



Department for Levelling Up,
Housing & Communities



Levelling-up and Regeneration Bill: Consultation on implementation of plan-making reforms

September 2023 Event Series

September 2023

www.pas.gov.uk



Department for Levelling Up,
Housing & Communities

Plan-making Reforms

Consultation on Implementation

September 2023
Planning Advisory Service Roadshows



- Development plans provide the foundations for delivering sustainable development.
- Local Plans provide the policy environment needed to make balanced decisions on planning applications.
- Without up-to-date plans, communities at risk of exposure to speculative applications for development. Currently, only **35% of local planning authorities adopted a plan in the last five years**, and they take too long to prepare - **7 years on average** (but often much longer). This creates uncertainty.

The vision for local plans:

- *Simpler to understand and use*
- *Positively shaped by the views of communities*
- *Communities and other users can engage with them more easily, especially while they are being drawn up.*
- *Prepared more quickly and updated more frequently*
- *Make the best use of new digital technology*



What are we consulting on?

16 thematic chapters with between 1 & 5 questions per chapter:

- Local Plan Content
- The new 30 month local plan timeframe
- Digital plans
- The local plan timetable
- Evidence and the tests of soundness
- Gateway assessments during plan-making
- Local Plan Examination
- Community engagement and consultation
- Requirement to assist with certain plan-making
- Monitoring of local plans
- Supplementary Plans
- Minerals and Waste Plans
- Community Land Auctions
- Approach to roll out and transition
- Saving existing plans and planning documents
- Equalities Impact



What are we NOT consulting on?

Provisions in the Levelling Up and Regeneration Bill

NPPF changes (for either the current system or future system)

Key plan-making implementation dates, set out below, and SPD transitional arrangements (all contingent upon Royal Assent of the Levelling Up and Regeneration Bill, and Parliamentary approval of the relevant regulations)

Local Plan Commissioners or the new Alignment Policy

Current system

Submission deadline:
30 June 2025

Adoption deadline: **31 December
2026**

Future system

Regs, policy & guidance in place so
plan-making can start: **Autumn 2024**

Open consultation Plan-making reforms: consultation on implementation

From: Department for Levelling Up, Housing and Communities
Published 25 July 2023

Get emails about this page

Applies to England

Summary

A consultation on our proposals to make local plans (and minerals and waste plans) simpler, faster to prepare, and more accessible.

This consultation closes at 11:59pm on 18 October 2023

The journey so far...



8 September
PAS FAQs published



12 September
Community Land Auction Webinar

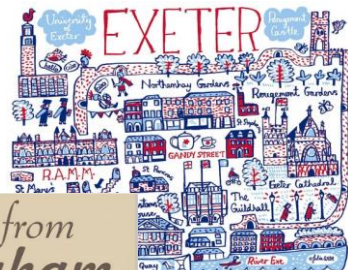
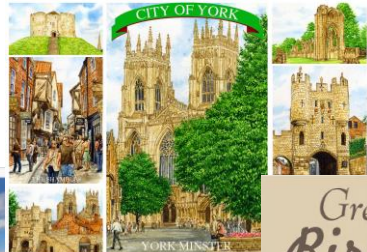


18 October
Consultation closes

25 July Consultation launched

3 August PAS webinar

September
Roadshow Events





Key themes:

- **30 month plan-making process:**
 - Evidence - assembly and proportionality
 - Getting timely input from others
 - Governance - including political cycles and sign off
- **Capacity and capability**
- **Gateways**
- **Rollout and transitional arrangements**
- **Detail of other reforms including:**
 - NDMPs
 - Supplementary Plans
 - Alignment policy



