Evidence Source	Date	Necessary	Desirable	Unnecessary	Purpose of the Evidence	Notes	Action required including gap analysis
Vision and Objectives	Corporate Plan and Manifesto	2019	Y			Identifies the strategic priorities for the authority.	Corporate Plan is current and sets the objectives for the Council.	None
Housing	Wattage Local Plan	2013		Y		Illustrates extant policy suite.	Out of date and based on draft RSS. Contains some site allocations reflected in the SHLAA.	None
	SHLAA	2012	Y			To identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. For housing set out the supply of sites within the next 5 years, and beyond.	Current SHLAA is 7 years old and not based on permissions granted or known site availability.	Update/complete a new SH&ELAA within 8 mths
	AMR	2014/15	Y			Indicates the progress of housing delivery against targets including completion rates, permissions granted, and the efficacy of extant policy.	AMR data not fully analysed for 2015/16 onwards.	Need to update AMR.
	SHMA	2013	Y			Identifies the need for different types of housing (related to the use of the standard method) from which policy options can be developed	New housing type assessment commissioned, taking into account the standard method.	Due to report within 6 mths; need to expedite.
	Housing Viability Study [absence of Whole Plan Viability Assessment]	2016	Y			Provides data, analysis and validation that strategic sites are viable and that the cumulative effect of proposed policy upon development viability will not impact on delivery rates.	Published Nov 2016; considered robust. Need to ensure all new policy requirements are considered for their effect upon development viability.	Need to update to reflect current market signals and emerging local policy.

### 3. Stages for Evidence Consideration

## Emerging Advice (IPE)

#### Stages for Evidence Consideration

1. Prioritise topics for evidence gathering relevant to the plan under production
2. Evidence audit
- 3. Develop action plan for evidence gathering**
4. Seek to quality control evidence sources
5. Analyse evidence to inform plan options/content

## Action Plan Template

Framework Theme	Evidence	Owner	Note	Action	Timescale	Funding	Status
<b>Housing</b>	SHLAA (now SHELAA)	Head of Planning Policy (to update the Template quarterly).	Call for sites undertaken in 2015 but data not analysed.  AMR data two years old.	Policy Team to create new SHELAA: produce brief, undertake data collection and analysis, feed in updated planning permissions/ commencements/ completion from AMR update.	May to Nov - call for sites Draft report by Dec Final report by Jan.	Secured	On schedule.
<b>Housing and Implementation</b>	District Whole Plan viability study	Head of Finance	External tender process underway; Tender process slipped due to consultation error.	Shortlist tenders. Let contract.	Tender deadline now March 1 <sup>st</sup> Contract to be let March 14 <sup>th</sup> Contract complete Oct 21 <sup>st</sup> .	Secured	Revised targets set.  Review quarterly.
<b>All</b>	AMR	Head of Planning Policy	Data for the last two financial years to be reviewed and analysed. Check efficacy of monitoring indicators.	Monitoring Officer to update with seconded development management colleague.	To produce first draft by August 31 <sup>st</sup> .	Secured	Work underway and on schedule.
continue...							

### 3. Stages for Evidence Consideration

## Emerging Advice (IPE)

#### Stages for Evidence Consideration

1. Prioritise topics for evidence gathering relevant to the plan under production
2. Evidence audit
3. Develop action plan for evidence gathering
4. **Seek to quality control evidence sources**
5. Analyse evidence to inform plan options/content

## 3. Stages for Evidence Consideration

### Stages for Evidence Consideration

1. Prioritise topics for evidence gathering relevant to the plan under production
2. Evidence audit
3. Develop action plan for evidence gathering
4. Seek to quality control evidence sources
5. **Analyse evidence to inform plan options/content**

Note: Collate the evidence in a transparent and accessible manner.

**Conclusion – understand the Framework, the needs of your plan area and the plan’s purpose in order to prioritise a proportionate evidence base.**

**The Advice Guide will be available on the PAS website shortly.**

**Thank you for listening**

# Session 5: Soundness and Quality Assessment



## Exercise 2: Spatial Strategy Summary

Share your spatial strategy  
summary with your neighbour

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## Exercise 2: Spatial Strategy Summary

Share your spatial strategy summary with the whole group – any volunteers?

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# Toolkit Part 4 – Format

		<b>Assessment</b>				
<b>KEY QUESTIONS</b>		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
<b>1.</b>	Overall does the local plan update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is 'an appropriate strategy' within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
Reviewer Comments:						
<b>2.</b>	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
Reviewer Comments:						
<b>3.</b>	Is it clear that the local plan update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?  If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?  Does the level of housing provide for an appropriate and justified buffer?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
Reviewer Comments:						

