



PAS Plan Making Support

An assessment of the impact of the Planning Advisory Service (PAS) plan making support

February 2014

Contents

Summary	2
1. Introduction.....	4
2. Approach to Assessment	5
Review of PAS Plan Making Advice Reports.....	5
3. Plan Making Recommendations.....	6
Impact on Plan Making	9
Implementation of Recommendations	100
Effect on Plan Outcomes.....	100
4. Conclusions and Recommendations	12

Summary

The Planning Advisory Service (PAS) provides plan making support to individual and groups of planning authorities.

An independent assessment of the impact of this direct support has been undertaken based on:

- **a review and analysis of the recommendations in reports made by PAS to 30 Local Planning Authorities; and**
- **interviews with officers from 20 of these Local Planning Authorities.**

The assessment found that the impact of PAS support was significant and implementation of PAS recommendations was generally high. These recommendations covered a range matters but were most frequently focussed on:

- **the evidence base for the plan primarily in relation to housing**
- **Duty to Cooperate and cross boundary impacts, again often related to housing issues**
- **Spatial strategy/ policy development matters such as developing options and associated sustainability appraisals.**

Local Planning Authorities (LPAs) typically only deviated from PAS recommendations where these were not aligned with local political agenda or where it was intended that the recommended work would be taken forward in another local plan document.

The LPAs interviewed were all extremely positive about PAS irrespective of the plan outcome. The timeliness of the advice at critical plan making stages was valued. LPAs interviewed also felt the support provided them with the confidence either in their existing approaches or in adopting different approaches.

Key recommendations for PAS in developing their programme of plan making support are to:

- 1. Maintain and increase opportunities for on-going support throughout the plan preparation process**
- 2. Consider how PAS plan-making support for individual authorities should include Councillors**
- 3. Focus greater support at options development stage of plan making**
- 4. Consider how frequent changes to national policy may shape future support.**

1. Introduction

- 1.1. PAS provides plan making support to local planning authorities. This work includes training events, dissemination of best practice and formulation of detailed guidance and checklists to support plan making. PAS also works directly with LPAs to provide bespoke plan making support.
- 1.2. This report presents the results of an independent assessment of the impact of PAS direct plan making support to individual and groups of local planning authorities in England.
- 1.3. Section 2 of this report describes the methodology for this assessment in more detail. The assessment comprises:
 - a review and analysis of the recommendations made to 30 LPAs which have received PAS plan making support; and
 - an assessment of the take up of these recommendations by LPAs.
- 1.4. Section 3 presents an analysis of the recommendations in PAS reports to LPAs. Section 4 reports on the degree of impact PAS recommendations have had on LPA's plan making approaches and plan outcomes.

2. Approach to Assessment

Review of PAS plan making advice reports

- 2.1. PAS's support for plan making varies according to the needs of the LPA. It is also shaped by the plan making stage. The support provided can take the form of:
- a critical friend approach, advising and providing support on plan development and the overall plan making approach in process and content terms
 - a review of the scope of the evidence or a specific component of the evidence base
 - technical advice, such as on sustainability appraisals.
- 2.2. For this assessment, PAS pre-selected 30 LPAs that had received recent direct plan making support¹; The LPAs selected represent a wide geographical spread across England and a range of planning contexts (urban, suburban and rural). They also reflect a range of plan status/ outcomes:
- published
 - submitted
 - adopted
 - withdrawn
- 2.3. The report(s) provided by PAS to each of the LPAs have been reviewed and the main recommendations made to each LPA were extracted. These were then summarised and categorised by the type of recommendation.

Telephone interviews with LPAs

- 2.4. A brief telephone interview was then undertaken with 20 (67%) of the LPAs selected during January 2014. Two of the LPAs reported that a number of key staff had left the organisation; it was therefore determined that these were unlikely to provide meaningful feedback to assist in determining the impact of PAS plan making support. One LPA declined to participate due to Examination in Public commitments at the time the interviews were undertaken. The remaining seven LPAs did not respond to the invitation to participate.

¹ Pre-selection by PAS of recent work was necessary to ensure the LPA officer interviewed had a good recollection of the recommendations and to ensure this assessment is relevant PAS's current plan making support activities.

