

Public and Stakeholder Consultation on the use of Artificial Intelligence in Planning

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Executive summary

- Two focus groups, one involving the public and one involving planning stakeholders and practitioners, consulted on views about the use of Artificial Intelligence (AI) within processes related to planning.
- Broadly there is a low level of trust of AI tools, which was the most common theme across both groups.
- Building trustworthy tools requires transparent processes and methods that are clearly communicated and have humans checking throughout.
- AI tools could free up planning officer time to make the most of their unique skills.
- Public views were more agreeable (with sufficient transparency and reassurance) to the use of AI in comparison with stakeholders.
- Six recommendations were identified based on the views from the consultation to help implement AI into planning tasks.



Introduction

This report forms part of an evaluation into the use of Artificial Intelligence (AI) systems, particularly Large Language Models (LLMs), for developing tools to support planning officers in reviewing representations submitted in response to local plans. To support the evaluation, we ran an engagement exercise to seek views on this work involving members of the public and key stakeholder groups who typically engage with submissions of representations. To undertake these consultations, we elected to run a series of focus groups. Focus groups were selected as an efficient data collection tool for seeking a diverse range of views. We ran two focus groups, one for the public and one for planning stakeholders and practitioners. Both groups were deliberately kept separate to minimise any perceived power imbalances. Recruitment to both focus groups was led by Greater Cambridge Shared Planning (GCSP) based on their local and professional networks.

Focus groups were delivered on 23rd January 2025 at Anglia Ruskin University. The first focus group involved 10 members of the public including three local councillors. The second focus group involved 14 participants from stakeholder organisations including planning agents, residents' associations, Historic England, the Ministry for Housing, Communities and Local Government, and Homes England. Both focus groups were also attended by members from the Digital Innovation and Smart Places team at Anglia Ruskin University, who acted as independent observers, and the project team from Greater Cambridge Shared Planning service and University of Liverpool. All members of the public were reimbursed for their time with a £10 local shopping voucher. Figures 1 and 2 provide some photos from the event.

Participants were divided into three tables to enable small group discussion. Both focus groups followed the same structure to enable comparisons to be made. The session started with a short introduction talk about the structure of the focus group, followed by an ice breaker activity that asked individuals to introduce themselves and describe their experience with using AI tools. This was then followed by a short talk about the problem faced by GCSP (i.e., large numbers of submissions, strain on resources to process) and the opportunities that AI might bring to minimise these issues. We then posed three key questions that we wanted participants to discuss, before ending by capturing any other information that we might have missed and outlining next steps in the evaluation process. The three key questions we discussed were:

1. How would you feel if Greater Cambridge Shared Planning were to use AI tools in helping them with supporting planning officers in their review of public comments and submissions of evidence?
2. What do you think are the strengths of having planning officers reviewing representation comments rather than an AI tool? How about the other way round?



Figure 1: Organisation of focus group attendees into small group discussions.



Figure 2: Presentation from Terry De Sousa.

3. How trustworthy would you find a summary report that was created by AI? What would you like to see to feel more confident in these reports or any decisions being made from them?

Each question was followed by facilitated discussion among participants on each table. Participants were asked to write down their thoughts on topics which were then thematically analysed to identify the key issues that came up, including comparing the views in each focus group.

During the icebreaker activity, we asked participants to rate their experience with using AI tools or AI in general, to gauge how familiar participants were. 36% of participants identified a high level of confidence, with 21% rating themselves as having low confidence or no experience. 39% rated themselves as mixed.

This report was written by the University of Liverpool team and approved by GCSP. No generative AI tools were used in writing this report.

Themes identified during consultation

The following section outlines the main themes that arose during the focus groups. There were three main themes, with theme 1 containing four sub-themes within.

Theme 1: Building trustworthy tools

The most frequent topic mentioned throughout focus groups related to low trust of AI and LLMs. We have divided these points into the four sub-themes that arose.

1.1 Performance of technology

Many participants expressed a level of scepticism or suspicion over AI and LLMs. These were based on their previous experiences in using such technology, which they had witnessed errors or inaccuracies in. Participants were concerned that any tool for summarising representations would be suboptimal or not accurate. Comments included being concerned over whether tools would miss out on any key points (and how we would know that AI has captured them all), inconsistent outputs that were not replicable, the inability of LLMs to fully understand the nuances of human language (e.g., sarcasm may be taken at face value), and potential bias (known or unknown) in how models were initially trained that could feed into reports. Some participants discussed how LLMs often produce responses that are too high-level or general, and that this might lose the depth of detail captured in individual submissions. One

participant queried whether any tool could be set up to ask leading questions or produce a report that favours a particular outcome.

