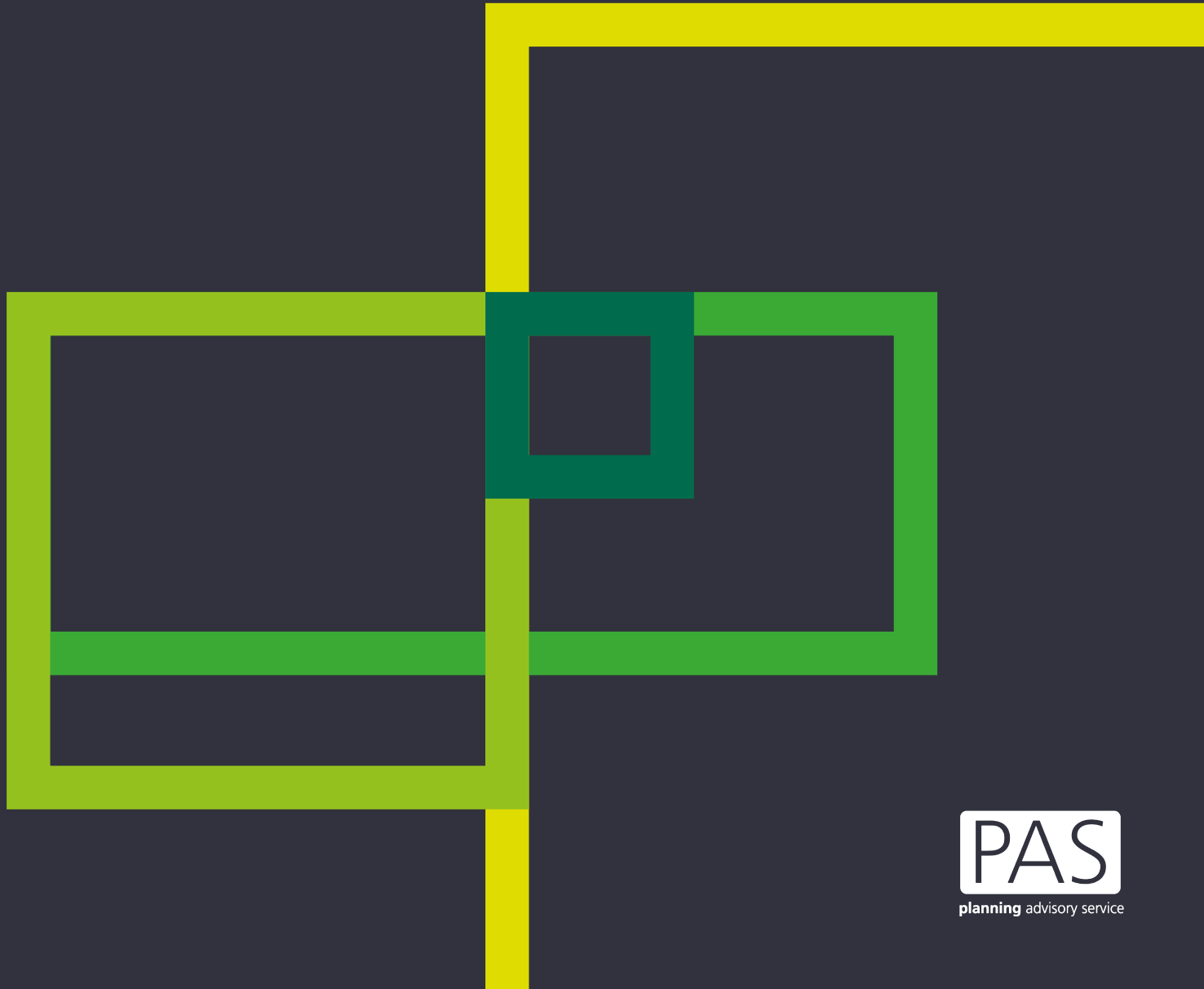


PAS Local Plan Route Mapper

Navigating plan preparation
efficiently to arrive at a quality plan



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Introduction

1. The Planning Advisory Service (PAS) Local Plan Route Mapper is designed to help you navigate the plan making process. Drawing on the experience of sector experts and plan makers across the Country, the PAS Local Plan Route Mapper provides a framework to help generate creative responses to the procedural and technical requirements to enable efficient and effective plan making and delivery of positive 'real world' outcomes.

2. The PAS Local Plan Route Mapper is focused on helping you to undertake a review and/or update of policies in your local plan or joint local plan (as distinct from a mayoral or combined authority Spatial Development Strategy as defined in Annex 2 of the National Planning Policy Framework, or neighbourhood plans). It aims to help users to:

1 Undertake a review of local plan policies:

The Local Plan Route Mapper includes advice on how to consider, as part of the review of local plan policies, whether to update a local plan and the extent and scope of that update (i.e. whether a full or partial update of policies is necessary);

2 Project plan and manage the update of local plan policies:

The Local Plan Route Mapper sets out ways to design an efficient and effective plan making process that reflects national planning policy and legal requirements, and provides tips on how to anticipate and navigate risks and challenges along the way; and

3 Carry out a policies update:

The Local Plan Route Mapper explains how to employ a robust method of plan making, to help you make sure you are only investing in what is critical to plan production and avoiding wasteful activities that add limited or no value to the plan process or outcomes. This can help avoid diverting time away from developing creative plan making responses to secure positive outcomes for the area that you are planning for. It will also help you to create local plans that meet the necessary legislation/regulations, National Planning Policy Framework 2021 (paragraph 35) tests of soundness and that are easy to use and understand.

3. The Local Plan Route Mapper document is supplemented by **a Local Plan Route Mapper Toolkit** – which you can use at different stages of plan making to check that your plan is heading in the right direction.
4. This advice note, and the associated Toolkit (PARTS 1–4), are intended to provide advice for practitioners based on advice from practitioners. The content has been tested with experienced local authority planners across the country and informed by conversations with leading consultants in the plan making field. However, it does not represent formal policy or guidance for plan makers. While this advice aims to explain how local plan making requirements will work in practice, any interpretation of the regulations and national planning policies is offered only as a guide and does not remove legal risk or challenge. It is therefore important to read and understand the regulations as well. In cases of doubt independent legal advice should be sought.
5. Further, the Route Mapper and Toolkit shouldn't be seen as a definitive view on how plan making should be undertaken although it is based on the experience of those who have been involved in the process – creative and innovative approaches that are relevant to your local context should always be pursued. Instead, this Local Plan Route Mapper and Toolkit provides a useful starting point for thinking through plan making issues and helping you to navigate the process. This might be particularly helpful if you are new to a role leading on plan production or want to make sure that you have taken into account the most up-to-date plan making requirements and 'best practice'. PAS will aim to keep this document up to date to reflect changes to legislation and guidance and examples of best practice – so it evolves as plan making practice evolves. You can help PAS to do this by contributing on the dedicated **PAS Local Plan Route Mapper and Toolkit user discussion forum**.
6. The process of a local plan review or reviewing local plan policies, as referred to throughout the Route Mapper and Toolkit, relates to the requirement for policies in local plans to be reviewed to assess whether they need updating at least every five years. Whilst many local planning authorities have already been undertaking local plan reviews, the requirement is now firmly embedded in the regulations and national planning policy. At the end of the review process you must conclude whether or not policies in the local plan need to be updated and publish reasons for your decision. If you determine that an update is required to any policies of the adopted local plan, you will then need to establish your process and timetable for the policies update, culminating in the publication of an updated Local Development Scheme.
7. **The Route Mapper and Toolkit acknowledges that the scope of any policies update may vary from a small-scale partial update of specific policies, through to a full update which could potentially result in the production of a new local plan or a joint local plan. The Route Mapper and Toolkit can be applied to any scenario of policies update being undertaken, but you should apply the advice provided pragmatically and proportionately to reflect your own plan-making circumstances and context.**
8. The advice included in the Local Plan Route Mapper is aimed at officers. However, councillors may find it useful in helping to understand the plan making requirements and the opportunities they present. Statutory consultees, local communities, infrastructure providers and the development industry may also find elements of the advice useful in framing their engagement with the plan making local authority at various stages in the process.

Local plans in context

9. Planning law requires that decisions need to be taken in accordance with the 'development plan' unless material considerations indicate otherwise (see [section 70\(2\) of the Town and Country Planning Act 1990](#) and [section 38\(6\) of the Planning and Compulsory Purchase Act 2004](#)). The 'development plan' for an area can comprise a number of different adopted planning policy documents ranging from Spatial Development Strategies (such as the Mayor of London's Spatial Strategy) through to Minerals and Waste Local Plans and neighbourhood plans.
10. The 'development plan' in the context of the Local Plan Route Mapper and supporting Toolkit is the local plan as prepared by a local planning authority. However, it is important to recognise that a council's local plan is not always set out in one document but can comprise a number of different development plan documents such as a Core Strategy, Site Allocations development plan document, Development Management development plan document, Area Action Plan(s) and 'made' neighbourhood plan(s). [The Local Plan Regulations 2012 \(as amended\)](#) and other

legislation prescribe the process for local plan preparation and some elements of its content. The local plan process is developed further in national planning policy (National Planning Policy Framework, Planning Policy for Traveller Sites and National Planning Policy for Waste) and guidance (Planning Practice Guidance) the latter of which is updated relatively frequently.

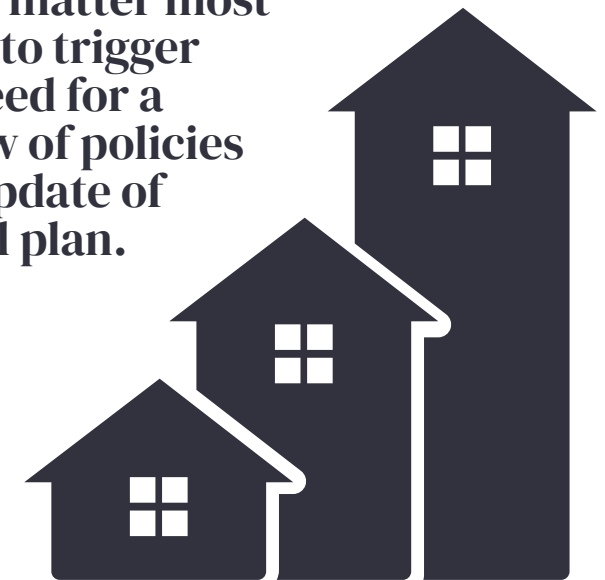
11. Plan making takes place within the legal and policy framework described above. Responding to this framework and complying with legally defined processes is unquestionably a major element of plan making and at times it can threaten to inhibit creativity; but it does not have to. This is evident from the examples of good plan making practice across the country. When prepared well a local plan coordinates and directs investment in a way that meets local objectives, clearly explains to communities how the places they live and work in will change – and some of the opportunities, compromises and challenges associated with this. When poorly prepared a local plan can inhibit the wider corporate objectives of the authority at the local

level, fail to consider sustainability impacts, confuse and disenfranchise communities, add costs and unnecessary delays to the delivering plan outcomes (including to the development industry) and fail to engage effectively with infrastructure providers and others with a stake in plan delivery.

12. A local plan has multiple audiences: including other council services, communities, developers, agents, and infrastructure and service providers. It is a technical document for the purposes of decision making but also needs to be more than that. This creates unique challenges in producing plans that are clear, effective and that reflect community aspirations – and requires a focus on problem solving both in the process of preparing the plan – and within the plan itself.
13. A good local plan is more than just about planning for the delivery of an area's housing numbers; it is about strategy, vision, focus and creativity. However, it is important to acknowledge upfront that much of the debate at most independent examinations will centre on housing and the policy context for securing its delivery. Failure to deliver new homes is also the single matter most likely to trigger the need for a review of policies and update of a local plan. Failure to keep your housing need requirement under regular review, or to achieve delivery of the housing need requirement in an existing local plan can significantly hamper efforts to maintain a plan-led system. In the absence of relevant up to date development plan policies,

or where you cannot demonstrate a 5-year supply of deliverable housing sites (with an appropriate buffer), or where the Housing Delivery Test indicates that the delivery of housing is substantially below the housing requirement over the previous 3 years, then the balance is tilted in favour of sustainable development. This means that planning permission should be granted except where the benefits of doing so are outweighed by any adverse impacts when assessed against the policies in the National Planning Policy Framework taken as a whole.

