



Using evidence
in spatial
planning

Spatial Plans in Practice:
Supporting the reform of
local planning

sustainable
communities



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March 2007
Baker Associates, Terence O'Rourke, University of Liverpool,
University of Manchester, University of the West of England
Department for Communities and Local Government: London

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Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU
Telephone: 020 7944 4400
Website: www.communities.gov.uk

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Chapter 1

Executive summary

Introduction

- 1.1 The Spatial Plans in Practice project is intended to make a positive contribution to the implementation of local development frameworks (LDFs). It will do this by disseminating lessons on aspects of spatial planning relevant to the work of planning authorities, local authorities, Communities and Local Government, and representatives of other interests where appropriate.
- 1.2 At the core of the project are the longitudinal case studies. Work with 25 case study areas where LDFs are being prepared will continue throughout the project. Two rounds of visits to the case study locations have taken place and this report draws on the investigation so far to present lessons. The matters covered will be extended and the lessons themselves will evolve as more is done by all involved, as the new system progresses, and as views develop.
- 1.3 This lessons report focuses on one aspect of plan making – **the use of evidence in spatial planning** – following a more specific investigation in 12 of the 25 case studies. The report deals with the role of evidence, with what sort of evidence is needed and how it is obtained, and with the use of evidence in the preparation and justification of the strategy, proposals and policies within parts of the LDF. Findings from the case study investigations are presented first, followed by the lessons that can be developed, drawing partly on the experience of the case study local authorities, and on other sources, such as policy guidance and reports of Independent Examinations.

Findings

- 1.4 The overall conclusion from the case studies investigated is that the local planning authorities have an increasing appreciation of the importance of evidence in preparing local development documents. They are collecting and using more evidence than before, and are collaborating with others in and beyond local government to assemble the evidence base for spatial planning. Within this overall picture, however, there is considerable variation.

Types of evidence

- 1.5 Three types of information used as evidence have been encountered, distinguished as: the analysis of data from existing statistics; background reports on specific topics; and characterisation studies used in understanding places, linked perhaps to focused community involvement. There is less experience of using techniques that explore possible futures as a way of understanding what might be possible, as well as what might be desirable.

- 1.6 A finding from the case studies is the tendency for different types of material to be included in the meaning of 'evidence'. For instance, many referred to the responses from community involvement and stakeholder events as 'evidence'. It is entirely appropriate to use this type of material in developing, evaluating and justifying choices that are made, and it does represent an important source of information representing views of those individuals and organisations.
- 1.7 While one reading of *Planning Policy Statement 12: Local Development Frameworks (PPS12)* may lead to the conclusion that the collection of evidence takes place in a self-contained, pre-production stage of plan making, the case studies show that there is a continuous process of developing the evidence, with new issues being recognised and addressed and material being developed in greater detail as development plan documents (DPDs) take shape. The case studies also demonstrate that keeping evidence up to date is a challenge, although some issues (eg landscape character work) are rather less transient than others (eg housing markets).

Resources for evidence

- 1.8 The broad picture amongst the 12 case studies is one of a reasonable level of satisfaction with the resources available to maintain an appropriate evidence base. Where skills and capacity are lacking internally then consultants are frequently used, and the information and evidence 'requirements' of the new system is leading to far greater use of consultants. This experience is reported to be broadly positive.

Collaboration

- 1.9 The findings revealed a wide range of collaborative activity to gather and interpret evidence, including with other local authority departments, neighbouring authorities, other tiers of government and government agencies and with the private (development) sector. Some interests, however, (especially other government agencies and developers) are engaged more easily at the level of specific sites and proposals than at the level of strategy.

Use of evidence

- 1.10 While many of the case study authorities have been able to demonstrate that appropriate evidence is being used to identify the issues for the LDF, to identify options and to select the preferred spatial strategy, this is not always evident in the documents that are produced. Consequently, the rationale for the choices made may not be entirely clear to other stakeholders and consultees in the process.
- 1.11 Up-to-date thematic studies on topics such as housing, employment and retail are available to inform the plan-making process in all of the case study authorities. However, practice is more variable when it comes to using this information to understand the characteristics and spatial relationships of sub-areas, settlements and neighbourhoods within an authority, for example, by disaggregating the data. Similarly, studies on wider, quality-of-life themes such as culture, green space and health are the exception rather than the rule.

Sustainability appraisal

- 1.12 All of the case studies have undertaken sustainability appraisals (SA) of their development plan documents, and six have submitted DPDs with an associated SA. The experience is mixed. Whilst most believe it has been a useful process, raising issues that may otherwise not have been considered, others have concerns about the resources required to undertake the process and the impact on decision making.
- 1.13 Half of the case studies used external consultants to carry out the SA, with others using in-house resources or a mixed approach. There is no evidence that one approach is preferable to another; all have benefits and disadvantages, and what seems to matter is that the process is well managed, integrated with the LDF process and adequately resourced.
- 1.14 Some case studies relied substantially on existing data to inform the evidence base for SA, but more identified the need for specific information to fill gaps or to respond to new issues raised by SA. There are examples where SA has led to changes to strategy and policy, and some where recommendations have been rejected when weighed against other evidence, eg from community consultation exercises. However, it is not always clear in development plan documents how the recommendations of SA are addressed and incorporated.

Monitoring

- 1.15 Support for the principle of monitoring as an integral part of the LDF process is evident from the case study work, but it is also clear that the development of appropriate monitoring frameworks takes time and that practice is still evolving. That both the LDF and the Annual Monitoring Report (AMR) processes are at early stages of development is evident from the number of AMRs which currently provide only baseline information rather than interpretation or evaluation, rely mainly on national core indicators, or relate to existing local plans rather than the LDF. Some authorities are, however, setting their own local targets, including locationally-specific measurable targets.
- 1.16 The linkages between the AMR and SA are, at best, patchy. In several cases SA and AMR processes are treated as two distinct remits that do not yet overlap with each other. Most authorities, however, recognise the need for greater integration, including selecting indicators which enable a causal link to be established between implementation of the LDF and the 'significant effects' being monitored.

Lessons

- 1.17 An effective local development document needs to be informed by evidence that is informative about: the character of the place and the community; what is wanted and needed for the future; and how change can be managed to assist in moving from the current situation to a more desirable future situation. A wide and inclusive view needs to be taken of what constitutes evidence, but all evidence used needs to be able to withstand scrutiny.
- 1.18 Evidence gathering is not a self-contained stage and the need to develop the evidence base will evolve as alternatives are recognised, new issues arise and consultation

responses received. This should be made clearer than is suggested by the inclusion in guidance of a pre-production, evidence-gathering stage.

- 1.19 Local authorities are concerned about how to know whether the evidence obtained is sufficient. This is an area where Communities and Local Government, the Government Offices, and the Planning Inspectorate (PINS), could provide assistance. However, it is unlikely to be a matter that guidance can ever prescribe exactly and is essentially a matter for professional judgement.
- 1.20 It is useful to appreciate that evidence takes different forms: statistical work, specific topic studies and characterisation work. The analysis of key statistics, eg from the Census, on a district basis is a useful starting point for the LDF process, even in cases where local authorities feel they already know what the broad issues are. It can enable the authority to be more specific about the scale of problems, consider recent trends which may be changing, identify or confirm problems that need to be tackled, begin to identify the opportunities and constraints, and compel authorities to consider spatial issues that may be less well understood, eg health, crime, skills.
- 1.21 Topic studies dealing with matters such as housing, employment and retail are a standard part of the evidence base. Such studies need to be designed so that they are integrated with each other, particularly where issues are related and where uses compete for the same land. There is a need for more future-oriented 'scenario' work telling local planning authorities what is possible, as well as what is already present. There is also a need for more detailed understanding of different settlements or neighbourhoods, and their relationships, to identify distinctive areas that might be building blocks of a spatial strategy.
- 1.22 Evidence should be kept up to date, recognising the resource implications. Authorities should prioritise the need to up-date according to the significance of the evidence to the strategy and policies, and the findings to date. The monitoring process should be examined closely for its potential contribution to the up-dating of evidence.
- 1.23 Many local authorities have recognised the benefits of collaboration with others in assembling the evidence base for spatial planning. Finding out what exists in other departments and agencies, and joint commissioning of studies that meet more than one policy purpose are important ways of making resources go further.
- 1.24 In practice evidence is defined in broad terms and includes information and intelligence generated through community consultation. Parish plans and neighbourhood planning exercises have proved especially valuable in two ways: providing data about the characteristics of settlements and neighbourhoods, their needs and issues; and providing evidence about the visions and aspirations of the local community.
- 1.25 Joint research and information arrangements, where they exist, perform a number of functions: assembling data for monitoring purposes, developing common methods for policy appraisal, identifying gaps in the evidence base and an arena for commissioning joint studies. There is a case for the wider development of such arrangements, particularly as resources and skills in county council planning departments are reduced.

- 1.26 Practice suggests that some stakeholders, including some government agencies and developers, are more easily engaged in contributing to the evidence base when the plan reaches the stage of dealing with specific sites or is an Area Action Plan. This may be entirely appropriate. However, there is a case for thinking carefully about the need for input from some of these stakeholders when strategic options are being considered, for example, the Environment Agency in relation to flood risk and other environmental constraints.
- 1.27 Consultants are being used more often in the new system, and generally speaking the process and outcomes of working with consultants are positive. Practice suggests that the resource implications of briefing and managing consultants should not be underestimated. Longer-term relationships with consultants working in partnership with local planning authorities seem to be particularly effective.
- 1.28 All of the case studies were confident that they could point to appropriate evidence to under-pin their decisions, but this was not always clear in the documents that were produced. Local planning authorities need to be more explicit in the way that evidence is used to identify issues and options and to justify preferred policies, and how this is presented in consultation documents, in order to assist stakeholders to come to an informed view on the appropriateness of proposals.
- 1.29 The sustainability appraisal process requires a dedicated officer who is responsible for liaising with consultants or the in-house team, and for ensuring the integration of SA with the LDF. Sustainability appraisal should be considered alongside the LDF process from the earliest stage.
- 1.30 There are two types of data and evidence needed to inform the SA: data or evidence related to the initial baseline position, and evidence needed to inform the appraisal of alternative strategies and policies. Where additional evidence is collected or commissioned this should be seen as contributing to the wider evidence base for the LDF and for monitoring purposes. There is also scope for joint collection of evidence together with other policy appraisal processes, such as health impact assessment.
- 1.31 There is much scope to improve the transparency of how recommendations from SA are addressed and incorporated in development plan documents, including the basis on which the recommendations of SA are weighed against other evidence and consultation responses.
- 1.32 To assist the meaningful appraisal of alternative strategies or policies, the options and the evidence to justify them need to be described explicitly in published documents.
- 1.33 Monitoring should be seen as an essential and integral part not only of the LDF process, but also of planning authority culture more generally. This will promote the use of an evidence base in plan and policy making, enable the assessment of the impact of policies and make planning processes more responsive.
- 1.34 Over time, monitoring activities can be expected to shift from the current preoccupation with monitoring of the socio-economic and environmental characteristics of the area to monitoring the impact of policies. The monitoring process potentially has value beyond LDF preparation and planning policy implementation. For example, it can help broaden

understanding of issues facing an area, linking to other corporate objectives and other sectoral strategies under preparation by other council departments and stakeholders.

- 1.35 When developing the monitoring framework, it is important to avoid the temptation to identify too many indicators and tailor indicators to local conditions and policies. For the purposes of bench-marking, the monitoring framework should address national and regional core indicators, but it should also go further to local indicators and targets which are closely linked to key DPD policies.
- 1.36 Good examples of the use of indicators and targets include the setting of specifically measurable targets, with timescales and the identification of partners, agencies and organisations who will be involved in implementation and delivery.
- 1.37 The case studies reveal that the current linkages between the AMR and SA processes leave much scope for improvement. Good monitoring and LDF practice should emphasise the links, for example, by ensuring that any potentially significant environmental impacts identified via SA are addressed through appropriate indicators in the monitoring framework.

Chapter 2

Scope of the report

Introduction

- 2.1 The Spatial Plans in Practice project is intended to make a positive contribution to the implementation of local development frameworks (LDFs). It does this in two ways. Firstly, it researches and identifies useful lessons from current and emerging practices. Secondly, it disseminates practical advice on aspects of spatial planning judged to be of value to practitioners.
- 2.2 This is the second lessons report from the Spatial Plans in Practice project. The first lessons report¹ presented findings from a broad investigation of 25 longitudinal case study areas where LDFs were being prepared, and reported on matters of programme setting and timely progress, and integration between local planning and other sectors.
- 2.3 This report focuses on one key aspect of plan making, following a more focused investigation with the case study areas. The visits and interviews with local authorities and stakeholders reported here were undertaken in 12 of the 25 areas during September and October 2006.
- 2.4 The subject of the lessons report is **evidence** – something which is integral to the whole process of plan preparation and critical to the value of the product. The report deals with the role of evidence in spatial planning, with what sort of evidence is needed and how it is obtained. It continues with an exploration of how evidence is used to understand what is needed for a place and community, and how evidence is used in the management of change. Consideration of these questions leads to lessons on using evidence in the preparation and justification of the strategy, proposals and policies within the parts of the LDF.
- 2.5 The report complements other previous and scheduled outputs from the project. In addition to the first lessons report, these include thematic studies on local development schemes² and core strategies³, and literature reviews on spatial planning⁴, culture change⁵ and achieving successful participation⁶.

Methodology

- 2.6 The detailed methodology for the longitudinal case study component is set out in the Inception Report⁷ and in the first Lessons Report¹. The 12 case study authorities investigated for this report were:

¹ DCLG (December 2006): *Making timely progress and the integration of policy*.

² ODPM (April 2006): *Starting out with local development schemes*.

³ DCLG (December 2006): *Preparing core strategies*.

⁴ DCLG (December 2006): *The Role and Scope of Spatial Planning – Literature Review*.

⁵ DCLG (December 2006): *Culture Change and Planning – Literature Review*.

⁶ DCLG (December 2006): *Achieving Successful Participation – Literature Review*.

⁷ ODPM (February 2006): *Spatial Plans in Practice: Supporting the reform of local planning – Inception Report*.

- Hambleton
- Horsham
- Hounslow
- Liverpool
- North Cornwall
- North Northamptonshire
- Plymouth
- South Hams
- St Helens
- Stafford
- Stoke
- West Berkshire

2.7 Within these authorities face to face and telephone interviews were conducted with a range of officers and stakeholders. In all cases this included the LDF team leader and team members, the lead officer for sustainability appraisal and monitoring, and representatives of Government Office and private consultants. It also included representatives from economic development, development control, transport, community development, and housing departments, community organisations, the health sector, the Environment Agency and executive members. The detailed research questions are set out at Annex A.

2.8 The case studies examined demonstrate a range of practice and general progress in the use of evidence. The lessons aim to develop the findings to provide guidance to local planning authorities and others on matters that they need to address in relation to the use of evidence.

2.9 Work with all 25 of the case study areas will continue, with two more rounds of investigation scheduled before the end of this year. With each round of investigation, lessons will be disseminated.

2.10 A second key part of the Spatial Plans in Practice project is the Strategic Survey sent to all local planning authorities. Where relevant, findings from the second survey round (undertaken in Spring 2006) are presented alongside the case studies. Further information about the Strategic Survey can also be found at Annex B and in the Inception Report⁷.

Audience

- 2.10 This report is intended to benefit the work of planning authorities and other parts of local authorities. It also has points of interest for representatives of other sectoral interests and Communities and Local Government.

Structure of the report

- 2.11 This report presents findings and lessons on the role and use of evidence. Chapter 3 sets out the role of evidence in preparing LDFs, drawing on policy guidance and information about how this is being applied. Chapter 4 deals with different types of evidence and how evidence is obtained. Chapter 5 considers the use of evidence in preparing local development documents. Chapter 6 looks at the use of evidence in undertaking the sustainability appraisal, and Chapter 7 is concerned with the link evidence provides between plan-making and monitoring. Each of these chapters describes what has been found from the case studies. The lessons in the report are presented as the second part of each of chapters 3, 4, 5, 6 and 7. Overall conclusions are presented in Chapter 8.

Chapter 3

The role of evidence in spatial planning

Introduction

- 3.1 This chapter is about why and how evidence should play a part in making LDFs. This section of the report draws upon what appears in guidance, the Inspectors' reports of the Independent Examinations in 2006, and emerging practice from the case studies. The lessons included in this section therefore reflect the way that the guidance is being followed and interpreted in practice. The lessons support the view from the guidance that spatial planning that is more informed is likely to be more effective.

Guidance

- 3.2 The following statements from *Planning Policy Statement 12: Local Development Frameworks*⁸ (PPS12) provide the context for any deliberation on the use of evidence in preparing LDFs (paragraphs 4.8 to 4.11):

“The policies prepared by the local planning authority should be founded on a thorough understanding of the needs of the area and the opportunities and constraints which operate within that area. Local planning authorities should prepare and maintain an up-to-date information base on key aspects of the social, economic and environmental characteristics of their area, to enable the preparation of a sound spatial plan meeting the objectives of sustainable development.”

“The evidence base is critical to the preparation of local development documents.”

“At the earliest stage in the preparation of the local development document, and particularly for the preparation of the core strategy, the local planning authority should gather evidence about their area.”