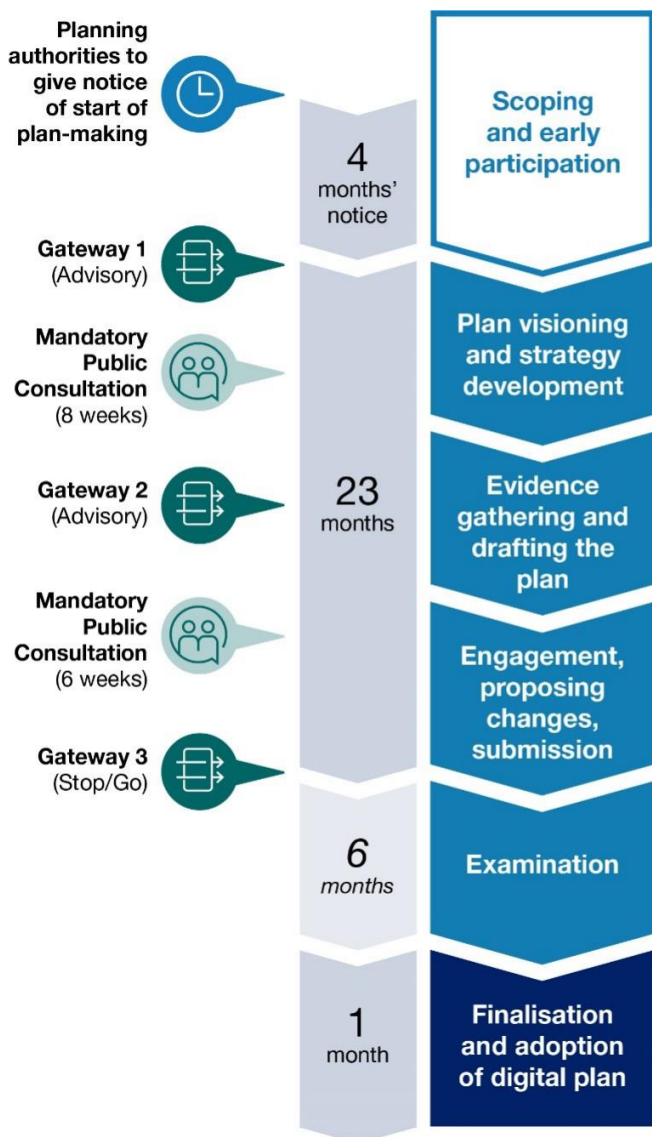
- Based on feedback from the webinar, you **overwhelmingly** told us that delivering plans in 30 months is your biggest area of interest and concern
- **We will use the 30 month process as an anchor for today's discussions**
- We have designed today's workshop to delve into this in greater detail, including:
 - Exploring how the overall reform package can enable and support 30 months
 - Identifying barriers to delivering plans in 30 months
 - Testing how barriers could be overcome, and what DLUHC can do to support
 - Noting where wider changes may cut across the 30 month goal; and what support is needed
 - Putting this in context – what does this mean for authorities now, and over the next 12 months as we approach commencement of the new system?



- Today's session should:
 - Help DLUHC understand the views of LPAs about our proposals
 - Support LPAs to develop and refine forthcoming responses to the consultation
 - Open up a positive conversation about what practically LPAs can do next in their plan-making activities
 - Leave attendees inspired about the future of local plans!
- DLUHC will use the feedback to:
 - Understand how the sector feels about our proposals
 - Identify focus for next phases of policy development
 - Understand where support would add the most value, so we can prioritise
- **BUT, you should still respond formally to the consultation** by the deadline of October 18



Department for Levelling Up, Housing & Communities



Please see consultation for the full diagram

Recap: The 30 month plan-making timeframe

We believe that a 30-month timeframe strikes the appropriate balance between needing plans to be made more quickly and kept up to date more effectively, with a realistic view on what is achievable.

We do not intend to set required timings for all stages in regulations.

However, we propose to set out in policy that authorities should adopt their plan (at the latest) 30 months after the plan preparation process begins (i.e. after Gateway 1).

