

DPS FRAMEWORK SCHEDULE 4: LETTER OF APPOINTMENT AND CONTRACT TERMS

Part 1: Letter of Appointment

RSM UK Consulting LLP
REDACTED

Dear Sirs

Letter of Appointment

This letter of Appointment dated 22nd September 2019, is issued in accordance with the provisions of the DPS Agreement (RM6018) between CCS and the Supplier.

Capitalised terms and expressions used in this letter have the same meanings as in the Contract Terms unless the context otherwise requires.

Order Number:	TBC
From:	Ministry of Housing, Communities & Local Government ("Customer")
To:	RSM UK Consulting LLP ("Supplier")

Effective Date:	22 nd August 2019
Expiry Date:	<p>End date of Initial Period – To be agreed with the Customer – A final report is expected early 2020 which the supplier is aware of, and a date will be specified following the inception meeting.</p> <p>End date of Maximum Extension Period – N/A (No extension period available)</p> <p>Minimum written notice to Supplier in respect of extension: N/A</p>

Services required:	<p>Set out in Section 2, Part B (Specification) of the DPS Agreement and refined by:</p> <ul style="list-style-type: none"> · the Customer's Project Specification attached at Annex A and the Supplier's Proposal attached at Annex B; and
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Key Individuals:	<u>For the Customer:</u>
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	<p>REDACTED</p> <p><u>For the Supplier</u></p> <p>REDACTED</p>
[Guarantor(s)]	N/A

<p>Contract Charges (including any applicable discount(s), but excluding VAT):</p>	<p>The total contract value shall not exceed £109,340.00.</p> <p>The payment structure for this contract is as follows;</p> <p>REDACTED</p> <p>Payments shall be processed through the submission of invoices to the Customer. Each invoice must include a detailed elemental breakdown of work completed and the associated costs before payment is made.</p> <p>Should the customer or the Authority wish to make any changes to this payment plan or have payments made on dates/achievements different to those above, this will be at the discretion of each party and subject to discussion between them.</p>
Insurance Requirements	Insurance will operate in accordance with the provisos of Clause 19 of the Contract Terms.
Liability Requirements	Suppliers limitation of Liability (Clause Error! Reference source not found. of the Contract Terms);
Customer billing address for invoicing:	TBC

<p>Alternative and/or additional provisions (including Schedule 8(Additional clauses)):</p>	N/A
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FORMATION OF CONTRACT

BY SIGNING AND RETURNING THIS LETTER OF APPOINTMENT (which may be done by electronic means) the Supplier agrees to enter a Contract with the Customer to provide the Services in accordance with the terms of this letter and the Contract Terms.

The Parties hereby acknowledge and agree that they have read this letter and the Contract Terms.

The Parties hereby acknowledge and agree that this Contract shall be formed when the Customer acknowledges (which may be done by electronic means) the receipt of the signed copy of this letter from the Supplier within two (2) Working Days from such receipt

For and on behalf of the Supplier:

For and on behalf of the Customer:

Name and Title: REDACTED

Name and Title: REDACTED

Signature: REDACTED

Signature: REDACTED

Date:

Date:

ANNEX A

Customer Project Specification

To be determined by the Customer at Call for Competition stage

Background to requirement/Overview of requirement

Planning reform has been a critical part of the Government's productivity agenda over the last two decades, in terms of both supporting greater housing delivery and contributing to wider economic growth. While there has been a strong emphasis on sharpening national planning policy through the development of the National Planning Policy Framework and encouraging up-to-date local plans, there have been continued concerns from the development industry – and more generally business – about the slowness and bureaucracy of the end-to-end planning application process under the Town and Country Planning Act.

Since 2008, a number of government sponsored reviews have specifically explored the effectiveness of the end to end planning application process. The 2008 Killian Pretty Review¹ sought ways to implement faster and more responsive planning decision making, while the 2010 Penfold Review² made recommendations for improving the processes for non-planning consents. These reviews have helped to drive reforms to each stage of the planning process, including:

- a stronger emphasis on pre-application engagement between applicants, local planning authorities and communities;
- improved information and validation requirements;
- streamlined consultation arrangements, especially with statutory consultees;
- a new performance and designation regime targeted at speeding decision making;
- action to encourage the timelier discharge of planning conditions; and
- new permitted development rights and proactive tools like local development orders.

But there remain concerns about the effectiveness of the planning application process, and as part of the Spring Statement, it was announced that the Authority would publish an Accelerated Planning Green Paper later in 2019 which would discuss how greater capacity and capability, performance management and procedural improvements can

¹ <https://webarchive.nationalarchives.gov.uk/20120919202659tf/http://www.communities.gov.uk/publications/planningandbuilding/killianprettyfinal>

² <https://www.gov.uk/government/publications/penfold-review-of-non-planning-consents-for-development-government-reponse>

accelerate the end-to-end planning process. This Paper will also draw on the recent Rosewell Review, which made recommendations to reduce the time taken to conclude planning appeal inquiries.

To inform the evidence base for the Green Paper, the Authority wants to commission research with similar outputs to the case study research for the Killian Pretty Review which examined what can disrupt the progress of an application during the different stages. Methods for conducting a research project which diverge from those employed by the Killian Pretty Review will also be welcomed.

The case study research looked at a total of 64 planning applications (both approved and refused) submitted across 8 local authority areas. The research sample included a representative range of development types based on the latest statistical releases, and included housing uses, applications by small-and-medium-sized enterprises (SMEs) and examples of applications related to renewable energy generation and usage.

Definitions

Expression or Acronym	Definition
CIL/ Section 106	means Community Infrastructure Levy Section 106 agreements, which are legal planning obligations agreements made between local authorities and developers.
LGA	means Local Government Association (https://www.local.gov.uk/)
73 / section 96A	means Section 73 of the Town and Country Planning Act 1990, regarding a local authority's power to make non-material changes to planning permission.

Scope of requirement

The objectives of this research are to identify:

the barriers and pressure-points within the planning applications process based on an end-to-end review of a sample of applications across England;

a typical time scale for each stage of the end-to-end planning process, the contribution each stage makes to the overall timescale and where greater exertion in one stage can have a positive impact of the speed of subsequent stages; and

the resources employed of each stage of the process for local planning authorities and applicants.

In doing so, this research will contribute to the:

evidence base for the Accelerated Planning Green Paper and future policy development; and

evaluation of the development management reforms that have been introduced over the past ten years.

The research will comprise 2 'waves' – a first wave and a second, final wave. The first wave will concentrate on a smaller sample of case studies (c.30 applications) and the findings of this first wave will help inform the development of – and will be published alongside – the Green Paper. The second wave (c. 50 applications) will be completed after the Green Paper's publication. The approach to the research will be reassessed after the first wave, in collaboration with the successful Supplier.

The envisaged the research would:

involve the examination (both qualitative and quantitative) of up to 80 planning applications in England (studied across two waves), to include examples of full, outline and reserved matters applications. These must have been determined in the past three years (since 2016), but not necessarily approved. For those approved, there should be evidence that the applicant has sought to discharge planning conditions;

expect to engage up to 15 local planning authorities (i.e. 5/6 sample applications per local planning authority), selecting authorities who provide for a mixture of local authorities in terms of size and geography;

ensure that collectively the samples are reflective of geographic spread, the concentration of applications in urban and rural areas (including London), and the balance of residential and other applications – see planning statistics link below. We expect the focus to be on major applications, with the remaining applications being substantive minor development in order to contrast the approach with major developments. Residential applications should be the main focus on the research, with the remaining applications being for commercial and infrastructure projects. We envisage that householder applications, change of use applications, applications referred to the Secretary of State on appeal and specialist planning applications (such as traveller sites or shale gas) will be out of scope. Owing to the case study research undertaken by the 2018 Review of Build Out,

applications for large residential sites (of over 1,000 units) will also be out of scope of this exercise;

seek to understand the experiences of local planning authorities and the applicants about their engagement with the process in relation to these cases. Where significant disruptions are highlighted which require the experience of third parties (i.e. agents or statutory consultees), their input should be sought where possible;

explore the end-to-end planning process from pre-application engagement through to post-decision matters and monitoring. The list of stages we expect this work to consider are:

pre-application engagement – pre-application discussions, including the use of Planning Performance Agreements (PPAs), and other pre-application engagements and consultation;

application submission and validation – the quantities of detail accompanying applications, the role of local information requirements and the validation process;

consultation – the impact of consultation with the general public and statutory consultees after submission and the extent to which this went beyond the statutory minimum requirements for consultation;

decision-making – the assessment of the application in accordance with relevant development plans, national planning policy and subsequent negotiations and information submissions;

determination – outcome of determination, reasons for the decision (crucial where permission was refused), the use of planning conditions and the decision-maker (delegated authority or planning committee). If planning committee decision, why was the application referred to the committee and did their decision agree with that of the case officer;

post-decision discharge of conditions – how many pre-commencement conditions were imposed, what is the current status of the discharge of conditions, how have discharge of condition applications or any section 73 / section 96A applications been submitted, and have there been any disputes on conditions imposed;

monitoring – local planning authority monitoring of progress in relation to compliance with conditions and completion of development;

identify the direct costs facing both the local planning authority and applicant for each stage of the process for each of the sample applications. This would include, for the applicant planning fees, and any pre-application / PPA charges and, for the local authority, an estimate of the cost of administrating the process including staff seniority.