“This evidence will be relied upon by the local planning authority in testing the soundness of the local development document at independent examination.”

- 3.3 PPS12 is clear and straightforward that the proper use of evidence is an essential part of the process of making local development frameworks. Other key policy statements also set out requirements for the evidence base. These include: the recently-published *Planning Policy Statement 3: Housing*⁹; and *Planning Policy Statement 6: Planning for Town Centres*¹⁰.
- 3.4 There is evidence that the guidance is having an effect. According to the Spatial Plans in Practice Strategic Survey, a strong majority (74 per cent) of local planning authorities

⁸ ODPM (2004), *Planning Policy Statement 12: Local Development Frameworks*.

⁹ Communities and Local Government (2006), *Planning Policy Statement 3 (PPS3): Housing*.

¹⁰ ODPM (2005), *Planning Policy Statement 6: Planning for Town Centres*.

that responded agreed that LDFs will deliver sounder evidence-based policies relative to old style local plans. The same survey found that over 80 per cent of local planning authorities were now giving more consideration to evidence requirements and over 70 per cent were devoting more resources to developing evidence.

- 3.5 There are other sources of evidence that make it clear that PPS12 is being interpreted as it is being applied. These include reports from Independent Examinations and other emerging commentaries such as the Spatial Plans in Practice literature reviews. These sources are considered below.

Spatial Planning Literature Review

- 3.6 The role and use of evidence has been considered as part of the literature review on the role and scope of spatial planning⁴. This review emphasises the importance of “more positive, evidence-based reasoning in the formulation of strategies and policies, and in managing change”, as a pre-requisite for planning making a positive contribution to achieving society’s goals (paragraph 2.2). This point is developed (paragraphs 2.8 and 2.9) where it is noted that whilst the need for planning to be based on sound evidence seems self-evident, the preparation of local plans has “undervalued an understanding of spatial development patterns and trends, and the generation of strategic options that might flow from that understanding”.
- 3.7 The literature review discusses the nature of collaboration as an essential component of spatial planning (paragraph 5.13), and identifies the evidence base and an understanding of the spatial development issues and drivers in an area as the focus for collaboration. It is noted too, that whilst there has been considerable progress in expanding the evidence base at the local level, “studies, data and indicators tend to be sectoral in nature”, when the spatial planning approach would encourage more joining up.

Independent Examinations

- 3.8 The publication of the Inspectors’ reports on the first two Independent Examinations of submitted core strategies has led to much comment and reaction. These reports, relating to the Stafford and Lichfield core strategies, were bound to be much anticipated with uncertainty about how the new tests of soundness would be applied in practice. In both cases the core strategies were found to be unsound. As a consequence in the case of Lichfield, other development plan documents (DPDs) that had been submitted at the same time could not be found to be sound since there was no core strategy with which to display conformity.
- 3.9 Stafford Borough Council is one of the case study authorities for this project and the experience of Lichfield Borough Council also will be drawn upon here for its relevance to the consideration of the role of evidence. Though the experience for the local planning authorities was essentially negative, these cases do allow lessons to be drawn, and this experience helps to understand what is sought by the guidance.
- 3.10 The Inspector’s report following the Independent Examination of the Stafford core strategy does not refer to the use of evidence in its ‘summary of findings’. The core

strategy fails the test of soundness quite comprehensively according to the Inspector's report, doing so against tests iv, v, vii, viii and ix as set out in PPS12 (paragraph 4.24). This example is not very informative as the core strategy does not do what is required of a core strategy development plan document generally, and therefore the absence of evidence is not particularly relevant.

- 3.11 The Inspector's report following the Independent Examination of the Lichfield core strategy is more informative on the use and role of evidence. The Inspector found that "there are two areas in which the plan is seriously defective," the second of these being "the inadequacy of the evidence base". The report says that, "In some instances the evidence is dated because the evidence was gathered in support of a local plan review some 3 to 4 years ago. In other cases, 'evidence' has only been presented to support the DPD policies during the examination itself or, as for Core Policy 8 (dealing with open space), is still not available. The inadequacy of the evidence base is a fundamental failing under test 10. For a plan to be sound the evidence base must be both comprehensive and up-to-date on submission."
- 3.12 Deliberation over the 'absence of a robust and credible evidence base' occupies a considerable proportion of the Inspector's report following the Independent Examination of the Lichfield core strategy. A key area where the evidence base is found to be 'seriously deficient' is the Council's decision to extend the time horizon of the strategy to 2021 in accordance with the Regional Spatial Strategy (RSS), yet "little, if anything, appears to have been done to extend the evidence base to cover the period until 2021."
- 3.13 The other areas of deficiency are more specific, and include:
- the lack of evidence in relation to the suitability of villages to accommodate growth;
 - the absence of evidence of exceptional circumstances to justify the changes proposed to the existing boundaries of the green belt;
 - the evidence on the impact that the proposed level of retail development at Burntwood would have, when the approach taken differs from the RSS;
 - the absence of a comprehensive evidence base to support the interim policy on open space (Core Policy 8); introduced in its entirety at the submission stage, this policy was found to be unsound in several respects;
 - the lack of a robust and credible evidence base to support the inclusion of a threshold of 10 for the application of the affordable housing policy in Core Policy 4, which was found not acceptable when the clear national guidance in Circular 6/98 states that exceptional circumstances are needed to justify a 'threshold' as low as 15.
- 3.14 The reporting of the Independent Examinations of the Stafford and Lichfield core strategies, and the evident interest in these, prompted Communities and Local Government to present its views to all planning authorities on the lessons to be learned from these early experiences of the soundness test in practice. A letter¹¹ from the

¹¹ Communities and Local Government (11 August 2006), *Letter to Chief Planning Officers following the first two DPD examinations*.

Department dated 11 August 2006, provides advice on what core strategies should do to avoid ‘encountering the same difficulties at the examination stage’ as the first two authorities, and one of the pointers is that core strategies should ‘be supported by relevant evidence’.

- 3.15 Since then the Inspector’s reports of two further Independent Examinations of core strategies have been published. These have both been found to be sound. Again, one of these, South Hams, is a case study being followed in this project; the other, South Cambridgeshire, is not.
- 3.16 The Inspector’s report from the Independent Examination of the South Hams core strategy contains a statement in the Introduction that is likely to be regularly cited; “In most respects, this is a sound plan, albeit not one that provides a good example of a high quality, concise and focused document.” Nevertheless, there is much to be learned and it is useful to consider the report for this investigation of the use of evidence. Though the report does not have a separate section on soundness test iv, dealing with the robust and credible evidence base, there are plenty of references to the use of evidence, and the relative importance of evidence from different sources and in relation to national and regional policy are illustrated to some degree by the Inspector’s deliberations.
- 3.17 The most important issue for the Council and the LDF is presented as, and accepted by the Inspector to be, the provision of affordable housing, and this issue provides a suitable example for looking at the consideration of evidence. The following points emerge:
- the evidence presented by the local planning authority on housing need is accepted by the Inspector;
 - what is found wanting by the Inspector is the clarity, coherence and specificity of the policy for delivering the contribution to affordable housing that is identified as needed;
 - considerable weight is given by the Inspector to evidence on the effect of high affordable housing requirements on the delivery of the overall housing requirement provided by the representors – particularly those from the house building industry who see their interests as being harmed by high affordable housing targets.
- 3.18 On the basis of what he had before him the Inspector had serious doubts about the core strategy’s approach to affordable housing. The extent to which there can be a departure from national and regional policy to meet local circumstances is the issue here, and it would have been useful if this report had provided lessons on the part played by evidence in making this judgement. The Inspector also found the approach taken to monitoring in the core strategy to be unsound due to the lack of a robust set of key indicators and targets to be monitored, and the lack of firm commitment by the Council to remedy any significant problems that might be revealed by the monitoring process.
- 3.19 The Inspectors’ report following the Independent Examination of the South Cambridgeshire core strategy does not make any explicit reference to evidence. In their

deliberations on the soundness of the DPD under the tests of conformity, coherence, consistency and effectiveness, the joint Inspectors do make frequent reference to, for instance, the evidence provided by the Council on the sources of housing supply in order to underpin the policy approach to housing provision in the core strategy.

Case study findings

- 3.20 The findings from the case studies on how the local planning authorities and their partners are adopting and applying the idea of gathering and using evidence in making local development documents are presented below.
- 3.21 All of the local planning authorities involved in this round of case study investigations are gathering evidence. In all 12 cases the local planning authorities are able to identify many pieces of evidence, including statistical analysis, surveys and studies undertaken or commissioned specifically for the LDF. Those that have got furthest with this process appear to be using evidence in making their plans. However, within this overall picture there is considerable variation.
- 3.22 Local planning authorities are finding that different types of material are needed for different types of local development document, and that different levels of detail may be required at different stages of the preparation of a local development document. From the experiences of the case study authorities, evidence gathering is something that continues through the greater part of the plan preparation process. Local planning authorities are finding that some types of evidence are pointing to what the plan needs to do, and using this appreciation (together with stakeholder responses for instance) to identify what further evidence is required in order to develop the local development document to the next stage. In this way, evidence continually informs the progression of policy development. This is different from what sometimes seemed to happen previously with local plans, when the gathering of evidence was something that took place after proposals had been made and objections had been raised to the content of the plan.
- 3.23 Relevant questions have been raised by some of the case study authorities, prompted in some cases by seeing the outcomes of the first two, unsuccessful, examinations of the soundness of core strategies. Matters raised during the investigation of the use of evidence have included:
- how can the amount of evidence that appears to be required all be gathered within a short space of time in order for it to be ‘up to date’, bearing in mind the need to make rapid progress and given the availability of resources?
 - how is the amount of evidence available judged to be ‘enough’?
 - can evidence in support of policy be provided after the submission of local development documents in order to demonstrate how the proposals are rooted in evidence?
- 3.24 These types of questions have an important influence on what some local planning authorities are doing. The possible consequence of a cautious response to such areas of

uncertainty, and to the now fully recognised possibility of 'failure', is likely to be for more time to be taken, through the collection of more information or through procrastination. What remains vital, is for authorities to understand that the use of evidence is not to enable the plan to pass the test set out in legislation, but for the plan to be better able to do the job for which it is required.

Lessons

3.25 Some lessons can already be drawn from this opening consideration of the role of evidence. These lessons are developed in subsequent sections of the report.

The role of evidence

3.26 What emerges from the investigation is that evidence has four roles in spatial planning:

- in understanding the place and the community, its character, needs, pressures for change and its future potential;
- understanding what might be possible through the management of change, to assist in deciding on what the plan should try to do;
- to assist in the design of the mechanisms to bring change about, including the deliberation over alternatives;
- to be able to justify the choices made.

3.27 An effective local development document needs to be informed. Evidence is required to understand and determine:

- what is the character of the place and community;
- what is wanted for the future;
- how the management of change will assist in moving from the current situation towards a more desirable future situation, in terms of the type of place or the well being of the community for instance;
- how to identify and structure the critical choices which have to be made.

3.28 There should be a cyclical process of:

- determining what change is wanted;
- developing the policies and implementation mechanisms to bring about the change that is wanted;
- the monitoring of change and the attribution of change to the effect of policy as well as understanding new and different requirements as they arise;

- reviewing a local development document to make it more effective in meeting its objectives and to contribute to new objectives.

3.29 The use of evidence creates the links between parts of this cycle. Evidence is key to the development of the strategy, proposals and policies, carrying out the sustainability appraisal, and the monitoring of change. Each of these elements has information requirements that overlap, and there is clearly value in designing the collection of information for each of these requirements on a common basis.

The timing of evidence

3.30 The use of evidence is an integral and ongoing part of preparing a local development framework, so that evidence gathering is not a self-contained stage.

Judging the adequacy of evidence

3.31 This is unlikely to be a matter that guidance can ever prescribe exactly. Inspectors' reports will provide useful illustration, but this is also a matter for professional judgement. What is clear is that confidence cannot come entirely from answering the question, "Have we enough evidence to proceed to the next stage?", but has also to be informed by looking back and asking "Is there sufficient evidence for the position we are taking?". Evidence cannot be used instead of judgement, it must be used as a knowledge base to inform judgement. It is essential that 'sufficient' is considered not just in terms of quantity but in terms of its quality and ability to stand up to rigorous testing.

3.32 Both parts of this test are essential. Judging whether there is enough evidence to proceed (in relation to different local development documents) will involve asking questions such as:

- are the place and the community sufficiently well understood to begin to develop broad strategic approaches?
- do we have evidence that points to alternatives that need to be explored?
- what does the information we have tell us about what additional information is needed to develop and implement the strategy?

3.33 Knowing whether there is enough evidence to explain and justify the position taken will involve asking such questions as:

- is it clear how the decisions have been made?
- have alternatives been raised in consultation that appear realistic but cannot be evaluated with what is already known?
- are the means by which the proposals will be implemented clear and persuasive?

Chapter 4

Gathering evidence

Introduction

- 4.1 This chapter explores the types of evidence gathered and how it is obtained. The lessons in this section of the report deal with the types of evidence that should be collected, in response to the key issues arising from the investigation and in terms of what currently appears to be the best advice.
- 4.2 The key issues addressed in this chapter are:
- the different types of evidence that can be used – as well as a debate over whether some inputs to the plan making process can be described as ‘evidence’;
 - the different ways in which types of evidence are used at different stages of plan making and how the flow of information gathering and use can be understood and managed for the greatest efficiency and effectiveness;
 - how the information required has to be determined by the needs of the place and of the plan, rather than by what is available;
 - looking to the future with ‘scenario studies’ as well as obtaining descriptions of present circumstances;
 - different ways in which evidence can be obtained efficiently;
 - the role of the skills and resources available in local planning teams, of collaborative activities with others within and beyond the local authority, and the use of consultants.

Case study findings

(i) Types of evidence collected

- 4.3 The case studies are using a range of different types of evidence and these are described in this section, with sources and the arrangements for gathering the information.
- 4.4 Essentially four types of information have been used as evidence:
- the analysis of data from existing statistics;
 - background reports on specific topics;
 - characterisation studies used in understanding places, linked perhaps to focused community involvement;
 - knowledge from stakeholders and community members.

- 4.5 The finding that responses from community consultation are sometimes referred to as 'evidence' deserves further comment. Material arising from community and stakeholder engagement is different from what is indicated in PPS12 as 'evidence' or implied by the references to an 'evidence base' or to 'evidence being gathered in a pre-production stage'. Its use in developing and evaluating alternatives and as part of the justification of choices that are made is normal and appropriate however. The material that emerges from the engagement of stakeholders and the community can add real knowledge about the place and the community, because of the authoritative bodies involved and because of the familiarity with the area. Any material used in this way must be capable of being tested since the local planning authority should not rely upon anything that is unable to withstand scrutiny.
- 4.6 Some consultation responses are very specifically about seeking to influence the plan-making authority, or the Inspector in due course, to take a particular position or view, and these types of material from community and stakeholder engagement will reflect the views and desired outcomes of the organisation or individual involved. There is a reciprocal relationship between other types of evidence and community responses however. Information provided to those engaging in the process – through the issues and options consultation stage for instance – enables people to understand better what the local development framework is seeking to do or needs to do. This enables them to make informed representations that are likely to be more useful to the local planning authority, or more effective in influencing the emerging plan.
- 4.7 There is a difference in how the case study areas are using evidence that describes the current situation and evidence that explores possible futures, for example, the way that different sectors of the economy might perform in the future, or the type and level of retail activity that could be supported by available expenditure. There is rather less experience of local planning authorities using the latter as evidence than the former, despite the fact that planning is explicitly about the future and about managing change to bring about desired outcomes. Dealing with unknowns, and hence predictions, is an area that has perhaps been discredited somewhat (nothing dates faster than predictions of the future), but the development of scenarios around what might be possible, as well as what might be desirable, should be a useful tool in developing alternatives and in considering their deliverability.

Data collection

- 4.8 Seven authorities drew together statistical information at a district level. In some cases, this was presented as an explicit section in core strategy consultation documents, for instance as a spatial portrait of the district or in a section entitled 'background evidence' (eg St Helens (see extract below), Horsham, Hambleton). Alternatively, North Cornwall (see extract below), North Northamptonshire and West Berkshire produced district or strategic area profiles as a background report to use as reference material in consultation documents.
- 4.9 Statistics are largely obtained from Census data, but also from other strategies (eg the community strategy, health, education, and local transport plan), the Annual Business Inquiry, council monitoring records, local surveys and background studies. Examining other strategies can prompt local planning authorities to look at existing studies and find within these information which can be used in making the LDF and might otherwise be sought from specially-commissioned studies.

Collecting key statistics

St Helens core strategy Issues and Options Report (August 2005)

The following extract comes from St Helens key statistical appendix to its issues and options report. It covered trends on population, housing, employment, deprivation, education, crime, health, retail and transport.

Population

- Between 1991 and 2001 the population declined by 1.1% to 176,843.
- A comparison between the mid 2002 and mid 2003 population estimates shows that population has stabilised at 176,730.
- Population is projected to decline by 0.3% to 167,880 by 2020.
- Population structure is ageing, with numbers of young people declining.
- Very low black and ethnic population.

Deprivation

- St Helens was the 36th most deprived local authority in England out of 354 local authority areas in the 2004 Multiple Index of Deprivation.
- 36% of people in St Helens live in the top 10% most deprived wards in England.
- The worst areas of deprivation are clustered around the Town Centre and Parr Wards.