Failure to deliver new homes is the single matter most likely to trigger the need for a review of policies and update of a local plan.



“A Local Plan should be bold, ambitious and provide the framework for at least the next 15 years of growth.”

Anna Rose
Head of PAS



It will set the vision and strategy for how the area should be developed over the lifetime of the plan.

It should be positively written to deliver the outcomes sought, recognising that in a complex environment with a variety of stakeholders and interests, you need to positively manage development.

A plan should be all about what you want to see rather than what you don't.

Plans will be of a cyclical nature which moves from plan making through to delivery and onto a review of the plan every five years. This ensures that plans get updated when they cease to be effective.

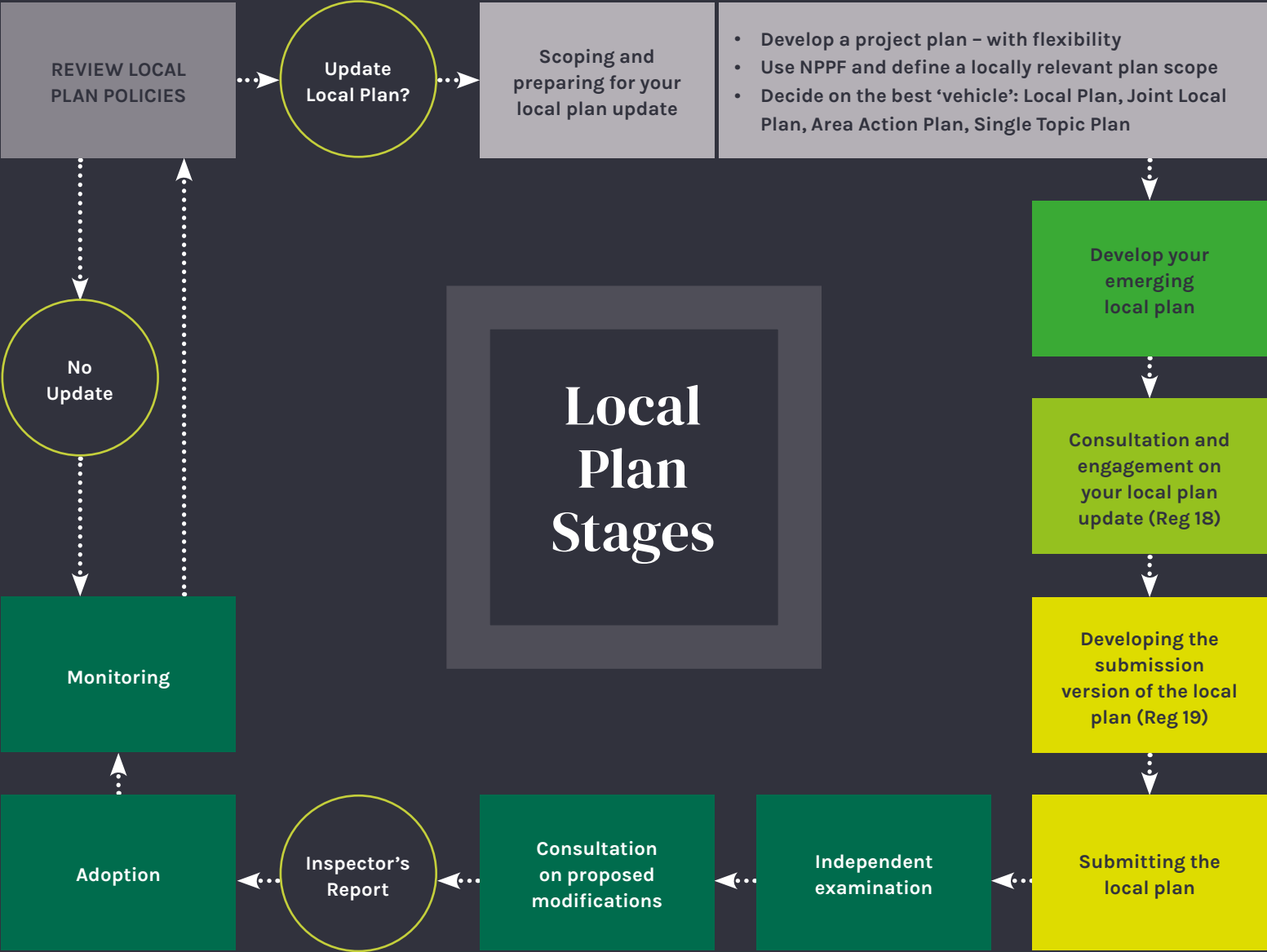
How to use the Local Plan Route Mapper

14. **In practice the specific plan making route you take will depend on the scope and extent of your policies update. However, whether you are undertaking a partial update of your local plan policies or a full update, much of the advice contained in the Local Plan Route Mapper will apply or can be tailored to your circumstances.**
15. Six distinct stages of plan making are identified, and 'checkpoints' to consider are highlighted within each of these stages to help you keep the development of your local plan on track. The stages are illustrated in diagram 1 below.
16. There is considerable discretion to determine the most appropriate type of development plan document for a policies update. A joint local plan may be more efficient than producing a standalone Plan. Equally, you need to consider whether or not the policies update can be appropriately dealt with through a single development plan document, or whether a staged approach is necessary whereby a 'parent' or strategic plan is underpinned by subsequent and more detailed development plan documents. If your review of local plan policies has concluded that a partial policies update is needed, an Area Action Plan or topic-based development plan document such as a Site Allocations or Development Management development plan document might be a more appropriate and proportionate approach.

DIAGRAM 1

KEY

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



17. The scope and form of the policies update will inform your approach to consultation and engagement during the production of the plan update. **Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012** provides a considerable degree of flexibility as to how a local plan (or a policies update) is produced. As a minimum, you must notify relevant organisations (as defined by the Regulations) of the subject of the policies update and invite each of them to make representations about what the policies update ought to contain. You must then take into account the representations made. **Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012** then requires the policies update to be published and relevant stakeholders (as defined by the Regulations) be invited to submit 'Regulation 20' representations prior to the Submission of the policies update for independent examination. Such an approach may be considered to be appropriate where a partial update to local plan policies is being made.
18. Whilst there is no legislative or regulatory requirement to do so, you may decide that further consultation and engagement is required over and above that set out in paragraph 17 either due to the scope and extent of the policies update or because local circumstances warrant it. Where you are undertaking a full or extensive update to your local plan, it may be prudent and appropriate to undertake public consultation on a full draft policies update together with supporting documentation at the Regulation 18 stage. This provides you with the opportunity and ability to make any necessary changes to the policies update prior to the publication of your Regulation 19 Submission Local Plan.

However, you should avoid undertaking several rounds of costly and time-consuming public consultation where it will not add value to the plan-making process. You should not plan to make any changes to your policies update after the publication of your Regulation 19 Submission Local Plan.

19. The Local Plan Route Mapper provides advice on project planning and management which will assist you in scoping and developing an approach to your policies update which is appropriate and proportionate to your circumstances. It also provides advice on developing and consulting on your draft policies update.
20. You should start at the stage that relates to where you are in plan making – and it might be that for partial policies updates you can skip some of the 'check points' set out in this advice. However, plans are in place for a long time and affect the lives of many – we therefore have a responsibility to make them the best we possibly can. The advice contained in this document will help you to decide the right next step for you.
21. Signposts of when you may wish to use different parts of the local plan making Toolkit are included in this document. The different parts of the Toolkit are intended for use by plan makers as a way to assess and inform your next plan making steps. The Toolkit is in four parts as shown overleaf.

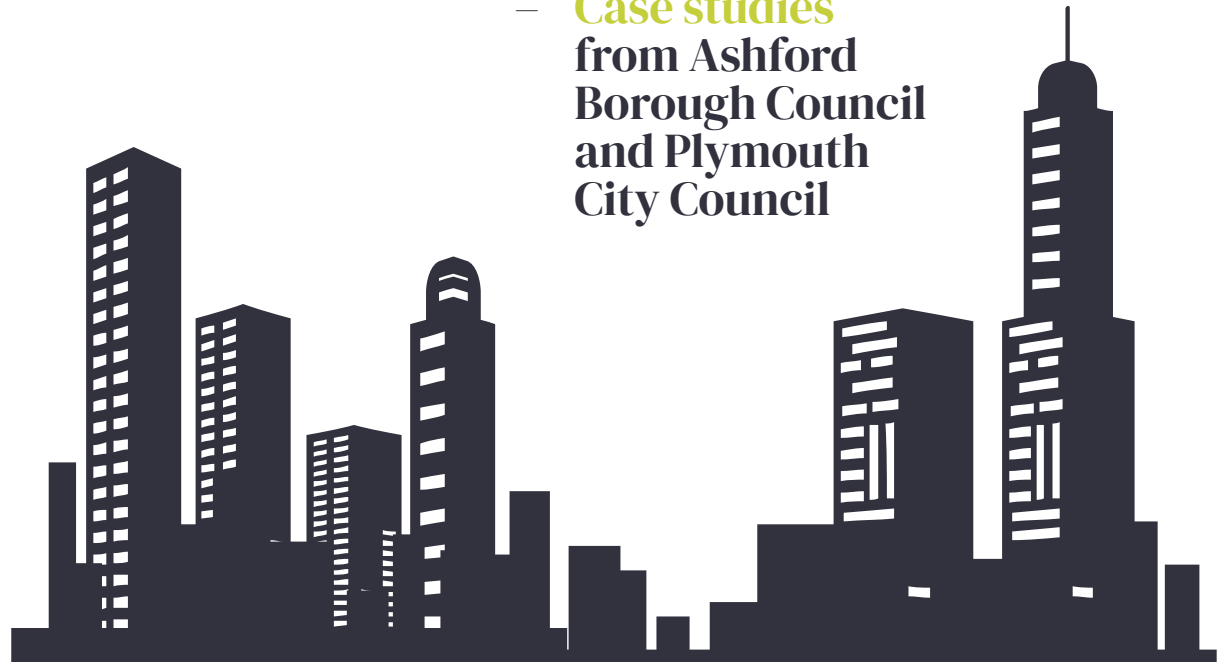
The Toolkit is in four parts.

PART 1 LOCAL PLAN REVIEW ASSESSMENT	<p>A succinct form to help you to undertake a review of your plan policies to assess the need for a policies update.</p>	<p>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.</p>
PART 2 LOCAL PLAN FORM AND CONTENT CHECKLIST	<p>Helps you to assess the content requirements for local plans based on the National Planning Policy Framework (NPPF).</p>	<p>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.</p>
PART 3 LOCAL PLAN PROCESS REQUIREMENTS CHECKLIST	<p>A checklist of procedural requirements for preparing local plans and some of the most important project management implications arising from these.</p>	<p>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 policies update 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 policies update or submit updated policies for independent examination.</p>
PART 4 LOCAL PLAN SOUNDNESS AND QUALITY ASSESSMENT	<p>A local plan assessment matrix.</p>	<p>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 policies update.</p>

22. We would encourage you to undertake some form of independent review, particularly in relation to PART 1 of the Toolkit, to check and challenge the robustness of your assessment. This could be undertaken, for example, either by another member of the planning service, or a colleague from another authority. PAS may be able to help you to access a Local Plan Route Mapper Expert User from another local authority or some consultancy support.
23. Finally, we have included some plan making tips based on a synthesis of interviews with planners, planning lawyers, former (and current) planning inspectors and specialist consultants. Case studies from Ashford Borough Council and Plymouth City Council are also included; reflecting on the experience and perspectives of lead officers on plan making practice.