- 2.5. The objective of the telephone interviews was to identify whether the **main** recommendations made by PAS had been implemented and understand the reasons where they had not. In order to provide consistency a structured interview was developed for use in each conversation. This is presented in Appendix 1. The recommendations extracted for each LPA were emailed to the interviewee in advance. None of the LPAs interviewed either corrected or disputed the summary recommendations identified.

3. Plan Making Recommendations

- 3.1. The report(s) to each of the 30 LPAs were summarised and the 107 main recommendations that were made were extracted from the reports. There were typically two to five key recommendations in each report. These 107 main recommendations can be broadly grouped into the following seven categories:

- evidence base
- overall spatial strategy/ policy development
- duty to Cooperate and cross boundary issues
- sustainability appraisals
- plan delivery, for example, viability and infrastructure planning delivery
- project management such as the need for clearer project management structures and/ or more detailed task and resource planning
- consultation.

- 3.2. Figure 1 clearly illustrates that recommendations relating to the evidence base, strategic and policy development matters and duty to cooperate/ cross boundary issues dominate the advice given in PAS plan making support.

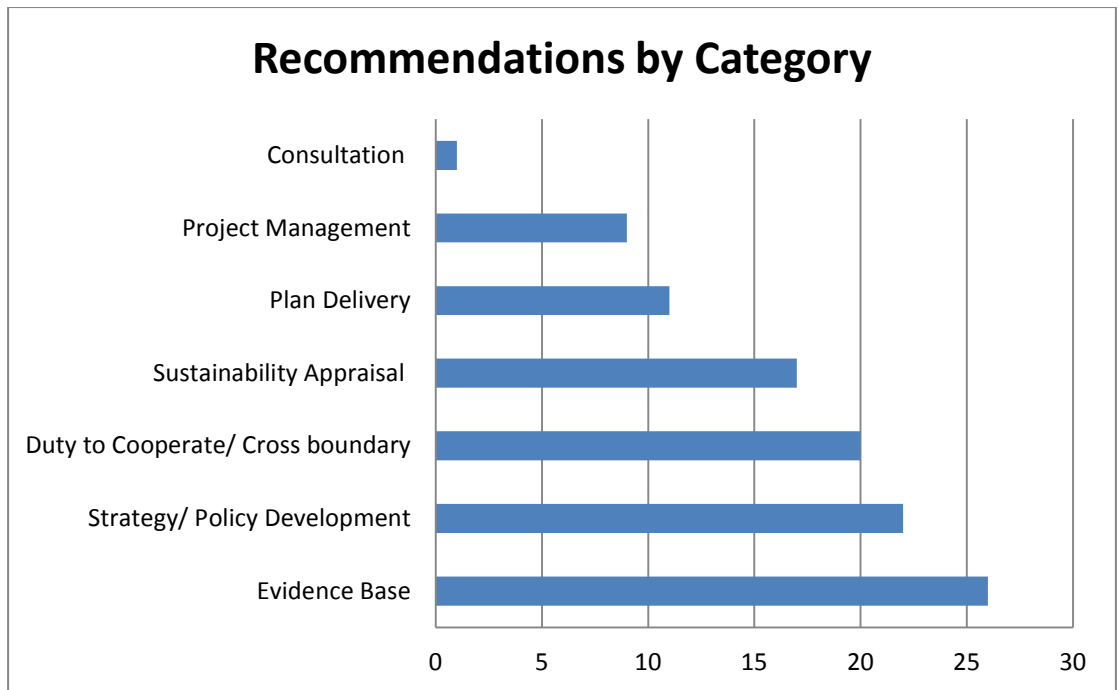


Figure 1: PAS Recommendations by Category

- 3.3. The category with the highest number of recommendations related to the evidence base (26 recommendations). Figure 2 breaks down the recommendations about the evidence base by topic and shows that more than half (58%) of these related to housing evidence. This typically focussed on the need for housing market assessments and housing land supply studies to be undertaken and to inform the plan strategy. Housing targets and delivery was a feature of PAS reports for all of the LPAs identified that had withdrawn plans.
- 3.4. Economic strategy and/ employment land also featured significantly within this category of recommendations about the evidence. In many cases this was also linked to housing matters: the link between economic growth and housing strategy. The general/ other category included recommendations related to the scope of evidence and other topics: such as greenbelt boundaries (again, often linked to housing strategy).