To reassure participants, they would like to see evidence of reliability and the validity of a tool in producing an accurate report. Such evidence should cover different settings, contexts and the range of issues where LLMs may perform less well. Clear guidance should exist to guide when and where planning officers should use these tools, including the aspects where they are less successful. This could be supported by integrating feedback loops into the development of AI technology, to help systems 'learn' insights and be improved.

1.2 Transparency

The reassurance of AI and LLMs would be best achieved through clear, open and transparent systems that would allow anyone to see how they operated. This should focus on the methods which underpin the model, so that it was clear how it worked or produced outputs. Participants asked that all work on the testing, evaluation and quality assurance of the AI tools, should be published openly on GCSP's website. This should include an assessment or judgement of how good any AI model is at doing a task, the extent of bias in the system and which functions it was less good at.

The topic of transparency was not just limited to openness about the methods but was also linked to issues relating to explainable AI. It should be clear how any outputs generated by AI were made by the tool itself. Multiple participants expressed a preference for AI-generated summaries to include references, quotations or citations to show where it had accessed information from (i.e., which submissions any text were drawn from).

Greater transparency should also extend to how GCSP were using AI tools in their tasks. Participants described the importance of the council being open as to how AI was being used and making it clear that anyone submitting representations would have consented to their submission being used like this. This could be supported by greater engagement and communication to the public. Similarly, any report published should make it clear that the report was summarised by AI. One participant suggested that framing was important, such as describing the tool as data processing rather than planning work.

There was much discussion in both focus groups about accountability and trust. Participants were concerned about what would happen if something went wrong because of an AI generated report (e.g., a decision was made based on an erroneous report). Participants felt that an AI could not be held accountable, unlike humans. This could open up GCSP to legal challenges on decisions, even if the perception was the decision was made based on AI rather than a human. To counter this, it should be made

clear who created the tool and who is accountable for it. Greater regulation may be needed here to help reassure the public and stakeholders on the use of these tools.

1.3 LLMs held to a higher standard

The constructive and negative discussion points presented throughout suggested that the use of LLMs were seen more critically than compared to current practice, irrespective of either's performance. One participant discussed that this might be due to the technology being relatively new. Participants felt that the issue of low trust would be difficult to get around and such scepticism may persist for a long time.

This issue was driven by a lower perception of trust in the outputs generated by AI tools than compared to humans. Points raised against the use of AI include potential for misinformation, inaccurate summaries or biases in the algorithm. However, less consideration was given to the basis that many of these points were entirely possible among planning officers as well (e.g., planning officers making mistakes or unconscious bias). Some participants suggested that planning officers were more neutral than AI as well, due to biases in how algorithms were trained.

Many participants suggested that they might be reassured if they could review and approve the AI summary of their submission. One participant suggested an additional step of having planning officers check every AI summary (or at least randomly selected checks), although this might defeat the purpose of using the AI tool to save time. Participants were mostly unaware planning officers currently send out the summaries of representations to those that submitted them to ask them to verify that the summaries are a true reflection of their original comments. A few stakeholders were even unsure of the exact process and seemed unaware that planning officers write short summaries of each submission. One participant suggested that GCSP should publish all summaries of submissions to build trust, even though this is already done. Another said that they might be frustrated if their long report was reduced to a short summary, despite this already being done in the current process. These comments came up less frequently in the public focus group. They point towards a general suspicion around the technology, almost expecting it to meet a higher standard than the current process even when designed to mimic it.

Some of the discussion among stakeholders suggested that they were concerned that their work would be less valued in an AI system. There was a general belief that particular submissions were more important than others and an AI tool might not know this (or factor it into a report unlike a planning officer). Concerns were raised about whether AI would give a fair representation of all views due to potential issues around bias, even though this was possible among planning officers too.

1.4 Ensuring a 'human in the loop'

A key concern that would help to reassure participants and build trust was to make sure that there were humans engaged in the process. This might be achieved through several actions, including introducing human checks during the report creation (e.g., reviewing summaries or consistency of reports), and emphasising that decisions on local plans were being made by planners and not AI. These would need to be clearly communicated to the public, as participants were concerned about the perception that GCSP might be implementing decisions made by AI. Participants felt that the more human input could be introduced into the use of a tool, the greater the authority of any outputs created. Members of the public felt that more touch points to check and evaluate this process might be a positive change to the current planning system.