We are seeking views on:

- how best to set the 30 month time limit
- a 'Project Initiation Document' to help define the scope of the plan and be a useful tool throughout the plan making process



Delivering plans in 30 months

- It's the outcome of a joined up approach
 - Each part of the reform package can **speed up plan** making but also manage **scope** for the planning authority
 1. Faster preparation and processing:
 - Digital, scoping, timetables, proportionate evidence, gateways + the wider reforms not consulted on here but part of the joined up approach
 2. Managing scope:





Delivering plans in 30 months

- Project Initiation Documents
 - Set out reasons for a local plan, establish buy-in
 - Issues to address
 - Evidence required
 - Resources and capacity
 - Governance
 - Risks: stakeholders, budget, politics



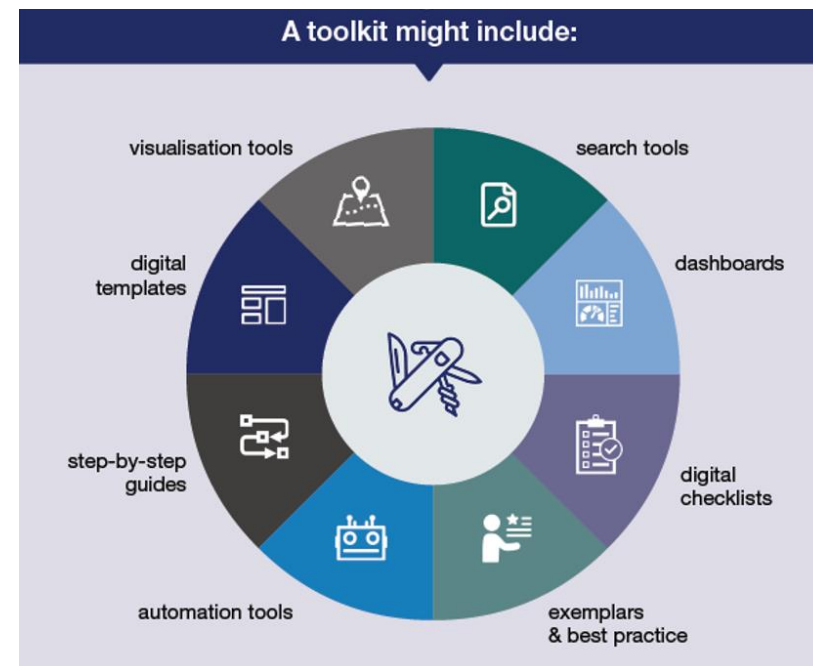
Recap: Digital plans

Our ambition is to bring planning and plan making into the digital age and transform how things are done for the better; to provide faster, simpler, more accessible plans and policies to deliver better outcomes, informed by up-to-date data and shaped more actively by communities and other stakeholders.

The Levelling up and Regeneration Bill will allow us to prescribe a common format for standardised data across plan-making. We think this should be supported and complemented by a toolkit of services and products that will allow planning authorities to prepare plans more quickly and produce simpler, visual and accessible plans.

We are seeking views on:

- the information produced during plan-making that would most benefit from data standardisation and/or open publication
- challenges faced in the current plan-making system where digitalisation could support better outcomes
- opportunities for digital tools and products that should be prioritised to deliver efficiencies in how plans are prepared and used



11 key pain points identified through listening to plan making participants

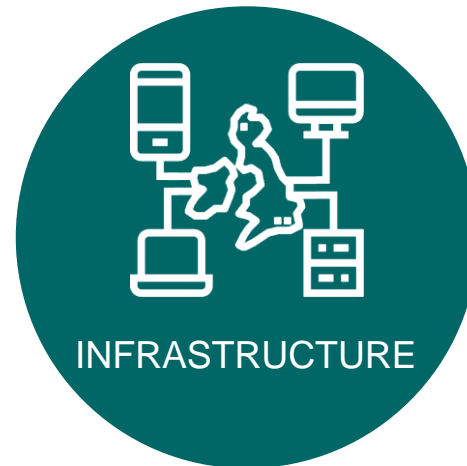
- 1. Lack of guidance on how to make plan** can result in unclear ownership, inconsistencies, and delays.
- 2. Uncertainty about evidence requirements and fear of challenge at examination** can drive overproduction, which leads to delays and puts pressure on time-strapped planning officers.
- 3. Citizens often don't understand Local Plans, and planners don't have capacity/guidance to involve them** resulting in a poor public perception and low engagement.
- 4. Lack of clear communicable timelines and updates** can prevent users from understanding and getting involved.
- 5. Lack of standard formats, terminology, templates** can make Plans inconsistent, time-consuming to develop and hard to use.
- 6. The political nature of the process can be masked** reducing trust as plans are not a true reflection of decisions made.
- 6. Documents are technical, long and contain unnecessary detail** making them hard to use and navigate.
- 7. Plans are usually static and pdf based** meaning they go out of date quickly and are no longer relevant.
- 8. Plans are uncertain and take so long to produce** that they are often out of date, driving development to go a different route.
- 9. Poor monitoring and feedback loops** can mean that plans are not updated and evolve.
- 10. Data is often locked up in pdfs**, making data not accessible or usable.
- 11. Parts of the plan-making process are simply more laborious, repetitive and time consuming than they need to be** (eg reps processing)