Poor Health

- In 2003 16% more people died before the age of 75 in comparison with the rest of the country.
- Death rates for heart disease, respiratory disease and lung cancer are a quarter above the national rate.
- 23.6% of St Helens' residents consider themselves to suffer from a long-term illness.

This is higher than the average of 18.2% for England and Wales.

- 10.1% of people of working age are economically inactive due to sickness/disability.

North Cornwall District Profile

A North Cornwall Profile is produced annually. This sets out baseline information drawn from various sources of published information and special studies under the following headings: population, health, employment, unemployment, business and industry, income, housing, community facilities, emergency services, well-being and deprivation, natural environment, built environment, transport, recreation and access. This gives a reasonably detailed and comprehensive picture of the area, some of which can be broken down to parish/ward level. It can be used to identify issues of concern and to compare areas.

4.10 The above exemplifies raw data providing indicators about the current situation. There also has to be an appreciation of what this means for it to be useful and influential, and these matters are developed in the next chapter.

4.11 An important variation encountered in the case studies is the extent to which information was used to describe functional relationships. It is very pertinent to spatial planning and to the sustainability agenda to see where people travel for work, education, shopping and leisure, and how they travel. Relevant data are available from the National Travel Survey and from the Census. This type of material combined with an appreciation of where activities are located informs thinking about the role and future of settlements and the way in which strategic decisions about issues such as the distribution of homes and jobs may affect travel demand and modal choice. Work for the Horsham core strategy, described later in this section of the report, is an example of material from statistical sources being combined with other material to gain a greater understanding of (in this case) the nature and performance of different settlements.

Topic studies

- 4.12 The most common type of evidence encountered in the case studies can be described as ‘topic studies’. Typically these gather information on a particular topic, and deal with the types of material most frequently presented as background reports for local plans under the previous arrangements. Several such topic studies are an expectation of national policy guidance. PPS3 encourages the undertaking of Strategic Housing Market Assessments¹² and the December 2005 guidance on employment land assessments¹³ has led to many of these types of study being undertaken.
- 4.13 Of the 12 case studies:
- all have urban capacity studies;
 - all have some form of economic and employment studies with most incorporating some assessment of employment land, and some linking this with scenarios of future economic potential;
 - all have town centre and retail studies;
 - ten have housing needs studies/housing market assessments;
 - six have some form of open space or green space assessment, with others underway or proposed.
- 4.14 Other types of topic report encountered in several case studies include:
- strategic flood risk assessments;
 - transport studies;
 - landscape character and green infrastructure assessments, particularly related to the urban fringe and the identification of possible development locations, as well as approaches to the positive management of the urban fringe;
 - gypsy and travellers’ needs studies.
- 4.15 Topic studies have different roles. They can identify issues in an area, consider what might be possible (with retail and economic studies in particular), or provide detailed information needed to operate a specific mechanism, such as for the provision of housing from different sources, or to address particular needs.
- 4.16 Though topic specific, this type of material provides spatial information. That is, material is obtained on issues such as the distribution of employment locations or open space, which can be related to accessibility issues in seeking a sustainable mix of activities. Understanding spatial differences across the district can assist in developing alternatives related to the distribution of development, and may also be used in policies and

¹² Communities and Local Government (forthcoming), *Strategic Housing Market Assessment Guide*.

¹³ ODPM (2004), *Employment Land Reviews – Guidance Note*.

guidance for using planning obligations, with different priorities for contributions to community infrastructure in different areas.

Understanding the place

4.17 A number of examples have been cited of the case study authorities compiling studies or collecting statistics on a district scale. But places are not homogenous and a more detailed understanding of the place is needed if there is to be a locally-specific strategy and policy options prepared for an area. Examples of sub-district analysis include:

- dividing the district into strategically-distinct parts (West Berkshire – 3 broad geographic areas (see extract below), Stoke and Liverpool – Housing Market Renewal Pathfinder priority areas);
- by settlement or neighbourhood (Plymouth, North Cornwall, South Hams, Hambleton, North Northamptonshire);
- using community action plans and strategies (parish plans in Horsham, Market and Coastal Towns initiative (MCTi) plans in South Hams).

Conceptualising different parts of the area

West Berkshire

In thinking spatially about its area, West Berkshire has identified three broad geographical areas as the basis for studying relationships and impacts within different parts of the District. The areas include:

- (i) Eastern Urban Area which comprises residential communities related to Reading;
- (ii) Newbury and Thatcham noted as two towns in close proximity to one another with a high level of interaction;
- (iii) Rural West Berkshire.

It is noted that whilst it is useful to break the area down when thinking about relationships, in preparing the strategy, it is important that sub-areas are not considered in isolation.



Geographic areas for the West Berkshire Spatial Strategy, reproduced (with permission) from West Berkshire Planning Strategy Preferred Options (Feb 2006)

4.18 In some cases, sub-district analysis has been prepared as a background study (eg Plymouth's Sustainable Neighbourhoods Studies or Horsham's Settlement Sustainability study – see extracts below). A different approach is where data have been used from

various sources (primary collection, thematic studies, local strategies, and previous consultation) to build up an understanding of different parts of the district and are presented in consultation documents (eg, North Cornwall and South Hams – see Chapter 5).

Understanding different parts of the area – background studies

Plymouth Sustainable Neighbourhoods Studies

A methodology was designed to gain a clearer understanding of how Plymouth's 43 neighbourhoods function in terms of social, community and environmental issues. The first tranche of studies has focused on 22 neighbourhoods. They are described as providing an initial 'health check' that can be used alongside other studies as well as the input from stakeholder engagement in making planning decisions.

The studies provide an assessment of whether the neighbourhood:

- Has a **thriving mixed use centre**, defined as having a clear and identifiable local centre, with access to jobs, education, healthcare, leisure, retail, public transport and open space.
- Is **balanced** with a well-integrated mix of different types and tenures of housing to support a range of household sizes, ages and incomes.
- Is **well connected** with a clear and understandable pattern of streets and spaces.
- Is **attractive and safe** with good quality buildings and public spaces.
- Respects and capitalises on its **environment**.

Quantitative and qualitative data have been used to assess criteria relating to access to jobs, education, healthcare, leisure, retail, public transport, community facilities (meeting places) and open space; levels of deprivation including health; housing tenure; economic activity; density of development; sense of place; attractiveness; safety; connectivity (within the neighbourhood and beyond); environmental constraints and assets.

Each criterion examined is colour coded as 'good', 'moderate', or 'poor' so that information can be assimilated to create a strategic picture of issues across the district. Each criterion contains detailed comments, including possible ways of addressing them (eg consider increasing population densities within walking catchments of neighbourhood centres). Some of this very local information is being used in area action plans. It also provides options for how the districts could evolve to become more sustainable. An extract from one of the assessments is presented below.

Neighbourhood area Stoke

Objective	Achieve objectives?	Comments	Options for PCC
1.1 Is there a range of community facilities, consistent with the neighbourhood population? Criteria: Facilities include shops, religious meeting places, community halls, scout huts etc.	Moderate	There are a large number of facilities for the current population size within Stoke, however the range of facilities is limited; the neighbourhood is very well served by shops and pubs etc, but there is a limited range of other local and neighbourhood facilities. Stoke is lacking in some community facilities such as a crèche, sports hall, community centres and offices, leisure and arts centres, and sports facilities, and there are no city facilities within the neighbourhood.	Look in detail at the neighbourhood's need for the facilities it is currently lacking, and consider ways to introduce facilities such as a crèche, sports hall, community centre, and leisure/ arts centre.
4.5 Are streets and spaces perceived as safe?	Poor	The neighbourhood of Stoke is an area of concern in terms of crime, ranking 7th worst neighbourhood in Plymouth.	Review the causes of crime in the neighbourhood that might be related to the physical make up of the urban areas. Consider lighting/maintenance issues.

Understanding different parts of the area – background studies

Horsham Settlement Sustainability and Greenfield Allocations Study (2005)

Horsham commissioned research on the sustainability of rural settlements to supplement information that had already been collected on village services in order to inform the emerging settlement hierarchy. The supplementary research focused on employment and travel to work data in order to understand local employment opportunities, levels of self containment in villages, where out-commuters are going and the mode of travel. Some examples of the key findings and recommendations are as follows:

- The level of self-containment (% of workers living and working in the same settlement) is generally low (18–43%) and is highest in Horsham. Category 1 settlements are typically more self-contained than Category 2, although Southwater is an exception (only 22% self-contained).
- Where there are considerably fewer jobs, it indicates settlements are largely residential or dormitory settlements. This was found for Southwater, Barns Green and West Chiltington Common/Village.
- Within the District, average travel to work distances range from 10km to 27km. Commuting distances from most of the villages are substantially greater than the average for rural residents in England and Wales.
- For most settlements, patterns of commuting are strongly to the north, towards Horsham, Crawley urban area and London urban area. This pattern was strongest for settlements in the north of the District, with southern settlements also showing commuting flows to the south coast.
- Jobs provided in the smaller settlements are frequently taken by those living in the larger urban areas. This is particularly so for those settlements near Brighton/Worthing/Littlehampton. It probably reflects the type of jobs on offer (retail, business parks) relative to housing availability and affordability.
- Southwater is a relatively unsustainable location for incremental development but may be appropriate for a larger scale integrated development in the future.
- The allocations to some of the Category 2 settlements, notably Ashington, Barns Green and Rudgwick and Bucks Green, appear somewhat high given the poor performance of these settlements on travel to work measures. Billingshurst could support some additional development, although long term plans for the future of the town would need to be considered.
- Public transport is little used even when it is apparently available, suggesting that there are issues such as frequency and quality of service to be addressed before use will increase. However, as car ownership is very high in Category 2 settlements and there is a culture of car dependence the provision of more and better public transport may not lead to greater use.

(ii) Timing of evidence

4.19 Two significant timing issues in relation to evidence have been raised by local planning authorities visited for the case studies. The first was discussed in Chapter 3. Whilst PPS12 provides for a ‘pre-production’ phase which is essentially about evidence gathering, the findings from the case studies are that evidence gathering does not all take place at the beginning of the process. There is a continuous process of developing the evidence, with new issues being recognised and addressed and material being developed in greater detail. The case studies demonstrate positive reasons for this, rather than later work being required because evidence has been overlooked. The types of evidence that are needed change and develop as the local development framework takes shape, with more evidence being needed to evaluate alternatives arising from stakeholder and community inputs for instance, or to develop implementation policies required as the overall strategy develops.

4.20 The second issue is related to the resource available to assemble the information authorities believe to be expected. This may well be beyond the capability of the in-house resource, or of the authority to fund consultancy support. It may be more efficient in some cases for more detailed information on a topic to be collected as a subsequent stage of a topic study. The approach is one of ‘nesting’, whereby sufficient information is gathered in order to make strategic decisions, and further information

may be gathered in order to develop the chosen approach to the next, more detailed stage. If the use of evidence is well planned (and it must be said, with a certain amount of good fortune), the investigation at the detailed stages will not undermine the choices made at the strategic stage.

(iii) Keeping evidence up to date

- 4.21 PPS12 talks of ‘a comprehensive and up-to-date evidence base’, and the Inspector for the Lichfield core strategy Independent Examination found it a weakness of the local planning authority’s position that “some of the evidence was gathered in support of a local plan review some 3 to 4 years ago.” Amongst the case studies a significant proportion of the material in their evidence base is of similar age, and some of it older. It is to be noted that some issues are less transient than others, with landscape character work needing to pick up changes rather less often than housing needs studies, for instance.
- 4.22 The case studies demonstrate that while there are good examples with reviews of urban capacity and housing needs work/housing market assessment being undertaken for instance, consistent and regular updating of background studies is not often undertaken. This is in part because of the availability of resources, particularly if the original work has been outsourced. Local authorities are more likely to use resources to gather different types of evidence rather than returning to update previous work. The lack of updating may also be because updating the material may not be straightforward. For instance, with an urban housing capacity study, the normal monitoring processes that are undertaken may identify opportunities from the baseline that have given rise to new housing, but new opportunities that have emerged (through the ending of another activity perhaps) can only be picked up through further detailed surveys. This is discussed in Chapter 7 on monitoring.

(iv) Collaboration

Skills and resources within LDF teams

- 4.23 In the 12 case study authorities the staff resources available in policy or LDF teams varied between 4 members of staff in the smallest authority to 11 in the largest. A minority (4) have a designated research and information officer, sometimes paid for from corporate resources and having a remit beyond the planning function, and, where such posts exist, they provide an important resource. In most of the case study authorities the responsibility for gathering and interpreting information and evidence is shared among policy or LDF team members, though typically a specific officer takes responsibility for monitoring.
- 4.24 Planning Delivery Grant (PDG) has been valuable in allowing most case study authorities to expand their capacity to undertake or commission research. In some cases additional professional or support staff have been employed. In some cases PDG has been used to pay for consultants to carry out specific studies. Some local authorities have used the money to acquire technical infrastructure, computers or information management systems. In many, however, uncertainty over the future allocation of this resource was leading to concerns about the ability to sustain current levels of staffing and capacity.

- 4.25 Despite the relatively small size of policy teams, most case study planning authorities were reasonably satisfied with the resources available to maintain the evidence base. That said, a number of authorities identified staff turn-over as a difficulty, with progress disrupted as local knowledge and experience is lost. Where skills and capacity are lacking internally then consultants are often used. Such use of consultants appears to be far greater in recent years following the planning reforms. In at least one case (Hounslow) the programme of plan preparation has been tailored to take account of the staff resource available, with priority given to one topic-specific DPD and a town centre Area Action Plan (AAP) rather than attempting to make progress on strategic policy.
- 4.26 Generally, there is evidence of slippage in time-scales and re-negotiation work programmes as authorities learn more about the 'requirements' of the new planning system. These requirements include those associated with collecting and interpreting evidence to support policy making and justify choices.

Collaboration with others to collect and interpret evidence

- 4.27 The cases study findings revealed a wide range of collaborative activity. There is increasing emphasis being placed on collaboration with others to generate information and evidence for planning.

Collaboration with other local authority departments

- 4.28 Collaboration with other departments and services in local government, including with county council services in two-tier areas, is a prominent feature of plan making in virtually all of the case study authorities investigated. There are exceptions to this, where collaboration with other departments and services is limited to specific relationships (often housing) but there was only one case where cross-departmental collaboration was characterised as 'weak'. Authorities report that the extent and range of collaboration is growing in the context of the information and evidence requirements of the new planning system, and the need for spatial planning to engage with and integrate related plans and strategies more explicitly. The findings from the Strategic Survey support this, with 75 per cent of respondents reporting that other departments are contributing to the LDF.
- 4.29 The link between planning and housing has been reinforced by the new system, and is a particular feature of areas where affordable housing needs are a high priority and of areas where housing-led regeneration is taking place. Other areas where corporate working is increasing include economic development, transport and open space.
- 4.30 Collaboration takes the form of:
- sharing data and information;
 - joint studies;
 - joint commissioning of consultants;
 - cross-service working groups for particular initiatives, projects or areas;

- cross departmental member and officer forums.

4.31 A higher level of collaboration is evident in cases where:

- planning related issues (affordable housing, regeneration, major projects) are corporate priorities and senior officers and members provide the leadership and resources to support corporate working on these issues;
- organisational arrangements bring together related functions in a single directorate;
- specific development projects require an inter-disciplinary approach to policy development and implementation.

Examples of working across the local authority in gathering evidence

Plymouth: A City Strategy Forum involving all departments plus external interests meets on a regular basis to discuss a policy issue (eg transport) or an area of the city. Neighbourhood planning exercises involving cross-departmental working at neighbourhood level have also been carried out. Both of these examples spawned from work on the city local plan, and subsequently the LDF.

South Hams: The Community Regeneration Directorate includes the services of planning, housing, economic development, community planning and major projects. This structure facilitates successful joint working across these services in gathering evidence. Cross-departmental working on the Sherford new settlement is a corporate priority.

Stoke on Trent: Planning is part of the Directorate of Regeneration and Heritage and the agenda and priorities of the Authority are strongly focused on regeneration of the area.

4.32 Better co-ordination and sharing of information and evidence across local authority departments is sometimes seen as a potential role for community planning teams and Local Strategic Partnerships (LSPs). However, in the case studies, there is no sense that LSPs currently perform this role to any large extent, aside from their instrumental role in facilitating and co-ordinating community consultation exercises.

Collaboration with other local authorities

4.33 There is evidence of a growing level of collaboration with neighbouring local authorities. From the Strategic Survey, 50 per cent of respondents reported working jointly with neighbouring authorities to develop the evidence base, and 80 per cent were working with neighbours to share information.

4.34 Among the case studies, the Berkshire Unitary Authorities have jointly commissioned Housing Market Assessments (HMAs). South Hams and Plymouth have collaborated with their respective neighbouring districts on a HMA. In Horsham and in South Hams, an Employment Land Review has been commissioned with respective neighbouring districts.

Collaboration with other tiers and other government agencies

4.35 Collaboration with other tiers of governance includes joint working with parish councils, various sub-regional bodies and regional agencies. The extent and range of collaboration of this kind is less apparent than collaboration within local government. This is partly because the scope for collaboration with some of these bodies is dependant on the

context, for example, the presence or not of sub-regional organisations and of active parish councils.