The Authority publishes quarterly National Statistics on authorities that undertake district and county level planning activities in England³. The statistics cover information on planning applications received and decided, including decisions on applications for residential developments (dwellings).

The Authority also holds data on planning applications collected by a third-party organisation, Glenigan, used to supplement the quarterly National Statistics to provide a rolling annual England total figures for numbers of planning permissions granted.

The Authority will provide the successful supplier with the necessary details and access to data at the commencement of the project.

The requirement

The Authority will require a series of outputs that directly address the research objectives outlined in section 5.1 and 5.2.

The Authority would expect Suppliers who bid for this research to set out their own proposals for how they would engage with necessary parties (including which ones) and collect this information and any other detail pertinent to the wider ambitions of an Accelerated Planning Green Paper.

Research project

Following the awarding of the contract, the successful Supplier will be required to present their proposed methodology and detailed timetable for undertaking case studies to the Authority for approval. This will include their proposals for a case study pro-forma and a simple database for collating the information. This project will gather both qualitative and quantitative data.

The successful Supplier will be required to prepare a presentation on the initial findings of the first wave of case studies to help inform policy development on the Green Paper.

Following the conclusion of their case study research (the first and the second waves), they will then be required to compile a final report which will set out their

³ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics>

findings. The report will present the findings from each stage of the process (as set out in the project scope) and will make use of visual illustrations where appropriate. The report will also include summary write-ups of each of the individual case studies in a consistent and accessible format.

The final report will focus on presenting the issues as identified during the course of the fieldwork and will not be required to provide an in-depth evaluation or make policy recommendations.

The successful Supplier will be required to store the underlying data collected as part of their research. This is to include data on the length of time it took for each application to progress through the various stages of the planning applications process. This dataset, once the research exercise has concluded, will be given to the Authority, in a format to be agreed (such as an Excel spreadsheet), to allow on-going analysis to support further policy development.

The successful Supplier will also be required to produce an illustrative timeline which represents the timescales of the end-to-end process as experienced in their research which can be cross-referenced with the expected timeframe, based, where possible, on statutory deadlines.

The report and the timeline will be made publicly accessible on GOV.UK.

ANNEX B

Supplier Proposal

To be determined at Call for Competition stage

4.1 Proposed research methods

REDACTED

Step 6: Dealing with discrepancies

Our previous work in this area tells us that there are often different perspectives offered by planning applicants and local planning officers. We will distinguish in our case study evidence between:

- factual, quantitative matters such as dates, time periods, and costs; and
- qualitative matters of opinion such as perceptions of barriers and responsibilities for delays.

For quantifiable data or verifiable facts, we will attempt to confirm with written or digital evidence. Where quantities such as costs are estimated we will record this. Our standard form for recording cost data will be sent to case study interviewees ahead of time so that the relevant evidence can be assembled and used to confirm their responses; this will give us early sight of quantitative evidence and can be used to support the interviews, as if any information provided is not clear this can be discussed in a case study interview.

For more qualitative questions, it is possible for opinions to differ. We will offer a reasonable amount of challenge and cross-examination during interviews to ensure that we have understood the issues and that the answers given are plausible and coherent.

Where the option is available, we will consider holding teleconferences rather than a series of one-to-one interviews, so that discrepancies can be addressed in real time and consensus reached. However, we do not anticipate that this will be the best option in the majority of cases. Where there have been disagreements between LPAs and third parties that have resulted in delays, we may achieve more informative and “honest” answers if we hold one-to-one discussions. Our experience of working with developers is that they would regard joint meetings with council officers as “part of the process” and would not be wholly forthcoming with their opinions on reasons for blockages and delays, whereas a more informal one-to-one setting would be likely to provide richer qualitative information.

Step 7: Follow-up discussions (where necessary)

It may be necessary to hold follow-up conversations with the local planning officer, after we have spoken to the developer. This would be undertaken in situations where significant differences not just of opinion but of factual information had been uncovered. We would in these instances return to the planning officer to clarify the source of the apparent contradictions. We have built this possibility into our case study costings. Throughout the

process, we will be sensitive to the nature and challenges of each case study and will flex our approach accordingly.

Step 8: Finalisation of case studies

Finally, as a check, we will send each write-up to both the applicant and the planning department. We will ask them to let us know if there is any factually incorrect information, or important information that they feel has been omitted. We have found this to be a useful exercise previously, though will need in this instance to request that our respondents reply promptly. We will retain authorship of the case study write-ups and only accept suggested edits of factually incorrect information, or additions that we consider to be necessary and in line with our project brief.

4.3 Key milestones and reporting

Key milestones

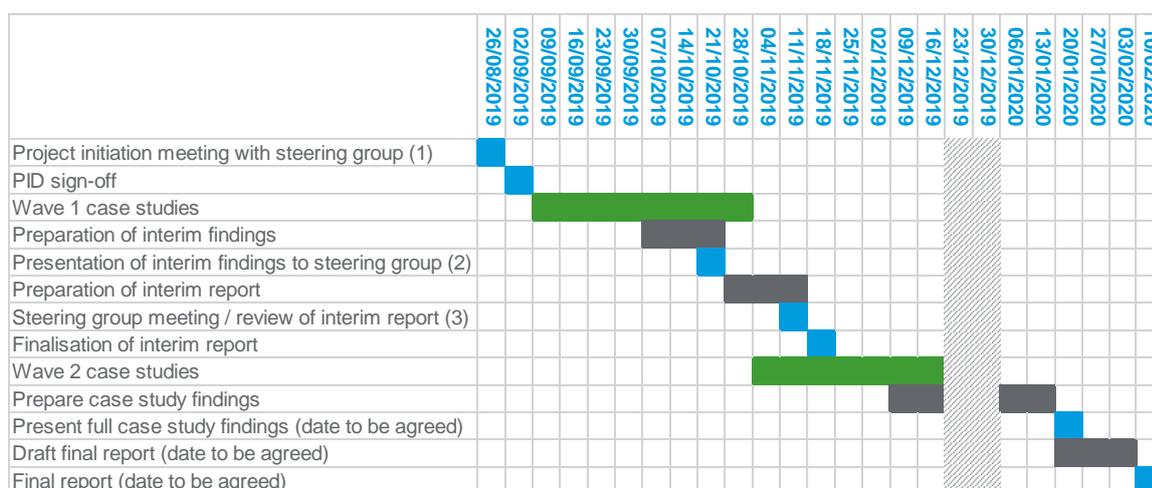
The key milestones and deliverables are set out in the table below (based on the schedule from the Statement of Requirements):

Milestone/ Deliverable	Description	Timeframe or Suggested Delivery Date
1	Project initiation meeting. Supplier to present proposed methodology and detailed timeline to MHCLG for approval	Within week 1 of Contract Award
	Case Study Template agreed with MHCLG	w/c 2 nd September
	Data/ Sampling Framework agreed with MHCLG	w/c 2 nd September
	Sample agreed, first contact with LPAs	w/c 9 th September
2	Case study research (first wave of c.40 applications)	9 th September – 21 st October 2019
3	Interim findings from first wave case study activity	w/c 7 th October 2019 TBC
4	Initial research findings following completion of first wave case study activity and presentation	w/c 28 th October 2019
5	Draft interim report	4 th November 2019
6	Interim report	18 th November 2019
7	Conclude case study activity (final wave of c.40 applications)	Anticipated late-2019

8	Initial research findings following completion of full case study activity and presentation	Anticipated early-2020
9	Draft final report	Anticipated early-2020
10	Final report	Anticipated early-2020

Gantt Chart

A Gantt chart of the project based on the milestones above is shown below. Actions by the project management team are shown in **blue**, actions by the delivery team are shown in **green**, and actions by both are shown in **grey**. The first three steering group meetings are numbered and identified with parentheses. The timescales for Wave 2 and the final analysis and reporting are provisional and are to be confirmed with the Authority.