Recap: the toolkit approach as outlined in the consultation document



FRONT STAGE

BACK STAGE



How is digital support for new Local Plans being addressed?

4 current areas of exploration:

CONSTRUCTING COMPONENTS OF A LOCAL PLAN

How are digital Local Plans assembled & presented?

SELECTING SITES

How might digital enhance site selection & allocation?

GATEWAYS & EXAMINATIONS

Enabling & supporting the new Gateways & examination process

CONSULTATIONS & REPS

Opportunities for digital efficiencies in consultations & reps processing

Other workstreams as needed

2023

2024

2025 >

Discovery
learning & hypothesis

Alpha
prototype & test

Beta
refine & build

Minimum Valuable Service (MVS)

(minimum set of tools & services to be valuable for the user on 'Day1')

MVS evolves over time, in response to data & learning in the field

In parallel:

Cross-cutting service components:

(eg Local Plans 'home', data standardisation, guidance, monitoring, notifications)

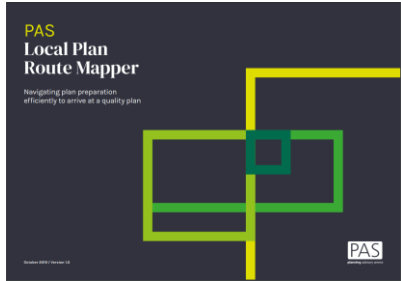
Delivering Local Plans in a Timely Manner

Good Practice Examples



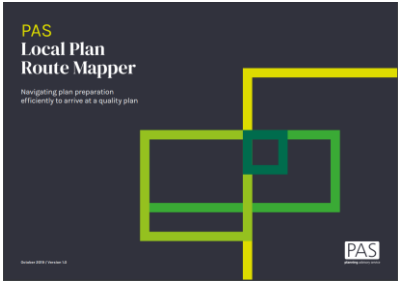
We'll cover...

- Scoping, Project initiation (+PID)
- Project plans
- Creativity with resources
- Proportionate evidence
- Gateway reviews
- Being bold!



- Informs the **Project Initiation Document (PID)** & project plan
- Identifies **key risks** and how to **manage/mitigate** them
- Take a **holistic approach** to project scoping
 - Look beyond evidence base production to procedural issues e.g. strategic matters, Governance arrangements, Community, Member & Stakeholder engagement & Consultation
 - Consider using PAS Local Plan Route Mapper and Toolkit
- Use outputs from scoping to secure corporate buy-in, articulate challenges and manage risks to plan-making

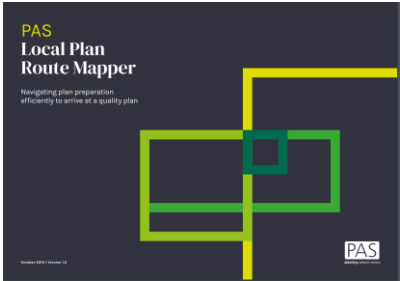
Use a Project Plan



- **Actively manage** Plan production:
 - Identify key milestones and potential risks
 - Assess resources, assess progress
- To be a useful tool, it **needs to be realistic**:
 - Not just the evidence base; (DtC, AMR etc)
 - Estimate time requirements for key tasks and map against team resources/available budget
 - Articulate interdependencies between different elements
 - Build in contingency time and expect the unexpected
 - Include governance and other lead-in times
- Use it to help **manage expectations** and **articulate priorities**