Examples of working with parish councils

Parish councils have played a significant role in contributing evidence for local planning in four of the case study authorities: Hambleton, West Berkshire, Horsham and South Hams. In three of these authorities a majority of parishes have produced parish plans, sometimes with financial support from the Countryside Agency, and typically facilitated and supported by the LSP coordinator. In these cases the parish plans provide an important source of evidence on village services, and also on local community visions and aspirations. The availability of this kind of evidence is particularly welcomed as a complement to the more top-down Settlement Sustainability Assessments that are used to develop settlement strategy in rural areas or districts containing a number of settlements.

4.36 Sub-regional bodies and organisations are an important part of the institutional landscape in specific cases where they are part of the legacy of local government arrangements, and in the case of London, of the current arrangements.

Examples of joint research and information arrangements

In **Merseyside** the key organisations that provide evidence for the planning function in the sub-region are the Merseyside Information Service, a key source of monitoring data for the sub-region, and the Environmental Advice Service, for countryside and ecological matters. The latter is also advising member authorities on the evidence needs and is developing a common methodology for 'Appropriate Assessment'.

In **Berkshire** the Joint Strategic Planning Unit has an important role in the monitoring of housing and employment, and the Thames Valley Environmental Records Centre performs a similar role in the environmental area. The Berkshire Development Planning group, including Berkshire forward planning lead officers, is essentially an experience exchange forum, but also plays a role in identifying gaps in the evidence base and in commissioning joint studies to fill these.

The Greater London Authority provides a wide range of evidence to **London Boroughs** and the London Plan Team commission London-wide studies such as the annual Office Policy Review. Where such arrangements exist they are highly valued and often highly regarded.

4.37 Joint arrangements between sub-regional tiers appear to be an effective and efficient way of creating and maintaining part of the evidence base for planning, but are available on a very uneven basis. Opportunities are likely to become more scarce as county council strategic planning resources are being reduced, and as counties are increasingly pre-occupied with minerals and waste planning.

4.38 Also in the category of sub-regional bodies are regeneration agencies such as RENEW and the North Staffordshire Regeneration Zone (NSRZ) which operate in Stoke on Trent. These are key organisations with substantial resources for commissioning evidence for policy making, far beyond the capacity of local planning authorities. For example RENEW have spent in excess of £2 million in the last three years on a variety of demographic, housing market and economic studies. From a planning perspective the data, evidence and the market intelligence these agencies provides is extremely valuable. In Stoke for example, this was said to bring "a fundamentally new level of understanding". There are issues about the relationship between LDF policies and those of these agencies, but this is less relevant to the present discussion.

4.39 For most of the cases studies regional agencies (Regional Assemblies, Regional Development Agencies) are more distant and less involved in providing or collaborating on evidence for policy. Local planning authorities make representations on regional

policy (the Regional Spatial Strategy and Regional Economic Strategy) and receive representations on local policy, and gain some evidence through this process. Relationships are based more on consultation on policy, supplemented by specific requests for information and the occasional use of specific regional studies, for example on gypsy and traveller needs. Exceptions to this include North Northamptonshire where the East Midlands Regional Planning Body has been a significant contributor to the evidence base from the wider Milton Keynes/South Midlands sub-regional study and a co-funder of local area assessments, and Stoke on Trent, where Advantage West Midlands is a key player in the regeneration agencies.

- 4.40 Government Offices had a specific role in relation to the LDF process. They were rarely seen as contributing evidence, and did not themselves see this as their role. Rather they provided advice, elaborating on government guidance, on the type and scope of evidence that was needed for the LDF, and how this might be presented in core strategies and other DPDs. In some cases this advice was less than helpful or clear from the local authority perspective and there were many calls for further government advice on these matters in the wake of the Stafford and Lichfield decisions.
- 4.41 Other relevant government agencies include bodies such as the Environment Agency, Countryside Agency and Health Authorities. Collaboration with other government agencies is far more patchy, and context/issue specific, with the notable exception of the Environment Agency, which is more broadly involved with providing evidence on environmental constraints, and sometimes collaborating on Strategic Flood Risk Assessment. Relationships and the extent of collaboration with other government agencies are partly conditioned by the stage that local authorities have reached in the LDF process. There is more engagement and input of data in relation to site specific proposals and AAPs.

Examples of collaboration with other government bodies

In **South Hams** a range of agencies, including the Environment Agency, Countryside Agency, Highways Agency, the Primary Care Trust (PCT), Police and Fire are members of stakeholder and working groups progressing the Sherford AAP which contains proposals for a new settlement.

In **Plymouth**, there has been significant collaboration with the health sector at the city-wide and neighbourhood level. The environment-planning- public health link is seen as key national and local priority, and relationships have been facilitated by a joint PCT/ City Council appointment of a public health specialist to a senior position in the City Council. Integration with the health sector is also being pursued elsewhere across the country including Liverpool and in some of the London Boroughs.

- 4.42 Case study authorities had no particular concerns about the nature and extent of collaboration with other government agencies. From a local planning authority perspective these were seen as relationships that would develop over time. However, some interviewees commented that the input of these agencies was necessary at an early stage of considering issues and options and should not be left to the later stages of site allocation. This kind of comment applied particularly to the technical evidence required from the Environment Agency to assess flood risk and other environmental constraints.

Collaboration with other sectors

- 4.43 The business and development sector and the voluntary sector were rarely found to be involved in the collection and interpretation of evidence for spatial planning. More typically these interests are consultees rather than active partners. There were, however, a number of examples of collaboration with developers or industry representatives over specific sites, major development proposals and AAPs, and in one case an example of involving the Home Builders' Federation (HBF) to market test the evidence and conclusions on housing policy and proposals. Collaboration with the development industry is therefore a product of the planning issues in specific localities (major growth or development) and the priorities for plan preparation and the stage reached (AAPs and site allocations). Collaboration with the private sector will become increasingly important as partnership working is encouraged. For example, the forthcoming Housing Market Assessment Guide suggests inviting developers onto a housing market partnership.

Examples of developers or landowners collaborating with the local planning authority to assemble evidence

In **North Northamptonshire** the Joint Planning Unit has had the benefit of being able to work closely with developers, notably with Bee Bee Developments, the owner of land identified for major growth. The developer has provided a considerable amount of evidence in the form of technical studies and other supportive material as part of planning applications. Much of this is promotional in nature, but also addresses issues relating to infrastructure needs, health and education requirements and environmental quality and design in the new development areas, and alongside studies commissioned by the joint unit has been used to inform decisions about the appropriate locations for growth.

In **South Hams** the developer/landowner for the Sherford new settlement scheme has commissioned a range of research and other studies, including an environmental audit, studies of retail and commercial needs, and air quality. They also funded an 'Enquiry by Design' process involving community representatives and service agencies to plan the details of design, environmental standards of new development and service provision in the new settlement. This included commissioning a not-for-profit Sustainable Building Initiative to advise on innovative and challenging development standards. This strong partnership approach is evaluated in very positive terms by the planning authority and the developer's representative. However the collaboration over the collection of evidence is seen in this case as an outcome of relationships and trust built up over a longer period of planning the new development.

In **Plymouth** collaboration with developers and landowners is a product of relationships built up via a development industry forum for the City, run and financed by the Chamber of Commerce. There are two cases of AAPs for neighbourhoods in the City where developers have funded studies to help speed the process of policy making and accelerate the production of the AAPs.

- 4.44 In all these examples there is a clear rationale for collaboration and a strong incentive for developers or landowners to contribute to the evidence base at a detailed level. The practice does raise questions of the 'privatisation' of the plan-making process, with vested interests having undue influence over decisions. In all these cases the local planning authorities were confident that these dangers were avoided due the way that information and evidence provided by private interests is independently audited in the policy-making process.
- 4.45 A different kind of involvement is provided by the example of Horsham. Here the HBF carried out a market assessment of the authority's urban capacity study, and have also responded in more conventional ways to policies concerning the scale and rate of housing development. The relationship in this case is less positive with the HBF taking the view that the evidence they provided which challenged the authority's conclusions was ignored on the basis that it was 'unhelpful'. This view is unusual among our respondents, but perhaps reflects a wider perception in the house building industry in

some locations, that local planning authorities' approaches to evidence is to use this to support pre-existing policy positions and to dismiss contradictory evidence. It also reflects a view put forward by a number of local planning authorities that more and better evidence does not eliminate disagreement and objections to plans where different views over the nature, scale and location of development are well-entrenched.

(v) Using consultants

- 4.46 The demands and requirements of the new planning system have led to a large growth in the use of consultants to support the planning process in a number of ways. This is apparent from both the case studies and the Strategic Survey.
- 4.47 This is partly because time-scales for the collection of evidence have been compressed, putting more pressure on local authorities' own staff resources. It is partly driven by the need to generate a wider range of evidence on a range of subjects, often, in turn, driven by government advice. It also reflects new procedural requirements such as statutory sustainability appraisal and the requirements of the Strategic Environmental Assessment (SEA) Directive, where an 'independent view' is often valued by the authorities. The Strategic Survey found that consultants are undertaking the majority of the work associated with sustainability appraisal in a third of local authorities. The limitations associated with using consultants are discussed in more detail in Chapter 6.
- 4.48 Consultants have been used in a number of ways:
- commissioned by planning authorities in the traditional way to carry out technical studies;
 - jointly commissioned by planning with other departments, other local authorities and other agencies;
 - commissioned by developers to support site promotion or planning applications;
 - retained on a longer-term basis to provide on-going technical advice, for example for sustainability appraisal, or more general support for policy making.
- 4.49 In areas subject to major growth and development (eg North Northamptonshire) or significant regeneration activity (eg Stoke on Trent) it makes sense for more extensive use to be made of consultants to conduct specialist studies. These are commissioned by bodies that are somewhat separate from local government and in the cases of Liverpool and Stoke include the local urban regeneration bodies.
- 4.50 Overall, local planning authorities are positive about the process and outcomes of working with consultants, though most observe that the process of briefing and managing consultants is time consuming. Local planning authorities with on-going relationships with individuals or smaller firms of consultants found the experience particularly valuable. In most cases the consultants interviewed were satisfied with their working relationship with local authorities, though a number commented that some smaller authorities were less engaged and provided less data input than was necessary. This comment applied particularly to consultants working with local planning authorities on sustainability appraisal.

Examples of partnership working with consultants

Hambleton has retained two senior ex-chief planning officers over a longer period to assist with the analysis of consultation responses and writing policy documents, and this on-going relationship builds experience and local knowledge.

Plymouth has an on-going contract with a consultant to provide support on sustainability appraisal throughout the life of the core strategy, helping to build capacity within the authority through training and mentoring by the consultant. This partnership approach is highlighted as an example of good practice in the area of sustainability appraisal.

- 4.51 In the small number of cases where consultants have until now been used in very limited ways, it is acknowledged that the demands of the new system will inevitably increase the dependence of local planning authorities on consultants to collect evidence. This partly reflects the need for more specialist expertise, and a pressure to demonstrate the independence of the evidence base.

Lessons

Types of evidence

- 4.52 It is useful to appreciate that evidence takes different forms. From this study these have been identified as statistical work, specific topic studies, characterisation work and the findings from community and stakeholder consultation.
- 4.53 An understanding of the issues on a district basis is a prerequisite of good project planning as part of the preparation of the local development scheme (LDS). The collection of statistics is particularly useful in gauging the scale of the issues reasonably quickly, using readily available information such as Census data or information from other strategies.
- 4.54 In many cases, local authorities may feel they already know what the broad issues are in their area, perhaps because they are longstanding (eg high unemployment, high house prices), but collecting statistics will:
- enable the authority to be more specific about the scale of the problems they face, as well as consider recent trends. For instance, what is thought to be known may be changing – eg high unemployment may be declining;
 - identify or confirm the strategic problems that need to be tackled (eg declining population, economic / physical regeneration, more affordable housing);
 - begin to identify some of the constraints (eg crime, retail leakage, environmental constraints) and opportunities (growing sectors of employment, popular parts of the district / neighbourhoods to live in or for business);
 - compel authorities to consider spatial issues that may be less well understood, such as health, crime, deprivation and skills.
- 4.55 Topic studies dealing with such matters as the sources of housing provision, employment land, retail requirements and green space, are a standard part of evidence collection.

These need to be designed to assist in both the development of strategies and the detailed means of implementation. The integration of studies should be sought where possible. Housing and employment needs are likely to be competing for some of the same land for instance, and the evidence collected should recognise this, avoiding double counting at very least and preferably providing for a fully integrated approach to be taken in the spatial strategy and in the management of change to realise the strategy.

- 4.56 In dealing with these types of topic study, there will be a need for scenario work and studies telling local planning authorities what is possible as well as what is already present.
- 4.57 Whilst district-wide gathering of information is useful in setting the strategic context for the LDF, areas are not homogeneous. There will also need to be a more detailed understanding of ‘place’, whether this is separate settlements or parts of one large settlement. Characterisation work based on – or used to identify – distinctive areas that might be the building blocks of a spatial strategy can use a combination of analytical techniques covering environmental character, accessibility mapping, market assessments and demographic and economic factors, and may usefully be combined with community engagement work.

Timing of evidence

- 4.58 Plan makers should see evidence as something that is accumulated successively throughout the process in continually developing, testing and justifying the approach to be submitted. The initial evidence gathering is about understanding the place and the type of responses that may be needed, as well as identifying further information that will be required. More evidence will be needed to evaluate alternatives arising from stakeholder and community inputs for instance, or to develop implementation policies required by the overall strategy as it is developed. The need for evidence to justify choices that emerge must not be overlooked or underestimated.
- 4.59 Evidence should be kept up to date, recognising the resource implications and prioritising the ‘refresh’ process according to the significance of the evidence to the strategy and policies, and according to the tendency of the material to date. The monitoring process should be examined carefully for its potential contribution to the updating of the evidence, with resources directed to what is needed to supplement information that is already collected in order to maintain the topicality of material.

Collaboration and use of consultants

- 4.60 The advantages of collaboration across local government include:
- the opportunity to spread knowledge of the LDF process;
 - the opportunity to pool resources or bid for corporate funding for special studies that meet more than one policy purpose;
 - assist integration of the core strategy and the sustainable community strategy;

- the need to draw increasingly on specialist expertise in areas such as flood risk, biodiversity, housing markets and transport modelling in making sound plans;
- the increasing need to tap into evidence and expertise provided by others to underpin negotiation of S106 agreements/ affordable housing;
- the potential to underpin planning policy with a wider and more robust evidence base.

- 4.61 Many local planning authorities have recognised the benefits of collaboration with others in assembling the evidence base for spatial planning. Finding out what exists in other departments and agencies, and joint commissioning of studies that meet more than one policy purpose are important ways of making resources go further.
- 4.62 Parish plans in more rural areas and neighbourhood planning in urban areas have proved valuable in two ways: providing data and information about the characteristics of settlements and neighbourhoods, and their needs and issues; and providing evidence about the visions and aspirations of the local community. This kind of evidence is particularly useful as a complement to more 'top-down' assessments of how a group of settlements or a city functions.
- 4.63 Joint research and information arrangements, such as those in Berkshire and Merseyside, perform a number of functions: assembling data and indicators for monitoring purposes; developing common methods for policy appraisal; and provide an arena for identifying gaps in the evidence base and for commissioning joint studies. There is a case for the wider development of such arrangements, particularly as resources and skills in county councils reduce in line with the disappearance of structure plans.
- 4.64 Practice suggests that some stakeholders, including some government agencies, developers and landowners, are more easily engaged in contributing to the evidence base when the plan reaches the stage of dealing with specific sites or for AAPs. This may be entirely appropriate. However, the need for input from some of these stakeholders is essential when strategic options are being considered. For example, arguably the Environment Agency should be making a major contribution at the earliest stage in relation to flood risk and other environmental constraints. Similarly, developers, should be encouraged not to wait until the latter stages of the LDF process to engage, but should be actively involved from the beginning possibly via development forums or representative bodies, in relation to market trends and feasibility.
- 4.65 Consultants are being used more frequently. Generally speaking both parties, the local planning authorities and consultants, are satisfied with the process and the outcomes. However, practice suggests that the resource implications of briefing and managing consultants should not be underestimated. Longer-term relationships with consultants working in partnership with the local planning authority can be particularly effective.

Chapter 5

The use of evidence in development plan documents

Introduction

- 5.1 Policies prepared by the local planning authority are to be founded on a thorough understanding of the needs of their area and the opportunities and constraints which operate within that area (PPS12, paragraph 4.8). During the examination into the development plan document, the Inspector will need to be confident that the preferred policies are not only founded on evidence, but that they are the *most appropriate* for the area, having discounted the alternatives. The justification for the chosen approach should not be developed as a supplementary report to the examination. Instead it needs to be evident to consultees as the approaches emerge to enable them to come to a view about the options, alternatives and what the local authority prefers.
- 5.2 This chapter examines the extent to which the case study authorities demonstrate the use of evidence in development plan documents (DPDs). We examine documents for evidence of the particular local issues and the choice of spatial strategy and other policies.
- 5.3 The focus in this chapter is on core strategies because they are perhaps the most challenging of all local development documents in terms of their strategic nature, their scope, and the amount of evidence that is required. However, the findings and lessons generated from the assessment of core strategies apply to all documents.