Key outputs

- A first meeting with the project steering group (project initiation meeting), followed by submission of a project initiation document
- Regular progress reports by email, one working day before a progress call to occur bi-weekly.
- A draft interim report to be submitted for comments in early November 2019, with finalised comments within two weeks of receiving comments back. This will include write-ups of the 40 case studies from Wave 1.
- A second meeting with the steering group to present interim findings
- A third meeting with the steering group to discuss the interim report and discuss the specification for the final outputs.
- Additional meetings throughout the remainder of the project (Wave 2 case study research and final reporting) as required; provisionally on a monthly basis
- The draft final report in early 2020 (date to be agreed at project initiation meeting) which will include the remaining 40 case study write ups from Wave 2.

- The final report with finalised comments within two weeks of receiving comments back.

We think deadlines to be delivered up to the interim report are tight but realistic and achievable with the level of resource available. We understand there is very little flexibility on this in order for the first wave of case studies to be completed and included in the Green Paper, which is to be published before the end of the year.

Keeping the Authority informed on progress

This project is on a tight timescale, particularly for the Wave 1 research. It will therefore be vital to work closely with the nominated project manager from the Authority and keep them updated on progress.

We commence all new projects with a **project initiation meeting** with the Steering Group. This will give us an opportunity to learn more about your priorities. The **Project Initiation Document (PID)** will be developed following this meeting and will set out stages, deliverables, timescales and risks, refinements needed to this timeline and key dates for each milestone, and arrangements for regular progress reports and meetings. The risk register will be updated as necessary by the project director, who will devise mitigations to be implemented if needed and discuss these with the project manager or Steering Group.

The PID will also set out clearly exactly when the Authority should expect to receive copies of research tools, and dates that have been agreed for feedback on these. We would suggest a phone call to discuss these is scheduled in to ensure that they can be agreed and signed off quickly.

REDACTED will carry out weekly progress conference calls with the MHCLG project manager and/or other Steering Group members. A written progress report will be submitted in advance of each call. This will ensure that all agreed deliverables as set out in your ITT and our contract are delivered on time and at the quality standard required. Action will be taken to remedy any slippages on a weekly basis. All queries will be responded to within two working days.

For a project on a tight timescale such as this, we will also keep in touch as necessary at other times.

REDACTED will attend all client meetings (with REDACTED substituting if necessary), including the two steering group meetings to review work, produce the contract meeting notes, and monitor and proactively advise on how project risks can be minimised. REDACTED reports to REDACTED who ensures that the resources needed to complete the project are of a high standard.

4.4 Processing and presenting data

In this section, we set out our plans for processing the data and information that we gather during the course of the research, and how to organise and present it so that our final report meets the aims and objectives of the project. This builds on our response to section 4.2 which sets out how information will be collected.

1. Data storage

Lawful and appropriate processing

The UK group of companies and LLPs trading as RSM (“RSM UK”), including RSM UK Consulting LLP, is committed to protecting personal data. RSM UK has established GDPR compliance policies, mandatory training for staff, site security and IT security policies, procedures for handling data subject requests, procedures for reacting to personal data breaches, a nominated Privacy Officer, and dedicated legal, contractual, information security and compliance staff. This reflects RSM’s status as a sizable (with over 3,500 UK staff), highly regulated professional services firm.

In accordance with its relevant policies, procedures, systems and controls, RSM UK will ensure that it maintains adequate records relating to its processing of personal data and, in particular, to satisfy the requirements of Article 30 of the GDPR (‘Records of Processing Activities’) and (where applicable) Article 35 of the GDPR (‘Data Protection Impact Assessment’). All projects are assessed at the appropriate level and procedures to manage data approved before the project begins.

Contact details of local authority officers will be obtained if possible from MHCLG, or from local authorities themselves, which is allowed as a legitimate use of this data. The case studies, as presented to MHCLG, will be anonymised so that no personal details will be shared. Where we seek introductions to applicants, and to third parties such as agents, we will ask local authorities to gain consent for us to contact the individuals and to pass on their contact details to enable us to do this. These personal details will be used solely in order to contact them and not linked to the subsequent interview transcript. All data will be stored securely, used only for the purpose for which it was collected, and destroyed after use. No other personal data will be required for this project; data on costs will be collected in aggregate and will include no personal data.

Information security

The information we process for this project will be stored on RSM UK’s secure servers and will only be accessible to RSM staff via authorised equipment (eg laptops and onsite desktops) and protected with strong usernames and passwords.

Data transfer between RSM staff, the MHCLG project steering group, LPA staff and interviews can for the most part be carried out by email; we anticipate that the only personal data transfer will be introductions to individuals for the purpose of arranging interviews, for which point-to-point email is suitable even if unencrypted. We can use password-protected encrypted documents for transfer in cases where sensitive data is to be exchanged.

We are aware of the Government Security Classifications Policy and have standard procedures to follow in cases where OFFICIAL or OFFICIAL SENSITIVE material is to be transmitted by the Authority, which we have developed on other assignments for Government. In particular, we have corporate access to the “Huddle” secure virtual storage facility, which can be used to create secure collaborative workspaces for “Dropbox” style online document exchange.

Organising the information

We will put together a pro forma of information to be collected from each case study. This will quantify information as far as possible (such as the length of any delays, and category of reasons). The information to be collected will include:

- whether the application is for residential or mixed use;
- the previous use of the land for which planning permission is being sought;
- the number of dwellings proposed;
- the tenure of dwellings proposed;
- any special characteristics or features of the application;
- the nature of the applicant (whether they are the owner, or working on behalf of the owner – eg a planning consultant – or whether they plan to sell the land once permission is granted)
- any legal restrictions on usage;
- whether there are any Sites of Specific Scientific Interest on the site;
- whether the application falls within a National Park;
- whether the application falls within a designated greenbelt;
- whether land is designated for housing in Local Plans, and whether the LPA has a current Local Plan;
- whether the Community Infrastructure Levy (CIL) is being charged;
- whether there is a S106 agreements in place, what this covers and any subsequent re-negotiations of these or challenges on viability grounds;
- evidence of good practice, including that influenced by the last ten years of policy reform, such as successful pre-application discussions
- evidence of poor practice, including poor implementation of the last ten years of policy reform and also new issues for potential policy development
- key dates for application and decisions, sources and lengths of delays by:
 - pre-application;
 - registration/validation;
 - consultation;
 - decision-making/negotiation;
 - determination;
 - post-decision; and
- overall assessment of blockages and areas for improvement.

Information will be quantified as far as possible, but room given within each case study write up to include qualitative information that relates to the unique situation of each site.

2. Presentation of the data

Analysis of case studies

The analysis of case studies will need to take place at three levels:

1. Case study level: to identify the common themes and barriers among individual applications;

2. LPA level: to study the monitoring activities undertaken by LPAs and the costs incurred in the process, potentially to suggest best practice and actions to reduce barriers; and
3. National level: to relate the application and LPA-level findings to the national context and establish what works in different planning ecosystems (urban/rural, large/small etc) and which barriers and solutions are of most relevance to the largest number of LPAs, applications, and ultimately people.

The task of identifying the common themes among the verbal and written responses of case study interviewees, in order to draw conclusions that are of relevance to English LPAs as a whole, is a qualitative analysis problem.

We are expert in the use of industry-standard dedicated qualitative analysis software (Nvivo) for this task. Structured transcripts will be analysed by our research consultants. We will agree a coding framework for this analysis based on the research objectives and key questions. These codes will then be applied to the elements of the transcripts that exemplify the codes. Additional codes can be proposed by members of the coding team as they encounter new activities, added to the overall coding framework, and shared among the team.

The Nvivo software also permits us to summarise the actual text responses under each code. We will therefore be able to investigate the transcripts for groups of interest which emerge from the coding and contextual information and report on the specific activities in each group.

Format of case studies

The rationale for the design of the information gathering element of the case studies is set out in our response to question 4.1 on research methods, and the templates that we will use are discussed in question 4.2 on information collection. Broadly, all case studies will be summarised using a common template in a similar style to those presented with the Killian Pretty Review Research Report⁴ but with additional information including perspectives from a range of stakeholders on the effects of planning policy reform since 2008, and quantitative information on the scale of the development and the costs borne by the LPA and applicants. Although they will be based on detailed notes, they will be heavily summarised so as to focus on the key issues and learning points. A senior member of the team will review each case study write up and ensure it contains clear information throughout.