Creativity with Resources

- We recognise the issue!
- Be realistic and creative about approach to resourcing
- Understand resourcing peaks
- Think about what roles really need a policy officer and where you can draw on wider planning or other expertise
- Workstreams in parallel
- Consider options to boost capacity:
 - Prioritisation and management of tasks within policy team
 - Wider resources within the Council and use of digital
 - Secondments
 - Neighbouring authorities and county councils
 - Potential to outsource resource intensive tasks



Evidence for Plan Making: A focus upon proportionality – February 2020

The appropriate focus and detail of evidence required to support a local plan will vary from for different places and will require planners to make professional judgements to assess an area and develop a plan appropriate to its own circumstances. This note sets out advice and information that should be considered when collating evidence to support a local plan. It is designed for LPAs to use themselves but we can work with local authorities to use it as a “critical friend”.

<https://www.local.gov.uk/pas/plan-making/local-plan-review-update/evidence-base/evidence-plan-making-focus-upon>

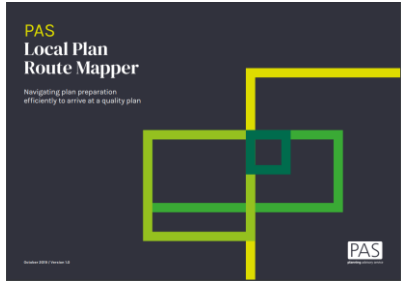
Direction of travel:

- Clearer evidence expectations in NPPF
- Distinction between soundness/legal and informative
- Only argued at examination
- Appropriate strategy
- Guidance: proportionate and good evidence
- Digital

Gateway Reviews

- Not a completely new concept
- They are an enabler, not a barrier
- The first 2 are advisory, the 3rd = stop/go
- Work doesn't stop (nor should the clock)

Be Bold!



- Challenging the norm/consider new ways of doing things
- Key areas to consider:
 - Streamlining governance arrangements/lead-in times
 - Accelerating procurement timetable/required steps
- Manage political pressures and expectations – using the PID/project plan/Route Mapper and Toolkit can help to evidence the value of an alternative approach and secure corporate buy in.
- Having a second opinion from a critical friend can be valuable and support decision making to help keeping things on track. Especially helpful in keeping members on board.

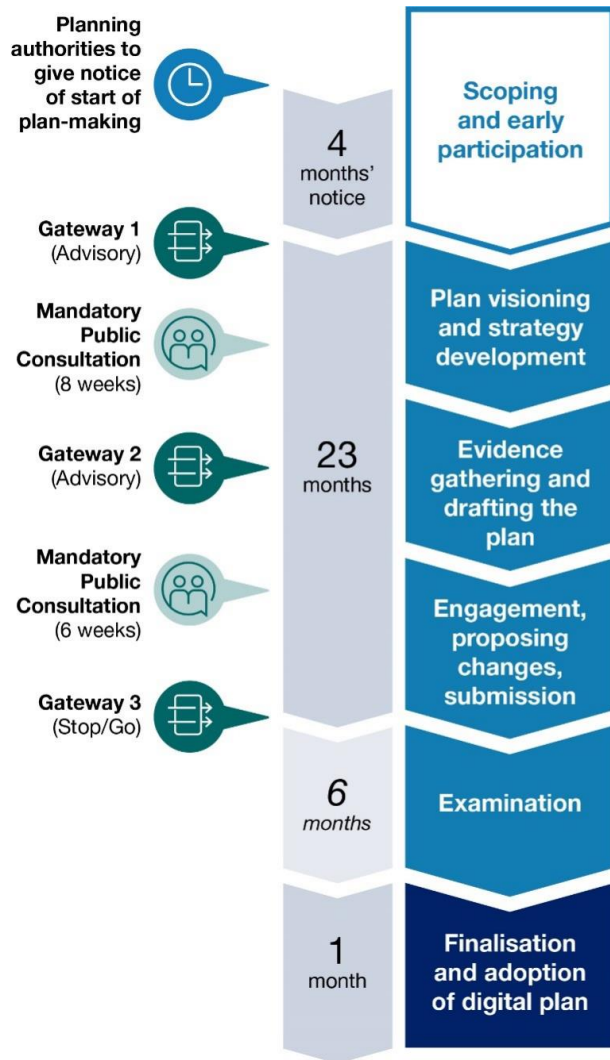
Roundtable discussions – Supporting the delivery of a 30-Month Plan

