

# How to gather and use evidence

Putting the pieces together



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### 1 Introduction

This resource will explain:

- what evidence is
- why evidence is important in policy development
- what different types of evidence can be used
- how to use evidence
- how to keep evidence proportionate

If you are new to neighbourhood planning you are encouraged to read the <u>Locality Roadmap</u> which explains the process of preparing a neighbourhood plan. It will provide useful context to this resource which focuses on the 'how'.

### 2 What is evidence?

Evidence can be both quantitative (facts and figures such as census data) as well as qualitative (e.g. opinions given in consultation responses) and should be used to support the decisions you are making and the policies you are developing to include in your neighbourhood plan.

The Government's planning guidance (para 040) states that: "there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan..."

Evidence should be used to inform the development of the policies that will be included in your neighbourhood plan, not used retrospectively to justify the policies.

# 3 Why is evidence important when developing planning policies?

Evidence is extremely important as it ensures that the choices made in your neighbourhood plan are backed up by facts. Evidence can also demonstrate that the policies in your plan have been informed by the participation of the local community and others with an interest in the area.

Without evidence the policies in your neighbourhood plan may be challenged:

- Independent examiners may recommend that a policy is deleted or modified if it is not supported by appropriate evidence
  - The independent <u>examiner</u> of the <u>Kirdford Neighbourhood Plan</u> (2014) recommended deleting the policy on local occupancy conditions for housing due to a lack of evidence



- In <u>Madeley</u> (2015) the independent <u>examiner</u> concluded that a policy requiring new offices to have "an active street frontage" was not supported by evidence, and "...seemed unduly onerous for the type of use...".
- The independent <u>examiner of the Cringleford Neighbourhood Plan</u> recommended a buffer zone either side of power lines be reduced from 50m to 15m. The examiner stated that "...there is no evidence ... [Cringleford Parish Council] has explained that their figure of 50 metres was selected arbitrarily".
- Those wishing to make a representation objecting to a policy in your plan may produce their own evidence. This would be considered by the independent examiner.
- Decisions on planning applications must be made in accordance with the development plan (including a neighbourhood plan) unless <u>material considerations</u> indicate otherwise. Clear evidence pointing towards an alternative view could be considered a very compelling material consideration where there is no evidence to support a policy. This could result in your plan having less influence in decisions on planning applications.

# 4 What are the different types of evidence that can be used in neighbourhood planning?

#### Participatory evidence

The starting point for many groups is to understand their community's views on the issues they think a neighbourhood plan should address. This is a form of qualitative data. It can be gathered by asking those with an interest in the area for information about their experience of living in and / or working in the area and the issues they think the neighbourhood plan should address. Community consultation and engagement is an essential part of developing a neighbourhood plan and views should be sought throughout the process.

- Information can be collected when deciding on the **extent of your neighbourhood area** and (if appropriate) **the make up of your neighbourhood forum.**
- Developing the vision and objectives for your plan. The wider community and others
  with an interest in the area should be involved in developing the vision and objectives for
  your neighbourhood plan. A range of methods can be used including: conducting
  surveys; social media; visioning days or design charrettes. (see <a href="How to develop a vision">How to develop a vision</a>
  and objectives). The Old Market Quarter Neighbourhood Forum in Bristol used a <a href="wish-cart">wish-cart</a> to gather views of the wider community.
- Developing and distributing a questionnaire. A questionnaire can be a useful tool to gather evidence about your community's views on specific issues that you want your plan to address. Questionnaires can also be targeted to specific sub-groups of your community:
  - Business questionnaires can be an effective way of reaching businesses and understanding their needs and issues. <u>Broughton Astley</u> Parish Council asked all



businesses in the area to complete a business survey. The <u>Much Wenlock</u> steering group involved the local Chamber of Trade in the design of their questionnaire so that the questions were appropriately targeted.