The Killian Pretty case studies were formatted to fit onto a single side of A4; some design compromises were made in this presentation, including a small font size and heavily-summarised text. As the case studies for this research cover a wider range of issues in order to meet the evidence gathering needs for future policy evaluation and development (as set out in our response to section 4.1 on research methods), we will instead aim for a clear presentation of the key information across two A4 sides, and a richer, less-summarised description of the issues. The key points will include:

- whether the application is for residential or mixed use;
- the previous use of the land for which planning permission is being sought;
- the number of dwellings proposed;
- the tenure of dwellings proposed;

⁴ Accessed via the UK Government Web Archive at https://webarchive.nationalarchives.gov.uk/20150601203143/http://www.planningportal.gov.uk/uploads/kpr/kpr_research-report-1.pdf

- any special characteristics or features of the application;
- the nature of the applicant (whether they are the owner, or working on behalf of the owner – eg a planning consultant – or whether they plan to sell the land once permission is granted)
- any legal restrictions on usage;
- whether there are any Sites of Specific Scientific Interest on the site;
- whether the application falls within a National Park;
- whether the application falls within a designated greenbelt;
- whether land is designated for housing in Local Plans, and whether the LPA has a current Local Plan;
- whether the Community Infrastructure Levy (CIL) is being charged;
- whether there is a S106 agreements in place, what this covers and any subsequent re-negotiations of these or challenges on viability grounds;
- evidence of good practice, including that influenced by the last ten years of policy reform, such as successful pre-application discussions
- evidence of poor practice, including poor implementation of the last ten years of policy reform and also new issues for potential policy development
- key dates for application and decisions, sources and lengths of delays by:
 - pre-application;
 - registration/validation;
 - consultation;
 - decision-making/negotiation;
 - determination;
 - post-decision; and
- overall assessment of blockages and areas for improvement.

The final report

We will also produce a short report that highlights key information from the case studies. We think this is essential, given the large number of case studies, in order for a reader to quickly distil the key findings of the study. The report will comprise:

- Study aims / terms of reference
- Desk research / policy context (explains choice of methods and classification of findings)
- Summary of methods
- Key findings from qualitative and quantitative analysis of case studies. This will include tables and statistical analysis that draws across all case studies such as:
 - the most commonly reported sources of delays in the planning system, by stage and type of applicant;
 - the total length of delays reported by type; and
 - features associated with applications that experienced the most and the fewest delays.

The report will also identify best practice, and the key pinch points.

Summaries of 80 case studies: The case studies presented in the Killian Pretty research report did not identify the local authority or provide the application number. We suggest that this is appropriate for the published report but will explore with the Steering Group whether these details could be provided for an internal version of the report. This would help identify exactly

where issues were arising and where good and bad practice were in place, but without a guarantee of anonymity the qualitative responses of interviewees may be less frank and informative.

5.1 Skills, knowledge and experience

Our team

ALL REDACTED

Our institutional experience

At RSM, most of our research is for public sector clients. Identifying and testing workable solutions to real world delivery challenges lies at the heart of this work. We have a wide range of experience and expertise in stakeholder engagement and conducting similar research across a wide range of sectors. This has given us deep and extensive experience, highly relevant to this study.

2018: Public Land Build-out analysis

RSM was commissioned by MHCLG to analyse the determinants of housebuilding rates on land sold by the previous Public Land for Housing programme. MHCLG wanted to know why some sites had fully built-out but many had not. The study was intended to identify ways in which housebuilding rates could be improved on both public and private sector land in the future, in order to help the government achieve its housebuilding targets. The research involved consultation with national stakeholders including MHCLG and other government departments such as DEFRA, the DfT and the MoD; Homes England; the Local Government Association (LGA); developers such as Crest Nicholson and Taylor Wimpy; and the Home Builders Federation.

This research involved 26 case studies of sites throughout England where the site-specific factors affecting housebuilding were explored. We visited the sites and interviewed local planners, developers, housing associations, Homes England regional staff and other local stakeholders involved in the development process in order to explore the factors that hindered or helped housebuilding.

This study has given our team

- an excellent understanding of the planning process, the interaction between different local stakeholders and the challenges that exist in meeting the government's housebuilding targets;
- practical experience of establishing contact with local planning authorities and developing productive working relationships in a short timescale;
- experience of developing case studies around planning issues.

2019-20: Evaluation of the pilot Voluntary Right to Buy

The pilot is operating across the Midlands in England, commissioned by MHCLG. RSM are evaluating the pilot. The study involves analysis of data collected by Homes England,

telephone interviews with people who have bought their home through the pilot and those who applied but were not successful, case studies of housing associations operating the pilot scheme, and a survey of participating housing associations. Analysis of case studies and first round of customer interviews was performed using Nvivo. The final report is due to be delivered in early 2020 and will improve understanding about how aspects of the scheme such as porting discounts, one-for-one replacement and potential future demand will work. The study demonstrates our ability to work closely with the Housing Association sector, presenting emerging findings to the pilot associations, as well as co-ordinating the team undertaking case studies of housing associations.

Relevant experience from this project includes

- developing detailed, in-depth case studies focussed on the VRTB processes – what is working well and important lessons to help inform national roll out of the pilot;
- developing productive working relationships to quickly collect data, information and policies for analysis from the housing associations included in the pilot, and from Homes England.

2018-2019: Scoping Evaluation of the Impact of Brexit on the Northern Ireland Housing Market

Commissioned by the Northern Ireland Housing Executive, this study explored the likely impact of Brexit on the drivers of the housing market in Northern Ireland, including the housebuilding sector. This included analysis of available secondary data, telephone interviews with a range of stakeholders, including developers, estate agents and housing associations. This demonstrates our ability to draw on a range of data sources relevant to housing and development and draw conclusions that are useful to policy-makers.

Relevant experience includes

- engagement with stakeholders who interact with the planning system;
- establishing productive working relationships to gather data, and make use of their networks to circulate surveys.

2018: The Incidence and Value of Planning Obligations and Community Infrastructure Levy in England in 2016-17⁵

This study for MHCLG examines the use of developer contributions in England during the financial year 2016/17. In so doing we present an account of the value, incidence and delivery of both S106 planning obligations and CIL. This is the first occasion on which both these measures have been valued together since the introduction of CIL.

The primary data collection methods were: a survey of all LPAs, County Councils and National Park Authorities; 20 case studies of LPAs; and 3 roundtable discussions with representatives of the development industry. Primary data were collected on the delivery of S106 and CIL in the 20 case study LPAs, and up to four sites for each of those authorities. The case studies were undertaken through both desk-based analysis and in-depth interviews with planning officers and development industry professionals. The data were collected in a short time frame between July and September 2017.

⁵ Lord, A, Dunning, R, Dockerill, B, Burgess, G and Carro, A (2018) The Incidence and Value of Planning Obligations and Community Infrastructure Levy in England in 2016-17. MHCLG.

Dr Burgess and the Centre for Housing and Planning Research conducted a similar study in 2007/8 also for MHCLG which involved 24 LPA case studies and 96 site case studies with visits⁶.

2014: Research on the nature of planning constraints⁷.

This research for the House of Commons Communities and Local Government Committee analysed the impact of planning constraints on the provision of new housing. It aimed to identify pinch points in the planning system through case study research across comparable local authorities, tracing the processes from the developer's decision to put forward an application through to the start of construction.

Secondary data was used to identify similarities between local planning authorities (LPAs) and to analyse outcomes. There were six preliminary in depth interviews with major housebuilders. Pairs of authorities were identified where conditions are similar but processes and outcomes are different. LPA planning officers were interviewed and four development schemes were selected in each LPA (small, medium, large and mixed housing applications) for detailed examination. These were preferably schemes where construction had started or was complete, and the developer of each scheme was also interviewed for their experience of the application process.

Enforcing the Enhancement of Energy Efficiency Regulations in the English Private Rented Sector

RSM was commissioned by BEIS and the Commission for Fuel Poverty to explore how well the recently-introduced regulations for enforcing energy efficiency standards were being enforced in the private rented sector. The study included arranging and facilitating six workshops across the UK to discuss ways of improving enforcement of the Minimum Energy Efficiency Standards (MEES). A range of local authority officers, landlords and tenant groups attended these workshops, which allowed us to gather and interpret a wide range of views. We presented our emerging findings to the attendees and chaired a discussion around how energy efficiency regulations were currently being enforced, and how this enforcement activity could be improved. Focus group notes and interview transcripts were coded and analysed using Nvivo.

This qualitative information was analysed and used to produce a report for BEIS that outlined the effectiveness of existing enforcement, policy alternatives for improving enforcement, and key principles for future enforcement. This work demonstrates our ability to engage with local stakeholders to analyse the impact of policy.

This demonstrates

- practical experience of engagement with a range of key stakeholders including local authority officers, landlord representatives, tenant organisations and academics;

⁶ Crook, A., Burgess, G., Dunning, R., Ferrari, E., Henneberry, J., Lyall Grant, F., Monk, S., Rowley, S., Watkins, C. and Whitehead, C. (2010) The incidence, value and delivery of planning obligations in England in 2007-08 Final Report. London: Communities and Local Government.

