

RTPI response to the consultation ‘Environmental Outcomes Reports: a new approach to environmental assessment’

June 2023

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General Observations

We acknowledge that there are problems with the operation of Environmental Impact Assessment and Strategic Environmental Appraisal (Sustainability Appraisal in the planning system) and empathise with the view that these systems have been focused too much on assessment and too little on outcomes.

However, they have served an important purpose to date, - ensuring rigour in environmental assessment - and based on the evidence provided we do not support the conclusion that abolishing EIA and SEA is necessarily the best way to improve these systems.

We have various concerns about the suggested scope of Environmental Outcomes Reports (EOR):

- Many of the current system's shortcomings arise from severe resource shortages which must be resolved for any system, including the proposed one, to function effectively. This is particularly important to ensure that monitoring and enforcement and robust, quality data is available to all parties.
- We disagree that social and economic matters should be excluded from plan-level EOR. And we consider it essential that both impacts on human health and how plans and projects interact with climate are included.
- The decision not to roll together Habitats Regulations Assessment (HRA) into EOR is a missed opportunity. HRA is an existing regime with a strong focus on outcomes. Its



continued separation will mean inefficiencies for plan-making bodies who still have to undertake HRA alongside EOR. Moreover, many of the issues currently associated with application of the Habitat Regulations (moratoriums on development associated with nutrient neutrality, water neutrality and recreational pressure on protected sites) remain unaddressed.

- We are pleased that the Government has listened to our requests for alternatives to feature in the EOR system. However, the treatment of alternatives proposed is far from adequate. Stronger provisions would make plan-level and project-level assessments more effective in sequence and in tandem.
- It is also not clear how the cumulative impacts of plans and projects will be assessed. These are of great concern to communities which are host to multiple schemes – which is an important consideration in our nationwide drive to decarbonize our economy.
- It is unclear if the EOR regime will retain current levels public involvement in environmental assessment, especially regarding the assessment of plans and project
- The introduction of a different regime for England, distinct from the alternative used in other nations, could create confusion for industry and difficulties on cross-border plans and projects.

Questions

Q.1. Do you support the principles that will guide the development of outcomes?

The list of principles at 4.7 does not include public involvement, so the statement at 4.6 about ‘public consultation’ seems weak. Moreover, the level of public engagement in national consultations is low and no proposals have been brought forward to improve that. There must also be an opportunity for locally-derived outcomes which have had the benefit of public involvement to be added to the list. The Government has said in the House of Commons that:

“...the focus of EORs is the assessment of the environmental impact of relevant plans and relevant consents, which is why clause 120 [now 142] refers to our international obligations relating to the assessment of the environmental impact of relevant plans and relevant consents. That ensures that relevant international obligations, such as those under the Espoo and Aarhus conventions, are properly reflected.” [Bill Ctee 8/9/22 Col 700]

The Minister said also that

“[Clause 120 now 142] will ensure that the public can be involved in the process of preparing an environmental outcomes report”

However, again, this is only a limited involvement if an EOR must restrict its outcomes to those specified at national level. What stakeholders essentially need to know regarding local plans is the answer to the question ‘is this plan any good?’. Reform the current system would enable that question to be more regularly and fully answered than it is at present but it is hard to see how limited assessment against the DEFRA Environment Plan will not answer this question.

The requirement not to duplicate policy is far too broad an exception and needs proper explanation. We do not agree with the Government that non-environmental issues should be excluded from assessment. It is not sufficient to say these are covered by 'policy'. Non-environmental matters are of fundamental concern to communities. Indeed, one of the great strengths of the England approach to assessment was the extension of it to become Sustainability Appraisal. Moreover in order to comply with the principle of non-regression, it will be essential to include human health in EORs.

Ultimately, in SEA the process must be able to answer the question 'is the plan worth having?'. A limited environmental appraisal is not going to do this. One matter which seems to be missing, for example, is the proportion of development on brownfield land. Another is the proportion of development which is accessible by non-car modes of transport. The RTPI's [Location of Development](#) series of reports provides a vital assessment of this at national level, but it should be clear at LPA level too.

Otherwise we agree with the principles.