There are a number of points you need to bear in mind when developing a questionnaire:

- ensure the questions are clearly written and are not leading (i.e. the question does not contain the answer you are seeking or a view you would like confirmed). For example, 'do you think open space is important' is a leading question as it is unlikely that the respondent would say no. The question 'are you able to access open space' may be more appropriate.
- have an awareness of return rates and the number of completed questionnaires needed to provide an accurate sample. This <u>response rate calculator</u> will enable you to assess the level of engagement and possible return rates for questionnaires.
- as far as possible ensure those submitting completed questionnaires are
  representative of the population. This can be achieved by asking the respondent to
  provide personal information (for example gender, age, ethnicity and level of income)
  and comparing this with the profile for the community in your neighbourhood area.
  Community Spirit Partnership CIC has published guidance on diversity monitoring and
  a sample database to capture this information. Similarly, you may wish to ask for
  respondents' postcodes to check if responses have been received from across your
  neighbourhood area.
- carefully consider whether a questionnaire is the appropriate tool. For example, in
  order to understand how much housing is likely to be needed in your area, you should
  use an <u>objective assessment of housing need</u>. This is a technical assessment. A
  questionnaire or survey alone will not be sufficient.

This <u>guidance note</u> provides some top tips on developing a questionnaire. Community Spirit Partnership CIC has published a <u>paper</u> on how to structure and develop questionnaires. Headcorn, a rural village in the Low Weald of Kent, explain in this <u>case study</u> how they gathered evidence for their neighbourhood plan by using surveys.

Participatory evidence alone will not be sufficient evidence to support your policies; you will also need quantitative data (facts and figures).

#### Facts and figures:

Statistics, data, facts and figures are examples of quantitative evidence. There are a number of sources of this evidence including:

 Your local planning authority. It may be able to share relevant evidence (facts and figures) with you, including information gathered as part of the Local Plan process. The <u>National Planning Policy Framework</u> provides a useful overview of the types of evidence that your local planning authority should have.

There may be a number of departments beside the planning department that may be able to provide information and evidence to help you develop your policies. See the <u>Who</u> to speak to at your local authority resource for ideas of who to talk to.



- Published data and statistics. There are a number of websites that publish statistical information and data including the <u>Office of National Statistics</u> (ONS: independent statistics related to the economy, population and society), <u>Census data</u> and <u>NOMIS</u> (official labour statistics). Data may be available for smaller geographical areas (for example ward level or Lower Super Output Area) as well as at local authority level.
- Information from organisations and bodies responsible for protecting the historic and natural environments. These include the Environment Agency, Natural England, Historic England. The <u>MAGIC website</u> provides authoritative geographic information about the natural environment from across Government.
- Organisations, charities, local amenity and interest groups within your area. These
  could include the Local Chamber of Commerce, Civic Trust or the Wildlife Trust who may
  hold information on businesses, heritage and biodiversity respectively.
- Existing documents and strategies for your area. This could include Village Design Statements, Community Action Plans or Parish Plans.
- Adjoining local planning authorities and neighbourhood planning groups. Looking
  at information from these sources will help you to have a greater understanding of the
  wider context for your neighbourhood area and other policies that may affect your
  neighbourhood plan.

We have produced an <u>illustration</u> to help guide you to particular sources of data and statistics for common neighbourhood plan topics and issues.

#### Review gaps in evidence base:

Having reviewed the existing evidence base you may find that:

- the community raised issues and concerns that you do not have evidence to support, in which case you need to gather evidence to plug these gaps
- the facts and figures may not substantiate the views of the community or they may contradict the views of the community.

If this occurs you need to decide whether or not to include a policy or policies in your neighbourhood plan as the current evidence may not provide sufficient support for your approach.

# 5 How do you use evidence?

Evidence should be used to inform the development of your neighbourhood plan and to support your choice of policies. Here are some tips on how to use your evidence base:

Assess whether the evidence is relevant for your neighbourhood plan. Your
neighbourhood plan can only include policies that relate to the development and use of
land. For example, you may have evidence of speeding within your neighbourhood area.



Your community may want speed bumps or speed reduction methods to be installed. This is not a land-use issue and is not something that can be addressed through a neighbourhood plan.