⁷ Burgess, G. Crook, T., Jones, M. and Monk, S. (2014) Research on the nature of planning constraints. House of Commons Communities and Local Government Committee.

- experience of establishing contact with local authorities at short notice to arrange and facilitate successful regional workshops;
- developing productive working relationships quickly, given the short timescale of the project (three months) to arrange workshops.

2018: Evaluation of Birmingham City Council Social Housing Allocations Scheme

This study involved working very closely with England's largest social landlord (Birmingham City Council). RSM were commissioned in order to identify if its social housing allocations scheme was meeting its objectives of being transparent, fair, efficient, and encouraging realism in allocating this scarce resource. The study involved speaking to policymakers and those who designed the current scheme, housing managers, housing associations, advice agencies, tenants, and people on the housing register. We also ran focus group discussions with housing association staff and housing applicants. The study also explored the interaction between the housing allocation scheme and homelessness policy, including the use of temporary accommodation. Data on the waiting list, housing allocations, and the current housing stock was drawn on to establish which stock was most in demand, as well as what was hard to let and why. There were over 40 recommendations made to the city council to help improve the allocation scheme, for which the council is currently devising an implementation plan and the report is due to be published soon.

In summary, for this project we

- engaged with a range of stakeholders including local authority officers, tenants, and households on the housing needs register;
- developed productive working relationships quickly, eg in arranging which data was to be provided by the client for analysis and asking questions about the data to understand and resolve any potential issues with it.

2018: Deep Dive study into the Shared Ownership and Affordable Homes Programme 2016-21

RSM was commissioned with support from the Cambridge Centre for Housing and Planning Research to deliver a review of the Shared Ownership & Affordable Homes Programme (AHP) 2016-21 using a deep dive case study research approach. The AHP has operated as the government's flagship housing programme in England under successive governments since the 1990s and is the main means by which the government provides funding for new Affordable Housing development. The objective was to assess the programme's effectiveness in delivering the UK Government's affordable housing objectives and achieving value for money. The study explored the cyclical variation in AHP delivery; the relationship between affordability pressure and affordable housing delivery; data and monitoring requirements of the AHP; whether the AHP was delivering where affordable housing was most needed; and the impact of wider changes to housing, planning and welfare policy on Affordable Housing delivery. The study involved 10 case studies of housing associations' interactions with the programme. We interviewed key staff within each housing association and drew on housebuilding data in order to analyse the impact of the Affordable Homes Programme on the location and volume of affordable housing completions in England.

The findings and recommendations were presented to MHCLG and Homes England for discussion and to help inform policy development.

2015-16 Strategic assessments of economic development land needs and existing employment land

RSM was commissioned by Leicester City Council to provide strategic assessments of economic development land needs over the period 2015–31 and existing employment land, along with property market assessments of: the Leicester city centre offices, Cultural Quarter, Pioneer Park and textiles sector. The study informed recommendations for allocations for offices (45,000 sq m) and industrial land (45 ha) with a requirement of 28 ha for strategic warehousing to be met elsewhere in Leicestershire. To deliver the allocations and safeguard existing land, recommendations were made for Council and LLEP measures in respect of funding land development, development, property investment and Local Plan policies.

2012 Leicester and Leicestershire HMA Employment Land Review

The Housing, Planning and Infrastructure Group of the Leicester and Leicestershire Enterprise Partnership (LLEP) commissioned RSM (then trading as PACEC) to update the Leicester and Leicestershire Employment Land Review 2008 (which was also produced by RSM/PACEC).

The objectives of the study were to:

- Provide a policy context
- Update forecasts of demand for office, industrial and warehousing development land at the district, PUA and Leicester and Leicestershire Housing Market Area (HMA) levels;
- Update data on the supply of office, industrial and warehousing development land at the district, PUA and Leicester and Leicestershire HMA levels;
- Undertake gap analyses to identify market areas of oversupply and gaps in the provision of office, industrial and warehousing development; and
- Make recommendations on the potential phasing of sites, allocation of sites and potential measures to bring forward development.

To undertake and update the review in 2012, the consultancy team worked with representatives of the Local Enterprise Partnership, the individual district local planning authorities within the county, and with developers and property agents in the collection, analyses and interpretation of data, semi-structured interviews and consultations.

The research involved demand and supply side assessments of employment land, including assessment of deliverability of sites within the employment land pipeline. Supply demand gap analyses were undertaken by office (B1 a and B1b), industrial (B1 c, B2 and small B8 less than 10,000 sq m) and strategic warehousing (B8) uses at the following levels: district, PUA and Leicester and Leicestershire HMA. Separate reports were produced for each district.

Project team CVs

5.2 Project management sStructure

Our team

REDACTED

Ensuring the project is delivered on time and to budget, with all key outputs delivered

The timescale for this project is tight, and we appreciate that MHCLG has a commitment to the publication of the Green Paper that means it cannot go over timetable. We have assembled a team of sufficient size and with the skills required to complete it to time but are aware that this will need careful management throughout.

We have put our methodology together with this in mind. Key features comprise:

- starting the background research in advance of the inception meeting;
- putting together the framework for selection of LPAs in advance of the inception meeting so that this can be agreed and the LPAs selected at the meeting;
- ensuring back-up LPAs are selected at the outset and contacted if an LPA is unable to confirm that they will take part within a reasonable timescale;
- selecting all 15 LPAs at the outset and all 80 case studies within them at the start of Wave 1 so that those which are able to be completed fastest are included in the interim report and those where it is harder to access the necessary information and people are in Wave 2.

Our recent study for MHCLG on build-out rates on public sector land employed similar case studies of individual sites for housing where we interviewed planners and developers and we are therefore aware of the challenges in engaging them quickly as is necessary in this instance.

Project management

We will schedule a project initiation meeting (PIM) with MHCLG in the week following the award of contract, to discuss our methodology, and establish contact points between RSM and MHCLG, and potential consultees.

Within one working week of this meeting we will produce the inception report. This will include the refined methodology, as established in the meeting as requested in the ITT. This will provide methodological transparency and ensure the research will be fit for its immediate purpose. It will also confirm the list of the 15 proposed LPAs in which we will undertake case studies, and suggested back-ups for each one.

We suggest MHCLG inform the LPAs that we have been appointed to carry out this work, encourage them to take part and let them know that we will be in shortly. We plan to start approaching local authority planners and other stakeholders to take part in interviews from w/c 2nd September.

Resource Planning and Review

Within our team, a resource planner is used to keep track of staff commitments. As soon as we are appointed, we will allocate the staff in this proposal to this project. This time is dedicated. If additional resource is required then the Project Manager will discuss this with REDACTED, the partner and resource allocated.

A task list is developed by the REDACTED for each week in line with the plan above. This is discussed with the team at our Monday morning meetings. Progress against the task list is reviewed on a Friday and actions agreed to deal with any slippage. Anna reports weekly to REDACTED on Project Deliverables

A risk log will be updated weekly by REDACTED and the Authority will be alerted to any new risks emerge.

Contingency resource is also identified for key team members, to minimise any staffing risks: see table below for nominated contingency replacements.

REDACTED

Our large team-based approach means that we have the flexibility to divert staff from other duties at very short notice if necessary, to make up lost time. This could, for instance, include expanding the size of the project team so that two interviewers can cover a case study. Our team-based approach also means that staff holiday periods do not cause any delays, as other team members will be briefed in advance to stand in and respond to any developments that occur during the period of leave. We will keep the Authority fully informed if any additional staff are brought into the project team at no additional cost to deliver the specified deliverables.

Quality Assurance

RSM's project management arrangements ensure that research projects are delivered to a high quality, at the required pace and to budget. REDACTED will carry out regular progress reviews and action will be taken to remedy any slippages. She will attend all client meetings (with REDACTED substituting if necessary), produce the meeting notes, and monitor and advise on project risk.

Ensuring high quality methodological design

Our proposed methodology design draws on our extensive expertise at undertaking research in this field and utilising similar methods. RSM is experienced in large-scale studies involving

fieldwork on multiple sites and able to predict likely challenges. This means that our methods are both realistic and can be relied on to produce high quality data.

Our proposed methods will be discussed with yourselves at the inception meeting and we can adapt methods if required in response.

Ensuring high quality stakeholder engagement

Planners, developers and others involved in the planning process will be contacted by phone. We will use experienced staff for these interviews and ensure that we tailor the questions asked to the position and role of the interviewee.