Case Study Findings

(i) Using evidence to identify the issues for the local development framework

- 5.4 Whilst all case study authorities report that evidence is being used to identify the issues for the LDF, the extent to which this is demonstrated in consultation documents varies. Hambleton, St Helens, Horsham, Stoke, North Northamptonshire and West Berkshire presented evidence of spatial trends at a district or sub-regional scale to arrive at the key issues. This includes references to the findings of public consultation and regional policy where relevant. In four of these authorities, the examination of the spatial context and identification of the issues are identified at the beginning of consultation documents and further detailed examination of the key issues flows from there. For example, Hambleton's Core Strategy Preferred Option Report identifies nine strategic issues for the LDF. Extracts are presented below. The document goes on to set out options for the spatial strategy and other strategic policies in response to the issues.

Identifying the issues using evidence

Hambleton Core Strategy Preferred Options (August 2005)

“Hambleton clearly benefits from an attractive environment, and has an enviable general level of prosperity. Nevertheless, and reflecting the community views expressed to-date, there are a number of specific issues that need to be addressed:

- sustaining the attractive environment and maintaining levels of affluence will remain key objectives in planning for Hambleton’s future;
- the dispersed settlement pattern of Hambleton means that ensuring accessibility to services and determining the best pattern of provision are inevitably amongst the most challenging spatial issues which the District Council, and the other service providers, need to address. Particular problems of accessibility arise for those sections of the community without access to a car, such as young and elderly people, and those with disabilities, and particularly those living in villages;
- linked to this, what is the best way of achieving sustainable development? What does this mean for the distribution of development, particularly between market towns and villages?
- there is a clear consensus on the need to sustain the focus on the regeneration of market towns, to enable them to continue to thrive as service centres to meet the commercial and community needs of rural areas, and to determine how to meet the retail and employment challenges of centres outside the District;
- house prices in Hambleton are amongst the highest in the region. Achieving the appropriate scale of new housing will be one the most critical issues to be addressed. Within the context of the scale of provision determined by the RSS, the particular need evident in Hambleton is to achieve more housing which is affordable – to provide for first time buyers and others with a need to live in the District, but who are currently unable to pay house prices in competition with incomers to the District, moving in to retire or to commute back to metropolitan areas;
- in line with national trends, Hambleton has an ageing population. However, in Hambleton this is even more pronounced: according to the 2001 Census, 23% of the District’s residents are over 60 compared to 21% nationally, and conversely, in Hambleton, 18% of residents are under 16, compared to 20% nationally. Meeting the needs of elderly people will be a major challenge, whilst ensuring that the District remains attractive to young people;
- a large proportion of Hambleton’s working population travels to work in other parts of the region. The more local economy is characterised by lower wage levels and relatively restricted employment opportunities. About 60% of businesses in Hambleton have experienced recruitment difficulties. Supporting the local economy by increasing the range of higher skilled jobs available locally is an issue to be addressed, with the aspiration of reducing levels of out-commuting.”

5.5 There was little discussion in the consultation documents of the other six case study authorities on how they had arrived at the issues for the LDF. Typically they drew simply on the priorities of community and corporate strategies.

5.6 PPS12 (paragraph 4.11) requires the issues and options stage to not only identify the issues, but also to set out ‘the options which are available to deal with those issues’. The example below is taken from the issues and options report for the North Northamptonshire Joint Core Strategy. It sets out an informed statement about the relationships between the main towns, with an option for the planned response.

Using evidence to identify the issues and options

Options for North Northamptonshire (June 2005)

Corby, Kettering and Wellingborough

“...As each town has its own identity and is a reasonable distance from the others, at the moment they tend to be in competition with one another for new jobs, shops and leisure development. The Plan could seek to change this so that each town contributes something different to an overall better whole and together they help to pull back jobs and services from larger towns outside North Northamptonshire. This should not mean that the towns should grow into one another but simply that it should be easier to move between them for different services, instead of travelling further afield as happens now.”

(ii) Using evidence to develop the spatial strategy

(a) Using evidence in the assessment of alternatives for the spatial strategy

- 5.7 In the interviews with the case study authorities, the LDF teams report that evidence is being used to identify options and select the preferred spatial strategy. However, this is not always clear from consultation documents. Of the 11 case study authorities producing core strategies:
- seven set out options for the spatial strategy explicitly either in issues and options and/or preferred options consultation documents;
 - three did not set out options explicitly, relying on a preferred spatial strategy only;
 - one case study had not sufficiently tackled the spatial strategy in the issues and options report, but this could be further developed in the preferred options stage.
- 5.8 Of the three case studies where only a preferred strategy was presented, two considered different components of the strategy on a thematic basis in separate chapters (eg roles of town centres, distribution of housing), but this was not presented as options for an overall spatial strategy. In the other case, whilst there was no discussion of spatial options in the consultation document, an accompanying questionnaire sought views on the preferred approach, including the levels of development proposed in the main towns and villages.
- 5.9 Of the seven case study authorities that set out spatial options for the core strategy:
- four set out options without any or very limited discussion of their relative merits;
 - three authorities (Stoke, Hambleton and North Northamptonshire) were more explicit about spatial strategy options and sought to explain why the preferred strategy was considered to be the most appropriate. However, with the exception of North Northamptonshire, the links with locally-generated evidence in these discussions were limited.
- 5.10 Hambleton is the most overt of the case study authorities in their consideration and rejection of alternatives (see extract below). However, even in this example, there are very few references to evidence. This is followed by another example from North Northamptonshire's core strategy preferred options (see extract below) which is more explicit about how background evidence has led to a view on what the emerging preferred strategy for the location and number of urban extensions should be.

Using evidence in discounting spatial strategy alternatives

Hambleton Core Strategy Preferred Options (July 2005)

"SPATIAL PRINCIPLES – Alternative options not selected:

a. rather than focusing most development on the Principal Service Centres of Northallerton and Thirsk, the same development could be shared more equally between all five Service Centres or other variations;

–this would not recognise the important differences in role, situation and potential of these towns, or their capacity to accommodate development;

b. more development could be targeted on the villages and less on the Service Centres;

–again, this would not recognise the opportunities for development in the Service Centres, their current and potential roles, and the limited scope to divert limited resources and services more widely;

c. no Service Villages would be designated but instead a share of development in a wider range of villages permitted;

–the essential purpose of the designation is to capitalise on existing good levels of provision, and focus new (and secure maintenance of existing) resources and service provision to best effect. The wider that development is spread, the more limited the individual benefits, and the loss of economies of scale;

d. define a smaller number of Service Villages, and greater number of Secondary Villages, thereby allowing more development in other villages or possibly in the market towns;

–the number and location of Service Villages has been chosen to reflect the scale of existing provision and to ensure that all the hinterland of the market town is accessible to either Service Village or Service Centre;

e. no development in villages not designated as Service Villages, and delete the category of Secondary Villages

–this would restrict the ability to meet particular local needs, where sustainable communities could be supported;

f. matching levels of new housing and new employment development;

–taking this as the sole guiding principle would ignore the reality of the existing settlements and their individual potential. However, as a general principle it should (and does) underpin the approach taken;

g. promoting development where it would maximise the reuse of brownfield sites

–again, in itself this would not be a sufficient principle, since it would not reflect the other strategic objectives and potential. However, this is an important principle which should support any approach, and will be reflected in the detailed policies contained in Section 4 following;

h. greater proportion of employment land at strategic sites, e.g. Dalton Airfield

–some "strategic" sites, outside existing centres but with good accessibility and infrastructure, may be acceptable ingredients within a sustainable package – but would need to be viewed as exceptions, otherwise overall sustainability concerns could be raised".

Using evidence to refine aspects of the emerging preferred spatial strategy

Preferred Options for North Northamptonshire (November 2005)

Location and scale of urban extensions – preferred option:

A thorough assessment of all potential directions of growth for Corby, Kettering and Wellingborough has been carried out (North Northamptonshire Urban Extensions Study, Joint Planning Unit, October 2005). This has taken the form of a sustainability appraisal, drawing together information on environmental constraints (landscape, biodiversity, heritage, coalescence), accessibility to key services and facilities (schools, town and local centres) and infrastructure constraints (utilities provision, impact on highway network). This work has identified the best locations for expansion of the towns over the period to 2021 and beyond....

...Based on this work and the consultation response, the preferred option is to concentrate on a few large urban extensions that can include a mix of homes, jobs and other uses and can deliver the infrastructure, facilities and a high quality environment to support a step change in the rate of housing development (option a). It leaves a degree of flexibility for some smaller greenfield sites to be developed alongside the principal sustainable urban extensions. The preferred directions of growth for each of the growth towns are shown on Figures 3 and 5....

(b) Extent to which evidence appears to be underpinning the spatial strategy

- 5.11 Of the ten authorities that included a section entitled ‘spatial strategy’ or equivalent (with or without options), the extent to which they appear to be based on evidence is mixed:
- in two issues and options documents, options for the spatial strategy were proposed for consultation with no background evidence as to why they had been selected, nor any use of locally-generated evidence in the discussion of their relative merits;
 - five case studies were not explicit in the use of locally-generated evidence to back up the preferred spatial strategy (referring largely to national, regional or sub-regional policy), although there appeared to be a good understanding of the area;
 - three authorities presented spatial strategies that appeared to be based strongly on evidence.
- 5.12 North Cornwall is one of the five authorities that were not explicit in the use of evidence at the preferred options stage. The Authority sets out a spatial strategy without any explanation as to why this is preferred. Yet from the interviews and what is known about the types of background information that has been collected, there is evidence behind the chosen approach. For instance, Bodmin has featured at the top of the settlement hierarchy for some time, and is the only settlement in the district that has been identified by name in the Regional Spatial Strategy for small scale growth. However, Launceston has been given equal status in the LDF, based on evidence from studies on community facilities, retail and employment which demonstrate that it has a similar level of self containment and the ability to provide for a good balance of housing and employment growth. Without making this information explicit, it is more difficult for stakeholders and the Inspector to come to a view on whether the proposals are the most appropriate.
- 5.13 North Cornwall is not alone in this approach. In many cases, the justification for preferred approaches was national policy, regional policy, or a sub-regional initiative (eg Housing Market Renewal Pathfinder priority area) with little justification of why this was the right approach on the basis of locally-generated evidence.
- 5.14 Hambleton goes a bit further than North Cornwall, presenting an informed statement about accessibility and levels of services to say why the settlements selected to accommodate growth are appropriate.

Using evidence to justify the selection of the preferred spatial strategy**Hambleton Core Strategy Preferred Options (July 2005)****Spatial Principle 1**

An area of opportunity is defined, comprising the Thirsk area, the southern part of the Northallerton area, and the eastern part of Bedale area. Reflecting the scope for development, in particular based on its accessibility, scale of existing facilities and relative lack of development constraints, this is the area where most housing and employment related development will take place.

- 5.15 Plymouth and South Hams’ preferred spatial strategies are very firmly based on evidence, frequently referring to background evidence. An example of how Plymouth’s spatial strategy has been based on evidence is presented below. This cross-refers to background studies where appropriate, but since this is the submission document (as opposed to a consultation document which can contain more discussion) the actual evidence is largely implicit.

Using evidence to justify the selection of the preferred spatial strategy

Plymouth Core Strategy 2006–2021 (submitted, August 2006)

The spatial strategy for Plymouth set out in the submission core strategy uses two key pieces of evidence as its basis – the Mackay Vision and a sub-regional growth study which includes an assessment of future economic potential. In the introductory sections to the core strategy, interpretations of these two pieces of work are provided. An extract is as follows:

“This (the Mackay Vision) is saying that if Plymouth is to take its place among the premier cities then:

- *There is a need for a sufficient critical mass of population to support the range and quality of services that the city aspires to. Without the demand, it is simply uneconomic to supply the necessary higher order services.*
- *But, to both create and retain this critical mass, Plymouth needs to become the city of choice where people want to live. To achieve this, design excellence will be essential.*
- *However, without high quality job opportunities population growth is unlikely, so the planning strategy needs to go hand in hand with the economic strategy.*

.....The Sustainable Growth Distribution Study for the Plymouth sub-region (March 2005) indicates that, providing certain interventions are successful, and there is no dramatic change in the country’s economic fortunes, the population of the PUA could increase to some 300,000 by 2026”.

In addition, other thematic studies and local neighbourhood studies have assisted in drawing up the detailed spatial strategy, such as a shopping study, urban capacity study, employment land review, local neighbourhood and local community planning studies. This leads to a spatial vision and a policy for the priority areas that will play a significant role in implementing the overall strategy. Some extracts are below:

“By 2021 Plymouth will ‘become the economic hub of the far South-West’, fulfilling its role as the leading retail, entertainment, employment, health and learning centre for the far South West..... To achieve this the city must be of a sufficient critical mass to support the level of services needed.....The aspiration is that the city will eventually grow to a population of over 300,000.

The priorities for regeneration are the city’s waterfront areas. Turning these areas around will be key to Plymouth’s urban renaissance. Considerable preparatory work has been undertaken in these areas and they have now reached a stage where aspirations can be translated into reality. In addition, the opportunity sites on

Plymouth’s eastern and northern corridors offer the potential to complement the waterfront regeneration initiatives by ensuring the overall level of change provides a balanced range, mix and type of development.

The foundations for the city’s transformation are its neighbourhoods. Many of these already provide attractive living environments with good access to local facilities.

However, others will need to use the opportunities arising from new development to create strong, inclusive and safe neighbourhoods – helping to reduce the need to travel. Building Sustainable Linked Communities throughout the city is a key element of this plan”.

The overall strategy is to be implemented, focusing first on nine priority areas within the city because of the opportunities they offer for change, their city wide importance, or their urgent need for regeneration. The policy is as follows:

Strategic Objective 5 – Delivering Regeneration

To prepare a series of Area Action Plans for the areas in the city of greatest development pressure or opportunity or sensitivity to change. The following areas will be prioritised:

1. The waterfront areas of City Centre / University, Devonport, Millbay / Stonehouse, East End / Eastern Gateway, Sutton Harbour and The Hoe.
2. The Eastern Corridor area of significant opportunity, in particular North Plymstock.
3. The Northern Corridor, where there is a need to focus the delivery of area based initiatives at Derriford / Seaton.
4. Central Park, where there are opportunities to consider the provision of improved leisure facilities.
5. Other areas where development pressure or opportunities arise and it becomes necessary to provide a comprehensive planning framework to guide development or areas considered sensitive to change.

The Core Strategy goes on to set out a well-researched strategic context for each of the nine priority areas, drawing on background studies and consultation results. This identifies the key issues, as well as a vision and objectives for each area that will need to be taken forward in the AAPs.

5.16 Some of the locally-specific evidence about the function and future roles of the main towns and their hinterlands used in the South Hams core strategy is captured in its *AAPs and Site Allocations Issues and Options Report*. The information presented in this document has been informative in feeding into decisions made in the core strategy. The box below sets out some of the evidence that has been assembled.

Understanding different parts of the area – using background studies in DPDs

South Hams AAPs and Site Allocations Issues and Options Report (October 2004)

In the AAPs and Site Allocations Issues and Options Report, the district is divided up according to the main towns and their hinterlands. Within each sub-area, information on the main towns and relationships with the hinterland are presented. This covers the size, role, self-sufficiency, and recent growth of the towns. Particular issues prevalent in the sub area are also examined, such as accessibility, infrastructure, community facilities, employment, etc. Subsequent sections go on to summarise the main proposals and representations on the recently reviewed Local Plan that was aborted in favour of the LDF. Each of the main towns has also been the focus of a Market and Coastal Towns initiative and a plan for the town has been prepared. An outline of the objectives, development principles and future strategy from each of the MCTI plans is given. Each sub-area concludes with a section on the LDF strategy for that area, as well as possible locations for housing and employment sites on an OS map. Text from the LDF strategy for the Ivybridge and Modbury area is given below.

“The Ivybridge and Modbury Area – LDF strategy:

- Encourage the provision of improved community facilities
- Not propose any significant new housing development in Ivybridge
- Encourage measures which seek to improve the viability and vitality of the town centres
- Encourage the provision of affordable housing on appropriate sites
- Encourage the creation of jobs and the development of appropriate employment sites”

Whilst the ‘LDF strategy’ cited above may appear to be generic, it is preceded by local evidence (eg what the specific deficiencies in community facilities are), including the issues and aspirations identified by the local community.

This detailed understanding of the place has been used to arrive at a settlement hierarchy and allocations of housing and employment to settlements in the core strategy that are evidence based, drawing on this informed level of understanding.

(iii) Using evidence to develop policy mechanisms

5.17 Core strategy consultation documents address two broad components:

- the spatial strategy (discussed in section above);
- key implementation policies.

5.18 This section examines the extent to which the case study authorities’ implementation policies appear to be based on evidence.

5.19 Three authorities did not set out any evidence on implementation policies, although one of these had only reached the issues and options stage. Only the options or preferred policies and proposals were set down, with no or little explanation of why they had been chosen.

5.20 Nine authorities drew on evidence about housing, employment and retail issues. In most cases, the use of statistics and findings from background studies was more commonplace in relation to policies on housing, employment and retail, for which

studies are traditionally prepared and for which monitoring data are available (such as land availability). Some examples of how evidence relating to employment, housing and retail implementation policies are being presented are set out below.