Before lunch: *Transferrable current practice, new approaches, the key challenges & solutions...*



After Lunch: *feedback / sharing...*

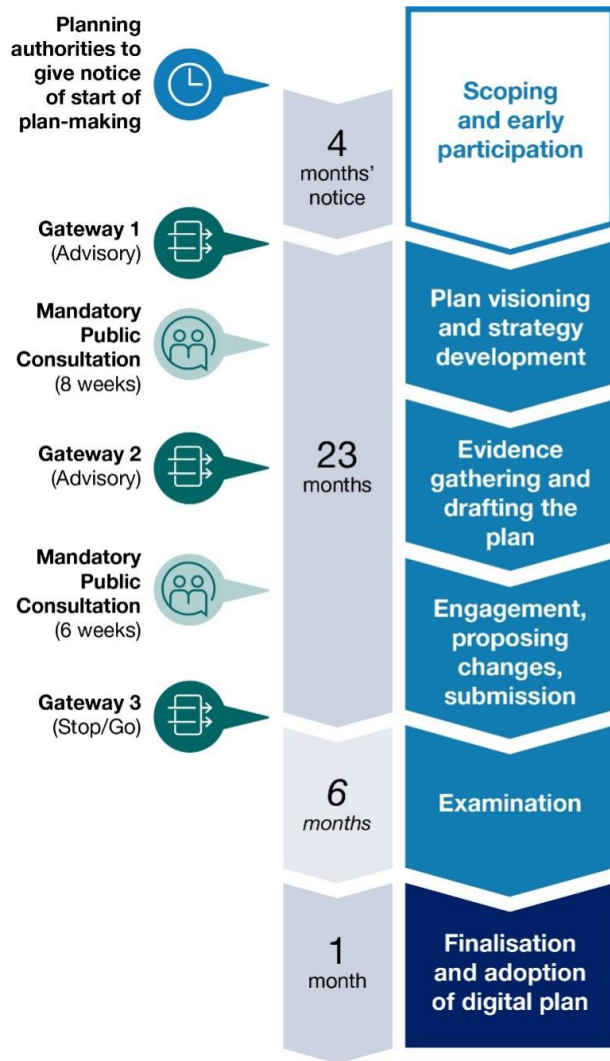
Supporting the delivery of the 30-Month Plan



Roundtable 1 Exercise to consider:

1. Scoping & early participation (ahead of the 30-month timeframe commencing).
2. Plan visioning & strategy development.
3. Evidence gathering and drafting the plan.
4. Engagement, proposing changes, submission.

How?



Key ambitions – How to make Local Plans:

- ✓ Simpler and easier to understand?
- ✓ Prepared more quickly and updated more frequently?
- ✓ Positively shaped through engagement?
- ✓ Make best use of digital technology?

Use a piece of Flipchart paper for each phase to capture:

Now

Now (Yellow notes)

Capture current good practice:

- Existing examples – Reinventing the wheel is OK.
- Practice that is low risk, high acceptability and easy to implement.
- Solutions to fill existing gaps in processes.
- Focus on incremental benefits.

Wow

Wow (Green notes)

Capture innovative practice that can be implemented:

- ‘Wow’ ideas are those with potential for significant change and possible to implement within current reality.
- Innovative breakthrough ideas.
- Practice that has high impact.
- Practice that is relatively easy to implement.

Challenges / Risks / Unknowns” (Pink notes)

Capture what makes delivering the “How” difficult.