Data protection and GDPR

The only personal data required for this study is the contact details of local authority officers, developers and other professionals to be invited to interviews. Contact details will be obtained if possible from the Authority or from local authorities themselves, all of which are allowed as a legitimate use of this data in order to undertake government-funded research. No other personal data will be required for this project. We do not expect to collect any data that would be classed as sensitive personal data for this study – as contact details alone are not classed as sensitive data. We consider that we would be the data controller for data that we collect during this study and will take the resultant responsibilities to protect the data.

RSM has established GDPR compliance procedures. All projects are assessed at the appropriate level and procedures to manage data approved before the project begins. The data will be stored in accordance with the GDPR. We have a data protection, that manages the formal personal data breach process as well as other data loss procedures and protocols.

We will ensure data gathered, stored and analysed is fully compliant with our regularly-updated Data Protection policy, in line with legislative requirements. We also maintain Health and Safety, Quality Assurance and Social Responsibility policies that apply to research environments and are available on demand. We propose nominating dedicated points of contact for data issues relating to the project from both parties (client and RSM). RSM is registered with the Information Commissioners Office (ICO) number ZA140812.

Ensuring quality of quantitative and qualitative analysis

Interviews will follow an agreed transcript focusing on the answering the key research questions, and interviewers will make detailed notes of conversations to capture as much information as possible. An agreed pro-forma will be produced (and agreed with the Authority prior to use) to ensure that the information is collected consistently across all case studies.

Where quantitative data can be collected this will be analysed in Excel or SPSS.

For the qualitative data, interview notes will be analysed using Nvivo software. This allows us to analyse deductively, exploring research questions set in the brief, or developed during the first phase of the research. It also allows inductive analysis, whereby text can be coded to topics identified from the interview text themselves.

Ensuring quality outputs

REDACTED has significant time allocated on this project to allow for close involvement in all written outputs. All project outputs will be reviewed by our REDACTED, before submission, allowing sufficient time for outputs to be refined. We also discuss and review all deliverables

with the Authority project group prior to submission, to ensure we meet expectations. All outputs will be proofread and will be in plain English and comply with the Authority's style guide.

Our academic expert will also review key outputs to ensure they fully reflect the wider literature in the field and any emerging policy issues.

User friendly outputs

The final report will be structured in a way that allows 'easy consumption'. It will contain an executive summary covering the main issues and main policy recommendations meaning these can be absorbed quickly. There will also be a more detailed recommendations section, where recommendations can be grouped by their relevance to different stakeholders. We envisage the recommendations being split into 'policy' and 'practice' - for government looking to develop policy in the area and for local authorities looking to learn from existing best practice respectively.

Our track record of delivering concise, well presented, user friendly reports

2018: Public Land Build-out analysis

RSM was commissioned to analyse the determinants of housebuilding rates on land sold by the previous Public Land for Housing programme. MHCLG wanted to know why some sites had fully built-out but many had not.

The research involved a regression analysis of data on build-out rates, and 26 case studies throughout England. The report drew conclusions from across the statistical analysis and case studies, with the 26 case studies presented as an accompanying report in easy-to-read summaries, including maps and images.

2019: Mandating Specific Regulatory Provisions on the Security of Consumer Internet-Connected Devices

The aim of this project was to assess the potential economic impact of the first three guidelines of the Code of Practice for manufacturers of internet-connected devices being made mandatory. The information gathered for this project was entirely qualitative. The literature review was varied and included academic papers and reports from consultancies and government departments, ensuring that we had a considerable amount of information and ideas to include in the report. Additional information was gathered by interviewing stakeholders. A qualitative survey was distributed to manufacturers and retailers of consumer internet-connected devices and issued reminders to potential participants to ensure maximum possible engagement with the survey.

The evidence gathered was analysed and used to write up an economic impact assessment for DCMS outlining the potential impact to the UK's internet-connected device sector if security was regulated. The final report also includes a summary and conclusions; a sector profile, consumer research and economic modelling.

2019: Enforcing the Enhancement of Energy Efficiency Regulations in the English Private Rented Sector

We gathered qualitative data by conducting interviews with stakeholders including sector experts from several organisations. We also ran six workshops across the UK to discuss ways of improving enforcement of the Minimum Energy Efficiency Standards (MEES). A total of 72

people attended these workshops which allowed us to gather and interpret a wide range of views. This qualitative information was analysed and used to produce a report for BEIS that outlined the following; the effectiveness of existing enforcement, policy alternatives for improving enforcement, and key principles for future enforcement.

[The final report](#) includes policy context, discussion of the barriers to enforcement in England, enforcement of efficiency standards in other parts of the UK, and how enforcement of the MEES could be improved (including costs of enforcement options). It also includes analysis of quantitative data about energy performance certificate data.

2018-2019: ESRC International PhD Partnering Programme Evaluation

We were commissioned by United Kingdom Research and Innovation (UKRI) on behalf of the Economic and Social Research Council (ESRC) to conduct an evaluation of the PhD partnering scheme pilot, which ran from 2012/13 to 2015/16. As part of the evaluation we sent out invitations to three groups to complete surveys: DTC managers, supervisors, and students who had been involved in the PhD partnering scheme. Based on the End of Award reports and survey responses, some survey participants were then approached for a more detailed discussion to develop the case studies. A report was then written to evaluate the PhD partnering pilot project.

The report presented survey findings and case studies to evaluate how well the scheme met the key objectives of the PhD partnering Programme which included improving international PhD student mobility and developing institutional links with organisations in other countries.

2017-18 Research into issues around the commercialisation of university intellectual property

This research aimed to increase understanding of how IP licences and university spin-out companies were functioning within the knowledge exchange and commercialisation system, identify where there are issues that prevent opportunities from being realised, and suggest potential improvements. It is referred to in the Industrial Strategy White Paper and has contributed to Government innovation policy.

The research programme incorporated a literature review, extensive surveys of universities, spin-out companies, external businesses that have licensed university IP, and investors, and detailed case studies of individual IP transactions from the perspectives of all the actors involved in the system. It was project managed by REDACTED and directed by REDACTED.

The research was published by BEIS in April 2018 and is available at <https://www.gov.uk/government/publications/commercialisation-of-university-intellectual-property> .

2018-2019: Scoping Evaluation of the Impact of Brexit on the Northern Ireland Housing Market

Commissioned by the Northern Ireland Housing Executive, this study explored the likely impact of Brexit on the drivers of the housing market in Northern Ireland, including the housebuilding sector, social housing sector and co-ownership (shared ownership). The report (which is to be published soon) included analysis of available secondary data, and results of telephone interviews with a range of stakeholders, and a survey of housing associations and Housing Executive Regional Managers, looking at potential issues that may be affected by

Brexit such as migrant populations, cross-border movements. The research is expected to be published shortly.

2017: Research into Letting Agents' Fees to Tenants in Wales

The Welsh Government commissioned [this research](#) into fees charged to tenants in the private rented sector across Wales. REDACTED led the work whilst at the Centre for Housing and Planning Research. The aim was to broaden understanding on what constitutes a 'fee' or a 'charge' and the levels at which these are levied. It explores the potential impact on letting agents, landlords, tenants, and the private rented sector as a whole, if these fees were to be banned. This demonstrates REDACTED ability to research issues where a diversity of opinions exists, examining the evidence and producing robust conclusions.

2016: Shared Ownership: Ugly sister or Cinderella?

This study was led by REDACTED whilst at the Cambridge Centre for Housing and Planning Research. It was commissioned by the Council for Mortgage Lenders (now UK Finance) in order to improve mortgage lenders' understanding of shared ownership and to help firms evaluate their appetite to support shared ownership in light of the government's aspirations for the tenure. [The report](#) also made recommendations for government, regulators, lenders and other stakeholders to help improve mortgage lenders' interest in the sector.

5.3 Risks and Mitigation

Introduction

We set out below:

- our assessment of the risks that will need to be considered and mitigated for successful delivery of the project;
- our judgement of the single most impactful risk associated with this project, the way in which it has informed the development of our methodology and risk mitigation strategy, and the additional mitigation required;
- our approach to unforeseen risks; and
- the quality assurance processes we will employ on this project.