The Route Mapper includes:

- **Plan making tips based on interviews with planners, planning lawyers, inspectors and consultants**
- **Case studies from Ashford Borough Council and Plymouth City Council**



Reviewing the need to update your local plan policies

A– Navigating the process of reviewing local plan policies

24. We have started the local plan making journey with reviewing policies to determine whether or not it is necessary to update your local plan. There is a legal requirement to review local plan policies at least every 5 years from the date of its adoption *along with your Statement of Community Involvement*. This requirement is set out in Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 as amended and NPPF 2021 paragraph 33. In practice you may need to review your local plan policies in advance of this 5 year requirement.

25. This section of the Local Plan Route Mapper provides an overview of one possible approach that you can follow in undertaking a local plan review. In practice the approach to review cannot be entirely uniform, as it will vary depending on your authority and the unique plan making challenges you face. There isn't a prescribed method of undertaking a review of local plan policies, but hopefully you will find that the following 'checkpoints' provide you with a useful guide

which will help you in navigating some of the main elements that you will need to consider. In the majority of instances, a review of local plan policies is likely to result in the need to update specific policies or parts of a local plan. Therefore, any conclusion to not update a local plan following a review of policies should be carefully reached, and in publishing your decision you will need to be able to provide clear evidence and justification.

26. Undertaking a review of local plan policies is not new and many local authorities will have established practice for this, which, if working effectively can be continued and used to inform the plan update. In undertaking the review, you will need to take into consideration policies in all of the development plan documents that make up your development plan as set out in paragraph 10, including any 'made' neighbourhood plans.

PART 1 of the Toolkit provides an assessment template to take you through detailed consideration of a range of factors that you will need to consider when undertaking a review of your plan policies.

You can use this in tandem with **PART 2** of the Toolkit which provides a quick reference list of the core NPPF requirements for local plan content; this can help you assess your existing local plan policies against current national planning policy.

A1: Collate evidence to support your review

27. Your existing local plan may already set out triggers which require you to undertake a review of your local plan policies in certain circumstances; you will need to revisit these as well as looking at broader matters that might influence the need for you to update your local plan. You will need to collect evidence to help you identify and consider whether:
- 1 the vision, policy objectives and spatial strategy of your local plan are being effectively delivered; and
 - 2 your plan meets current national planning policy requirements; and
 - 3 there have been any local changes which have significant/material spatial implications for the strategy set out in your plan (which may include the implications of any made neighbourhood plans or changes in neighbouring authority areas).
28. Evidence gathering should be focused and proportionate drawing on existing data wherever possible. As a minimum this will mean reviewing:

- the National Planning Policy Framework;
- your Authority Monitoring Report;
- the outputs of the standard methodology in relation to housing need for your area and how it relates to your current requirement (acknowledging that the outputs of the standard methodology provide the starting point for determining your local housing requirement);
- your Housing Delivery Test results;
- your current 5 year housing land supply position; and
- your Infrastructure Delivery Plan/Infrastructure Funding Statement.

29. Robust on-going monitoring can help to significantly reduce the time to, and cost of, gathering your initial evidence. We would also suggest that you explore what monitoring information other parts of your authority (such as Housing Services and Environmental Health) or partners and organisations (such as Registered Providers and the Local Economic Partnership) gather, so that you can tap into this knowledge rather than duplicate it. This should then help you to identify if you need to undertake further work to either bring your evidence up to date or expand the matters that you monitor.

A2: Considering the corporate context

30. It is important to recognise that your local plan is one of a small number of plans and strategies that comprise the Council's statutory Policy Framework (others include the Council's Annual Budget, Medium Term Financial Strategy and Corporate Plan) as well as its non-statutory policy framework such as Housing, Economic and Regeneration strategies. It should provide the spatial

dimension for delivering a Council's ambitions for its place (including those supported by the Council at a more strategic level such as Growth Deals and Local Industrial Strategy developed by the Local Economic Partnership) and so should not be developed in isolation. It can also be key to securing some financial stability for a local authority through income generation, reduction in revenue spending and attracting outside investment.

31. Within this context the review of your local plan policies provides an opportunity to take a step back and consider what your council needs the local plan to support the delivery of from a wider perspective. The decision on whether to update your local plan should also be informed by the degree to which the local plan relates to, and integrates with, the wider strategies of your council and its partners. The local plan provides an opportunity to bring together the spatial elements of other strategies and should be responsive to these. The plan should also reflect local ambitions and priorities. These will sometimes be reflected by a manifesto published by the council's administration or other political commitments. These may relate to very local issues but could have a global context. The recent focus in many areas on tackling climate change, achieving carbon zero outputs and improving air quality are examples of this.
32. One area that has an impact corporately but which can often be overlooked is ensuring that the budgets are in place to undertake any update to the local plan that may be needed. Updating local plans can potentially have significant financial implications and in a time of ever-decreasing revenue funding in local authorities the challenges that this poses should not be underestimated.

A3: Engage with other authorities and agencies

33. Reviewing your local plan policies should not be undertaken in isolation. It is important to think about how any agencies or other local authorities will be impacted by, or will impact on your review and discuss it with them. Do their plans and decisions have impacts for you now or vice versa? Do the emerging implications suggest the need for a joint plan? Local planning authorities need to comply with the Duty to Cooperate not just when updating a development plan document but also when reviewing policies within it, as this is deemed to be an activity under Paragraph (3)(d) of Section 33A of the Planning and Compulsory Purchase Act 2004 in that it prepares the way for the preparation of development plan documents. It will be particularly important to consider the implications of any material changes in local housing need (using the outputs of the standard methodology as a starting point) with other relevant authorities and agencies.

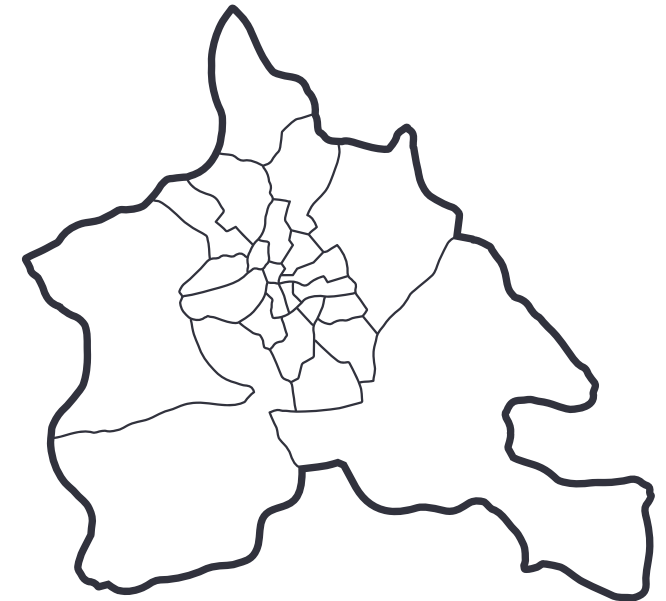
A4: Consider the evidence and its implications for review

34. We would recommend that you then take a step back and consider what the evidence and any engagement is telling you about your local plan, including its strategy and objectives, whether it is being delivered and if it remains relevant in the context of national policy and local circumstances (see Diagram 2 below). You need to consider each policy as well as the local plan as a whole.
35. Where the plan does not comply with national policy – including in relation to delivering your local housing need requirement – you are likely to need to update your local plan (unless a departure from national policy can

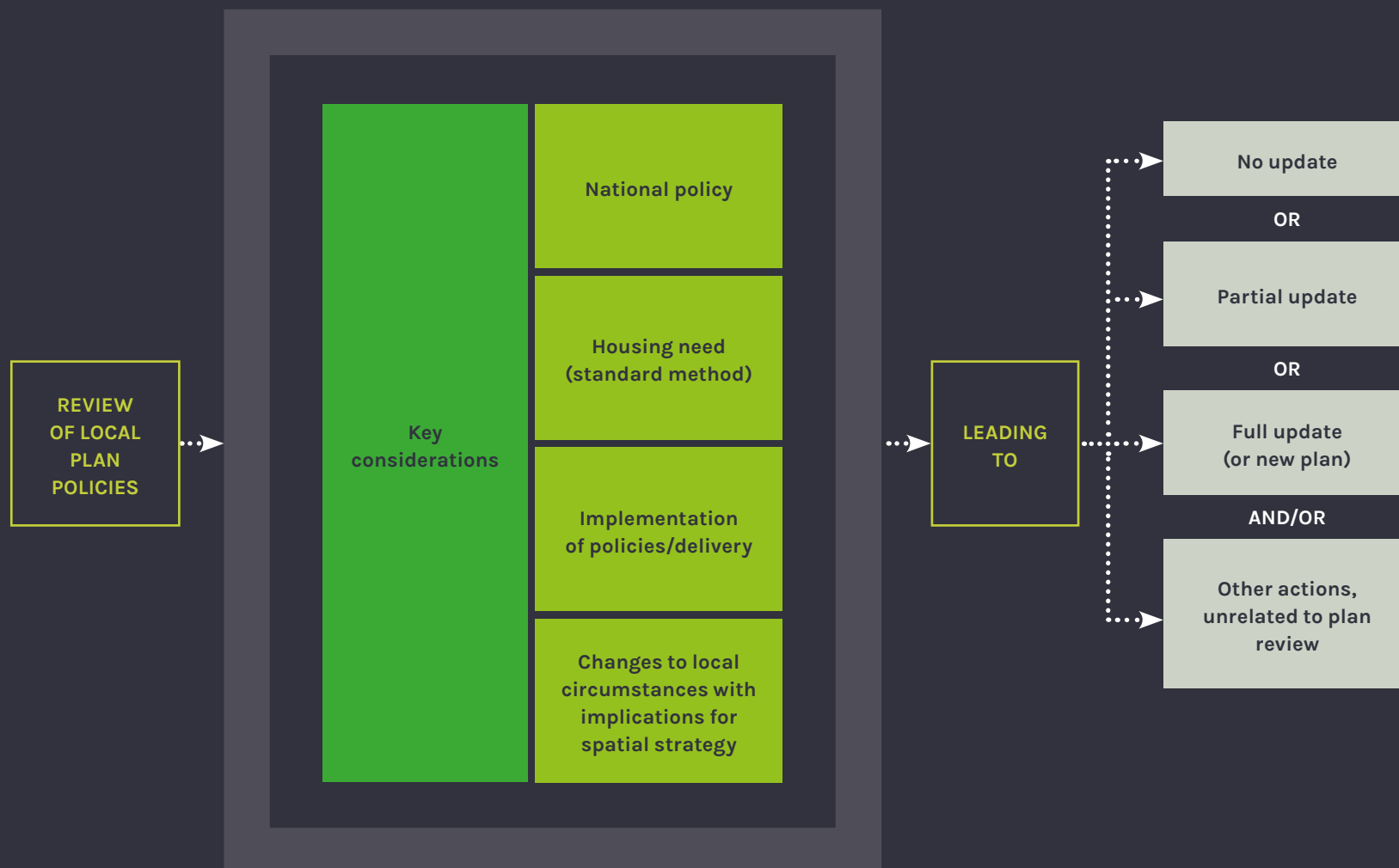
be justified). The starting point for deriving local housing need will be the application of the standard methodology. There is a clear expectation that significant changes in local housing need (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan) will result in the need to update relevant policies and aspects of the local plan. Where it has not been possible historically to meet housing needs in full, you should ensure that you have thoroughly considered and assessed the ability of any new sites now available to contribute towards previously identified unmet needs, and reconsidered the ability of neighbouring areas to contribute towards any unmet needs in your locality before determining that policies do not need to be updated. Any decision not to update relevant policies in your local plan where local housing need has significantly increased from that currently planned for will need to be clearly evidenced and justified.