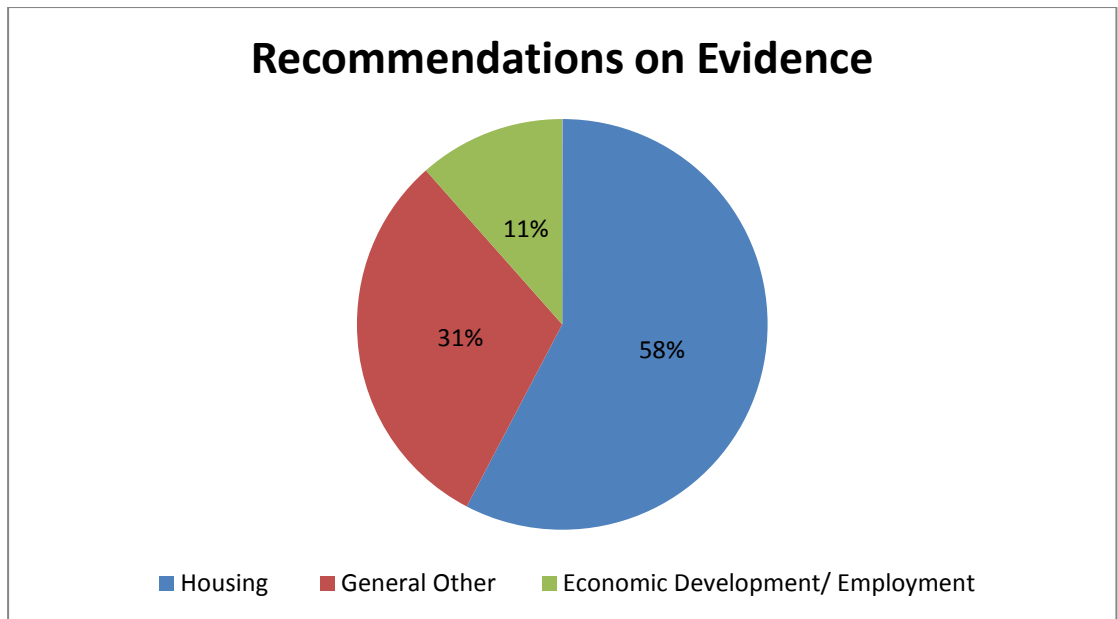


Figure 2: Topic of recommendations related to evidence base

- 3.5. These topics – housing and employment strategy - overlap strongly with the specific recommendations identified in relation to the duty to cooperate/ cross boundary category of advice. The 20 recommendations related to duty to cooperate/ cross boundary are overwhelmingly about targets for housing growth and supporting infrastructure and the coherence of economic strategy with those adjacent authorities.

- 3.6. Advice related to strategy / policy development included a more diverse set of recommendations (see Figure 3). However, they are all linked to the articulation and evolution of the spatial strategy within the broader national policy context. There were 22 recommendations in this category overall.