Presenting evidence on emerging employment policies

Preferred Options for North Northamptonshire (November 2005)

Employment

"This study (the Employment Land Futures report) considered those industrial/commercial sectors that are provided for through the planning system.... The study looked at the levels of growth, the resulting indicative jobs figure and the desires of existing planning and economic development policies. The economies of the four districts of North Northamptonshire and their characteristics (for instance in terms of labour supply) were also analysed. The study found that the workforce in North Northamptonshire districts is generally less well qualified than the national average, with particular issues in Corby. Skills development is a key issue in making the area more attractive for new employers, particularly in higher value added activities....

....The study concluded that the policy-led scenario is ambitious and that it may not be possible by 2021 to attract demand on the scale indicated, particularly in Corby and especially in higher-value office-based activities. Two further scenarios were investigated that were variations on the policy-led approach. The worst-case scenario indicated the potential impact of having policies that place restrictions on development in some places and attempt to push development to others that the market does not find attractive, with the result that North Northamptonshire as a whole loses out. A more acceptable option envisages Corby being successful in attracting industrial/distribution jobs but less so for service sector jobs, which would instead be accommodated at Kettering and Wellingborough (hereafter called the 'second-best scenario'). The study concluded that either this or the more ambitious policy-led approach should be the starting point for the plan.

PREFERRED OPTION:

In view of the regeneration needs of Corby and the preference for diversification of the economy of North Northamptonshire as whole, option C is the preferred approach. To support this, the policy-led approach (as outlined in the employment study mentioned above) would be the most likely to deliver the outcomes required and the creation of the 43,800 jobs identified in the regional strategy. This would envisage Corby succeeding in attracting the desired additional service jobs and therefore its economy (and the economy of North Northamptonshire) becoming more diversified. It will however be important to monitor the situation (see section 10 below). If Corby's diversification occurs more slowly than expected, it will be necessary to allocate additional land at Kettering and Wellingborough to ensure that service sector jobs are not lost from North Northamptonshire. Potential sites should be identified by the districts to facilitate rapid allocation if this is needed....

Table 3 indicates that there is currently an oversupply of land available for manufacturing, a general undersupply for strategic distribution and an undersupply of land suitable for office needs. This suggests the need to re-orientate land allocations away from manufacturing and more towards office-based uses, and the need for de-allocation of some 114 hectares".

Presenting evidence on emerging housing policies

Hambleton Core Strategy Preferred Options (July 2005)

Affordability of housing

"The Housing Needs Study 2004 looked at affordable housing, and its findings are as follows:

- there is a shortfall of 563 dwellings (113 units per year) for 2005 – 2010, chiefly for 1 and 2 bedroom general needs properties;
- there is good capacity within older people's housing stock;
- a variety of accommodation is required, but mainly houses;
- a 50:50 split between social rent and shared equity provision is recommended.

In terms of the distribution of affordable housing need the study broke the District down into 11 sub- areas....The Housing Needs Study provides a good guide to the general level of affordable housing in the District. Although the scale of need will be kept under review as the Plan progresses....The table following indicates the scale of need identified by the Study.

Table 1 – Affordable housing: scale of need in relation to new building

Service Centre & hinterland	new building target (Policy CP5A) (per annum)	Housing Needs Study 2004 Affordable housing need (per annum) 2005–2010	proportion of all housing proposed in CP5A, required to achieve identified need	estimated yield of affordable housing – applying proportions (per annum)
Bedale	40	18	50%	20
Easingwold	50	23	50%	25
Northallerton	100	21	25%	25
Stokesley	50	26	50%	25
Thirsk	80	24	30%	24
Hambleton total	320	113	37% (derived)	119

* it is noted that the numbers have been changed slightly in the submission document.

In the case of Hambleton, the evidence described above suggests that there is a compelling requirement, based on the amount of affordable housing need established, and the likely scale of total housing provision and sites likely to come forward, to set very low thresholds throughout the whole Plan area. Policy CP9 therefore proposes a single threshold: the Policy applies to all developments of 2 or more dwellings, or 0.1 hectares or more in size. This reduces the threshold from 15 to 2 in the settlements greater than 3,000 in population. Over the last five years, some 17% of all dwellings given consent were on sites of between 2 and 14 dwellings. These would now be brought within the application of the Policy. In the rural areas, reducing the threshold from 3 to 2 dwellings would have included a further 7% of all dwellings. Thus in total, if future development mirrored that experienced during the last 5 years, an extra 24% of all dwellings would be caught by the Policy.

The preferred options document goes on to present the preferred policy, setting the threshold for negotiation and indicative targets for affordable housing in each of the five service centres and hinterlands as in Table 1.

Presenting evidence on emerging retail policies

Plymouth Core Strategy – Key Changes to the Preferred Options (April 2006)

Shopping – key changes

Key issues arising from consultation.

- *Concern about the target for new shopping floorspace, assessment of retail capacity, impact on other centres and consideration of other opportunities for shopping development* – is being considered through a new Shopping Study
- *The need to discourage out of town shopping* – is reflected in the revised strategic objectives
- *The need to improve the availability of affordable, good food to less affluent communities* – is reflected in the revised strategic objectives
- *The importance of “demonstration of retail need” as a criteria for new shopping development* – is reflected in the revised strategic objectives
- *Concern about a policy which constrains the nature of shopping at the City Centre* – is addressed in part in the revised preferred options.

Key messages from the Shopping Study

Plymouth currently performs slightly below average in retail terms for a city of its size. Plymouth has a 53.3% share of a total catchment turnover of £1.245bn (the City Centre has a 42.5% share of this turnover)...However, with the opening of Drake Circus, and taking account of the likely effect of the new Princesshay shopping scheme in Exeter, it is anticipated that Plymouth’s market share will increase. Plymouth will also be expected to perform at a little above the benchmark in terms of trading density.

- The study suggests that, in terms of comparison goods, there will be little potential capacity for significant new shopping provision until after 2011....By 2016, the study suggests that, with anticipated population growth, new provision of between 35,000 and 50,000 sq m net will be justified in order to support Plymouth’s wider vision for a sustainable high quality city....By 2021, Plymouth’s growth agenda if successful is likely to justify in the order of 75,000 – 110,000 sq m net new floorspace... And by 2026, the demonstrable need may be approximately double this.
- What this demonstrates is that in the medium to long term, substantial new retail investment will be required if Plymouth’s growth agenda is successful... It is vital therefore that the LDF includes a positive strategy for capturing and directing this long term potential in a manner which delivers aspirations for the future.
- In relation to food shopping... About 12.5% of the City’s available expenditure leaks to locations outside the city, most notably Tesco at Lee Mill. As a response to this there is considered to be scope for a new food store in the Derriford area, to form a new district centre for that part of the city. There is also considered to be scope for additional food shopping to address issues of social exclusion and ‘internal’ leakage from the western part of Plymouth.

Revised Core Strategy Preferred Option in relation to shopping issues.

-To protect the primary retailing role of the City Centre within the context of a mixed use centre with complementary housing, office, cultural and leisure provision.
- To remedy identified food shopping deficiencies in western Plymouth in the early part of the plan period, with a new store in the Weston Mill area.
- To promote a district centre at Derriford as a key component of the creation of a new sustainable neighbourhood of Plymouth, and to support the existing employment, health and residential uses and provide a new focus in the north of Plymouth.
- To promote the sustainability of new major developments in Plymouth, particularly at Millbay and Plymstock Quarry, through the provision of shopping provision sufficient to meet local needs and – in the case of Millbay – the needs of visitors and tourists.
- To facilitate implementation of the Eastern Corridor transport proposals and regeneration in the East End through redeveloping the existing Friary retail park for non-retail uses and provision of an alternative consolidated retail warehouse location on the Laira Embankment.
- To reappraise on at least a 5 yearly basis the need and potential for shopping development in Plymouth having regard to the actual population change achieved and revised population growth forecasts.

- 5.21 Beyond housing, employment and retail policies, very few of the case studies have made the connections with locally-generated evidence in preparing policies (eg for issues such as accessibility, the environment, culture, health, crime and design). These policies tended to be more generic. Plymouth and North Northamptonshire are the exception and their consultation documents do tend to refer to evidence in the implementation policies.
- 5.22 For example, Plymouth’s core strategy has used evidence to create locally-specific policies on cultural facilities, green space provision and transport. North Northamptonshire also provides evidence on environmental protection, green space networks and future infrastructure priorities in a similar way to the examples cited above.
- 5.23 Looking across the case studies and considering the range of the implementation policies addressed in core strategies, whilst evidence appeared to inform statements within consultation documents, this was not always cross-referenced with background reports or other evidence, even when evidence was known to exist.

Lessons

Be more explicit in presenting evidence in consultation documents

- 5.24 Whilst all case study authorities are confident that they are using evidence to prepare strategies and policies, it is not always clear in consultation documents what evidence is being used. In some cases, local authorities are able to demonstrate they have evidence, but this has not been disclosed in consultation documents.
- 5.25 Local authorities need to be more explicit in the use of evidence in defining the context and issues in order to identify options, and also in justifying preferred policies. Relying on supplementary papers at the Independent Examination may help the Inspector come to a view on whether the document is founded on a robust evidence base, but relevant evidence, including reasons for selecting the preferred option must be shared with consultees during the preparation process to assist them in coming to a view on the appropriateness of proposals.

Reporting evidence – where should it go?

- 5.26 Regulation 25 requires the informal involvement of communities in the development of issues and options (*Creating Local Development Frameworks*¹⁴, paragraph 8.3). The issues and options stage is described as a continuous process rather than one discrete exercise and there is no requirement at the issues and options stage to produce documentation, although all the case study authorities produced an issues and options paper for consultation. As the Guide, paragraph 8.3 states, “For example, it may be appropriate to involve local communities and stakeholders in a series of events at which the evidence base is presented and options for the area are identified”. Therefore, the issues and options stage may be seen as part of the evidence gathering, but there is still an expectation that evidence and options are presented to consultees – be it in a document or as part of a more interactive arrangement.

¹⁴ ODPM (2004), *Creating Local Development Frameworks – A Companion Guide to PPS12*.

- 5.27 Given the need to set out clear reasons for the selection of preferred options (PPS12, paragraph 4.12), the preferred options document will contain more technical analysis than perhaps the issues and options or the submission documents. However, if the authority is to be successful in involving the community in the LDF, consultation documents will also need to be accessible. Therefore, a balance needs to be struck between demonstrating that the proposals are appropriate and founded on a robust evidence base, at the same time as being accessible. Evidence may comprise a mixture of references to specific pieces of research and evidence-based statements about the place.
- 5.28 The submission document will contain the final set of policies and is expected to resemble the adopted document, subject to the recommendations of the Inspector. Therefore, there will not be the same level of justification of the preferred approach as was set out in the preferred options report. In the submission document, the main purpose of the supporting text to policies will be to advise on the implementation of policies, including an interpretation of the policy.

Evidence underpinning the issues

- 5.29 In consultation documents, the issues presented should be based demonstrably on what is known about the area and how it functions. The options presented should be a direct response to the issues raised by the evidence about the characteristics of the area and how it is changing. Local authorities may get a more meaningful response, particularly from the local community, if the understanding of the place is shared. For instance this may include how the population is changing, how the economy has fared in the past, including how it is forecast to perform in the future, how new development could address local priorities such as regeneration, affordable housing, etc. A more informed understanding of the place will enable consultees to consider what the impacts of the options might be and hence which one they think best responds to the local issues.

Evidence underpinning the spatial strategy

- 5.30 There is a strong association between the case studies that use evidence to build up an understanding of places and the extent to which the spatial strategy is locally specific. Six of the case study authorities demonstrate that they have sought to understand the roles of places with a view to determining what their future role should be by:
- carrying out settlement or neighbourhood studies (eg Horsham, Plymouth)
 - drawing on information in DPD consultation documents about settlements gleaned from assessments of travel to work information, community facilities, accessibility, as well as information from thematic reports such as housing market assessments, employment and town centre studies.
- 5.31 As has been discussed in Chapter 4, whilst there are also a number of authorities that have sought to understand individual settlements or parts of a city (including relationships with other places), a lot of evidence has been collected on a thematic basis (eg employment, retail, environmental studies). Thematic studies need to consider different parts of the administrative area (eg the spatial issues of individual settlements or neighbourhoods) to build up a picture of places.

5.32 In several case study core strategy documents, evidence about particular parts of the district is set out at the end of the document with a view to being taken forward in local strategies (eg North Cornwall, West Berkshire) or is presented separately in consultation documents on area action plans (eg South Hams). Whilst this information will have a key role to play in local strategies and AAPs, this is precisely the type of local information that needs to be assimilated to inform the core strategy.

Evidence underpinning options and the selection of options

5.33 If the area is treated in a homogenous way or if evidence is only collected thematically with little consideration of geographic differences, it will be difficult to identify spatial options. In general the best example of the type of thematic study to consider spatial differences most effectively are retail studies which include an assessment of the health and performance of different towns within an area. The briefs for other themed research should stipulate that studies draw out spatial differences.

5.34 In the case of the Stafford core strategy, the Inspector considered that the options were contrived by having “Three degrees of intensity of policy wording, *greatest restriction, less restriction and least restriction*, giving detailed policy wording variants, rather than broad alternative spatial approaches as to the policies and how the development strategy might be delivered”. The Inspector’s view was that the Authority needed “To provide a reasonable choice of spatial options for the public to respond to. In concentrating on degrees of strictness of approach, rather than on alternative approaches per se, this resulted in serious shortcomings” (paragraph 3.2.3, Stafford BC Core Strategy Inspector’s Report).

5.35 Simply stating different levels of control to an established settlement hierarchy will not necessarily enable the type of stakeholder engagement that is sought in the new system. As is set out in PPS12, “The options must be of sufficient detail for the type of development plan document envisaged, to enable meaningful community involvement and the sustainability appraisal” (paragraph 4.12). Therefore, evidence is needed to enable authorities to describe the existing roles of settlement and to be able to identify possible future roles, expressed as development strategy options.

5.36 The case studies were not always explicit in explaining why the preferred policies had been chosen. The Inspector’s report for the Stafford core strategy noted that “It would have been helpful if the process of choosing the preferred options had been set out more clearly in a single document”. Local authorities should be more explicit in explaining why particular options have been chosen over alternatives in a single accessible source – which should be the preferred options document.

Evidence underpinning policies

5.37 Using evidence to defend implementation policies is a longstanding feature of local plans. The case study authorities used evidence to back up policies on housing, employment and retail. It was more unusual to find evidence being used to prepare locally-specific policies on themes such as culture and green space. Local planning authorities are encouraged to think beyond the traditional remit of land use planning to collecting evidence that will assist in addressing broader quality of life issues for instance in relation to health inequalities, environmental improvements and leisure and cultural facilities.

Chapter 6

Sustainability appraisal

Introduction

- 6.1 This chapter considers the findings in relation to the use of sustainability appraisal (which encompasses strategic environmental assessment) and its relationship with evidence. Evidence is fundamental to the sustainability appraisal process. It is vital to establish a baseline position from which to assess change and to set up a robust sustainability framework. There are opportunities to establish a common evidence base using that which is necessary for the sustainability appraisal to inform policy and options development, as well as the monitoring process.
- 6.2 Sustainability appraisal plays an important role in influencing decisions. This is considered in detail and many examples are provided which show how it can be used as part of the decision-making process. Option assessment is a fundamental purpose of the sustainability appraisal process. This requires alternatives to be set out clearly and in sufficient detail to allow an appraisal to be conducted, and a clear methodology needs to be used to evaluate alternatives and provide information for use in option selection.

Case Study Findings

(i) Undertaking sustainability appraisal

- 6.3 All the case study authorities have undertaken sustainability appraisals of their development plan documents. Six authorities have submitted development plan documents with an associated sustainability appraisal. The other six authorities are at varying stages from initial and informal appraisals of issues and options reports through to more formal sustainability appraisals of their preferred options documents.
- 6.4 The case studies have reported mixed experience of the sustainability appraisal process. More than half of the case study authorities believe the sustainability appraisal process has been useful and that it provides valuable evidence for use in the LDF. However, a number believe it is a burdensome requirement, with concern expressed that the effort required is not commensurate with the impact on policy making and policy effectiveness. This is a worrying finding which is likely to be a reflection of attitude and approach. Those authorities that believe sustainability appraisal is a useful process use it accordingly and value it, while those that see it as an external verification process question its value.
- 6.5 The Strategic Survey found that a third of authorities envisaged using consultants to undertake the majority of their sustainability appraisal work. Half of the case study authorities used external consultants to carry out their sustainability appraisal. Four authorities undertook sustainability appraisal in house, and the remaining two used a combination of consultants and in-house resources. For example, Horsham used consultants for the initial stages and in-house resources for the submission draft

document. This allowed them to learn from the consultants and become familiar with the necessary techniques at an early stage in the process. North Northamptonshire produced the scoping report themselves, and then used consultants for the formal preferred-options stage.

- 6.6 Widely different opinions have been aired about the use of consultants versus in-house staff. It is clear that there are benefits from both approaches. Some believe that in-house preparation provides a continuous stream of input into the policy-making process, with good relationships and iteration at the various stages. Others feel that external consultants provide a more objective and rigorous test of policies. The Environment Agency, for example, has commented that sustainability appraisals undertaken by consultants are more thorough than those undertaken in house. In Plymouth, a partnership approach to working with consultants on sustainability appraisal appears to have been particularly effective and provided a beneficial learning experience for officers, enabling them to undertake an in-house appraisal of other documents.