36. If local circumstances suggest that a different strategy or strategic policy approach is required you are likely to need to update your local plan. However, the judgement as to whether a partial review or a full review is appropriate may not be as clear cut. If the vision and objectives and the spatial strategy are still 'fit for purpose' and changes can be made to policies that do not affect these, a partial update to the plan is likely to be the most appropriate and proportionate approach.

37. It might even be the case that a policies update is not the answer (or only part of it). Where your local plan complies with national planning policies, there has been no significant change in local circumstances that would mean the plan is not 'fit for purpose', but the plan is still not delivering as originally envisaged you need to understand why this is the case and whether updating your local plan is necessary or would have any beneficial effect. For example, in the case of under delivery against a local plan target, is a change in plan strategy or policy necessary or are other interventions more appropriate to step up delivery? In the case of housing this might link to an action plan associated with the Housing Delivery Test.



Process for reviewing local plan policies



A5: Publish your decision – and reasons for it

38. You need to record and report on the outcomes of your assessment. Any report should give you and stakeholders clarity on:

- 1 whether there is a need to update your local plan policies: and
- 2 if there is a need to update, what the scope and extent of that update will be.

If you are proposing a partial update you should also make clear why it is possible to deal with the specific policy/policies or site allocation(s) in isolation without needing to update the rest of your local plan. The report must be clear on the reasons as to how you have arrived at this decision and your justification for this, with reference to evidence. This is particularly critical where you have determined not to update your local plan.

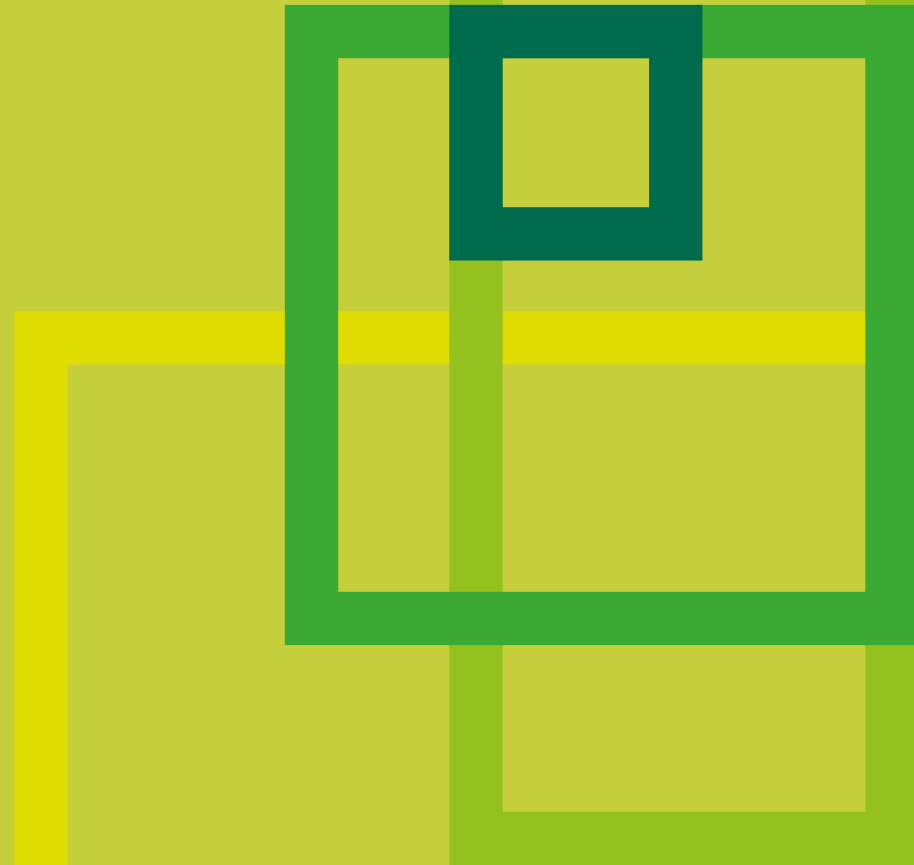
39. Your approach to ‘formalising’ any decision as to whether or not to update your local plan will depend on the constitution of your local authority. The sign off process itself is not prescribed in legislation. However, you may want to consider whether or not changes to your council’s scheme of delegation (as set out in its constitution) are needed to accommodate the requirement to review local plan policies. The formal decision of the council that is taken should be published, not least in order to ensure the decision-making process is as transparent and open as possible. Once the decision has been made, you will then need to update your Local Development Scheme once you have developed the timeline for undertaking the update (see Section B in relation to developing this).

40. It is worth acknowledging that it may not be possible or even appropriate to publish a definitive list of the local plan policies that are proposed to be updated following a review. Your review decision may indicate the type and degree of policies update required, but you may not know exactly which policies may need to be changed until you have undertaken the work to inform the actual update which will take place after the publication of the Local Development Scheme (see Section B of this advice).

A6: Integrate plan review ‘indicators’ with your monitoring processes

41. The requirement is to undertake and complete a review of local plan policies at least every 5 years from the date of adoption – but a need to review or update a local plan (or policies within a local plan) before that period may arise. Ideally review triggers and monitoring indicators will have already been embedded within your local plan and reported on in your Authority Monitoring Report. Monitoring frameworks are a key component in supporting the process of reviewing local plan policies, but are often developed as ‘an afterthought’ because a section on monitoring has to be included in a local plan, but has not, in the past, been seen as an integral part of plan making.
42. A good monitoring framework can save time and money. By helping to flag up issues at an early stage which, if known about and addressed early enough, may enable you to consider timely interventions to address issues through means other than a policies update. In addition, a comprehensive and clear monitoring framework will enable your process of reviewing local plan policies to be efficient and effective.

Project planning and management



B– Scoping and preparing for your policies update

43. The first stage of the policies update journey should involve defining and planning your approach from the beginning to the end of the process. This means putting in place a robust approach to project management and defining the scope of your policies update. This is important for a number of reasons including to provide a good understanding of the resources (people and money) likely to be needed, helping others to understand when they need to gear up to be able to respond to key stages, and ensuring that PINS is able to resource an independent examination. The following section provides an overview of the process which you may wish to consider.

PART 2 of the Toolkit provides a quick reference list of the core NPPF requirements for plan content; this can help you scope what your policies update will need to cover.

PART 3 of the Toolkit highlights some important procedural requirements for this stage of plan making.

If you are undertaking a full update to your local plan or developing a new joint local plan, you may find the assessment matrix in Part 4 of the Toolkit helpful in informing the development of policies and identifying

B1: Define the scope of your policies update

44. The NPPF sets out, at paragraph 20, the key strategic matters that must be addressed in plans. However, authorities have significant discretion to decide what more detailed/non-strategic policies should be included such as site allocations, the provision of local infrastructure and community facilities and so on. The NPPF is the starting point for determining the scope of your policies update – but the local and corporate changes that might have led you to conclude that a policies update is necessary should also be a significant factor (see Section A2 of this note) in determining what your local plan needs to cover. It's a local plan after all.
45. If you are in London, or part of an area with a mayoral or combined authority Spatial Development Strategy, there is a requirement to ensure your plan is in general conformity with it. This will affect the scoping stage. Where there are any made neighbourhood plans these also need to be factored into the scoping of your plan update.

B2: Establish the right vehicle for your policies update

46. Before getting into the detail of the approach to updating your local plan, it is vital to consider whether or not the previous or existing spatial approach is still the most appropriate. If a full policies update is needed it might already be apparent that a joint plan is the most effective and effective way of addressing cross boundary issues. Section 28 of the Planning and Compulsory Purchase Act 2004 enables two or more local planning authorities to agree to prepare a joint local plan (see Section C1 below). A joint local plan may be more efficient than producing an individual local plan. Equally, you need to consider whether

or not the policies update can be appropriately dealt with through a single development plan document, or whether a staged approach is necessary whereby a 'parent' or strategic plan is underpinned by subsequent and more detailed development plan documents. If your review has concluded that a partial policies update is needed, an Area Action Plan or topic-based development plan document such as a Site Allocations or Development Management development plan document might be a more appropriate and proportionate approach.

47. There is no 'one size-fits-all' approach as set out in the introduction (see Diagram 1). Instead, the scoping stage provides you with the opportunity to establish the most appropriate approach, tailored to your local context and local plan making circumstances.

B3: Duty to Cooperate starts now

48. The legislative Duty to Cooperate starts now! Start to identify the cross-boundary matters that will be relevant to your plan and the authorities and organisations you need to engage with on these matters. Capture both the engagement but most critically the outcomes of this engagement as you will need this later in the plan making process and it will provide an essential audit trail of changes and decisions. Remember, an Inspector cannot remedy any deficiencies when it comes to the Duty to Cooperate legal compliance part of the independent examination. This is why it is normally the first matter that an Inspector will explore. From a practical perspective it can also be very helpful if there are staff changes during the life of the local plan's development, and will also be beneficial in helping to ultimately inform and shape your authority's Statement of Common Ground to help evidence that the Duty to Cooperate has been met.

B4: Scoping and developing the Project

49. We would strongly recommend that you prepare a Project Initiation Document which sets out the scope of the plan update (including all of the topics and policies that you consider are likely to need to be updated and/or the level of additional homes that will need to be accommodated), the form that the policies update will take and the evidence that will need to be developed or updated to support the new plan or updating of the existing plan. This should then be used to develop a high-level timeline for its delivery and the budgets and staff resources likely to be needed (not just within the planning service but from elsewhere in the council and potentially from other public bodies) to see the project through from plan inception to adoption. In doing so don't forget to include the costs and resourcing of the independent examination itself. There will always be unknowns, including future changes to legislation and national policy and guidance, and some will need to be 'guesstimates' (such as how long the independent examination is likely to last). However, this provides a structured way to plan your project management approach.
50. The Project Initiation Document should describe the scope of the policies update itself. It should present the matters that the policies update is intended to cover (linked to the review of policies and in light of NPPF requirements on necessary local plan content) and highlight any possible cross boundary impacts.
51. The Project Initiation Document should seek to:
- Identify which key stakeholders will need to be involved in developing the local plan including other council services and, in two-tier areas county council services, statutory consultees and neighbouring authorities and when they will need to be involved;
 - Identify any new decision making/advisory structures (such as committees/working groups) which need to be formed to support the development of the policies update, the time that it will take to set these up, including whether there is a need to change the council's constitution to do so, and identify if any new delegated authority is required, including at the 'Main Modifications' stage after the independent examination hearings (which again may need changes to the council's constitution);
 - Be clear about the decision-making route at various stages and the lead-in times needed for the sign-off and publishing of reports;
 - Factor in election periods and the preclusions on consulting or making decisions in the lead-up to them;
 - Factor in the need to potentially bring new councillors or a new council administration up to speed following an election;
 - Consider any implications of the Planning Inspectorate's (PINS): **Procedure Guide for Local Plan Examinations 2019**.
 - Identify the likely evidence needed based on the scope of the plan;
 - The resource requirements needed including for consultation and for the development of the evidence base;
 - Undertake a realistic assessment of the time needed to procure any evidence that needs to be produced by consultants including writing the brief, the approach to procurement followed by your council (which is likely to be determined by the likely financial costs) which can increase the time taken;

- Undertake a realistic assessment of the time for the different elements of the evidence base to be finalised (including factoring in time to review and seek changes on drafts);
 - Build in plenty of time for the development of the policies update document itself so that you can be satisfied that it is of a high quality and has addressed the issues and opportunities it needs to, including a clear link between the Vision and Objectives, Spatial Strategy, Strategic policies and if included the non-strategic policies and site allocations and that you have the evidence to support your approach;
 - Build in sufficient time between any initial consultation and engagement and the publication of your Regulation 19 Submission Local Plan to be able to properly consider responses. Experience from previous local plans and current local knowledge can help provide some understanding of the likely scale of responses that you will receive to inform this element of the timeline;
 - Reviewing your Statement of Community Involvement and the intended approach to consultation; and
 - Include a risk register – highlighting mitigation measures.
52. Through the risk register, it is important for the Project Initiation Document to consider the impacts of unforeseen changes in circumstances and ensure that any necessary mitigation measures are identified. Incorporating contingency into future project planning both in terms of budgets and timescales may be pragmatic. For instance, whilst it is impossible to accurately predict at the outset, staff turn-over may have a significant impact upon the progression of a policies update. It may be prudent to consider what measures may be put in place to mitigate the unanticipated departure or long-term absence of key staff.