In terms of their implementation however, we've aware of discussions with other UK nations about regarding extending the LURB to permit them also to reform EIA and SEA in their territories. We have no confirmation of this, nor any idea what the other nations would say. In all our dealings in these matters since the Brexit Referendum in 2016 we have pointed out that to introduce a single separate regime just for England when all of the EU and the rest of the UK use a single alternative is not only potentially confusing for industry but could also lead to difficulties on the borders. This applies especially in relation to river catchments, such as the Severn, but also the areas covered by Marine Spatial Plans around the UK and Ireland.

Q.2. Do you support the principles that indicators will have to meet?

As we do not know what the 'priority outcomes' are it is difficult to say whether these principles are appropriate. It is vital that indicators are able to respond to the particular circumstance of individual plans and projects, and these may well have unique and/or large scale and complex impacts. This should be stated.

Indicators need to take account of the fact that a series of relatively minor or less significant impacts resulting from a plan or project may add up, cumulatively, to a significant overall outcome.

The key issue emerging from discussions with practitioners (for example, as as identified by the [Planning Advisory Service](#)) is that there is a severe shortage of widely available data for environmental assessment. Indeed, this is regarded as an issue of much greater significance than the system of assessment. So a key priority for EOR must be to ensure that the government provides data to back up those indicators which are chosen. The overriding principle must be 'draw from existing data sets', or there should be a commitment to generating more data sets in order to underpin this process. Otherwise it will not be an improvement on the current situation.

For example;



“We heard how the Natural England Magic Map geospatial tool was widely used by council officers until there was a loss of trust in the quality ... of the data at which councils stopped using it so often” [100]

And

“If LPAs are supposed to evaluate development proposals against national environmental indicators using data that is consistent across the whole of England then the bodies responsible for collecting that data will need to be properly resourced. That data will also need to be readily available to LPAs who themselves will have to be resourced appropriately to ensure they have access to appropriate technical experts in both data handling and interpretation as well as sufficiently resourced GIS support.” [108]

“We heard that councils had been prevented from accepting digitally-based non-PDF environmental assessment due to [the policy of] corporate IT departments” [111]

While it is accepted that matters for consideration will be the subject of later consultation, it is very disappointing that some crucial matters are missing from the initial list. These include:

- Climate Change, Net Zero and flood risk;
- Landscape and seascape omits the built form – i.e. townscape. This should be replaced by a more encompassing term such as ‘character and visual aspects of place’;
- Odour, in addition to noise and vibration, and this must consider both human and biodiversity effects (see also below); and
- Impacts on people (in addition to e.g. visual and noise, this can include matters such as severance, reduction in access to open space, health and environmental impacts that result in social or economic impacts)

In Committee the Government appeared to concede this point (at least as regards human health):

“As set out in subsection (2)(b) of the clause, the definition of environmental protection includes the protection of people, which would allow the Secretary of State to consider matters relating to health when setting outcomes. Subsections (2)(a) and (b) refer to protection from the effects of human activity, which would include protection from the impacts of climate change.” [col 684 8/9/22]

If this is the case it seems strange that human health seems to be missing from the list at 4.10.

We do not agree with the Government that non environmental issues should be excluded from strategic environmental assessment. It is not sufficient to say they are covered by ‘policy’. Non-environmental matters are of fundamental concern to communities. One of the great strengths of the England approach to assessment was the extension of it to become Sustainability Appraisal. Moreover since human health is included within SEA and EIA in the EU, not to include them in England could constitute a violation of the regression principle.

Furthermore, it is the interaction between environmental and other issues which constitutes the proper development of policy. If the environmental issues are considered separately in a distinct process, there is a risk that this interaction could be missed.



We are not convinced that removing social and economic considerations from EIA will reduce the amount of assessment needed, but simply move it to another place. There may end up being more paperwork as the difficulties of picking up the interactions between the three pillars of sustainability are realised.

As regards the NSIP regime, we note that under S5(3) of the Planning Act 2008:

“Before designating a statement as a national policy statement for the purposes of this Act the Secretary of State must carry out an appraisal of the sustainability of the policy set out in the statement.”

We would support the continued wide application of ‘sustainability’ as currently in SEA and do not support its restriction to a list of environmental matters limited to the contents of DEFRA’s Environmental Improvement Plan. This is one area where we believe the consultation implies limited consideration of the different needs of plan level and project level assessment.

With regards to the proposed list of indicators, ‘owned and managed’ should be amended to “owned, managed and monitored” to reflect the role that monitoring plays in management.