Example of good relationship between the authority and consultants – Plymouth

There has been a particularly good relationship between Land Use Consultants and the LDF team in Plymouth. The process has been managed by a dedicated officer responsible for the sustainability appraisal process. It is clear that there is mutual trust and respect on both sides and there has been considerable communication at all stages. This has helped ease the process when there has been considerable time pressure and demands made by the local authority. The consultants are engaged on a long term contractual arrangement and will be on hand to give support and appear at the forthcoming examination if necessary. The SA has been comprehensively undertaken with many changes and iterations and the Authority feel that it has led to recognition of issues that would otherwise have been missed. They recognise that there has been enormous pressure on both parties and believe they could have done it better with hindsight and with more resources. Land Use Consultants believe that Plymouth is one of the most responsive councils they have worked with and that they address the comments raised. They believe the key to the process has been the successful relationship in which neither side is afraid to admit it does not know the answer.

- 6.7 The findings show that where there are good relationships and a well-managed process (whether this is in house or with consultants) this is likely to lead to more support for the process from the LDF team, and more use of the sustainability appraisal.

(ii) Using evidence to inform sustainability appraisal

- 6.8 The results show that more than half of the case studies identified the need for additional, specific evidence to feed into their sustainability appraisal, the rest using existing information, often exploiting data held by other agencies. West Berkshire has used data already available in reports and on websites to provide baseline information. This has included information from Berkshire County Council as well as the Thames Valley Environment Records Centre (TVERC). Horsham relied substantially on data provided by the Environment Agency. North Northamptonshire drew upon joint studies on landscape characterisation and green infrastructure, undertaken for the whole County.
- 6.9 Some authorities also used the process to identify gaps in the evidence base, eg data on flood risk, which they intend to fill at a later stage in the process. In Stoke, for example, evidence on a range of issues was found to be limited and/or out of date, leading them to commission new evidence. Further detail is provided below.

Commissioning new evidence – Stoke

Work on the sustainability appraisal in Stoke involved working closely with the Environment Agency/Natural England on specific issues identified in consultation. A great deal of work on the transport side was done through Halcrow's Integrated Transport Study (2005) which has considered accessibility issues. They have also identified many gaps in the evidence base and new evidence commissioned included:

- Biodiversity, fauna and flora – Staffordshire Biodiversity Action Plan, North Staffordshire Green Space Audit.
- Population and human health – housing needs and stock condition surveys by RENEW, PCT data on health profiles, police crime data.
- Water and soil – derelict land reclamation data, and household waste recycling data.
- Air and climate factors – air management information.
- Social inclusiveness – deprivation data, shopping surveys, PCT health provision information.
- Economic development – NOMIS data, and information from the Integrated Economic Development Study.
- Culture and heritage – Heritage Characterisation Study, protected sites and buildings evidence.

6.10 There have also been some attempts at integrating sustainability appraisal with the health impact assessment process. Plymouth is currently investigating the issues involved in linking these two different vehicles and is working closely with the Public Health Development Unit to undertake joint consultation events for area action plans and their associated health impact assessments. Liverpool is also seeking to undertake a health impact assessment of options through their strategic environmental assessment. Further details are set out below.

Integration of Health Impact Assessment and SEA – Liverpool

The health and wellbeing of the residents of Liverpool is recognised as a key issue that needs to be addressed. The LDF team are attempting to integrate health impact assessment of options into the strategic environmental assessment process. Improving health and reducing inequalities is included as a specific part of their core strategy objective of building strong and inclusive communities. Some health indicators have been included specifically within the scoping report and have been identified as criteria against which performance will be assessed.

- 6.11 Information collected through the sustainability appraisal can also inform strategy and policy more generally. Plymouth, for example, commissioned a greenscape assessment, as a result of the sustainability appraisal identifying this as a gap, and the assessment is also being used to inform other aspects of the LDF process.
- 6.12 There are opportunities to integrate the framework for sustainability appraisal with the monitoring process, avoiding unnecessary use of different indicators or of duplication. In most of the case studies the links between sustainability appraisal and monitoring could be strengthened (this is discussed further in Chapter 7 on Monitoring). There are, however, exceptions to this, for example Stoke is aiming to incorporate information from the sustainability appraisal into their Annual Monitoring Report to provide a future indication of effectiveness.

(iii) Using sustainability appraisal to influence development plan documents

- 6.13 The findings show that in most case study authorities the sustainability appraisal has influenced decisions about the content of DPDs directly. For example, the results of the sustainability appraisal have led to the following changes to strategy and policy:

- clarification of the role of settlements and the spatial distribution of development (South Hams);
- making more explicit the link between the spatial vision and core strategy policy (North Cornwall);
- explicit consideration of the needs of older people (Hambleton);
- further consideration of the extent to which road improvements make a longer-term, sustainable difference to economic prospects (St Helens);
- incorporation of mitigation measures, as recommended by the sustainability appraisal (various).

6.14 One example of how the sustainability appraisal has been used is described in more detail below. This example also shows, however, that the results of sustainability appraisals may be rejected in the context of conflicting ‘evidence’ from community consultation exercises.

Use of Sustainability Appraisal – South Hams

There are many examples of changes that have been made to the core strategy as a direct result of the sustainability appraisal. Most of the recommendations were to the text and involved wording changes which the Authority was able to incorporate. However, a more specific example is the advice to include guidance on the types of development that would be appropriate in area and local centres. Following this the Authority then designated central zones for larger settlements which are to be the focus for retail, leisure, commercial and office development etc.

One example where the Authority did not take on board a recommendation from the sustainability appraisal was in relation to the appropriateness of a higher level of development in Ivybridge (the District’s largest town). This was considered, but found to be inconsistent with community aspirations and views. Although it is essential that all sources of evidence are considered in the decision-making process, it is also important to ensure that the sustainability appraisal is formulated to take into account the views of the community and stakeholders early in the process. This will then make sure that no conflict arises and the appraisal can directly influence decisions.

6.15 It is important that there is a high degree of transparency in the way that recommendations from the sustainability appraisal are addressed and incorporated in development plan documents. In practice, however, few of the emerging development plan documents make explicit reference to the sustainability appraisal process. An exception is Hambleton, where the core strategy highlights “Recommendations from the SA/SEA which have particularly influenced the form of the submitted strategy” and provides clear links with specific policy issues. This approach, commended by the Government Office, was used for the preferred options stage and provided a valuable audit trail.

Highlighting Sustainability Appraisal recommendations in a DPD

Hambleton Submission Core Strategy February 2006 p23

Spatial Principles, advice from the SA/SEA

The SA/SEA shows that the Spatial Principles will contribute towards sustainable development by:

- helping to improve access to a range of services and facilities by directing development according to the existing and potential service provision of settlements;
- focusing development in the five market towns which should help to improve access to a range of services and facilities;
- directing development away from the most sensitive landscapes by focusing employment development on the five market towns. This should help to ensure designated sites of nature conservation value are protected;
- focusing development in the five market towns which gives strong support to their service centre functions. This will help in achieving the renaissance of the market towns;
- acknowledging the influences of surrounding urban and rural areas and encouraging development in the central Area of Opportunity. This should help to support local businesses, rather than those linked to neighbouring metropolitan areas; directing development to settlements where there is likely to be future demand and capacity for increased employment activity. This should achieve a better balance between homes and jobs.

(iv) Using sustainability appraisal in option formulation, assessment and selection

6.16 The sustainability appraisal clearly has a specific role in testing options and alternatives. There is evidence that local planning authorities both recognise this and are using sustainability appraisal to test and select development options. This was evident in the comments of interviewees during the case study work, and from the Strategic Survey which found that 80 per cent of respondents agreed that producing sustainability appraisals would 'aid consideration of development options'.

6.17 The sustainability appraisal in West Berkshire provides a good example of the process of evaluating and selecting options using an approach that has been commended by the Government Office, albeit in a context of uncertainty about the precise scale of housing development in the District. The core strategy set out strategic options that were then assessed according to sustainability criteria, and recommendations made about the most sustainable option. Continuing uncertainty over the housing provision means, however, that a final decision had yet to be made. An extract from the sustainability appraisal is below.

Option Appraisal

West Berkshire Sustainability Appraisal (extract pages 11–13)

The assessment of the options for this area revealed that the most sustainable options were **Options B and D**. These options promote the efficient use of land and could enhance the built and historic environment of the Eastern Urban Area and Theale. ...

The other options were considered less sustainable for a number of reasons:

Option A: Depending on the location of development, expansion outside the current settlement boundaries to the west and south will result in negative impacts on the North Wessex Downs AONB and floodplain, as well as possible negative impacts on SSSIs, a registered park and garden, and sites of archaeological and/or historic interest. ...

An assessment of Options H, I and J revealed that by comparison with other locations, it is more sustainable to focus development within Newbury and Thatcham. However given the differing nature of both settlements and the uncertainty over the type of development required, the assessment is unable to conclude which of the three options presented is most favourable and it may be a combination of options needs to be selected alongside options to protect the gaps between Newbury/Thatcham and adjacent smaller settlements.

- 6.18 The sustainability appraisal of Hounslow's Employment DPD assessed the evolving preferred options compared to a 'status quo' option of retaining existing policies set out in the 2003 Unitary Development Plan and a 'do nothing' option of relying on national and regional guidance. In addition, the effects of the different scenarios have been assessed for their significance with consideration to the probability, geographical scale, duration and timing of effects. To ensure the preferred options are as sustainable as possible, mitigation methods are identified to ensure the adverse effects arising from options are minimised and benefits maximised.
- 6.19 The Hounslow LDF team believe this process is an integral part of a more rational approach to planning and has resulted in more weight being given to issues not previously incorporated in the plan-making process. Examples of the issues raised include greater recognition of the effects from the preferred options, in particular in relation to the location-specific issues raised by the Brentford Area Action Plan, and also greater awareness of the proposals' impacts on implementation.
- 6.20 While all sustainability appraisals should evaluate alternative strategies, this may be severely hampered by the lack of detail about options included within the development plan documents. This was explored in Chapter 5 in relation to the use of evidence to inform options. PPS12 states that options presented "Must be of sufficient detail to enable sustainability appraisal" (PPS12 paragraph 4.12). However, where, as in some of the case studies, there is no explicit reference to alternative strategies, or where very little detail to justify options is provided, then the opportunity for sustainability appraisal to undertake meaningful option evaluation is limited.
- 6.21 There are some concerns about the role of sustainability appraisal as a decision-making tool. This refers to issues such as the interpretation of the summation of positive and negative effects in selecting the preferred option, and the problem of dealing with trade-offs between criteria in making choices. This raises questions about how sustainability appraisal is used in terms of the analytical/evaluative approach taken and its robustness in terms of testing options and ability to be translated into a useful part of the decision-making process.

Lessons

Undertaking sustainability appraisal

- 6.22 It is suggested that the sustainability appraisal process benefits from a clear management structure with a dedicated officer responsible for liaising with consultants or the in-house team. It also appears to be important to facilitate and ensure good relationships with the consultants or in-house team with regular and open channels of communication.
- 6.23 The sustainability appraisal process must be integrated into the preparation of the development plan document at the earliest stages of its gestation.

Using evidence to inform the sustainability appraisal

- 6.24 It is essential that evidence is seen as fundamental to the appraisal process, both to inform the initial baseline position and the appraisal of future changes.
- 6.25 The process can be used as a mechanism to check the existing evidence base at an early stage in the process and identify gaps. Any additional necessary information should be highlighted with a strategy and timescales for its collection. All information which is commissioned could be utilised for a common evidence base for use across the authority, which supports the formulation of strategy and policy and is also used for monitoring.
- 6.26 There are benefits from developing a direct and integrated relationship between the sustainability framework and the monitoring framework.

Using sustainability appraisal to influence decisions

- 6.27 Ensuring the process is transparent has benefits for all parties. The recommendations should be clearly identified and addressed within the DPD. There is an opportunity to use appropriate text to provide a clear audit trail, highlighting how findings have been incorporated.
- 6.28 To maximise influence at the early stages it is essential that the sustainability appraisal considers issues at the strategic scale. It should not be limited to suggesting minor wording changes and mitigation measures.
- 6.29 There is a statutory duty on local authorities to have regard to sustainable development and the sustainability appraisal should be the key determinant of decision making. However, at present it is being seen as just one influence among many. It could be used more successfully if it is seen as the mechanism which considers all the influences including all the evidence and consultation responses and weighs them against other, and provides a comprehensive and concise document to be used directly in the preparation of a DPD.

Using sustainability appraisal in option formulation, assessment and selection

- 6.30 It is important that the appropriate level of detail is provided at each stage to allow the meaningful consideration of alternatives. A critical issue for authorities is how they would determine what is an appropriate level of detail.
- 6.31 Sustainability appraisal should provide explicit recommendations about the most sustainable options supported by clear reasons. An assessment of all options against a clear set of criteria should be undertaken. This should then provide conclusions drawing on the results and be used directly in the decision-making process.
- 6.32 The findings have identified some real problems in how sustainability appraisal is being tackled. There is considerable variety in its use and application across the case studies, with a mix of approaches taken and different views about the benefits of the exercise. There is a clear requirement for more effective use of the sustainability appraisal process. One way of tackling this would be to revise the guidance on sustainability

appraisal. It is essential that within that document detailed advice is included on the following:

- management arrangements and how to undertake an appraisal;
- methods of integration and links between documents;
- use of evidence to inform, facilitate, evaluate and identify gaps;
- methods to assess strategic options effectively;
- methods of weighing influences and alternatives;
- transparency of findings and use in the decision-making process;
- linking the monitoring and sustainability appraisal processes.

Chapter 7

Monitoring

Introduction

- 7.1 The role of monitoring is to identify where changes are or are not taking place and to attribute these to the influence of the LDF. This enables policies to be reviewed so objectives can be achieved more effectively. There is a specific requirement on local planning authorities to prepare Annual Monitoring Reports (AMRs). Monitoring requires information and there is potentially a strong link with the use of evidence in plan making. This section considers how the use of information in monitoring and the role of evidence in plan making can fit together.

Case study findings

(i) Role of monitoring and the annual monitoring report process

- 7.2 Annual monitoring is one of the requirements of the LDF process and annual monitoring reports (AMRs) have been prepared for all case study authorities (except North Northamptonshire since in this area of joint LDF preparation the requirement falls to the individual district councils rather than the Joint Planning Unit).
- 7.3 Support for the principle of monitoring as an integral part of the LDF process is evident from the comments of the interviewees. For example, interviewees from North Cornwall saw monitoring as a key part of LDF team culture and several others (e.g. Horsham, Plymouth, Stafford, South Hams and West Berkshire) considered it an important component of the plan-making process. Cited benefits of monitoring included its role in encouraging continued improvements across the Council (Hounslow) and in providing a 'pen picture' to councillors and others of what was happening in the Authority (Liverpool).
- 7.4 These positive views on the importance of monitoring echo the results of the Strategic Survey which found that virtually all respondents either agreed or strongly agreed with the notion that producing an AMR will promote the use of an evidence base in plan and policy making, facilitate the development of a useful monitoring framework, enable the assessment of the impact of policies and, allow planning processes to be more responsive.
- 7.5 However, the introduction of appropriate monitoring frameworks takes time and is clearly still developing and evolving. Several interviewees in case study areas considered their AMR system to be evolving and highlighted areas requiring further development or improvement. Others, such as Hambleton, considered that it would become an integral part of managing and reviewing policies in the future but had not yet had much direct impact on the LDF process in their Borough to date.
- 7.6 More detailed issues raised by authorities included the need to identify and prioritise appropriate indicators and/or targets that are at the right level for plan making, avoid

the temptation for identifying too many indicators, and tailor indicators to local conditions. Concerns were also raised about the extent to which some of the identified national core indicators were appropriate to rural areas and one authority described elements of the AMR process as somewhat ‘bureaucratic’.

- 7.7 More generally, as more DPDs are adopted, the emphasis of AMRs can be expected to shift from one of primarily monitoring current conditions within the area to a greater emphasis on monitoring the implementation of policies and proposals.

(ii) Approaches to the annual monitoring report

- 7.8 Most of the AMRs prepared by the case study authorities address national (and regional) core indicators although, in some cases, individual core indicators may not be covered because of a lack of appropriate data, the need for further research which has not yet been undertaken as a result of limited resources, or because the indicators in question are not easily monitored on an annual basis. There are three different approaches to monitoring; the West Berkshire AMR concentrates on providing data on core output indicators and covers the majority of them. Stafford also uses national core indicators, linking them where possible to their local policies, and Hounslow identifies performance against national, regional and local targets.
- 7.9 Both the LDF and AMR processes are at early stages in their development. Currently, a number of the AMRs provide only baseline information rather than interpretation or evaluation. Others only monitor existing local plan policies since no LDF components have yet been adopted. For example, Hambleton’s AMR currently monitors performance against their existing district local plan but in the future will relate to policies within their core strategy and development policies document.
- 7.10 There is evidence that some authorities (eg Hounslow, Plymouth, West Berkshire, South Hams, Horsham) are setting their own local targets, including examples of authorities setting locationally specific measurable targets with timescales (see example below). There are also examples of the use of monitoring frameworks which identify partners, agencies or organisations which will be involved in the implementation and delivery of policies and targets (eg Hambleton, North Cornwall and Horsham).