53. The time related elements set out above should then be used to develop a relatively high-level but realistic timeline for undertaking the development of, or update to, the Plan. This should then be used in producing your Local Development Scheme. It is important that you balance being ambitious but realistic in your timetable planning. Delays to a published Local Development Scheme can impact on other organisations resource planning, including that of the Planning Inspectorate which uses LDSs to programme Examinations and Inspector availability and inform the Inspectorate’s quarterly reporting to the Ministry of Housing, Communities and Local Government. Having to re-publish your Local Development Scheme can also be confusing for the public and others with an interest in plan-making.

B5: Factor in engagement with the senior management team and councillors at the scoping stage and beyond

54. Using the evidence collated through the process of reviewing local plan policies, work with your senior leadership team and with councillors to think about what you want the policies update to achieve. This will be critical in particular for a full policies update and may require setting up working/advisory groups or a series of workshops. This engagement will also be necessary for partial policies updates – although in such cases this may only need to be through focused meetings and briefings.
55. This engagement is not about generating a one paragraph vision statement (if this is an area that needs updating) – it is an open and honest conversation about the challenges that may lie ahead and potential compromises needed as a result of, for example, what the evidence is telling you, in order to achieve a sound local plan which delivers

better places for your communities. This includes, where appropriate, the setting of objectives and development of high-level spatial approaches. These discussions with your senior leadership team and councillors need to be set within the context of the regulatory framework and national planning policy requirements. Ignoring this context within these discussions reduces the likelihood that your plan will make it successfully or effectively through an independent examination – unless of course you have clear and robust evidence to support a different approach in some policy areas recognising that national planning guidance is a material consideration, but that policies also need to reflect local circumstances. In particular review the NPPF and pull out the ‘musts’ and ‘shoulds’ that are relevant to the scope of your policies update. PART 2 of the Toolkit will help you do this.

56. Supplement this with ‘intelligence’ on what is going on locally. For instance, you can use resident surveys undertaken by the council as part of its on-going engagement with residents, speak to ward councillors where this would be beneficial, relevant officers in other council services and community groups, undertake social media research to understand what the issues are for your local communities (many now have their own social media platforms). What are the top concerns and priorities? This does not need to be a large scale, extensive or costly exercise (unless you think it is necessary). But you do need to get a handle on key community issues.

B6: Consider sustainability requirements

57. Too often the Sustainability Appraisal process, which must incorporate the requirements of the **Strategic Environmental Assessment Directive**, remains detached from the actual plan-making journey. This can result in duplication and become a tick box approach to meeting the legislative requirements, rather than being used as

a key tool for testing the development of your plan or update from an environmental, social and economic perspective. The Sustainability Appraisal process should be at the heart of plan-making. This may be achieved if the route is carefully scoped and considered from the outset. The Scoping Stage should also ideally consider and incorporate any requirements to undertake a Habitats Regulations Assessment if this is needed.

58. This approach can start at the project planning stage by combining your Sustainability Appraisal Scoping report with the ‘scoping’ of the local plan process itself. This can allow for consultation (either targeted or broad in nature) on a combined scoping report, which sets out the Sustainability Appraisal ‘objectives’ together with the intended scope and nature of the policies update.
59. Consultation and engagement on relevant aspects of the Project Initiation Document and the Sustainability Appraisal Scoping report should enable you to seek agreement from statutory consultees (and a wider audience if appropriate), that your approach is robust – both in terms of forming the basis for the preparation of the policies update and the Sustainability Appraisal process which will inform it. It may also help to seek buy-in and commitment to participate and inform the preparation of the policies update by informing the future work programmes and resource planning for key external delivery partners and consultees.
60. Incorporation of the Sustainability Appraisal into the policies update in this way will help to support genuine ‘options’ generation, where relevant, through the Sustainability Appraisal process, in addition to improved policy formulation and drafting. The Sustainability Appraisal process is central to the development of spatial strategy alternatives – which is an essential component of plan making.

B7: Develop a consultation and engagement plan

61. We would recommend that a detailed consultation and engagement plan is developed which expands on the approaches that are set out in your Statement of Community Involvement. The formal consultation stages should be reflected in the Project Initiation Document. This is the consultation and engagement that you will undertake **before publication** of your Regulation 19 Submission Local Plan. At the Regulation 19 stage you are publishing your local plan in order to seek representations into the soundness and legal compliance of the local plan ahead of the independent examination rather than consulting on it.
62. Your approach to consultation and engagement on the policies update, as prescribed under 'Regulation 18', should be driven by the scope of the update required – including whether it is a full or partial policies update, your local circumstances and Statement of Community Involvement. In developing your consultation and engagement plan, you will need to consider whether:
 - an issues and options style consultation setting out local challenges and high-level options is necessary and will add value; **or**
 - a more targeted engagement on the scope of the local plan as part of the Regulation 18 stage is more effective and appropriate; **and/or**
 - If consultation on a full draft of the policies update is appropriate at this stage.
63. For each stage of consultation that you have decided is necessary, you should be clear about what you are looking to find out to inform the development of the policies update and the methods that will ensure that the approach you

take is both effective and inclusive to secure the proper representation of a range of community interests. It is also important to consider how you will effectively engage statutory consultees and Duty to Cooperate bodies at key stages of the development of the policies update.

B8: Local Development Scheme and Statement of Community Involvement

64. Developing the Project Initiation Document and a consultation and engagement plan will help to inform any updates that may be required to your Local Development Scheme and Statement of Community Involvement, the latter also required to be reviewed within 5 years of its adoption. A requirement of the local plan review process is an update and publication on your website of your Local Development Scheme. This is a requirement under **Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended)**. This must specify the development plan documents (i.e. local plan) which will comprise part of the development plan for the area and includes a timeline for production – so communities and interested parties (including the Planning Inspectorate) can keep track of progress.

B9: Consulting on the Sustainability Appraisal Scoping Report, Project Initiation Document and updates to the Statement of Community Involvement

65. You might decide that it would be appropriate to use the high-level project planning and scoping stage as the basis for your Regulation 18 consultation/engagement on your policies update, particularly where only a partial update of policies is being undertaken. However, you may decide

that if you are proposing to update your spatial strategy and allocate additional sites or where you think local circumstances warrant it, a more detailed approach to consultation/engagement may be more appropriate. We provide more advice on this in Section C.

66. A Sustainability Appraisal Scoping Report has to be the subject of consultation with prescribed statutory bodies (giving at least 5 weeks for a response). You may decide to take the opportunity to consult and/or engage on the Sustainability Appraisal Scoping Report (incorporating the Sustainability Appraisal Scoping) in order to enable a wider group of statutory consultees and stakeholders (including neighbouring authorities) to comment on the proposed scope and approach to be taken to plan production, as well as the proposed Sustainability Appraisal objectives. Through this consultation/engagement, it can be useful to seek a commitment from statutory consultees and stakeholders that they will be able to inform plan preparation through timely inputs, having given them notice to enable them to coordinate their resources and plan accordingly.
67. The scope of the consultation (and engagement) on the Sustainability Appraisal Scoping Report should be proportionate and will depend upon local circumstances, the scope of the plan update, and your intentions in relation to any future consultation to be undertaken as part of the Regulation 18 stage.
68. A review of your Statement of Community Involvement also has to be undertaken every 5 years. This is taken from the time of the adoption of the Statement, not the date of the adoption of your local plan. Nevertheless, if the timescales for reviewing your Statement allow you to, we would suggest that it is beneficial to review it, and if necessary, update it

at this point. There is no longer a requirement to consult on your Statement of Community Involvement but as a matter of good practice, we would encourage you to do so.

B10: Finalise the Project Initiation Document – and updates to the Local Development Scheme/Statement of Community Involvement

69. Following consultation you may need to alter the Project Initiation Document to reflect comments received. You can then produce and publish your updated Local Development Scheme. By consulting on relevant aspects of the Project Initiation Document, the Council and other stakeholders in the local plan will be able to commit to the updated Local Development Scheme timetable with a much greater degree of confidence and certainty than may otherwise have been the case. The Sustainability Appraisal objectives can then be finalised, enabling options generation and policy development to commence (under Stage D below). The final scoping report should also confirm how any requirement for a Habitats Regulations Assessment will be met.
70. Depending upon the outcome of the review of local plan policies (explained in Section A above) and confirmation on the process of consultation and engagement to be followed as part of the policies update process, it may be necessary and/or beneficial to update the Statement of Community Involvement. This will ensure that future consultation and engagement will be meaningful, proportionate and effective, reducing the potential for historic requirements to remain which may be onerous, unnecessary, and ineffective which could ultimately stifle the efficiency or effectiveness of stakeholder involvement in the local plan process.

Plymouth City Council

Richard Grant
Strategic Planning Manager



In 2004 the Council started work on its Core Strategy (as part of the then Local Development Framework planning policy approach). This started the process of thinking about planning policy development as something other than developing a rule book. Instead the focus was on creating a visionary document for the community about the transformation of the city.

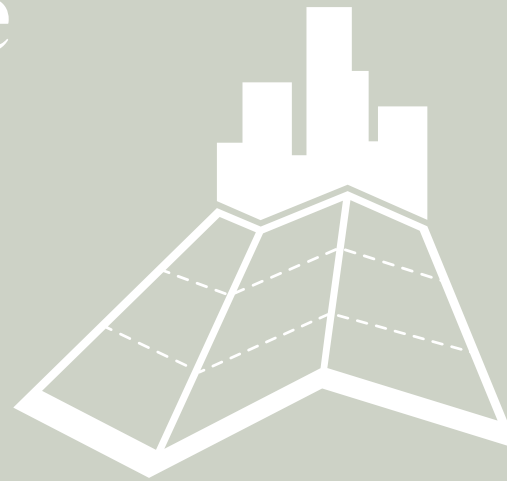
The Core Strategy enthused people and caught the imagination. It had a sense of vision, drive and direction by focussing on telling the story of what the place could become. This is something that we have tried to retain in subsequent plans including The Plymouth and South West Devon Joint Local Plan which we adopted in 2019. We started work on the Joint Plan in February 2016 and submitted it for independent examination in July 2017.

National policy tests for plan making are in some ways becoming more process led. This primarily relates to requirements on housing need, supply and the 5 year land supply. If the need number you have is not comfortable, you still need to face up to it! We have a housing crisis and the planning system needs to find ways to resolve it and not try and hide from it. You have to be honest with your councillors about what you have to plan for.

In Plymouth we had an advantage in that the Council wanted to embrace growth. We started off from a good place of not trying to side step the housing need and the affordability challenges and we upped our numbers above our standard methodology figure. In doing a Joint Local Plan we can articulate the response to rural areas with environmental constraints. Explaining these constraints in the context of a growing city at the heart the area is an easier story to tell.

