

Levelling-up and Regeneration Bill: Consultation on Implementation of Plan-Making Reforms

Executive Summary of DAC Planning's Consultation Response

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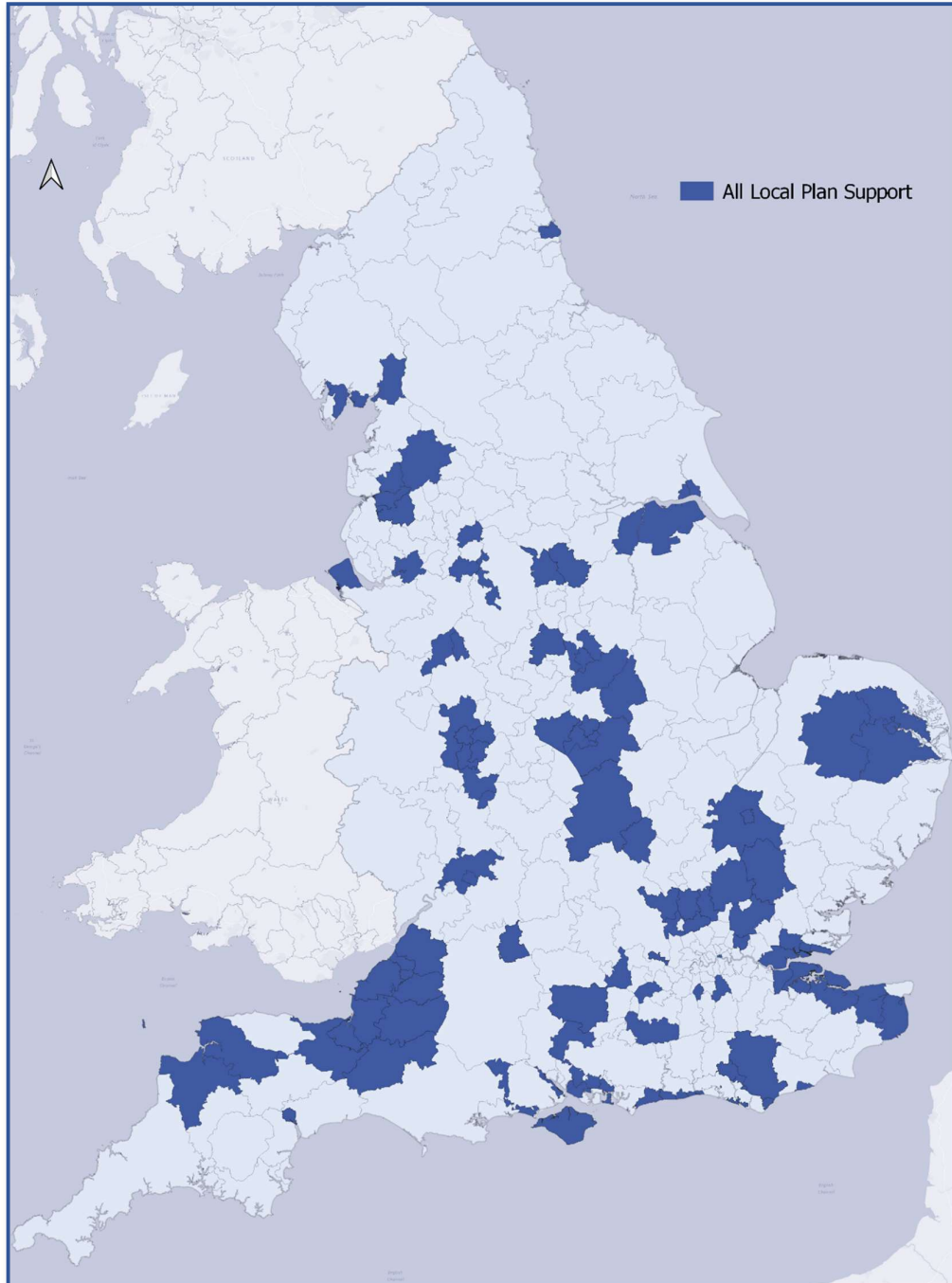
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Executive Summary

The *Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms* was released on 25 July 2023 and includes detailed proposals on a range of plan-making matters.

DAC Planning is an award-winning planning consultancy that specialises in supporting and advising on plan-making nationally. Our extensive range of direct experience in plan-making means that we are uniquely placed to assist with the evolution of plan-making reforms.

DAC Planning's national coverage in providing plan-making support to planning authorities



Our response to this consultation draws on our extensive plan-making experience, including:

- A wide range of ongoing direct involvement in the preparation and independent examination of local plans nationally;
- The production and roll-out nationally of best practice advice to support local plan development in the form of the [Local Plan Route Mapper and Toolkit on behalf of the Planning Advisory Service \(PAS\)](#);
- The delivery of the Local Plan Gateway Review programme to approximately 70 authorities on behalf of PAS and the Department for Levelling Up, Housing and Communities (DLUHC); and
- Ongoing project management support for local plan production on behalf of PAS and DLUHC (provided to approximately 50 planning authorities to date).