Q.3. Are there any other criteria we should consider?

Not in addition to the much wider scope we refer to in Q2.

Q.4. Would you welcome proportionate reporting against all outcomes as the default position?

This would be welcome in theory, but having to provide results on each indicators for each outcome for each project is a large increase in monitoring activity over the current situation. This arises because of the approach to using national indicators set out in Q2.

Q.5. Would proportionate reporting be effective in reducing bureaucratic process, or could this simply result in more documentation?

‘More documentation’ is principally occurring because under-resourced local planning authorities are opting for easier, risk-averse approaches to assessment. Unless this matter is properly addressed, changing the system will not result in less documentation. It takes resourceful and well-qualified staff to be able to minimize work.

The [PAS Barriers Report](#) pointed out that:

“the lack of confidence is a result of the reduction of resources available in planning departments and planning policy in particular.” [129]

“in councils where a lack of confidence occurs the ramification is that the councils spend a lot of money on getting external support for EIA screening and scoping opinions and the supporting technical evidence. This is also true for SA/SEA processes.” [130]

Moreover, if policy teams could be bigger (as we advocate for in our [Planning Agencies](#) proposal) there would need to be less use of consultants.

“There is widespread consensus that when SA/SEA is done in-house barriers break down and there is notably better inclusion of the process into plan making..” [152]

We are not clear how just changing the process into a ‘proportionate’ one is going to address the more serious underlying resource questions which apply to so much of this agenda.

It is regulators and Statutory Nature Conservation Bodies’ (SNCBs) fear of local challenge which often leads to documentation beyond what is required. Changing this attitude and behaviour would address the issue. Regulators and SNCBs should be provided with adequate training and clear guidance to improve their confidence to assess the information provided as it is and trust the scoping process to deliver what it is intended for. And improved resourcing for regulator and SNCB staff would help to improve retention of experienced/skilled staff.

A proposal which might be given consideration is for the responsibility for project assessment to change from the developer to the planning authority. At present developers pay for EIA and often LPAs then also pay consultants to help them assess the EIA itself. It would be preferable for the developer to pay the LPA to do assessment.

This would open the door to the creation of single data banks (e.g. transport models) curated by the LPA which could serve the purpose of local plan preparation, EOR and monitoring. It would go a long way also to remove expensive arguments in planning inquiries between developers’ consultants and LPAs’ consultants. In return for a single version of the truth, developers would make considerable savings on the cost of producing evidence and the delays inherent in scrutinising it.

Q.6. How can government ensure that EORs support our efforts to adapt to the effects of climate change across all regimes?

While we recognise the challenges in including carbon that have apparently been observed in the past, we would say that at the very least carbon should be one of the indicators. It is vital that the EOR regime includes assessment of climate change as an integral part of ‘the environment’ and as an aspect of that environment that clearly results in significant change and threats to other aspects of the environment (e.g. biodiversity, erosion resulting in loss of heritage assets, changes in landscape character or visual appearance).

Consideration of climate change (its effects and consequences) within EORs must include all aspects relevant to a plan or project, including, for example:

- Flood risk;
- Coastal erosion; and
- Contribution to net zero etc.

The RTPI is a supporter of the Part Z campaign to establish mandatory carbon reporting in building regulations. This should also form part of both plan and project level assessment.

Q7 Do you consider there is value in clarifying requirements around the consideration of reasonable alternatives?

Great care needs to be taken to treat alternatives appropriately in context. In theory:

- Plan-level assessment should cover alternatives properly; so that
- at project level alternatives should not be needed.

However this elegant arrangement may often not work in practice. Very often projects arise in the absence of a plan, partly due to severe resource constraints in plan making (being able to effectively respond to these kinds of projects is one of the advantages of the UK's discretionary planning system).

Because of this **we strongly disagree** with the statement that:

“This will require plan-makers and developers to provide a summary record of their decision-making on alternatives. This is not intended to be a comprehensive assessment of alternatives rather, a high-level summary of the key dates when decisions were taken.”

First, in the case of plan level assessment, it is quite unacceptable that a mere ‘summary record of decision making’ is all that is provided. Alternatives must be properly assessed and the results of that assessment shared with the public.

Second, if there is no plan in place to guide the decision at project level, then alternatives must be additionally properly assessed at this level.