The other part of the jigsaw is supply. We went to town on understanding it. We set out our site supply methodology and trajectory in such a way that we know how it will be delivered from now to 2034 – the whole plan life. The 5-year land supply has lots of ‘wriggle room’ and the trajectory includes a 13% buffer. This meant there was limited challenge at the independent examination as the Inspector could tell it was a well-constructed plan. We’ve also been able to use this as a tool with developers to both challenge them about, and coordinate with them on delivery. When a developer’s site delivery is lagging behind we move them to outside the 5-year land supply as we have enough headroom and currently have 6.7 years of supply.

“You need to have an awareness of the balance between the creative and process elements; a local plan needs to be robust but don’t lose the *visionary* plan making aspects.”



If you nail the ‘rock’ of the plan which rightly or wrongly is about housing, this allows you to have the other more visionary elements – the ‘creative stuff’ which tells the story of your place. You need to have an awareness of the balance between these creative and process elements; a local plan needs to be robust but don’t lose the visionary plan making aspects.

What’s been missing over the last few years in the language of plan making is the word ‘spatial’. I see this as being about a more holistic understanding of the things that make a place work beyond just the use of land. The process aspects can make it seem like the plan making system is being done to you rather than it being a tool for you to do good. But if plan making isn’t creative I don’t want to do it anymore! Think of the process as a tool to achieve your ends. We started with what we think is the answer for our community and what Plymouth and South West Devon *could* be. We set out that vision first and then used the legislation and the NPPF to achieve that vision. I think that is what planning is all about.

Updating your local plan policies

C– Developing the update to your local plan policies

71. The next stage of your journey involves the actual development of your updated local plan. Your focus should start with developing your evidence and on engagement with key delivery partners and stakeholders.



PART 2 of the Toolkit provides a quick reference list of the core NPPF requirements for local plan content; and is a useful reminder of what your policies update needs to cover.

PART 3 of the Toolkit highlights some important procedural requirements for this stage of local plan making.

If you are developing a full update of your local plan or a new joint local plan, you may find the assessment matrix in **PART 4** of the Toolkit helpful in informing the development of policies and identifying issues. If you are undertaking a partial update of your local plan, pick out the key questions relevant to your update.

C1: Collating, developing or commissioning evidence

72. There are broadly two types of evidence documents:
(i) those that inform the preparation of local plan policies and any site allocations and generally need to be completed to inform the preparation of the draft version of the policies update; and (ii) those that assess the impacts of local plan policies and any site allocations and are therefore needed to support the strategy that the policies update is proposing such as the Sustainability Appraisal, Habitats Regulations Assessment, Viability Assessment and Infrastructure Delivery Plan. Key documents and evidence requirements should have been identified at the project planning stage and it may be helpful to consider them within these categories.
73. There may be a need for engagement with statutory consultees and other key stakeholders including local groups, infrastructure providers and developers (as appropriate) on the approach to collating the evidence, including confirmation of the methodology to be utilised and any key baseline assumptions to be used. For some types of evidence this is an essential component of the methodology.
74. As set out in the NPPF and reflected in the PAS advice on proportionate evidence, you should be focused on collating or commissioning only what is absolutely necessary to develop your local plan. Ask yourself whether or not the evidence is essential to help inform the production of the local plan and/or assess its policies? If not, you probably don't need it. The focus has to be on robust approaches to evidence without falling into the trap of developing masses of unnecessary documentation. Further PAS advice on the proportionate evidence is set out on the [PAS website](#).

TIP: Plan your approach to developing the evidence

Think up front about the overall evidence you need to inform and support your local plan and how the different evidence streams fit together to avoid a siloed approach to its preparation. Think about how the different studies need to adopt common assumptions and the way you write briefs, procure and create opportunities for consultant teams to ensure consistency.

The evidence does and should interact, for example, be clear about the relationship between all the evidence that you collect. The site selection evidence and sustainability appraisal is a particularly good example of this overlap. There is a real challenge for councils in not duplicating resources and it is important to consider whether criteria can be aligned. Make sure that you understand the relationship between reasonable alternatives identified through Sustainability Appraisal and options in site selection – along with other evidence on constraints (for example including Green Belt and AONB) opportunities (including infrastructure capacity) and viability.

C2: Engaging with stakeholders to develop the spatial strategy

75. Your next step is to continue the discussions on high level options with senior leadership team and councillors on your vision and strategy. Depending on the scope of the plan update you will want to extend engagement to other key stakeholders including departments within your authority and individuals/organisations beyond, including the Local Economic Partnership. This could include meetings, focus groups or workshops with other officers within your authority, statutory consultees, county council and neighbouring/Duty to Cooperate authorities. It may also extend to targeted engagement with local groups including Town and Parish Councils, designated neighbourhood plan forums, Tenant and Resident Associations and potentially topic-based focus groups such as with infrastructure and service providers, as well as those groups typically less represented in planning.
76. Where appropriate, this targeted early engagement could be in place of consultation on a direction of travel or Issues and Options style document. However, there may still be instances where a formal 'Issues and Options' route is more appropriate. Any consultation and engagement with the public should be integrated and coordinated with wider authority communication and consultation channels.
77. There may also be value in engaging at the strategy stage with any in house specialists or consultants such as in relation to the Sustainability Appraisal, Habitats Regulations Assessment or viability assessment in defining – and not just assessing – the strategy.

TIP: Viability and infrastructure planning

There needs to be meaningful and ongoing consultation with developers, especially of strategic sites, on viability appraisal assumptions. This means there needs to be time in the plan making programme for this. The sources of any estimates of the cost of infrastructure on strategic sites need to be clear and justified. A formula-based approach based on a historic tariff may not be the right one where on-site delivery of infrastructure is expected with a different cost implication. But it also goes beyond this. There is also value in considering how infrastructure planning evidence such as set out in infrastructure delivery plans and the strategy and mechanisms for delivery across sites is reflected back into viability appraisals in a more nuanced way.



78. If you are undertaking a full plan update, or even if you are undertaking a partial update, you will need to identify options and where possible 'reasonable' alternatives to the approach you are taking. This won't always mean starting from scratch – local plan visions, objectives and strategies might still be fit for purpose or provide a reasonable option.
79. This testing of options and alternatives is a critical element of your Sustainability Appraisal and one which is likely to be heavily scrutinised during consultation and as part of the independent examination on the plan. It is therefore essential to ensure that options development is fully integrated with your Sustainability Appraisal process. Use your Sustainability Appraisal to help identify and test the options for Plan production as part of a process to inform the selection of 'preferred' options, rather than retrofitting the Sustainability Appraisal once a preferred route has been decided.

TIP: Explain your spatial strategy – and why it is an appropriate one for your area

You need to be able to clearly articulate what your spatial strategy is! Using specialist advice and evidence as related to viability or ecology is valuable at the strategy development stage; these documents are not just a means of appraising the policies late in the plan making process. The sustainability appraisal should help you identify/ generate and assess alternative strategic options rather than being an afterthought or late in the process to assess policies. Options need to be realistic, viable and so on, but you are also looking at strategies for a time horizon of 15 years or more and technological as well as socio-economic and environmental change in that period could impact on any strategic approach that you adopt. If in doubt about whether an option is a 'reasonable alternative', the process of testing it can be valuable in determining whether it is reasonable – and factoring it in or out.

C3: Drafting your policies update

80. This part of the journey is your real opportunity to focus on the quality of the policies update that you are developing. It is your chance to bring all of the work that you have undertaken together and demonstrate how your policies update can make a positive difference to the area you are planning for. How you approach its drafting can either produce a document which is vibrant, energetic and positive or which downplays the opportunities to address your area's challenges and attributes. How you design and write the document and use graphics play a big part in this and we have provided some examples of local plans that have used this to good effect (see Tip Box, page 28).
81. One of the biggest challenges to achieving a high-quality policies update is that you are preparing a document which is intended for multiple audiences, from decision makers and applicants through to infrastructure providers and neighbourhood planning groups. It can also influence investors decisions on where they believe their funding can be used to best effect for their shareholders – the 'is this a place that I think I can do business in' question.
82. Ultimately, despite these multiple audiences, local plans are there to provide the framework for decision making in your area within the context of the 'plan led system'. It therefore has to be based on evidence and meet the soundness and legal compliance tests. In doing so it needs to 'tell the story' of your place and what the policies update is trying to achieve. This is a key part of how you should approach articulating the Vision, Objectives and spatial strategy within the policies update. Consequently, whether you are preparing a full or partial update or developing a new local plan or joint local plan this strategic element always needs to be referred back to so that you can 'sense-check' the more detailed parts of the document to make sure that it is justified and clear in terms of the 'golden-thread' running through it.
83. Policies need to be clear and robust and be underpinned by your evidence. It is essential that you work with development management colleagues (and if appropriate developers and other stakeholders) to test the policies to make sure they can actually be used to achieve what you want them to achieve. If at all possible test these against 'real world' examples to help ensure that there are no unintended consequences when applying them.
84. Policies should be clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals and ensure consistency in decision making. Wherever possible they should be positively worded. They should enable an applicant to be very clear as to what is expected from any development proposal submitted to the council. They should also be relevant in terms of the scale of development that the policy applies to. Not all development will be of a scale or type that can support some policy requirements and the way you word your policies will need to reflect this.
85. Statements that amount to policy requirements or have a direct effect on the development should be set out within the policy itself, not in the supporting text. This is a common mistake of submitted plans. Conversely, statements of intent that are just about what the Council is going to do but don't have any bearing on what an applicant is required to do should not be included within policy but in the supporting text.
86. It is important that policies are in general conformity with national policy and where possible use the same terms. Local planning authorities' own interpretation of national

policy on matters such as Green Belt, heritage assets and the loss of open space can cause confusion, potentially resulting in the need for main modifications to be made to plan policies through independent examination. However, avoid repetition of policies (and national planning policy) wherever possible and wordiness in your drafting style. Cross referencing to policies within other policies is very rarely a necessary or useful move! This is because the plan should be read as a whole and introducing cross-referencing can have the unintended consequence of raising the importance of specified linkages over others which are not specified. Statutory consultees, and officers in other council departments can have a particular role not just in ensuring that the policies update takes the right approach but in supporting the development of concise and clear policies that avoid repetition.

87. Many plans can become unnecessarily lengthy because of the extent of the supporting text (sometimes called ‘reasoned justification’ or ‘explanatory text’) provided in relation to each policy. Again, any supporting text (which has weight but not the same legal status as the policy itself) should be focussed on setting the context and justification for the policy and, where appropriate, provide further explanation as to how it is intended to operate.

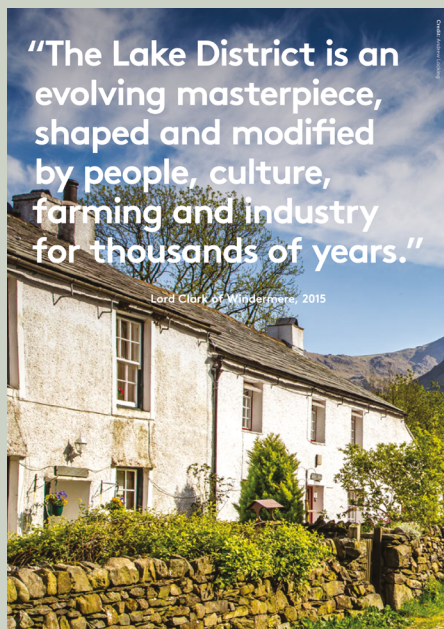
Clearly present in a way that decision-makers; applicants; infrastructure providers; local businesses; *and* local residents can understand.

For policies which are ‘allocating’ sites, the requirements of the development of a particular site should be set out in the policy itself rather than in the supporting text, particularly if it relates to site specific requirements, such as for the provision of necessary infrastructure.