- What currently challenges the “How”?
- What risks are there to achieving the ambitions?
- What practice is currently impossible to implement (what are we waiting for and need to know?)

Solutions / mitigations (Orange notes)

For each pink note provide at least one solution or mitigation focussing on:

- What is within the LPAs discretion?
- How can we reduce the risk?
- What could government do to help?
- What can we do better?
- What can we stop doing?
- Remember each solution however big or small adds to the understanding of what is possible

Roundtable 2 – Supporting the delivery of a 30-Month Plan

Feedback...

*Solutions and recommendations for
the key challenges*



Roundtable 3 – Capacity and capability

A discussion and workshop on the skills and resources that will be most useful to deliver the future planning system



Close your eyes, imagine it's the year 2033

- Nationally Local Plan coverage is high, with nearly 100% of councils having an up-to-date plan in place.
- Some elements of plan production have been templated and standardised.
- The focus of plan development for councils is focused on strategy and visioning, translating the corporate ambitions into reality. The scoping of development strategies and directions for growth starts with the environment and is driven by capitalising on environmental improvements.
- Public engagement in plan-making is much higher than in 2023; councils engage with their communities almost solely via electronic means. Consultation features such as virtual exhibits, 3D visualisations, virtual post-it notes, social media, chat bots, AI and other digital means to collect, categorise, group and predict community views is all normal practice.
- There are national datasets and real-time information available making the generation of evidence base and monitoring data live with policy decisions & adaptations being made quickly.
- Affordability of housing is still an issue in many parts of the country; likewise land values in many area make viability of new development a challenge.
- More councils have either merged into new larger authorities or have had the move to having joint local plans or sub regional plans
- The recruitment and resourcing problems of 2023 are but a distant memory.

**What should LPAs do now?
What plan making activity can we be
getting on with over the next 12-
months?**





Recap: Roll out, transition and saving

We want to ensure a smooth transition to the new system for planning authorities.

The latest date for plan-makers to submit local plans for examination under the current system will be 30 June 2025. We also confirm our intention that those plans will, in general, need to be adopted by 31 December 2026. these dates are contingent upon Royal Assent of the Levelling Up and Regeneration Bill.

Small cohort of around ten “front runner” authorities to prepare new-style local plans

The “front runners” could start plan-making from autumn 2024.

Other LPAs would be grouped and allocated a 6 month plan-making commencement window (a “wave”),