We draw on lessons learnt from this work and apply our depth of knowledge of plan-making to the key questions posed in the consultation. As such, the response focuses on proposals for the vision and content of local plans; details regarding the scoping and early participation stage; templating the Project Initiation Document (PID) and 30-month timetable; and the mechanism of Gateway Assessments. **DAC Planning is well-placed to provide input to the detailed design and implementation of plan-making reforms and would welcome further engagement with DLUHC in this regard.**

Chapter 1: Plan Content – In this section, we observe the evident merit in the proposed development of templates to assist in plan production and in clarifying expectations on content at the outset of the process. We emphasise that simplicity of use and application must be central factors to their design. We consider that the process for authorities to develop locally specific visions and objectives is a reasonably well-developed area of plan-making and not an area of particular concern for authorities. In a similar vein, the concept of sustainable development running as a golden thread through local plans is already considered to be evident in practice through the requirement in paragraph 11 of the NPPF.

Chapter 2: The new 30-month plan timeframe – DAC Planning’s key observation is that it is essential that key aspects which define the scope of the plan to be produced must be incorporated into the scoping and early participation stage of the plan-making process in order to ensure that the 30-month timetable can be met. This includes: visioning; an audit of the evidence base to ensure that requirements have been identified; identification of the scope of spatial strategy options to be ‘tested’ as part of plan production; the scope and extent of policies to be included; and the identification of cross boundary issues to be considered through plan-making. Without an understanding of these critical plan-making matters, it is not possible to accurately scope the project fully or allow for the preparation of a realistic 30-month programme. These elements should be reviewed as part of the Gateway 1 stage alongside the PID and detailed project plan. In addition, we highlight a number of more detailed observations with regard to the 30-month timeframe including the need to factor in timescales necessary to deliver the Gateway Assessments, process consultation responses and factor in the timing of consultation and election periods.

DAC Planning provides detailed comment in respect of the preparation and utilisation of a PID in the early stage of plan-making drawing on our directly relevant experience. We explicitly incorporated a scoping and PID production stage within the PAS Route Mapper advice to authorities, and our work to implement this advice to authorities means that we are in a unique position to understand what works well and what doesn’t. We provide a suggested PID template format in Appendix 1 to help share our thinking and learning. We are strongly supportive of this

approach and would be pleased to collaborate further in the evolution of the approach and templates. The PID template is presented in 3 parts as summarised below:

Part 1: Introduction	Background
	Purpose of the Project Initiation Document (PID)
	Existing Local Plan and justification for Partial or Full Review
	Legislative Framework and National Planning Policy/Guidance
	Council Strategies and Plans
Part 2: Structure of the New Local Plan	Geography
	Plan period
	Topics/ Scope
	Objectives
	Vision and Strategy Options
	Key Chapters
	Background Evidence
Part 3: Plan-Making Process	Project Plan and Programme
	Approach to Community and Stakeholder Engagement
	Governance and Decision-making
	Managing Risk
	Resourcing

We note the value of a PID in particular in gaining corporate buy-in to the plan-making process as well as securing a commitment from key stakeholders to engage in plan-making in accordance with timescales agreed upon. By doing so, timescales for plan production are informed from the bottom-up by a sufficiently detailed, realistic, and robust project plan.

Chapter 4: The Local Plan Timetable – DAC Planning advises that the local plan timetable is a key element to the scoping stage of plan-making and that a detailed programme must sit together with the PID. We agree with proposals in the consultation for timetables to be regularly updated, and that any updates should be agreed through the most streamlined process. In respect of the milestones outlined in the consultation (paragraph 79), it is not clear what additional information these provide over and above the Local Development Scheme timetable. In our experience, high level timetables presenting milestones in this consultation are relatively straightforward for planning authorities but the area that is often more challenging is the creation of more detailed project plans which underpin the timetable by mapping out key interdependencies and timescales for critical tasks and milestones. Without this level of detail, it would be challenging for planning authorities to fully understand the scope of work required and ensure that sufficient resources are available to work towards achieving a 30-month timetable. This is a key area of focus within the Project Management Support we are providing to authorities on behalf of PAS and we have developed detailed local plan programme templates to support this process which we would be happy to discuss and share.

Chapter 6: Gateway Assessments During Plan Making - DAC Planning supports the introduction of Gateway Assessments to: help ensure plans set off in the right direction; are compliant with legal and procedural requirements, supporting early resolution of potential soundness issues; and to monitor and track progress. Drawing on our experience, we provide a number of observations regarding the proposals including, the frequency and timing of Gateway Assessments, the need for clarity and consistency in the format and structure of Assessments and in the resource commitment required from planning authorities.

In terms of responsibilities for undertaking the Gateway Assessments, the assessors outlined in *Figure 4* are welcomed. In particular, DAC Planning supports the Gateway 1 stage as a function of independent specialists who are able to make recommendations regarding plan-making process, rather than soundness. In respect of Gateway 1 specifically, DAC Planning recommends that the 30-month timeframe starts following the completion of the Gateway 1 stage and on the date of the planning authority's sign-off of the PID and project plan rather than on the commencement of the Gateway 1 stage. As already referenced in relation to the PID, we would also recommend, in reference to *Figure 1* of the consultation document, that the visioning and confirming evidence requirements stage (the plan visioning and strategy development stage) should also be included in the process prior to Gateway 1.