The main foreseeable risks are summarised in the table below:

Key risks and mitigation

Risk	Mitigation
Interim results not ready to support Green Paper	<ul style="list-style-type: none">• All actions below, plus additional mitigation to ensure that the first wave of case studies is representative of the whole and can be completed to schedule – see detailed response later in this section
Research design unsuitable	<ul style="list-style-type: none">• Experienced RSM housing research team, supported by academic housing research specialist / S106/CIL expert

Risk	Mitigation
	<ul style="list-style-type: none"> • Project Initiation Meeting to confirm scope, supported by rapid review of policy context and draft sample design • Early review of case study tools: interview topic guides, quantitative pro forma, write-up template • Sharing of interim and draft outputs with Steering Group
Case studies not representative	<ul style="list-style-type: none"> • Classification of English LPAs by 5 key characteristics for sampling • Careful selection of quota targets by residential/commercial, successful/unsuccessful, large/small etc., • Random selection within quota cells to avoid bias • Two waves of case studies; wave 1 to be studied for representativeness/coverage to inform selection of wave 2
Lack of engagement with LPAs	<ul style="list-style-type: none"> • Covering letter from MHCLG to planning lead, to generate buy-in • Nomination of single main contact point within each LPA • Flexibility on interview times; main RSM contact point for queries • Reserve list of LPAs drawn up if selected LPAs do not engage
Lack of engagement with consultees	<ul style="list-style-type: none"> • Information on study purpose to be circulated • Lead LPA contact to assist with contacts, chasing • Flexibility on interview dates/times • Sampling frame to include reserve LPAs, case study applications
Lack of institutional memory of planning reforms	<ul style="list-style-type: none"> • Interviews with LPA senior officers, planners with sufficient length of service • Interview questions to test for effects of last 10 years' planning policy, even if respondent not directly familiar with them
Disparity in quality of case study content	<ul style="list-style-type: none"> • Early testing of case study template • Continuous analysis to identify common themes and make sure interviews test for known issues • Identify missing information and support with external data

Risks and mitigation

We have listed below our detailed assessment of the main risks that our research may face, and identified ways in which these risks will be managed. This is not a ranked list; the risks are presented in the approximate order in which they may arise during the work programme.

Overall research design is not suitable

Risk: As the external time pressures on preparing the interim results are so great, there is a risk that the research programme could begin without a full understanding of what MHCLG are expecting and how the outputs will be used; in that case, the research outputs would not be fit for purpose.

Initial likelihood: Medium. **Impact:** High. **Likelihood after mitigation:** Low

Mitigation: We have assembled a team with expert knowledge of the planning process, that has delivered similar projects for MHCLG and other public sector authorities in the recent past. We have brought in Dr Gemma Burgess as a strategic advisor with her unrivalled research experience of CIL/S106 issues.

We have a standard approach to mitigating this risk as part of our project management procedures, using PRINCE2 methodologies. The main features are as follows.

- We will clarify the project scope at the outset with a Project Initiation Meeting, and codify it in a Project Initiation Document to be signed off by RSM and the client.
- We will manage the project through milestones that all trigger deliverables for review by the client.
- We will submit interim and draft versions of key deliverables for review to ensure that work is proceeding to client expectations.

For this project, the specific risk mitigation actions are as follows.

- We will prepare for the Project Initiation Meeting by bringing a draft sampling frame design and a rapid review of the policy context and project objectives. This will be possible based on the expert knowledge of our team and the work we have already undertaken on sample design for this proposal.
- We will prepare four specific outputs for review prior to case study commencement:
 - the topic guides for interviewers;
 - the summary for distribution to interviewees;
 - a standard form for recording quantitative information such as costs; and
 - and the template for presentation in the research report.
- As soon as the first case study interview is complete, we will summarise it into the pilot case study output template and send for review in order to ensure that it meets expectations.
- Following the milestones set out in the project specification, we will provide interim research findings, a presentation of these, and draft and final interim reports to support the Accelerated Planning Green Paper.

Ownership: RSM, with input and feedback required from project Steering Group

Case studies are not representative

Risk: Qualitative research design aims to maximise the coverage of the population by looking for distinctive, independent case studies that illustrate different circumstances. With any small number of case studies, there is always a risk of the spread of case studies failing to capture all types of situations and ways in which LPAs operate.

Initial likelihood: Medium. **Impact:** Medium. **Likelihood after mitigation:** Low

Mitigation: We will need to focus our research effort on a subset of the 15 selected LPAs in order to complete the Wave 1 case studies on time. There is a major risk that not all the 15 will be responsive enough to provide the information required to schedule.

We will ensure that the LPAs selected give comprehensive coverage of English LPAs (large/small, urban/rural etc.), and that the case studies selected are representative of the variety of applications across England (by scale and time taken, residential/commercial, accepted/refused etc.).

The overall target is for 80 case studies within 15 LPAs – 5-6 interviews in each. We suggest for Wave 1 that we focus on 8-9 LPAs (slightly more than half) and aim to complete 4-5 interviews in each. That leaves the option of conducting an additional interview in the Wave 1 LPAs after the interim deadline, if that is required to improve coverage within that LPA or in the overall sample as a whole.

We will discuss the sampling strategy with MHCLG and the Steering Group and also build upon the data analysis undertaken in the scoping phase to ensure that we include case studies that provide coverage of the main factors that affect the efficiency of applications.

We will continuously review the spread of completed case studies within English LPAs. Our proposal is to carry out 5-6 case studies in each of 15 LPAs; however, if during the research we judge that there is more value to be gained from an extra case study in one LPA than another, we will flex the target of 5-6 per LPA. For example, we may engage with a large LPA with many major applications and a variety of contexts (city core or city fringe, small or large etc.), and decide that additional case studies there would add more value than completing 6 case studies from a relatively homogeneous set of applications in a smaller LPA.

We will design the sampling frame in such a way that it oversamples the rarest groups of the population; this increases the accuracy of the survey findings in that group and also mitigates the risk of low response rate in that particular group.

Ownership: RSM, with sampling frame to be signed off by project Steering Group

Lack of engagement from local planning authorities

Risk: If local authority officers decline to participate in the case studies, the level of information collected from each one will be very incomplete, which will make it hard to compare case studies and develop wider conclusions. It would not be possible to look at the wider impacts of planning acceleration policy on development in other parts of the local authority.

Initial likelihood: Medium **Impact:** High **Likelihood after mitigation:** Low

Mitigation: We will ensure local authority officers agree to take part before confirming each case study choice. To encourage them to participate we will:

- enquire by phone initially in order to ascertain the name and email address of the lead planning officer (unless these details can be supplied by MHCLG);
- email them explaining the purpose of the research;
- attach a covering letter that we will ask MHCLG to supply confirming the value of the research and encouraging participation;
- offer them the opportunity to discuss the research with a member of our team who can answer any questions; and
- offer a range of times for an interview and arrange Skype and conference call facilities if required.

If local authority officers decline to take part, we will not undertake case studies in their area. We will instead draw from a reserve list of LPAs which we will have drawn up at the time of the initial selection.

Ownership: RSM project team responsible for case studies

Lack of engagement from case study consultees: planning officers, applicants, statutory consultees and third parties within case studies

Risk: The quality of the case studies depends upon securing interviews and evidence from individual planning officers, applicants, and third parties. Even if the Local Planning Authority management engages with us this is not always sufficient to ensure responses from other participants in the process. We also recognise that unsuccessful applicants may be less willing to participate than successful ones.

Initial likelihood: Medium Impact: Medium Likelihood after mitigation: Low

Mitigation:

- Information will be provided on the purpose of the research and the value of respondents' contributions. This helps to motivate people to respond, particularly in the case of unsuccessful applicants who may have useful feedback.
- A telephone and email contact will be provided for respondents if they have any difficulties or queries on the survey.
- We will allow time for respondents to engage with us but will send reminders, encouraging them to respond
- We will have designed the sampling frame in such a way that it oversamples the rarest groups of the population; this increases the accuracy of the case study findings in that group and also mitigates the risk of low response rate in that particular group.
- If informative case studies can be prepared based on quantitative information and planning officer involvement alone, we will submit these; we will not require engagement from applicants and their agents in all cases, particularly if the evidence suggests that the application went smoothly and that it is an example of good practice rather than a case study of residual blockages and delays in the system.

Lack of institutional memory of planning reforms

Risk: The research needs to gather evidence on the effectiveness of the last ten years of planning reform as well as evidence of current problems. There is a risk that the available interviewees have not been in post for long enough to appreciate the history of planning policy over the longer timescale.

Initial likelihood: Medium. Impact: Medium. Likelihood after mitigation: Low

Mitigation: We will build follow-up questions about the types of barriers that should have been overcome into the case study interview template. This will give evidence on whether the issues addressed by planning reforms are still causing problems. It will not be possible definitively to attribute the lack of a barrier to the reforms themselves (they may not have been a particular problem in every locality anyway; to further mitigate this risk we will hold an overarching interview in each LPA with a senior officer with management oversight for planning, or a long-serving planning officer, to ask questions about the situation in the LPA area as a whole, not connected with a specific case study application.

Disparity in quality of case study content

Risk: There may be disparities in the types and amount of information that LPAs retain about planning applications, and the level of detail provided. As set out above, the level of institutional memory of past planning reform may vary. There may also be differences in the level of uptake from non-local-authority sources, particularly if we are reliant upon the planning officers to make introductions to developers and their agents and their levels of access vary from LPA to LPA. This may make analysing and comparing the case studies more difficult, and make it harder to develop useful conclusions for a national study.