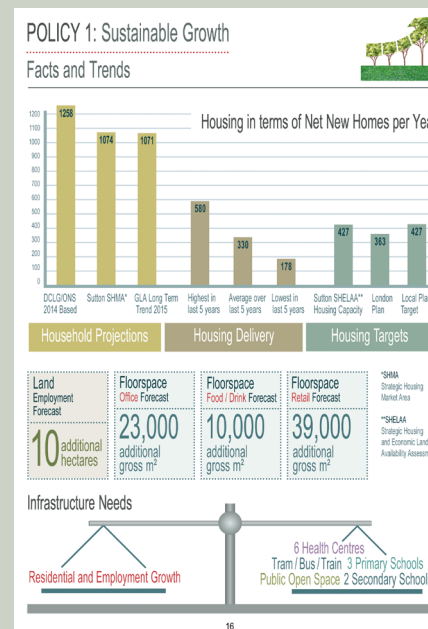
88. You should challenge yourself about the number of policies and the length of the policies update. It does not need to be overly long and the more policies you have and the longer the supporting text the greater potential there is to be confusing, lose the sense of ‘story’ of the local plan and create potential issues of legal challenge if something gets ‘missed’ when making a decision on a planning application. Text which may be required to provide explanation and justification to support the policies update at independent examination (as opposed to future decision making) may usefully be included within supporting documents rather than within the policies update document itself.



TIP: Local Plan Presentation – Approaches



1



2

The Local Plan Expert Groups' Local Plans report to the Communities Secretary and to the Minister of Housing and Planning (2016) included a number of recommendations related to the way in which local plans are presented and formatted – to ensure they are legible and usable.

Councils preparing plans have taken a range of approaches to designing and formatting local plans.

- 1 Lake District National Park's Local Plan, which has won an award on engagement with the community, has a strong graphic identity incorporating a number of photographs of the area.
- 2 The London Borough of Sutton's Local Plan, similarly uses lots of photographs and relies on infographics and diagrams to convey key data on the planning context.

C4: Presenting the policies update

89. You need to clearly present the overall spatial strategy, policies, allocations and Policies Map in a way that: decision-makers (your development management colleagues and councillors who sit on your planning committee); applicants (as primary users); infrastructure providers; local businesses; and local residents can understand. This is not an easy task! It might include, where relevant, the use of simple graphics (see page 38).
90. At this stage you may want to think about online access and the interoperability (i.e. the degree to which computer systems or software can exchange and make use of information) of your plan content both for the consultation, publication and eventual adoption stage. If you have the resources, an interactive Policies Map will aid users (and reduce the level of enquiries received).

C5: Develop the evidence documents that assess/are informed by the policies update

91. Engagement with other bodies and organisations is likely to be needed in developing the evidence base. The obvious and legally prescribed requirement for this is in relation to the Sustainability Appraisal and Habitats Regulation Assessments. It is also a practical necessity for developing other evidence documents such as an Infrastructure Delivery Plan and Viability Assessment. Building in testing of assumptions and costs – particularly in relation to strategic sites is important to ensure the viability of plan policies and deliverability of site allocations.
92. You also need to have clear evidence to support your assumptions on housing delivery rates. It is crucial that you can explain and justify how the policies update will

TIP: Use the wider evidence base in your Sustainability Appraisals

Other parts of the evidence base should be referenced and used within a sustainability appraisal to justify your assessment of strategic approaches and policies. A thorough understanding of how your evidence base relates to the strategy and individual policies is also key and drawing on evidence in the context of the sustainability appraisal can be a good way of bringing this together and helping you tell the plan story.

provide for a 5-year supply of specific deliverable housing sites against the housing requirement (and appropriate buffer) on adoption. If it is not possible to demonstrate a 5-year land supply on adoption you may need to consider incorporating a ‘stepped’ housing trajectory into your policies update.

93. This would provide for a stepped approach to meeting local housing needs with the housing requirement varying at 5-year periods over the course of the plan period to reflect constraints in housing land supply and/or delivery during the early years. However, such an approach should only be contemplated where compelling evidence exists to justify it and you can demonstrate that the use of a ‘stepped’ trajectory is legitimately required to enable local housing

needs to be met in full over the plan period and maintain a plan led approach.

94. The development of the evidence base can be left too late in the plan making process – outputs should be available to accompany the publication of your Regulation 19 Submission Local Plan.

C6: Statements of Common Ground

95. At this stage it is advisable to formalise the ‘Statements of Common Ground’ that provide the evidence for the legal Duty to Cooperate. Further PAS guidance on this is set out in **PAS Statement of Common Ground draft Advice & Template**. These are different to the independent examination topic based ‘Statements of Common Ground’ which can aid the independent examination process by addressing outstanding concerns received through representations received during plan-making (see below).

C7: Monitoring and review framework

96. As far as possible, the Plan should include clarity on how future reviews of local plan policies will be undertaken. You may decide that including detail on how you will approach ‘Local Plan Review of policies’ may assist by setting out exactly how and when the Council will seek to undertake future local plan policy reviews, and how the Council will determine whether or not updates to the local plan will be required. Policy objectives and targets need to be clear, as do the triggers for review. Any actions identified in response to these triggers need to be effective to remedy the identified failure to hit targets. Such an approach will assist by providing clarity to all stakeholders and users of the Plan and reducing the potential for ambiguity in the future of the process for reviewing local plan policies.

C8: Start to assess the soundness of your policies update

97. It is never too early to consider whether your local plan meets the independent examination ‘tests’ of whether it is a ‘sound’ plan as set out in national policy. In practical terms after the publication of your Regulation 19 Submission Local Plan it is too late! Once you start developing your policies update, start thinking about whether it is ‘sound’ right away – make the soundness tests your ‘mantra’.
98. Checking the soundness of plans cannot be an inward exercise especially as it relates to plan delivery. Engagement with delivery partners such as infrastructure providers and strategic site promoters/developers to get agreement on delivery issues is essential. You need to ensure that the housing delivery strategy of the policies update is supported by robust, up to date evidence. It is particularly important to ensure that careful consideration is given to developing robust and realistic assumptions on future delivery rates for housing and in establishing funding and delivery arrangements for infrastructure required to support planned growth. Your dialogue, and any decisions reached, with delivery partners should be captured as they may be helpful later as an ‘audit trail’ including in the development of any examination focused Statements of Common Ground.

D– Consulting and engaging on the policies update

99. As set out in the introduction section above (paragraphs 17–18) the approach to consultation and engagement will vary depending upon the scope and extent of plan update and local circumstances. As a minimum, under the Regulation 18 stage you must notify relevant organisations (as defined by the Regulations) of the subject of the policies update and invite each of them to make representations about what the policies update ought to contain. You must then take into account the representations made. However, where you are undertaking a full or extensive update to your local plan, it may be prudent and appropriate to undertake public consultation on the draft policies update together with supporting documents (i.e. a full version of the draft local plan). This section relates to consultation carried out *before* the Regulation 19 stage, but elements will also be applicable to the Regulation 19 publication or main modifications consultation.

PART 3 of the Toolkit highlights some important procedural requirements for this stage of plan making.

D1: Consulting and engaging on the policies update

100. Consultation should be in line with your Statement of Community Involvement and any more detailed consultation and engagement plan which you may have developed. Giving careful consideration to the approach and methods for inviting and collating comments is important in order to ensure that the consultation is openly accessible, but that the processing and analysis of responses will be as agile and efficient as possible. The use of on-line surveys and feedback forms can encourage targeted responses whilst also helping to improve the efficiency of processing and analysing feedback received.

101. You need to keep a record of parties you have contacted regardless of whether they are individuals or organisations. During the consultation there is value in meeting with relevant statutory consultees to get an early insight into issues, explain what the local plan and relevant policies are trying to achieve and highlight relevant aspects of the evidence base or justification. Talking through queries and issues informally can assist statutory consultees by significantly reducing the time they need to spend in reviewing documentation on-line, whilst also helping to avoid the potential for misunderstanding or misinterpretation of the local plan which can significantly elongate the plan-making and independent examination process. Developing a collaborative approach in this manner may seem time-consuming, but ultimately it will assist, and form the basis for presenting an agreed approach through a Statement of Common Ground at the independent examination.

D2: Review comments and prepare a Consultation Report

102. Now you need to switch gear and start to review the responses you have received and decide on how to amend the emerging local plan approach. The time this takes will again depend on the approach that you are taking to your policies update (i.e. a full or partial update). Diagram 3 outlines a process you may wish to follow.
103. One way to deal with this is to break down responses received into the specific issues (or codes). Record each of the comments received in a database along with who made the comment, their agent and contact information. Then for each comment, code it by its theme and the policy/plan area to identify key issues and actions required in response. This might include whether new evidence is needed to test

TIP: Notifying statutory consultees

When formally notifying statutory consultees it is a good idea to send each of them a 'bespoke' letter signposting them to the key evidence relevant to their area of interest (including web links) to help them to respond. You may know where the information is but you shouldn't expect them to have to try and find it - and some relevant evidence may be missed particularly if it is contained in a number of different documents. This may save you time later in the process and helps to develop a collaborative approach to plan making.

or revise approaches. Categorising comments received will help you to identify and quantify the key issues or themes emerging, and also enable you to take a considered and consistent approach to responding to the key issues and themes identified.

104. The consultation approach should be documented in a consultation report, setting out the bodies and persons invited to comment, a summary of the responses received, identification of key issues/themes identified through analysis, and the responses to these. This should include reference to how the local plan will be amended and where any further evidence base work may be required. You should also include in the report all of the methods that you used to make people aware of the consultation

ranging from statutory requirements through to the use of council e-bulletins and social media. In doing so you need to make sure that you are complying with the General Data Protection Regulation (GDPR). Production of a consultation report is important in order to report back on the consultation process in an open and transparent way, but also to inform the production of your Consultation Statement at a later date.

DIAGRAM 3: Consultation Approach



D3: Consider the need for further engagement or evidence

105. Depending on the issues arising from your consultation and engagement, there may also be a need to undertake further targeted or wider engagement or evidence base collation in order to inform the production of the Regulation 19 Submission Local Plan. This may include workshops with internal officers, statutory consultees, and key stakeholders including locally constituted community groups and designated neighbourhood plan forums.
106. As far as possible you should be seeking to resolve any outstanding issues with statutory consultees and stakeholders in local plan delivery (including infrastructure providers, strategic site promoters/major housebuilders) at this stage.

Ashford Borough Council

Simon Cole
Head of Planning Policy



Ours is a typical planning context in the south east with the main issue being delivering housing growth whilst maintaining environmental/countryside protection. In Ashford there was significant community concern around speculative applications in locations that were not appropriate. Understandably there was also frustration from our councillors about the limited capacity available as resources were being diverted to appeals in the context of the challenges around maintaining our 5-year housing land supply.

Our starting point was to get out into the community to have a grown-up conversation with residents and parish councillors about the challenges we faced. You need to be 100 percent transparent in the way in which you explain the issues to your community and you need to be clear about what your Statement of Community Involvement says.

Ashford haven't used 'issues and options' style documents as a rule although there are instances in which they can be helpful to build consensus around approaches. We started with 'Plan Ashford' which was really a series of conversations to understand what the issues were. We then did a 'call for sites' exercise and a series of exhibitions jointly with the parish councils. We simply presented the available sites on a map without indicating their suitability. We used this as a basis for discussions with communities on what their thoughts were on these sites – the issues and opportunities. We then did some more targeted engagement as part of the Regulation 18 stage including with different sections as the communities but did not publish this formally as a draft for consultation.

Understanding what your plan is seeking to achieve is key. In terms of developing the strategy, you need a clear narrative – and that narrative needs to be underpinned by evidence. Don't start from sites to develop the strategy as you don't always meet in the middle!