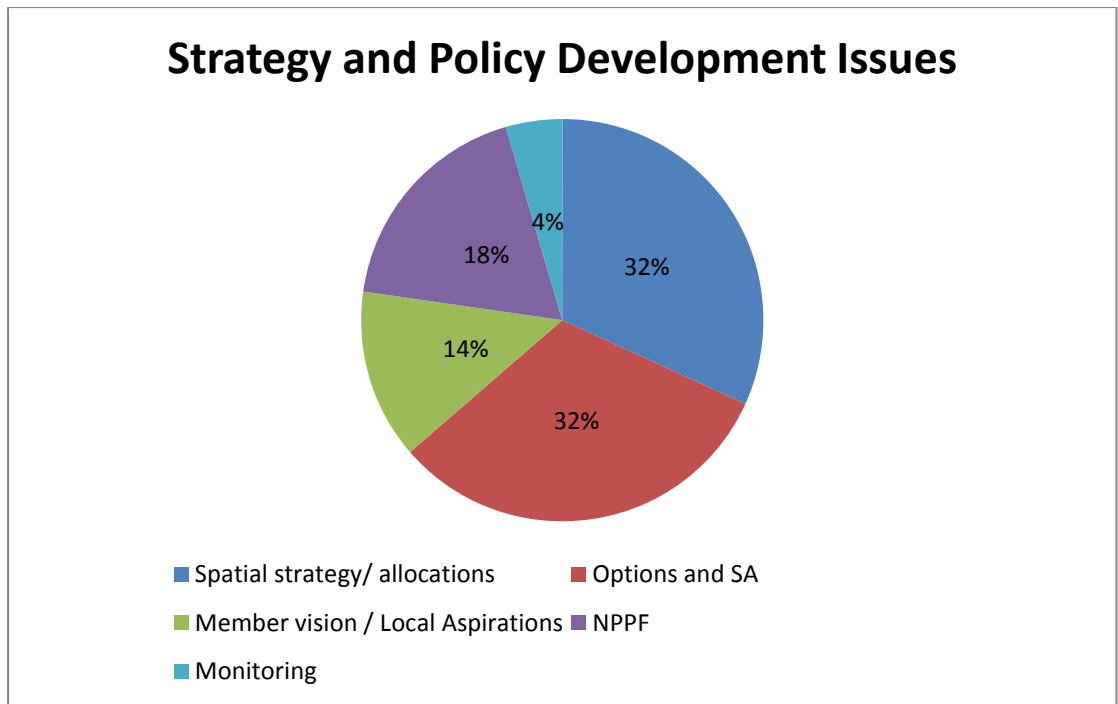


Figure 3: Topic of recommendations related to Strategy and Policy Development Issues

- 3.7. Within the category of advice related to strategy / policy development, the need for development of *evidence led* options and robust associated sustainability appraisals features strongly (32% of recommendations within the category). The need to get the balance right between a strategic approach and provision of sufficient detail was also a recurrent recommendation (32% of recommendations within the category). The latter was frequently made where there was a proposed later preparation of a development plan document intended to contain more site detail e.g. site allocation plan. Notably, these two types of recommendation featured in the PAS reports for all of the LPAs identified that had withdrawn plans.

Impact on Plan Making

- 3.8. Half of the LPAs interviewed (10) rated PAS as having a significant impact on their plan making process. Several reasons for this were provided and these included:
- timeliness of the advice at critical plan making stages
 - helpfulness of confirmation of the approach and direction being taken or having gaps and issues highlighted by an independent external body
 - the follow up support and productive on-going relationships with PAS and in some cases with external technical consultants e.g. on sustainability appraisals.
- 3.9. The remaining 10 authorities rated PAS as having some impact (no authorities rated PAS as having little impact). The reasons given for the impact not being greater included the following:

- although helpful and useful the advice provided confirmed the existing rather than altered the approach (four LPAs)
- the support was rated highly but not enough PAS resource was available to provide the further support required (three LPAs)
- more support was required on the political dimension (one LPA)
- fundamental problems were not identified (one LPA)
- PAS is in an impossible position because of the lack of stability in the national planning system (one LPA).

Implementation of recommendations

- 3.10. There was a very high reported take up of the recommendations made by PAS by the 20 LPAs interviewed as part of the assessment. In many cases the response was that the recommendation was timely, helpful and implemented - this shortened interviews!
- 3.11. Only 15 recommendations made to these authorities were either not or only partially implemented. The reasons given for this were:
- the political direction was already fixed and in opposition to the recommendations by PAS (5 LPAs)
 - it would be dealt with in a site allocation document (3 LPAs)
 - this work had already been undertaken in a different study (2 LPAs)
 - the work was in progress or about to be undertaken (2 LPAs)
 - project timeline did not allow for it (2 LPAs)
 - unclear recollection of recommendation (1 LPAs).

Effect on plan outcomes

- 3.12. Only 5 LPAs with withdrawn plans have been included in this assessment and interviews were undertaken with only three of these LPAs (which we will call 'LPA 1, LPA 2 and LPA 3). In addition, LPA 3 is an unusual case in that advice was sought after submission of the plan and PAS support is generally prior to publication stage.
- 3.13. LPA 3 reported that all PAS recommendations had been implemented. However, PAS involvement in this case was limited to a sustainability appraisal and this had already been identified as an examination issue at the point at which PAS became involved. LPA 1 reported they had not implemented one of their recommendations related to housing site selection and LPA 2 were unclear on the implementation of one recommendation related to statement about NPPF compliance (however, the other recommendations made had been implemented).

- 3.14. The small number of LPAs with withdrawn plans included in this assessment means establishing a definite relationship between implementation of PAS recommendations and plan outcomes is difficult. A more detailed assessment with a larger number of authorities would be required to meaningfully investigate this. However, review comments made by Planning Inspectors (PINs) show that a number of soundness issues highlighted by the Planning Inspectorate were identified by PAS as issues. Table 3 highlights this. (LPA 3 is excluded as the examination issues were known at the point of PAS involvement.)