Initial likelihood: High. Impact: Medium. Likelihood after mitigation: Medium

Mitigation: We will populate the case study template with details from early interviews as a pilot, to help us ensure that the framework for analysis that we develop is appropriate for the level of detail likely to be available to us. We will identify common themes found in the planning applications and ensure we find appropriate information easily despite any disparity in their style and content and the information provided by interviewees. We will take care to identify missing information as such, to clearly distinguish it from situations where an application states specifically that something is not occurring.

Ownership: RSM project team with responsibility for preparing case study content

Major risk – failure to support the Green Paper in 2019

This project is distinctive in that the key milestone for project planning purposes is the interim report, not the final report, because of the need to support the Accelerated Planning Green Paper in 2019.

The interim report effectively needs to stand alone as a robust, reliable research document, despite the fact that only half the case studies (Wave One, comprising around 40 studies) will have been completed. As a result, the interim report suffers from all the risks identified for the research programme overall but with additional considerations because the deadline is tight and the amount of research completed will be restricted.

In summary, the specific additional mitigation for the interim report will be:

- **Research design is not suitable:** The scope of the research and the design of the case study programme need to be confirmed as soon as possible so that the research can begin and will lead to an interim report that is fit for purpose.

- **A delay in getting started:** to ensure that the research gets started as quickly as possible, we will:
 - start the background research in advance of the inception meeting;
 - put together the framework for selection of LPAs in advance of the inception meeting so that this can be agreed and the LPAs selected at the meeting; and
 - ensure back-up LPAs are selected at the outset and contacted if an LPA is unable to confirm that they will take part within a reasonable timescale;
- selecting all 15 LPAs at the outset and all 80 case studies within them at the start of Wave 1 so that those which are able to be completed fastest are included in the interim report and those where it is harder to access the necessary information and people are in Wave 2.
- **Delays in signing off research tools:** The project will require very prompt feedback on draft deliverables from the project Steering Group to accomplish. We will agree the dates for this with the Steering Group at the inception meeting and confirm them in our Post-Inception Document. A delay in signing off research tools is a significant risk for delivery to timescale.
- **Lack of engagement from local planning authorities:** We will make every effort to engage with the LPAs, supported by an introductory letter from MHCLG, and as stated above will preferentially select those LPAs that respond more quickly and provide early access to comprehensive information for Wave One.
- **Lack of engagement from consultees:** We will maximise the use made of written information available on planning applications. We will only include case studies where we have been able to speak to the relevant planning officer, and will offer all planning applicants/developers the opportunity to participate (either by email or by a telephone interview). However, if any applicants/developers decline to do so we will still include these case studies for the interim report as the information is likely to contain useful lessons for policy development and best practice. If further information is uncovered after the interim report, we will discuss with the Authority whether they would like us to add to the existing case studies for inclusions in the Final Report.

Unforeseen risks

The risk management information set out above details our approach to reducing the known risks wherever possible. However, in our experience, it is quite common for delays to occur to research studies which are beyond our control, and often also beyond the control of the team who have commissioned the research too. These unforeseen delays may occur in a variety of situations, with some examples listed below.

- Delays often occur at the start of the project whilst the client is establishing exactly what they want to know or finding a suitable time for an inception meeting.
- There can be delays in accessing key data or gaining permission to access data that is not publicly available.

- It can take time for clients or other stakeholders to access contact details required (such as local authority officers, applicants, statutory consultees and agents in this instance), and to be confident that they can pass these on to us.
- There are risks inherent in working on policy-focused research where the policy agenda can be fast moving, and the research interests can change during the research.
- Political events such as a general election can cause a need to pause fieldwork due to purdah.

Our approach is to be flexible to such events, accepting that they may occur due to factors beyond our control. Our first approach is always to find ways forward that ensure the research is still able to meet its objectives. Key elements of our approach are listed below.

- The project director sets out a **project action plan** at the start of the research. It clearly indicates the **'pinch points'** – aspects which, if delayed, risk delaying other parts of the research. In this case, the key pinch point is delivery of the interim report. The project action plan sets out where any input is needed from the Authority, and when it is needed. This is likely to include aspects such as:
 - providing access to data not yet published;
 - providing contact details of local authorities and others;
 - providing a covering letter to accompany requests for interview; and
 - commenting on draft interview schedules or reports.
- The project director ensures that as many aspects of the research as possible **run concurrently**, ensuring that we make progress with any elements of the evaluation that are not being held up, whilst we wait for those that are.
- Our **large team-based approach** means that we have the flexibility to divert staff from other duties at very short notice if necessary, in order to make up lost time. This could, for instance, include expanding the size of the fieldwork team so that two interviewers can cover a local authority case study. Our team-based approach also means that staff holiday periods do not cause any delays, as other team members will be briefed in advance to stand in and respond to any developments that occur during the period of leave.
- Our case study team will ensure that they have at least **two contacts in each local authority**, to reduce the risk of delays if the lead contact should be unexpectedly unavailable or unresponsive for some reason.
- There is no general election scheduled during the fieldwork period, and the local elections will have finished before fieldwork begins so the **risks of purdah** disrupting research are not high. Nevertheless, the current political instability due to Brexit does create a higher than usual risk of a snap general election. We have direct experience of this issue from 2017: a research project for BEIS involving a survey of universities was delayed by the snap general election, due to restrictions on policy consultation activities for government.
We will discuss how best to mitigate the impact of this, should it happen, with the Authority at the earliest opportunity. We will also ask the Authority in advance which elements of the research should not be undertaken, should a snap election be called, and purdah begin without notice, and how we would handle research that is already

planned. It is likely that the consequences of purdah period suspending fieldwork for six weeks cannot be fully mitigated and would delay the research or reduce the number of case studies achievable.

Quality assurance processes

RSM's project management arrangements ensure that research projects are delivered to a high quality, at the required pace and to budget. REDACTED will carry out regular progress reviews and action will be taken to remedy any slippages. She will attend all client meetings, produce the meeting notes and monitor and advise on project risk. All project outputs will be reviewed by REDACTED, in advance of submission, allowing sufficient time for outputs to be refined. We will also discuss and review all deliverables with the MHCLG project Steering Group prior to submission, to ensure we meet expectations. All outputs will be proofread and will be in plain English.

Ensuring user friendly outputs

The final report will be structured in a way that allows 'easy consumption'. It will contain an executive summary covering the main issues and main policy recommendations meaning these can be absorbed quickly. There will also be a more detailed recommendations section, where recommendations can be grouped by their relevance to different Neighbourhood Planning Groups. We envisage the recommendations being split into 'policy' and 'practice' - for government looking to develop policy in the area and for Local Planning Authorities looking to improve their processes respectively.

Research ethics

The main ethical considerations relating to this research involve ensuring that informed consent is obtained from participants, and that no harm arises to them, or to researchers, involved in undertaking the study.

Procedures for ensuring ethical practice

As a major financial services firm, RSM has well-established systems covering professional ethics in which all staff are trained regularly. These set out professional ethics and establish out how all activities should be conducted in accordance with the IFAC, ICAW, ICAS and IPA code of ethics. Partners and staff are required to conduct themselves and their work in accordance with applicable professional ethical standards and codes of conduct. An Ethics Partner, supported by an Ethics Team, and also an Ethics Panel oversee this area.

In addition, there are ethical issues that arise through the specific activities of undertaking social research. RSM Economic Consulting therefore has its own procedure for assessing risks and managing ethics. We will produce a risk register as part of our PID, which will be updated as necessary by the project director, who will devise mitigations for the project manager to implement if needed. Procedures for ensuring informed consent is obtained are carefully designed and their usage monitored. Our team has extensive experience of operating in environments where ethical issues are of paramount importance, for instance in dealing with patient data in our current study for NHS England on evaluating digital tools to prevent type two diabetes.

Data protection and GDPR

Survey responses will be anonymous. Names and phone numbers obtained to contact participants will be stored securely, used only for this purpose, and destroyed after use. This information will be stored separately from anonymised interview data. No other personal data will be required for this project.

RSM has established GDPR compliance procedures. All projects are assessed at the appropriate level and procedures to manage data approved before the project begins. RSM have a privacy and Information Security team who ensure compliance with GDPR principles and that any data processed by RSM must be:

- processed lawfully, fairly and in a transparent manner (lawfulness and transparency);
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (purpose limitation);
- adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed (data minimisation);
- accurate and, where necessary, kept up to date (accuracy);
- stored for no longer than 3 months (storage limitation); and
- kept secure and protected from unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality).

Part 2: Contract Terms



Contract Terms v6.0