An independent examination is all about preparation; you can't wing it! Hearings are not public inquiries and there is a limited role for advocates – they should be evidence led. Being able to point the inspector to evidence

“The strength of a local plan is based on two pillars: consultation and evidence gathering... get the balance right between them.”

Simon Cole

Head of Planning Policy,
Ashford Borough Council



and articulate why you have made certain choices – and how you have exercised your planning judgement is key. This can mean that you have allocated the ‘best site’ based on a strategy decision rather than consideration of the site ‘scores’ in isolation; but you have to be able to justify and explain this. Being able to point an inspector to the relevant section of an evidence document whether in statements or during hearings inspires confidence.

We have now adopted our plan, and the reality is we keep our situation under review in terms of land supply and keep an eye on delivery. But having the plan in place has given clarity to our development management officers who were previously dealing with policies in multiple documents and has given confidence to our councillors.

A local plan must define a strategy – and together with supporting documents – tell the story of why this is appropriate. The strength of a local plan is based on two pillars: consultation and evidence gathering. You need to approach these proportionately and get the balance right between them.

E – Developing the submission version of the policies update

107. The next stage of plan making drafting is preparing your Regulation 19 Submission Local Plan policies update. The publication of your Regulation 19 Submission Local Plan policies update is not a consultation stage. Rather it is the point at which you publish the updated local plan policies that you intend to adopt, having been informed by earlier consultation and engagement, and that you are seeking representations under Regulation 20 on its soundness and legal compliance. You should be confident at this point that your updated local plan policies are sound as this is what you intend to submit to the Secretary of State for independent examination.

PART 3 of the Toolkit highlights key procedural requirements for this stage.

PART 4 of the Toolkit is helpful in providing a *final* check of policies and identifying issues and any changes that might be needed before publication. If you are undertaking a partial review of your plan, pick out the key questions relevant to your update.



E1: Revise the draft policies update and update relevant evidence

108. The amount of work that you need to do at this stage will depend on whether you are developing a full or a partial policies update, and how you approached your consultation and engagement at the Regulation 18 stage (see Section D). You will need to prepare your Regulation 19 Submission Policies update having had regard to consultation and engagement undertaken at the Regulation 18 stage.
109. As highlighted in section D3 above, you will need to ensure that any delivery assumptions are adjusted as required to ensure that they remain robust and justified in light of the evidence. Where you are seeking to confirm your 5-year housing land supply through the independent examination process you must ensure that you have undertaken appropriate engagement with developers and others with an interest in housing delivery, and that you make clear your intention to confirm the housing land supply through the independent examination process within your Regulation 19 Submission local plan updated policies. This will then enable you to choose to fix your housing land supply through annual position statements (subject to confirmation from the Planning Inspectorate) in the future, should you wish to do so.
110. A final Sustainability Appraisal report and, if relevant, your Habitats Regulations Assessment will need to be prepared and there may be a need to update evidence documents where you have changed policies or approaches as a result of the consultation. You will need to ensure that key evidence base documents which support and demonstrate the deliverability of the policies update at independent examination, such as the housing and economic land availability assessment, infrastructure delivery plan and viability study, are sufficiently up-to-date, comprehensive and robust.

E2: Update any Statements of Common Ground

111. You should ensure you have resolved as far as you can any outstanding issues from statutory consultees and Duty to Cooperate bodies. Record this in your Statement(s) of Common Ground which should capture not just the process of engagement but the outcomes of this engagement, clarifying areas of agreement and difference as you head into the independent examination stage.

E3: Publication of the policies update

112. Publication of your Regulation 19 Submission Local Plan updated policies and all of the supporting documents intended for submission, including the consultation statement and evidence, should be considered as the start of the independent examination process. You should be satisfied at this point that the Plan policies will be 'sound' and that no further changes will need to be made prior to submission for independent examination. The purpose of this stage is to publish the updated local plan policies and invite the submission of (Regulation 20) representations to be considered by the Inspector as part of the independent examination rather than as a further stage of consultation.

E4: Start to get ready for submission and examination

113. At this stage a number of early practical actions should be taken to get ready for an independent examination.

This might include:

- Finalising the appointment of the examiner with the Planning Inspectorate
- Getting ready for print and distribution of the plan and supporting documents
- Finalising arrangements for the programme officer to be in place;
- Organising training for officers in the team who do not have any recent independent examination experience; and
- Being prepared to write to the Inspector once they have been appointed requesting that they propose any modifications necessary to make the policies update sound.



TIP: Practical arrangements for hearing sessions

It's important not to forget the practical arrangements associated with an independent examination and you should work closely with the Programme Officer on this. An important aspect of this is booking rooms for hearing sessions. The room needs allow the Planning Inspector and those presenting at sessions to be heard easily by each other and anyone from the public who wishes to attend to watch the sessions. This is likely to mean that microphones are needed (and some councils webcast/film this type of public hearing) and that name panels are available for everyone presenting. You may also need to consider whether you need additional officers to help direct or assist the public or additional signage to help participants or the public locate the room. Don't forget you will also need a separate room for the Planning Inspector for the duration of the hearings. In selecting this bear in mind this will need to provide easy access to the room in which the hearings sessions are held whilst at the same time allowing the Planning Inspector, who needs to maintain independence, separation from all participants involved in the hearing sessions, including council officers.

F– Independent examination and adoption

114. This section of the Toolkit sets out guidance on the independent examination stage and beyond. The Planning Inspectorate (PINS) has provided specific guidance on procedural requirements associated with local plan independent examinations: Procedure Guide for Local Plan Examinations 2021. You should refer to this as you prepare for publication of your Regulation 19 Submission Local Plan updated policies.

PART 3 of the Toolkit highlights some important procedural requirements for this stage of plan making.

F1: Submitting your policies update

115. The PINS Procedure Guide for Local Plan Examinations 2021 sets out the documents that need to be submitted and the form that these should take (including the submission of Regulation 19 representations). A key task at this stage will be to review any representations received and create a main issues summary and indicate the Council response to these. This may extend to proposed main (or any additional consequential modifications that arise). Again, the guidance from PINS provides an explanation of the form in which any such changes should be presented in, and where further publicity of proposed changes will be required.

F2: Examination focussed Statements of Common Ground

116. Examination focussed Statements of Common Ground as distinct from Statement of Common Ground prepared in connection with the Duty to Cooperate, are a really useful tool in taking a collaborative approach to responding to any issues raised through Regulation 20 representations received from statutory consultees and key stakeholders. A large number of Regulation 20 representations can be resolved through proposing agreed modifications to the local plan to the Inspector. Even where this is not possible a Statement of Common Ground can help to provide a focus for the Inspector as to what the main outstanding issues are. Taking such an approach helps to minimise both time taken during hearing sessions and the time needed for officers to prepare. We would strongly advise that you start developing Statement of Common Grounds with relevant stakeholders as soon as possible after the close of the period for receiving representations on your Regulation 19 Submission Local Plan (if not before). This allows:

- proper time to consider and explore ways forward;
- the opportunity to provide further information if necessary; and
- for recognition that other organisations will have their own internal sign-off processes which are not always speedy.

F3: Preparing for the independent examination

117. Hearings are only a part of the independent examination. A substantial part of the examination takes place in writing. Commonly the Inspector will, before the start of

the independent examination Hearing Sessions, send initial questions and comments to the Council to respond to before issuing a schedule of 'Matters, Issues and Questions' for all respondents to consider. The Council's response to initial questions received can help the Inspector to understand the issues more clearly, point them towards relevant documents and pieces of evidence, and can also enable some of the necessary main modifications to be drafted to potentially avoid unnecessary discussion at the hearings. Responses should be focused on aiding the Inspector so that his or her 'Matters, Issues and Questions' can be as well informed and focussed as possible.

118. When responding to 'Matters, Issues and Questions' received from the Inspector, we would strongly advise that you develop a standard template and that each question or sub-question is set out and responded to separately. It is really important to keep these succinct and to the point. Understand the question being asked, and answer it right at the start. Hearing Statements help an Inspector to find the information needed so make sure that you can link your response back to the Plan (including associated supporting text), the evidence base or other plans and documents (including the NPPF and PPG) and include a signpost to the document reference, paragraph number(s) and page number(s). There is an enormous amount of information that an Inspector has to review and absorb so it is important that you provide as much help as possible to ensure that they can easily access the relevant information and evidence that you are using to support your response. You should not include anything that cannot be substantiated.

119. You should start to consider well ahead of the independent examination which officers, and potentially consultants, will need to lead on drafting responses to each of the

‘Matters Issues and Questions’ and who will lead on presenting these at the Hearing Session. Legal advice is generally not necessary, but should you choose to appoint a barrister to lead to present to the Examination, the barrister should be available for the duration of the hearings. Think too about whether any other officers and/or consultants might need to be available to support those officers presenting at the Hearing Sessions (typically sitting on a row of chairs behind the presenting officers so they are able to pass relevant documents or notes). It may also be helpful to have an officer available to arrange any printing that might be required during the Hearing Sessions. Many councils invite a councillor, normally who has responsibility for overseeing the development of the local plan, or a senior officer to give an opening statement at the beginning of the hearing sessions to introduce the local plan and relevant team members who will be participating.

F4: Consultation on proposed modifications

120. The Planning Inspector will work with the Council to help finalise the schedule of main modifications and will help the Council to distinguish between main and ‘minor’ or (sometimes known ‘additional’ modifications). Main modifications are those that have an effect on the development, minor modifications are often only factual updates and clarifications. The Inspector will only recommend main modifications if they are necessary for soundness (or in some cases legal compliance).
121. The **PINS Procedure Guide for Local Plan Examinations 2021** highlights the process that you need to follow.

F5: Monitoring implementation

122. Following adoption, as prescribed in legislation, the implementation of the local plan must be monitored. There is a requirement for councils to report at least annually on progress with local plan making, any activity relating to the Duty to Cooperate and on indicators related to local plan implementation to help assess any local plans that are not being implemented. Where you have prepared a joint local plan there may be value in aligning information sources and adopting consistent monitoring sources. This might extend to ensuring that any monitoring software is capturing data across the different authorities in a consistent way.

**Following adoption...
the implementation
of the local plan must
be monitored.**



Further support / Key plan making documents

123. Our priority is to help councils get an up to date local plan in place as soon as possible, so that places have local plan policies to steer development and make local decisions. The Local Plan Route Mapper and Toolkit will help you to make this happen and to understand what needs to be done to get a good plan in place. PAS can work directly with local authorities to use the Local Plan Route Mapper and Toolkit as a "critical friend" or provide an advisor from our team of experienced local authority peers or our team of consultants.

If you would be interest in accessing this support please contact pas@local.gov.uk.

124. Links to the key plan making related documents referred to in this advice are set out below for ease of reference:

- [National Planning Policy Framework, June 2021](#)
- [Planning Policy for Traveller Sites](#)
- [National Planning Policy for Waste](#)
- [National Planning Practice Guidance](#)
- [Procedure Guide for Local Plan Examinations, June 2021](#)
- [Local Plans report to the Communities Secretary and to the Minister of Housing and Planning \(2016\)](#)

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Pilot Authorities (Plan Making Teams)

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Salford City Council
Newcastle City Council
Canterbury City Council
Torbay Council
Central Lincolnshire Authorities

Local Planning Authority Workshop Attendees (Plan Making Teams)

Hastings Borough Council
Woking Borough Council
Lewes District Council

ANNEX 1

Local plan route mapper toolkit

TOOLKIT PART 1

Local Plan Review Assessment

TOOLKIT PART 2

Local Plan Form and Content Checklist

TOOLKIT PART 3

Local Plan Process Requirements Checklist

TOOLKIT PART 4

Local Plan Soundness and Quality Assessment



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