Table 3 Issues raised by PINs for Withdrawn Plans

Issue	Highlighted in PAS report
LPA1 - Planning Inspector letter July 2013	
Soundness in terms of overall housing provision	YES
Duty to co-operate (linked to housing)	YES
LPA2 – Planning Inspector letter 11 April 2013	
The assessment of housing requirement not NPPF compliant and housing strategy flawed	YES
Timeframe of plan site allocations will not be identified until 2016	YES
Environmental impacts of northern urban extension southern extension more sustainable	NO
Lack of clarity on how SA influences the plan	NO
LPA3 - Inspector’s Briefing Note for Pre-Inquiry Hearing November 2013	
Housing delivery	YES
Employment Land	NO
Infrastructure (outside sustainable urban extensions)	NO
Gypsies and travellers provision missing	NO
Evidence gap on retail, sport and recreation and tourism	NO
Insufficient assessment of viability/ deliverability	NO
Sustainability appraisals and reasons for rejecting/ accepting options	YES
LPA4 - Inspector’s January 2011	
Concerns around housing strategy then lack of certainty over final housing strategy pending further work on the evidence base	YES
Changes to the national policy context in which the plan was being prepared	YES

4. Conclusions and Recommendations

- 4.1. All authorities interviewed rated the impact of PAS plan making support as significant. The level of take up of PAS recommendation was also high with only 15 out of 107 recommendations not implemented or only partially implemented. The small sample size of 20 LPAs interviewed, coupled with only a third of these cases where the plan outcome is known, means it is difficult to correlate the take up of recommendations with plan outcomes. However, comments from the LPA's interviews and a review of Planning Inspectorate views in relation to withdrawn plans suggest a strong alignment between PAS support and the Planning Inspectorate's approach to examinations.

Strengths to preserve

- 4.2. The LPAs interviewed were all extremely positive about PAS, irrespective of the plan outcome. The identified areas of strength which PAS should seek to preserve are summarised below:
- the independent and expert nature of PAS leads to credibility with and trust of LPA planners. Maintaining an independent and neutral role is important.
 - focusing support on early stages of the plan making process and generally prior to publication is most effective – and should continue to be the approach.
 - the strong alignment between PAS advice and examination outcomes and issues are a major strength.
 - on-going relationships and advice from PAS is particularly valued. This was also true for technical consultants on sustainability appraisals where continued working relationships were formed with LPAs.

Areas for further development or reflection

There are four main recommendations, as detailed in this section.

Recommendation 1: Maintain and increase opportunities for on-going support throughout the plan preparation process

- 4.3. Critique or concern about PAS support was wholly absent in interviews with LPAs. However, in some cases it was noted that the requirement for on-going critical friend support *throughout* the plan making process was not met by PAS. Concern was also expressed about funding reductions leading to PAS resources being too stretched or unavailable. No assessment has been made of PAS funding issues

and funding mechanisms are beyond the scope of this report. However, in the context of this recommendation the following points might warrant further consideration:

- LPAs found having an independent review, a broader perspective and a credible external body to help them take a step back useful. There is significant (and repeat) demand for the PAS service, particularly on-going critical friend support and willingness to pay for this type of additional on-going support.
- Technical consultants have established relationships with LPAs and secured on-going work, making work with PAS an avenue to further fee generating work direct with LPAs.

Recommendation 2: Consider how PAS plan-making support for individual authorities should include Councillors

- 4.4. Understanding the political context in which plans are developed is important. One LPA (which rated the impact of PAS support the lowest) commented that the recommendation for a tourism study was made despite the lack of political support and advice that this was the case. The LPA with the lowest implementation of PAS recommendation (only partial implementation of all four) explained this was due to the recommendations diverging with the political agenda. This was despite PAS being robust and critical in their advice and it appeared planning officers supported these recommendations.
- 4.5. Independent recommendations made in reports and workshops should not be swayed by political context but they could acknowledge it. The recommendations might be better received (and possibly even adopted) if the support process included Councillor engagement or at a minimum provided a briefing to relevant elected members on the assessment outcomes. However, this is only encouraged where the key strengths of PAS as a provider of independent and neutral support is not compromised.