Third, improvement of the current system needs to take into account the challenges faced by local planning authorities in doing SEA. At present the PAS report points to the difficulty of generating genuine alternatives in certain cases of plan making. This can be due to the limitations placed on local discretion by national planning policy. It would indeed be helpful to LPAs if this situation was more clearly made known through guidance. We are aware of councils ‘inventing’ alternatives to satisfy the alternatives requirements.

The introduction of National Development Management Policies could be an opportunity to clarify this, but NDMPs still present LPAs with challenges. It will still be necessary to explain to communities that these are fixed and not open for consultation during plan making, even when it is national policy that can be subject to the greatest levels of criticism during local plan making.

In addition, at 5.7 it is stated that EORs will succinctly summarise and signpost underlying technical work carried out for the development of the plan or project. This list is missing the assessment process step. In order to effectively understand what the environmental outcomes of a project will be, the wording ‘assessment of contribution towards achieving an outcome’ must include a brief explanation of and signposting to the assessment process for each matter considered and any cumulative relationships between them. The assessment of ‘contribution towards achieving an outcome’ should clearly state (either here or in a glossary) that positive, negative and neutral outcomes should be included.

**Q8 How can the Government ensure that the consideration of alternatives is built into the early design stages of the development and design process?**

EOR policy should set out the requirement. This should then be amplified in guidance, which should set out the required sequence of process, including:

- A requirement for early consideration of alternatives.
- A requirement for early consideration of cumulative effects, which must be considered early on in the EOR process, including of various impacts caused by a plan or project, and other relevant plans or projects in the relevant local and/or wider area;
- Within the plan or project;
- With other relevant plans or projects or projects; and
- That the EO assessment and reporting process must be iterative, whereby the process informs the development of plans and the design of projects.

Also, see answer to q 7. We are generally concerned that the attempt to roll SEA and EIA into a single process will result in a solution which is not particularly well adapted to SEA. It is important to have two distinct processes to maximise both the proper treatment of alternative and also the advantages of having plan-level assessment.

This is especially important given that research indicates somewhat greater satisfaction with SEA than EIA:

“The workshop series highlighted opposing views on the effectiveness of environmental assessment. Most participants in the workshops expressed the view that environmental assessment is an integral part of the plan making process . . . We heard that SEA/SA can help with key pieces of work such as site selection.”

Q9 Do you support the principle of strengthening the screening process to minimise ambiguity?

A more risk-based approach seems appropriate. However, the EOR process must require the consideration of potential significant outcomes (positive or negative) and must consider potential effects on sensitive sites from plans or activities in a wider area, including, for example, on protected birds who not only use a designated site but also land or water around.

Q10 Do you consider that proximity or impact pathway to a sensitive area or a projected species could be a better starting point for determining whether a plan or project might require an environmental assessment under Category 2 than simple size thresholds?

No. Neither size thresholds nor proximity are really ways of telling whether a project has significant environmental effects. However we would agree that research (conducted by PAS) has indicated that too little emphasis is placed on the significant effects as opposed to other (non-significant) effects.

Furthermore, this section of the consultation document seems to conflate the assessment of projects with the assessment of plans. It is difficult to imagine any circumstances in which a plan should not be assessed.

Also it is not sufficient for the “mitigation hierarchy” as described in clause 39 to be followed, as this only covers environmental impact. A key issue for the public are other alternatives which may not have environmental concerns but give rise to strong public feelings.

Q11 If yes, how could this work in practice? What sort of initial information would be required?

No comment.

Q12 How can we address issues of ineffective mitigation?

To the three matters at 7.4 (avoidance, mitigation and compensation) should be added enhancement or restoration.

LPA monitoring teams require improved resourcing to complete the level of monitoring for mitigations included in planning conditions that is required to be effective. Improved resourcing should be accompanied by clear timelines regarding the assessment of mitigation and a defined process for when developers’ mitigation is concluded to be ineffective.

Enhanced monitoring and data collection should then be utilised to provide developers with mitigation measures that are proven to have been effective based on previous monitoring. The National Infrastructure Commission in its recent report on [reviewing planning for infrastructure](#) recommended setting up a data sharing platform which could help access data for mitigation (see our response to question 15 for more details). In turn, developers can choose mitigation measures that have previously been effective. This should, in theory, reduce the amount of ineffective mitigation in the future.