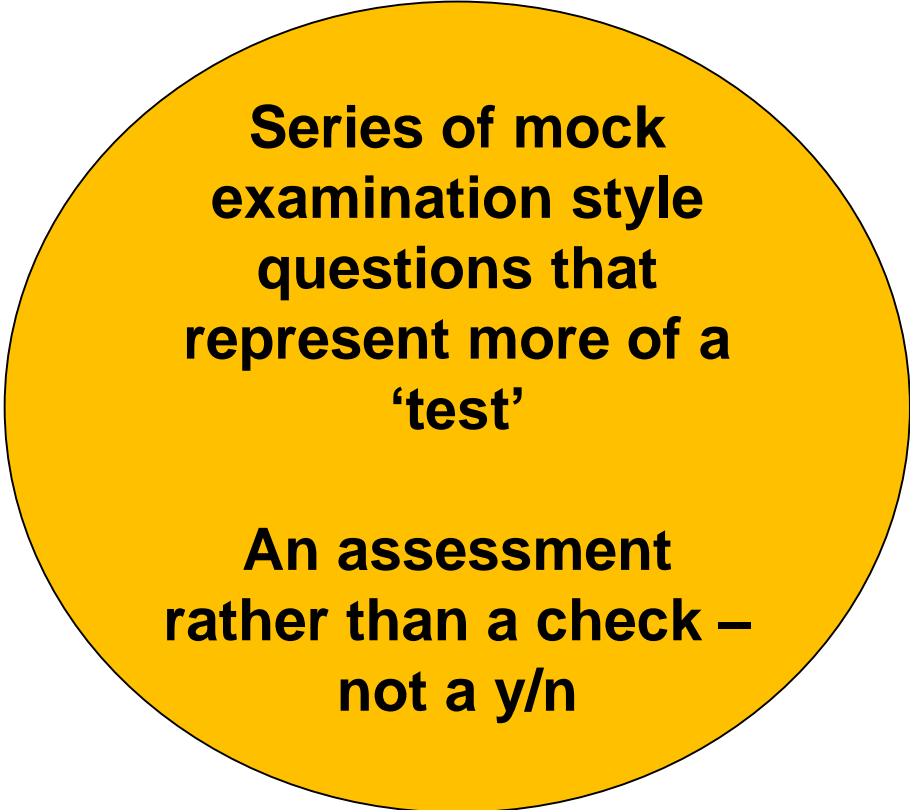
# Toolkit Part 4 - Structure

Questions linked to plan requirements

By category

- Growth Strategy, Process and Outcomes , Housing Strategy, Justified approaches to plan policy and content, Deliverability, Policy effectiveness and clarity

Capture degree to which you meet the requirements – and risks/ actions



**Series of mock examination style questions that represent more of a 'test'**

**An assessment rather than a check – not a y/n**

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# Toolkit Part 4 - Approach

- Focus on exam style questions rather than the high-level criteria for assessment
  - Informed by actual examination questions
  - More direct / challenging style of question
-

## Exercise 3: Sound and Sounder

### Using toolkit Part 4 efficiently and creatively

*Individually:*

Have a scan of Part 4 of the Toolkit and identify some questions which are particularly pertinent to your plan-making context

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# Exercise 3: Sound and Sounder

## Using toolkit Part 4 efficiently and creatively

*In groups:*

1. Reviewing the toolkit part 4, how will you help your team to use the toolkit in an effective and proportionate way?
  2. When and why (and potentially on what questions/ sections) should an LPA have a light touch approach and when and why should they be more thorough/ detailed?
  3. Which questions / sections will be most helpful for you in working to achieve soundness and quality?
-

# Feedback



# **Session 6: Plan Making Roundup and Reflections**

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# Key issues raised today

- Does the Route Mapper and Toolkit apply to minerals and waste plans?
  - Terminology around the review of Local Plans – what is a review and what is an update?
  - Sequence and timing of the review and update? What needs to be completed within five years?
  - What warrants an update to the plan? For instance, defining strategic / non-strategic policies.
  - Approach to Reg 18 engagement and consultation – how do you present the updated plan?
  - How long does it take to complete the Toolkit?
-

# Key issues raised today

- Does the Route Mapper advocate scrapping issues and options / preferred options consultations?
  - How to identify exactly which policies need to be updated? What happens as part of a local plan review and what happens as part of scoping an update?
  - How can the local plan review be challenged?
  - Internal governance arrangements for signing off local plan review – and role of elected members
-

# Key issues raised today

- Need to ensure sufficient headroom in plan over LHN – key message for members
  - Challenging when in constrained context, but ultimately need to ensure flexibility exists to deliver
  - The issue of unmet needs must not be left to later review & update process
  - PINS advisory visits may be helpful early in the process (or speak with PAS)
  - Build constructive relationship with Inspector
  - Inspector can only recommend adoption of main modifications that specifically address soundness
-

# Key issues raised today

- In incorporating NP allocations, may need to consider potential under-delivery
  - Role of ongoing monitoring crucial to inform Local Plan Review
  - Requirement for Local Plan Review is every 5 years – however need to keep plan under review is ongoing and linked to effective monitoring
  - 15 year plan period needs to be factored in – pragmatic approach
-

**And the prize goes to....**



# Session 7: Next Steps and PAS Support



# Session 7: Next steps and support

- KHub - [Route Mapper & Toolkit Users' Forum](#)
  - Route Mapper Support: Peer Critical Friend & Consultancy support
  - Evidence Advice and Tool: with support – out this month!
  - Reg 22 statement advice and template: available shortly
    - Looking for potential pilot LPAs
  - Be a peer – local plans peers!!
  - Feedback forms - please remember to note your target submission date
-



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