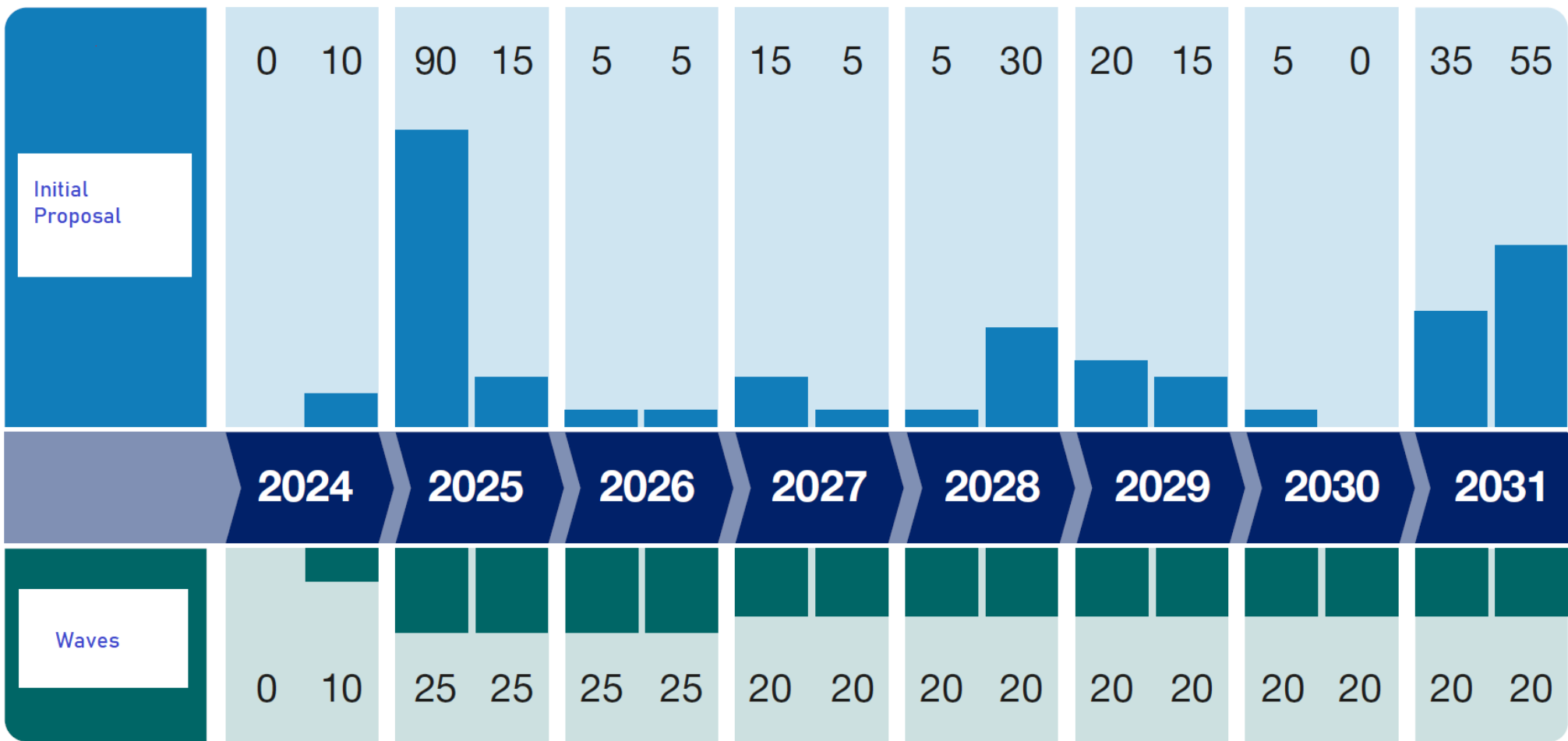
Alternatives are proposed, along with proposals around protections from speculative development

We are seeking views on:

- options for rolling out the new plan-making system (including protections)
- a proposal for existing development plan documents and saved policies to remain in force until the planning authority adopt a new-style local plan



Indicative phasing of start times for new-style plans





- The consultation will be open until **18 October 2023**
- Responses encouraged to use Citizen Space: <https://consult.levellingup.gov.uk/planning/plan-making-reform-consultation/>
- Questions should be directed to: planmakingconsultation@levellingup.gov.uk

What's next?

- **Plan-making reforms events**
 - London, Mon 11th September
 - Manchester 13th September
 - York 14th September
 - Birmingham 19th September
 - Exeter 21st September
- **Plus other topic specific sessions** – keep an eye on our newsletter and also tell us what would help.
- PAS will summarise all of the feedback today to support DLUHC in next stage considerations of reforms – **BUT IT IS IMPORTANT THAT YOU ALSO STILL FEEDBACK AS A COUNCIL**

PAS

The latest from PAS

Local Plan Gateway Review

Local Planning Authorities (LPAs) are required to have an up to date local plan in place by the end of 2023 or face government sanction/intervention. The planning system is in the middle of substantial change and PAS has created a "Gateway Review" - to help LPAs weigh up the best options for getting their local plan 'to the line'.

Infrastructure Funding Statements - A step-by-step guide and sample template

In December 2020 councils have to report for the first time on Section 106 contributions, and for those that charge the Community Infrastructure Levy the reporting requirements have changed slightly too. We have put together a guide and even a video to help you understand what you must report and what you should report.

Upcoming Events

Find out about our new series of events that are focussed on developing the skills you need to be a better planner or councillor involved in planning.

Keep in touch

The Planning Advisory Service bulletin
Sensible people do not volunteer to get more email. But 8,000 people including planners from every planning

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It is where we announce new materials and events.

See also @pas_team