With the requirement for Biodiversity Net Gain, mitigation is no longer enough. The mitigation hierarchy should be revisited to ensure that is adapted and amended to provide for the requirement for Biodiversity Net Gain . We agree the demonstrable application of the hierarchy must be mandatory in the EOR process. In addition:

- EOR must be required to demonstrate in tabular format what has been done to avoid, mitigate, compensate and deliver BNG; and
- Avoidance should also include designing out environmental impacts.

Q13 Is an adaptative approach a good way of dealing with uncertainty?

The present system often does little in terms of monitoring outcomes and the effective of mitigation. An adaptive and dynamic approach to mitigation during and after implementation will be crucial, and responsibilities and mechanisms for resourcing those responsibilities must be clearly set out in regulation and amplified in guidance.



Mechanisms for securing adaptive approaches have been established through, for example, the Nationally Significant Infrastructure Project consents, including for example for Hinkley C and Sizewell C. These schemes set up funds that can be drawn on should unforeseen impacts arise on these large and complex projects. This could form the basis of a model that could be adapted for EOR monitoring and adaptive mitigation.

Q14 Could it work in practice? What would be the challenges in implementation?

Securing the responsibility for and resourcing of monitoring will be crucial to monitoring and evaluating outcomes, and triggering adaptive or dynamic mitigation where outcomes are not as expected.

Q15 Would you support a more formal and robust approach to monitoring?

Yes. This is essential if positive outcomes are going to be delivered. However, in order provide a more formal and robust approach to monitoring, there must be adequate resourcing for local authorities and statutory consultees to review the monitoring that is provided by developers. We support the National Infrastructure Commission's (NIC) recommendation within their [latest study](#) on the infrastructure planning system:

“By the end of 2024 the Department for Environment, Food and Rural Affairs should introduce a data sharing platform for environmental data with clear data standards, sharing relevant developer and local nature recovery strategy data. By the end of 2025, statutory consultees should develop a library of historic and natural environmental mitigations for different kinds of infrastructure. Statutory consultees should also receive and use new resource to gather baseline data and agree strategic mitigations for urgent infrastructure, firstly for wind generation and electricity transmission, and then water resources, by the end of 2025”.

A monitoring model is being developed in relation to the Biodiversity Net Gain requirement. It would be helpful and simplify processes if it provided consistency of approach with other environmental outcomes.

To ensure transparency, public confidence and reassurance there needs to be public transparency through the publication of monitoring and adaptive mitigation. As happens for some NSIPs and with nuclear legacy site stakeholder groups, this should be backed by appropriate reporting and scrutiny arrangements.

Q16 How can the Government use monitoring to incentivise better assessment practice?

We struggle to see how monitoring can encourage better practice. The key issue is satisfactory sanctions. For example, it has been observed that you can have unplanned loss of ancient woodland on a Smart Motorway construction due to numerous prior failures of compliance with

the Construction Environmental Management Plan (CEMP), but no monitoring or sanctions applied.

The Government is saying that if the anticipated levels are not met and remediation proves necessary, it will be pursued and enforced. But the challenge is to make this 'stick', See Q17 below.

Q17 How can the Government best ensure the ongoing costs of monitoring are met?

The proposals for tying the cost of monitoring to the grant of planning permission are interesting (although they would not cover the question of how to monitor a local plan). There is a threat and an opportunity here.

The threat is that the monitoring of the environmental outcomes of a project is secured through these measures, but the monitoring of all the other outcomes is not. Nor would the monitoring of planning conditions (nor the implementation of biodiversity net gain). It seems overly theoretical to treat the monitoring of environmental outcomes separately to other outcomes, and other aspects of permissions, when it is all the same site in question. Our recent [enforcement research](#) has shown just how little proactive monitoring of actual planning permissions local authorities are in a position to do.

Separately, the reference to 'competing calls on resources' in para 8.3 is misleading, since the main problem is huge overall reductions in resources. If resources had remained level, or increased, the 'competition' would be less.

Q18 How should the government address issues such as post-decision costs and liabilities?

The use of bonds has been successfully used in minerals planning for many years. It would be good to see it extended to some other kinds of planning permissions. We commend projects such as Hinkley Point C and Sizewell for examples of principles and mechanisms that could be adapted for wider use.

Q19 Do you support the principle of environmental data being made publicly available for future use?

No comment.

Q20 What are the current barriers to sharing data more easily?