Some of the discussion focused on critical conversations around power balances. Participants suggested that it was important to position humans as in charge and AI purely as a tool. Discussion centred on ensuring that AI was not making any decisions but also stemmed from wider concerns about the rise of these technologies. These comments were more common in the public focus group. A few participants highlighted the potential for political backlash of using AI technology and suggested the need to focus on reassuring the public to minimise this.

Theme 2: Not forgetting the value of planning officers

There was a lot of discussion around the professional expertise that planning officers bring to the process and that it was important not to lose this when introducing AI. Participants identified that planning officers build up knowledge over time and that this was invaluable. This may include being able to understand the nuances of submissions, historical contexts or the local settings of the issues being described that an AI system may not be aware of. This expertise might be difficult to replace with AI, although turnover of staff might limit these benefits. Participants also emphasised that planning officers have better judgements to make decisions compared to AI. The ability to revert to human-led reports in situations where planning decisions were complex was also suggested, since participants felt that AI was less effective here.

Participants, particularly in the public focus group, noted that AI could augment the skills and tasks of planning officers. Where AI could help to minimise repetitive, mundane or low-skilled tasks, this could enable planning officers to spend their time focusing on planning issues that were most important. There was a preference that time saved should allow planning officers to spend more time on public interactions and consultations on local plans, allowing local voices to be embedded within decision

making. These opportunities were dependent on being able to demonstrate that any AI tool was accurate and trustful. Explaining these benefits to the public clearly was noted as critical in enabling this.

Participants expressed that they didn't want AI to replace planning officers, such as staff losing their jobs or preventing future investment in new staff. These were key issues that people were worried about.

Theme 3: Diverging views between the public and stakeholders.

While both focus groups offered constructive supportive and critical comments, the views in the focus group involving members of the public were more positive or accommodating than those in the stakeholders focus group. Most members of the public focus group were broadly in favour of the responsible use of AI, if there was human intervention throughout the process and full transparency on how the tool was created (including its performance) to provide reassurance. In contrast, stakeholders and practitioners were cautious in discussing any benefits of the technology and often focused their discussion on limitations. Scepticism was most vocal from planning agents or groups who frequently submitted representations. Many stakeholders also assumed that the public would be entirely negative about the use of AI.

One participant in the public focus group noted that the local Cambridge population may be more receptive to technology than other locations. We suggest caution about making wider generalisations about the themes in this document due to the limited number of focus groups undertaken.

Stakeholders also mentioned concerns about dissatisfaction over spending long hours and a lot of work in writing a submission, only for it to be summarised by AI in seconds and not read by a human. They felt this might put people off from submitting evidence or people would not submit long documents anymore. This arose more frequently among stakeholders than in the public focus group.

Other themes

There were some topics identified by participants that did not fit a specific theme or were only briefly mentioned. We list those here:

- The potential of AI to widen inequalities, especially if inherent biases that exist within a model perfoliate into reports that further discriminate against particular groups or communities.

- AI could help summarise the views of people who might not be able to use the right words to express their opinions or allow people to write in their native language which would then be automatically translated.
- LLMs are associated with significant environmental impacts in their creation so their use may be viewed negatively. Need to consider how to offset those impacts (e.g., carbon offsetting, use of 'green AI').
- Philosophical discussion about what it means for planning decisions if people writing representations use AI tools to do so and then GCSP use AI to summarise AI views. This may decrease the quality of planning decisions.
- Need to discuss the ethical implications of this work.
- The speed and cost of AI for doing this task was frequently cited as a key strength.
- AI tools could extend the data and details included in reports that are currently not mentioned. This should focus on looking at the geographical distribution of who submitted representations to explore the social and spatial inequalities in which views were being considered (allowing wider consultation work to offset). This was raised frequently in the public focus group.
- AI tools more consistent in summarising reports. Quality of summaries might vary by staff (e.g., new staff might be less good vs experienced staff).

Recommendations from consultation

Based on the results of the analysis above, we suggest the following actions are considered towards implementing AI tools for reviewing representations on local plans:

- Ensure clear communication to the public and users of the planning system on how AI is being used during consultation stages.
- Publish open documentation on the methodology, evaluation of performance and implementation of AI tools, and potential future steps for further development or ability to scale the tool up.
- Develop a new policy on who is held accountable when AI tools are used within planning tasks.
- Consider a formal strategy for embedding more checks into the development of AI reports by planning officers.
- Explore the potential of tools that allow users to review and approve AI generated summaries.
- Design outreach activities to reassure the public on the benefits of AI in planning.

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