- Ensure each policy in your neighbourhood plan is supported by evidence. It is
  advisable to include a supporting statement for each policy i.e. reason for the policy and
  the evidence that supports the policy. For further information see <a href="How to write planning policies">How to write planning policies</a> and <a href="How to structure your plan">How to structure your plan</a>.
- You should summarise the evidence succinctly and if appropriate provide links to further information or direct the reader to an evidence summary. This approach was adopted by <u>Ascot, Sunninghill and Sunningdale</u> Parish Councils and was recognised by the independent examiner as good practice.
- Present the evidence clearly so that the reader understands what the evidence is showing. A range of techniques and methods can be adopted including the use of tables, maps, graphs and diagrams. Broughton Astley Parish Council included a number of approaches in their <u>neighbourhood plan</u>.
- Ensure you clearly reference the source of your evidence. Wherever evidence is referred to it should be clearly referenced (with hyperlinks where possible) and dated.
- Have a look at examples of how others use and present evidence. The <u>Cuckfield Neighbourhood Plan</u> (2014) was commended by the <u>examiner</u> who commented: "The Neighbourhood Plan has taken a pragmatic, thorough and systematic approach to the issues identified. It is clearly based on evidence which not only builds on previous work the Parish Council have done, for example in producing a Parish Plan and Village Design Statement, but also includes new and specific evidence which has informed and influenced the evolution of the Neighbourhood Plan. Coupled with extensive community engagement, this has resulted in a Neighbourhood Plan which is in many ways an exemplar..." Similarly, Broughton Astley Parish Council was commended for its <u>robust evidence base</u>.
- Consider appointing a third party to carry out an evidence review. An independent review of your evidence may reveal evidence gaps or risks such as missing or inadequate evidence prior to submitting your plan to your local planning authority. If you are looking to appoint a Chartered Town Planner then we recommend that you use the RTPI Online Directory of Planning Consultants.
- Remember that your neighbourhood plan is not a static document. You should make
  use of the best available data at the time you write your plan.
- Try and ensure the data relates to your neighbourhbood area. This can be tricky as some data is only available for a wider area; if this is the case seek the advice of your local planning authority. It may have information at neighbourhood level or be able to advise you on how the data could be interpreted at a more local level. Your authority may



also be able to give you advice on how to access information from statistical websites at the appropriate geography.

- Do not try and hide evidence. Having reviewed the existing evidence base you may find that:
  - the community raised issues and concerns that you do not have evidence to support in which case you need to gather evidence to plug these gaps,
  - the facts and figures may not substantiate the views of the community or they may contradict the views of the community.

If you do not have the evidence to support a particular policy then you should consider removing the policy otherwise you run the risk of the independent examiner recommending the policy is deleted or modified.

- If you remove a policy because of a lack of evidence you may wish to explain to the local community why a particular issue they raised during consultation is not being addressed in the neighbourhood plan.
- Bear in mind that specific evidence is required for certain policies. For example:
  - the first step when developing policies that set out the level of housing in an area should be to consider an <u>objective assessment of housing need</u>.
  - Independent examiners have recommended the deletion of land designated as Local Green Space in neighbourhood plans where the evidence does not support the designation when applying the <u>criteria</u> in the National Planning Policy Framework.

# 6 How do you keep evidence proportionate?

The scope and level of detail of the evidence you need should be proportionate to the significance of the issues being addressed in your neighbourhood plan. Evidence requirements are also likely to vary according to the complexity and size of your neighbourhood area. For example, if you are to focus on two or three policy areas (for example design and biodiversity) you will require less evidence than if you are seeking to address a wider range of issues. Evidence should focus on the issues you wish to address and support the policies in your neighbourhood plan.

The golden rule is that quality, not quantity, of evidence is important. You only need sufficient evidence to help you to develop a clear understanding of your neighbourhood area, the drivers behind the issues your plan is addressing and to support your choice of policies. You do not need to review every piece of evidence and data in existence nor look for evidence about things that your plan is not dealing with. For example, if you are seeking to allocate land for allotments a review of the waiting list should be sufficient to demonstrate demand and you will not need to survey all local residents. However, if you are seeking to allocate land for housing you will need to carry out an appraisal of options and a robust <u>assessment</u> of individual sites against clearly identified criteria. You cannot base your decision solely on public opinion.



It can be difficult to understand what is proportionate in any given circumstance so discuss this with your local planning authority. It is required to provide a proportionate evidence base to justify the policies in its Local Plan so it will be familiar with the challenge.

## 7 Conclusions

Evidence can help you to develop a clear understanding of your neighbourhood area and the planning issues that you can use your neighbourhood plan to address. Proportionate, robust evidence should support the choices made and the approach taken in your neighbourhood plan.

Evidence can be qualitative or quantitative, and you will need both. There are a number of sources of evidence but the golden rule is that quality, not the quantity, is important.

We have produced an <u>illustration</u> that provides an idea of sources of quantitative data (facts and figures) that may be needed.

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