Locationally specific targets and/or targets with timescales

Plymouth’s core strategy includes locally-specific targets for each strategic objective, for example, on Education:

‘Delivery of new primary schools in Barne Barton, Devonport, Millbay, Southway and Plymstock, and the Whiteleigh Campus, by 2008–2016.’

In **Horsham**, references to the monitoring framework are included in the core strategy – each theme includes an indicator, target and agency. For example:

Tourism & Cultural Facilities:

Increase contributions that tourism makes to the local economy;

Increase number of hotel beds by 2018

- 7.11 More generally, the AMR for South Hams has been identified as an example of good practice within the region, particularly for the attempt to present it in an accessible style, using plain English.

(iii) Use of the annual monitoring report in local development framework policy development

- 7.12 Given the early stages of both the LDF and AMR processes noted above, it is not surprising that direct connections between the two are somewhat limited currently. However, there are some examples where AMRs have been influencing LDF policy development. In Plymouth, monitoring has influenced the overall vision and strategy, and also contributed to more detailed policy development through, for example, monitoring of housing trajectories.
- 7.13 Other examples of the use of indicators and monitoring to influence planning policy include the use of evidence from AMRs to extend the life of currently-saved policies (Liverpool), the need to protect employment land from other uses (Hounslow) and use of contextual indicators in various evidence reports prepared as part of the LDF process (South Hams).
- 7.14 The use of the AMR and the demands upon it sometimes extends beyond plan making. In St Helens, for example, demand for appropriate monitoring information to help defend development control decisions at appeal has resulted in changes in the Authority's information and monitoring processes to ensure urban capacity figures are kept up to date.

(iv) Linkages between development plan documents and the monitoring framework

- 7.15 Although in several cases it is too early in the process for significant linkages between any DPD and AMR, some examples were evident of direct linkages between indicators and targets with specific DPDs. For example, in Stafford, indicators are linked across to each policy. In Hambleton, there is clear link back from indicators to policies through a separate annex as well as recognition that other DPDs will refine and set targets for many indicators. Other examples can be seen in West Berkshire and South Hams.

Linking indicators and LDF policies

West Berkshire

Objectives are linked to policies and each policy has identified targets and indicators, e.g. in respect of the location and intensity of development:

Target:

Achieve average density of at least 30 dwellings ph in completed residential developments

Local Output Indicators:

Percentage of residential development within settlements or allocated sites

Percentage of completed floorspace for non-residential uses within settlements or allocated sites

South Hams

Each policy in the core strategy has an indicator and target. For example:

CS2 Location of development:

Provide 80% of new residential and 80% of new employment development within Development Boundaries.

(v) Relationship between sustainability appraisal and monitoring frameworks

- 7.16 Case study evidence reveals that linkages between the AMR and SA processes are patchy at best. In several cases, SA and AMR processes seem to be treated as two distinct remits that do not yet overlap with each other. For example, significant effects indicators do not seem to be influencing monitoring frameworks and, in at least one authority, there were entirely separate arrangements in place for the monitoring of DPDs and environmental impacts identified in the SA. One exception was South Hams where the authority is to monitor the potential significant environmental impacts that the sustainability appraisal has identified and, in their monitoring framework, indicators and targets are incorporated to monitor sustainability issues.
- 7.17 However, several case study authorities did recognise the need for greater integration in the future and there were already a few examples of this. In North Cornwall the SA recognizes that monitoring should involve measuring indicators which enable a causal link to be established between implementation of the LDF and the likely significant effect being monitored. In North Northants the SA suggests annual monitoring of the SA, alongside the monitoring of the LDF within the AMR, with all four authorities (within the joint LDF area) using common information. Other examples are highlighted in the box below.

Relationship between sustainability appraisal (SA) and LDF monitoring (AMR)

Horsham: recognition that 'significant effects' monitoring is required and the Authority hope to do this in their AMR in the future.

Hambleton: identifies 'significant effects' indicators in the monitoring framework

Plymouth: significant effects are identified in the SEA and included in the AMR and monitored as appropriate; performance against these will be monitored in future

Hounslow: identifies impact on significant effects in the AMR, although corporate sustainable issues have not been monitored

Lessons

- 7.18 Although most planning authorities have previously undertaken some form of monitoring of the main characteristics of their areas, and of the impacts of their policies, the requirement to develop a rigorous monitoring framework and to prepare an AMR is a new challenge for many. The AMR process is, therefore, still evolving and developing in several case study areas. Nevertheless, examples of potential good practice are starting to emerge, and there are a number of potential lessons worth noting.
- 7.19 First, monitoring should be seen as an essential and integral part not only of the LDF process, but of planning authority culture more generally. Doing so, will promote the use of an evidence base in plan and policy making, enable the assessment of the impact of policies and make the planning processes more responsive.
- 7.20 Over time, monitoring activities can be expected to shift from the current preoccupation with the monitoring of the socio-economic and environmental characteristics of the area to monitoring the impact of policies. However the monitoring and AMR process potentially have valuable uses that can extend beyond LDF preparation and planning policy implementation. For example, it can help broaden understanding of the issues

facing a particular area, linking to other corporate objectives and other sectoral strategies under preparation by other council departments and stakeholders.

- 7.21 When developing the monitoring framework, it is important to identify and prioritise appropriate indicators and/or targets that are at the right level for plan making, avoid the temptation to identify too many indicators, and tailor indicators to local conditions and policies. For the purposes of benchmarking and national / regional analysis, the monitoring framework should address national and regional core indicators, but it should also go further to identify local indicators and targets which are closely linked to key DPD policies.
- 7.22 Good examples of the use of indicators and targets include the setting of locationally-specific measurable targets with timescales and the clear identification of partners, agencies or organisations which will be involved in the implementation and delivery of the policies and targets.
- 7.23 Given the early stages of both the LDF and AMR processes noted above, it is not surprising that direct connections between the two are currently somewhat limited. However, there are some examples where AMRs have been influencing LDF policy development at both more strategic (eg core strategies) and detailed levels (eg through monitoring of housing trajectories). Generally, authorities should be linking indicators and targets closely to policies.
- 7.24 Finally, the case study evidence reveals that the current linkages between the AMR and SA processes leave much scope for improvement. In some cases, SA and AMR processes seem to be treated as two distinct remits that do not yet overlap with each other. Good monitoring and LDF practice should emphasise the linkages between these processes by, for example, ensuring that any potentially significant environmental impacts identified via the SA are addressed through appropriate indicators and targets in the monitoring framework.

Chapter 8

Conclusions

Introduction

- 8.1 The lessons developed from the case studies and other sources are presented in the chapters of this report and gathered together in the Executive Summary. This chapter sets out conclusions on the developing use of evidence within the new plan-making system. These conclusions relate to matters that should assist Communities and Local Government in continuing to promote the most efficient and effective use of the new arrangements and be beneficial for other users of the system.
- 8.2 The overall conclusion from the case studies investigated this time is that the local planning authorities have an increasing appreciation of the importance of evidence in preparing local development documents and are using evidence more than before. Some of this is an extension of previous practice, though the failure of the first two core strategies when examined for soundness has clearly had a salutary effect. The realisation that it will be essential to demonstrate that proposals are rooted in evidence is combining with a greater appreciation of the need for 'proper plans prepared by a proper process' to increase the use of evidence generally.
- 8.3 This report identifies a number of areas in which good practice is interpreting the guidance and moving it forward, and areas where there is uncertainty that advice and practice need to overcome. Communities and Local Government and PINS have an important role here. Local authorities feel unsure about the variety of advice received from the Government Offices and PINS and there are evident examples of uncertainty and variation. The considerable variation in the form of presentation of Inspectors' reports is noticeable, for instance. This may be inevitable in a new system where practice has yet to settle down, and where there is such a potential for different approaches, but it does need to be addressed.
- 8.4 The Inspectors' reports are an important contribution to the understanding of the new system and how it is to be used and applied, as well as to how the soundness test will be applied. With the incentive on local planning authorities not to fail, there is some concern that development plan examination reports will be viewed disproportionately. It would be unfortunate if there were any tendency to say, 'that core strategy passed – we can use it as a model', when it is the application of information and ideas within a proper process that will achieve success against the soundness test as well as – most importantly – leading to a good plan for the place. Any request for 'model' plans and policies must be strongly resisted. However, there are a number of sources that provide useful information. These include the Spatial Plans in Practice Thematic study on Preparing Core Strategies¹⁵, the recently published guidance produced by Planning Advisory Service on Core Strategies¹⁶ as well as their Soundness Self Assessment Toolkit¹⁷.

¹⁵ DCLG (December 2006), *Preparing core strategies*.

¹⁶ Planning Advisory Service (December 2006), *Core strategy guidance*.

¹⁷ Planning Advisory Service (September 2006), *LDF soundness self-assessment toolkit*.

8.5 Specific conclusions are as follows.

The role of evidence

8.6 Evidence has four roles in spatial planning that need to be reflected in both the types of evidence used, and in its timing. These are:

- in understanding the place and the community, its character, needs, pressures for change and its future potential, and enabling the strategy to be locally specific;
- in understanding what might be possible through the management of change, to assist in deciding on what the plan should try to do;
- to assist in the design of the mechanisms to bring change about, including the deliberation over alternatives;
- to help justify the choices made.

What is evidence?

8.7 A broad range of different types of material can constitute evidence, and definitions of evidence are less important than the issue of what weight is given to information in influencing policy and strategy proposals. A wide and inclusive view needs to be taken of what constitutes evidence. Anything which assists in understanding a place and a community, and which is used in deciding what should be part of the plan should be seen as evidence and hence needs to be able to withstand scrutiny.

8.8 From this project the types of material used as evidence include:

- the analysis of data from existing statistics;
- background reports on specific topics;
- characterisation studies used in understanding places, linked perhaps to focused community involvement.

8.9 To work as evidence, material has to be:

- accessible;
- capable of being tested;
- fit for the purpose for which it is used, including being sufficiently specific.

The timing of evidence

8.10 Evidence gathering is not a self-contained stage, and the use of evidence is an integral and ongoing part of preparing a local development framework. The need for more information and evidence will become evident as alternatives are recognised and consultation responses are received. This should be made clearer than is suggested by

the inclusion in guidance of a pre-production stage that is essentially a stage of evidence gathering. The time for the review of what evidence is available is when each successive stage in the preparation of the local development document is to begin.

8.11 The use of evidence has to be seen as part of a cyclical process in preparing local development documents. This is a process of:

- determining what change is wanted;
- developing the policies and implementation mechanisms to bring about the change that is wanted;
- the monitoring of change and the attribution of change to the effect of the local development document, as well as understanding new and different requirements as they arise;
- reviewing a local development document to make it more effective in meeting its objectives and to contribute to new objectives.

8.12 Evidence is fundamental for three elements of the preparation of a local development framework: i) the development of the strategy, proposals and policies, ii) carrying out the sustainability appraisal incorporating the requirements of the SEA Directive, and iii) the monitoring of change. Each of these elements has information requirements that overlap, and there is a clear value in designing the collection of information for each of these requirements on a common basis.

Judging the adequacy of evidence

8.13 Local planning authorities are concerned about how they will know whether the evidence obtained is sufficient. This uncertainty is likely to be a significant cause of delay and is an area in which Communities and Local Government and the Government Offices, assisted by PINS, could assist local planning authorities. That said, this is unlikely to be a matter that guidance can ever prescribe precisely. Inspectors' reports will provide useful illustration, but in the end it will be a matter for professional judgement by the plan preparation teams within local planning authorities, aided by a transparent decision-making process. As highlighted above, there are a number of publications that can help, including *The Soundness Self Assessment Toolkit*.¹⁷ It is, however, essential that 'soundness' is not seen just as a hurdle to be passed; the end result must be the delivery of a plan that will secure sustainable future change of an area.

Annex A

Research Note

Case study visits stage 2 August/September 2006

Theme: Evidence based positive planning

The overarching question on this theme is:

Are the reforms leading to plans where the policies and proposals address the necessary issues and which make use of a sound evidence base to manage change?

More detailed questions:

What infrastructure (numbers in LDF team, skills base, and specific research capacity) is available to create and maintain an evidence base? How has this changed? What are the problems?

What sources of evidence are available, and what does it tell them about the area? How has it been used?

Are special studies, surveys or other exercises in evidence gathering being conducted, and how. On what issues, and why? Compare with priority issues for LDF identified in stage 1. Lessons?

Are consultants being used and for what, how much has this cost, how resourced and managed, and how effective has this been? Lessons?

Has there been collaboration with other LA departments, other tiers of government, regional bodies or government agencies to generate data or to analyse its implications? Collaboration with private or voluntary sectors/pressure groups? How has this worked and with what results?

What specific techniques and methods are being used to generate evidence, examples, and what has been the experience here? What worked, what didn't? – (examples given in appendix 1 – question for LDF team)

Is evidence being used to develop understanding/new understanding of the distinctive spatial development trends and challenges in the area? Seek examples. Has this influenced strategy, policy, and how?

Is evidence being used to overcome conflict or difference, and how? Seek examples.

How is evidence being used to select, test and refine options?

How are techniques like sustainability appraisal being used and at what stage? How do they influence decisions, seek examples? (See appendix for fuller set of questions).

What monitoring arrangements are in place or planned? What role does or will monitoring play in policy review? What has been done for the AMR? To what extent are they regarded as a bureaucratic requirement vs. an important part of the policy process?

Is there any evidence that approaches to plan making are changing in respect of the use of data/evidence/techniques? What's different about the new planning system, and why?

How is evidence used in discussion with politicians, development interests or others? How is evidence tested or challenged with other evidence? Has it changed views or perspectives? Again, what's different now compared to past practice?

Is there evidence that *evidence* is being used more systematically in making strategy or policy? An assessment of strategies, policies and proposals to evaluate the extent to which they reflect and weigh evidence (see next question + see section 6).

In the DPD, is there evidence of evidence being used to inform/determine:

- the issues for the LDF
- the LDF vision and objectives
- the LDF strategy (including the way options are generated, appraised and refined)
- the policies in the LDF (including the way options are generated, appraised and refined).

If a more systematic evidence-based approach is not yet apparent, what are the factors that account for this? (Skills/resources, complexity/uncertainty over processes eg. SA, HMA, absence of the right collaborative arrangements, scepticism/mind-sets?) What could be done to overcome them, and through what sort of intervention?

Annex B

Strategic Survey Findings

The Strategic Survey was undertaken between February and March 2006 with a revised completion date for the 7 April 2006. 198 authorities responded which gives a response rate of 50%

Question 9 – Contribution to LDF by:			
Other departments	Number of responses		
	No	Yes	
LSP	43	152	195
Other LPAs	95	98	193
	104	87	191

Question 10 – Proportion of work to be undertaken by consultants					
	75% or more	50–74%	25–49%	25% or less	Don't know
Policy development	0	1	10	132	40
Evidence gathering	2	19	40	101	30
Stakeholder and community engagement	0	3	11	127	41
Preparing Sustainability Appraisal	48	10	6	88	38

Question 16 – Relative to local plan, LDF will deliver:

	Strongly disagree	% Strongly disagree	Disagree	% Disagree	Neither	% Neither	Agree	% Agree	Strongly agree	% Strongly agree	Total
Greater flexibility	13	7	42	21	39	20	91	46	11	6	196
Stronger community involvement	8	4	34	17	32	16	104	53	18	9	196
Earlier decision making	28	14	62	31	44	22	53	27	10	5	197
More sustainable policies	6	3	30	15	42	21	103	52	16	8	197
More efficient programme management	13	7	25	13	26	33	108	55	25	13	197
Sounder evidence base	7	4	19	10	25	13	133	68	13	7	197
Better quality and more sustainable development	8	4	35	18	60	31	85	43	8	4	196
Quicker plan preparation	67	34	62	31	26	13	41	21	2	1	198

Question 18 – Work with neighbouring authorities on LDF			
	%	Total	
Network informally	78	157	201
Meeting to discuss specific issues	74	148	
Sharing information	78	156	
Developing evidence base	44	89	
Working on joint plan	35	71	
No contact	0	0	

Question 24 – Different approaches undertaken in past year to develop evidence		
	No	Yes
More consideration of requirements	24	162
More consideration of plan alternatives	51	129
Allocated more resources	49	135
Trained staff in analytical skills	115	67
Undertaken new methods	114	57

Question 25 – Producing Sustainability Appraisals will:

	Strongly agree	% Strongly agree	Agree	% Agree	Disagree	% Disagree	Strongly disagree	% Strongly disagree	Total
Aid consideration of development options	31	16	124	63	14	7	6	3	196
Decrease opposing representations	0	0	12	6	100	51	44	23	195
Ensure better quality plan	15	8	101	52	22	11	6	3	196
Ensure more sustainable outcomes	19	10	108	55	24	12	4	2	196
Increase transparency of plan preparation process	17	9	100	51	33	17	12	6	195

Question 26 – Producing the Annual Monitoring Report will:

	Strongly agree	% Strongly agree	Agree	% Agree	Disagree	% Disagree	Strongly disagree	% Strongly disagree	Total
Facilitate development of monitoring framework	41	21	142	72	5	3	3	2	198
Improve evidence base	30	15	146	74	9	5	1	1	198
Enable assessment of targets	31	16	150	75	5	3	2	1	199
Allow more responsive planning	8	4	110	56	24	12	5	3	198