The key issue emerging from discussions with practitioners (e.g. as identified by PAS) is that there is a severe shortage of widely available data for environmental assessment. Indeed, this is regarded as an issue of much greater significance than the system of assessment.



Consequently, a key priority for EOR must be to ensure that the government provides data to back up those indicators which are chosen. The overriding principle must be 'drawn from existing data sets', or there should be a commitment to generating more data sets in order to underpin this process. Otherwise it will not be an improvement on the current situation.

For example;

"We heard how the Natural England Magic Map geospatial tool was widely used by council officers until there was a loss of trust in the quality ... of the data at which councils stopped using it so often" [100]

And;

"If LPAs are supposed to evaluate development proposals against national environmental indicators using data that is consistent across the whole of England then the bodies responsible for collecting that data will need to be properly resourced. That data will also need to be readily available to LPAs who themselves will have to be resourced appropriately to ensure they have access to appropriate technical experts in both data handling and interpretation as well as sufficiently resourced GIS support."
[108]

"We heard that councils had been prevented from accepting digitally-based non-PDF environmental assessment due to [the policy of] corporate IT departments" [111]

Officers expressed frustration where multiple developers were assessing the same thing but with no learning from what's already been done [119].

One solution to this process would be for the local planning authority to do the assessments rather than the developer, but with the developer paying for this to be done. This would also mean that LPAs did not need to also employ consultants to check the work done by the developer's consultants, as happens at present.

Q21 What data would you prioritise for the creation of standards to support environmental assessment?

The topics for assessment via the EOR system first need to be agreed, and then prioritised.

Given the impending introduction of the Biodiversity Net Gain requirement, this dataset is clearly a priority, but Government must ensure that other crucial data such as heritage, landscape character areas, contaminated land, water quality, high grade agricultural land, etc. are not left behind.

All relevant datasets should be made available via one single and consistent platform.

Q22 Would you support reporting on the performance of a plan or project against the achieve of outcomes?

Yes, and in particular we support doing this ‘in conjunction with other strategic level monitoring requirements, including local plan monitoring’. However the carving out of a special system for environmental assessment only under EOR could harm the achievement of this.

Q23 What are the opportunities and challenges in reporting on the achievement of outcomes?

See Q22 above on the isolation of environmental reporting.

Q24 Once regulations are laid, what length of transition do you consider is appropriate for your regime?

1 year for:

- Plans under the Town and Country Planning Act 1990;
- Planning applications under the Town and Country Planning Act 1990; and
- National policy statements under the Planning Act 2008.

2 years for NSIP projects under the Planning Act 2008. The size and complexity of NSIP regime projects means they would need at least 2 years to enable developers to consider implications on project scheduling and costs and for PINS to train inspectors, etc.

Transition timescales will depend on integration of Welsh and Scottish legislation, and stakeholders in Wales and Scotland will need to be consulted.

Clarification is needed on the point in the application pipeline at which new obligations would apply. It is not enough to apply the new rules to projects ‘submitted’ on a specific date as by that time a lot of preparatory work has already been done.

Q25 What new skills or additional support would be required to support the implementation of EORs?

The key issue here is to build up internal capacity in planning departments rather than have externally provided “support”. As we have observed the difficulties currently found with SEA and EIA may be the result of too much outsourcing :

“...in councils where a lack of confidence occurs the ramification is that the councils spend a lot of money on getting external support for EIA screening and scoping opinions and the supporting technical evidence. This is also true for SA/SEA processes.” [PAS 130]

Moreover, if local authority policy teams were bigger (as we advocate in our Planning Agencies concept) there would need to be less use of consultants.



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“There is widespread consensus that when SA/SEA is done in-house barriers break down and there is notably better inclusion of the process into plan making..” [152]

We would very much like to see the government’s assessment of the costs of both introducing this new approach and running it. We are aware, for example, that many planning authorities, especially in poorer parts of the country, are just about able to keep the existing planning system running provided it is not altered.

*“We ... run a very slimmed down service and due to the general lack of planners and difficult to fill vacancies we are often having to pay exorbitant rates for temps. Our planning policy team was trimmed to the bear minimum following the adoption of our local plan in 2018. **If we are to fulfil some of the expectations outlined in the LURB then we will need to increase capacity.** We would agree that the fee increase is well over due.”* Kate Ingram, Burnley Council (emphasis added).