Recommendation 3: Focus greater support at options development stage of plan making

- 4.6. The National Planning Policy Framework includes a greater focus on housing supply/ growth, the duty to cooperate and, increasingly, viability issues. As a consequence these are key examinations issues and are quite properly reflected in PAS's wider programme of events and case studies and guidance. The overall review of the PAS recommendations highlighted that determining the balance between strategic policy and site detail and the generation of plan options are also common topics identified as issues by PAS. As local authorities move towards single local plans the risk of soundness issues arising from the balance between site detail and overall spatial strategy will diminish. However, following the removal of an overt requirement for an

'issues and options stage' may alleviate the risk of LPAs encountering difficulties in option development.

- 4.7. This suggestion goes beyond PAS advice being better early in the plan making process. Rather LPAs might benefit from more focussed technical support in and around this stage of plan making to ensure:
- plan options are based on evidence that justifies their 'option' status
 - sustainability appraisal of options and that reasons are given for the choice of option that is taken forward in the plan.
- 4.8. There may be the potential to explore the benefits of this stage of plan making for securing political commitment and stakeholder buy-in. Well developed and justified options supported by a robust options appraisal and clear consultation can, on occasion, provide important fall back options for later stages of the plan. It is possible this could prevent the whole plan being derailed i.e. providing the Examiner with an opportunity to invite an authority to consider an alternative that has been appraised and consulted on.

Recommendation 4: Consider how frequent changes to national policy may shape future support

- 4.9. The pace of changes to the national planning policy was highlighted by two LPAs as creating a challenging context for PAS. National changes to policy that are given immediate effect rather than a future implementation date pose particular difficulties for LPAs within a longer plan development period. LPAs frequently have political decision-making processes / cycles with a three-month lead in time along with statutory consultation periods that extend plan making activity and are forced to 'retrofit' policies to new national approaches. There may be some reluctance to take a step back in the plan making process – which is an area worthy of further investigation.
- 4.10. These changes are outside of the control of PAS and are not always easily predictable. However, a system where it takes less time to amend national guidance than to prepare the Local Plan has profound implications for plan making processes and supporting planners. Based on the review of the reports undertaken as part of this assessment, more explicit guidance on judging when to go back a plan stage or to retrofit approaches and case studies on how to demonstrate compliance (building on checklists tools) would be relevant to many LPAs.

Concluding Remarks

- 4.11. Finally, a recurrent theme in interviews with LPAs was about the confidence the PAS support instilled in planners. The LPAs interviewed felt that the PAS support was highly valuable in endorsing either their current direction or the need to make changes to it. The role of PAS in giving LPAs a sense of confidence in their plan making – and the frequency with which this was cited – was striking.
- 4.12. PAS is viewed as credible, is respected by practitioners, and should build on the key role they have carved in supporting plan making. Continuing and, where possible, extending this area of PAS support is necessary to improve plan making practice and is essential in what is perceived by practitioners as a changeable national policy context.

Appendix 1

Introduction
Introduction: Thank you for agreeing to participate in this study. There are 5 or 6 questions in total and I will try not to take up too much of your time. I hope you received the confirmation email in which we highlighted a number of the recommendations that PAS made. I thought we might start by talking briefly about some of these...
Identify whether recommendations were implemented
One of the recommendations made was to... Did you implement this? [Establish and record clearly whether yes, no or in part and capture reasons. Prompt questions: If yes or partially, ask them how they went about it if appropriate and not already clear. If no, then why and if an alternative approach is implied ask what they did instead and reasons for it. Repeat for each of the recommendations identified]
Ask LPA to score overall impact
OK, so all in all if I were to ask you to rate the impact that the PAS support had on your plan making with: 1 being a little impact 2 Some impact and 3 a very significant impact, how would you rate it and why? [Establish and record clearly whether: 1, 2 or 3 and capture any explanatory comments. Prompt questions: Looking back where how did it help or why was the impact limited / were any elements less useful]
Ask LPA to give reason for overall impact score
[If, rated 1 or 2] Finally what would have changed it from a 1 to or a 2 to 3? [If rated 3]: Why do you think that the impact was so significant?
Close
That was really interesting and I am certain PAS will find the detailed feedback helpful. I do not expect to do so, but would it be ok if either PAS or the Smode research team got in touch with you again if we need to clarify any of the points we discussed today? Thanks again for your time etc. [Record if Further contact acceptable Y/N – any conditions]