



The Future of Strategic Planning in England

Effective decision-making
and robust governance

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Executive Summary

In last year's White Paper, Planning for the Future, the Government recognised a number of weaknesses in the current planning system. This included the limitations around managing growth at a strategic scale, and specifically, ensuring that spatial planning decisions are aligned with infrastructure prioritisation and delivery. Although the White Paper proposed the abolition of the Duty to Cooperate (the main mechanism for managing planning across local planning authority boundaries), it did not include any fully formed alternative. The County Councils Network (CCN) and Catriona Riddell Associates Ltd (CRA) therefore developed a new approach to strategic planning (set out in [Planning Reforms and the Role of Strategic Planning](#), October 2020) to inform the Government's thinking around potential solutions. This was designed to fill a gap in the current planning system but could also work within the context of planning reform and in relation to the government's wider 'levelling up' agenda.

The proposed strategic planning model set out in the report was based on a systems approach across all tiers of government, ensuring that spatial planning decisions are fully aligned with other policy and investment decisions that facilitate sustainable growth. It aimed to maximise the potential of planning at the strategic level by:

- Providing a **shared framework pitched at the right geographical scale to give effect to national priorities** aimed at supporting sustainable growth and improving the overall wellbeing of the environment and communities.
- Providing a more robust approach to addressing some of the most sensitive and challenging issues in planning, by elevating these to a higher spatial level and allowing consideration of more options, resulting in a more **ambitious approach to growth within a faster and more streamlined planning system**.
- Ensuring that **local plans are more deliverable**, with all partners' policies, priorities and investment programmes aligned around a shared vision for sustainable growth.

In developing the approach, two key issues were identified. Firstly, that regardless of what form strategic planning takes, there is a **need for a much more robust approach to decision-making with strong leadership at its core**, if we are to tackle some of the important but challenging issues that need to be addressed to achieve sustainable growth. Secondly, that the **fragmented and complex governance arrangements underpinning current approaches to managing growth urgently need to be simplified** across all tiers of government, ensuring that long term economic, social and environmental priorities are fully aligned with spatial planning and infrastructure decisions. This is particularly challenging where there is more than one tier of local government or combined authority involved in decisions around strategic planning and/or infrastructure funding and prioritisation.

This report therefore takes the original proposal set out in Planning Reforms and the Role of Strategic Planning as a starting point and further refines it to specifically address these two challenges. However, it has also been developed to reflect the updated national context since the White Paper was published, particularly the potential change in direction for planning reform and the priority being given to devolution and 'levelling up' the country.

The proposed approach set out in this report comprises two main components for more effective governance and decision-making in strategic planning:

- An **accountable strategic planning body** with responsibility for specific functions, including developing and delivering a **strategic growth plan**; and
- A representative **advisory and challenge body**.

This is intended to provide a stronger, more effective basis for decision-making and solve many of the current problems in both planning for and delivery of priorities around growth. It focuses on the key issues that matter both nationally and locally; has partnership and strong leadership at its core; and provides much needed clarity around roles and responsibilities for all tiers of government (and partners). Vitally, although some legislative and national policy changes would be needed to implement the approach fully, it does not rely on these in the short term. The approach could therefore be introduced quickly to start addressing the immediate and significant challenges the country faces in relation to the economic recovery, climate change and housing delivery.

The evidence supporting the proposition has drawn heavily from a review of current practice and experience across England. This indicates that, whilst there is already a lot of strategic planning activity going on, this is significantly weakened by the decision-making structures. This is resulting in a focus on current delivery programmes, with very few authorities addressing the need to plan for the future beyond the very short term. It is also clear that if this is not addressed soon, it will impact further on our ability to respond to both the immediate and long term challenges around economic stability (and future growth), climate resilience and meeting our development needs, especially infrastructure and housing.

Any new approach to strategic planning will require both central and local government to accept the limitations of the current system and that some changes to existing roles and responsibilities are necessary if the system is to work properly and the anticipated objectives are to be achieved. Specifically, this will require a more integrated approach to delivering growth across all tiers of government; a new relationship between the different departments and agencies involved; and a high level of trust that local government is competent to take on more responsibilities through a strategic role.

It will also require a very different approach to the allocation of resources and the skills needed to deliver sustainable growth. Since the introduction of the current planning system in 2011/12 (through the Localism Act and National Planning Policy Framework) local plans have done all the heavy lifting in terms of co-ordinating and delivering strategic priorities. However, the current focus on housing delivery and the potential sanctions on local planning authorities (mainly through five year land supply requirements and the Housing Delivery Test) is clearly having an impact on planning for the longer term and on collaboration across local authority areas. There are particular issues in two-tier areas where county councils have a major (and increasing) role to play in facilitating growth but have no formal spatial planning function. If the current strategic planning void is to be filled effectively with an integrated approach to supporting sustainable growth, this will have to be supported by the right level of resources and right type of skills in all tiers of government.

CCN Planning Reform Survey Summary Findings

CCN recently undertook a survey of its members on the planning reforms proposed in the Planning for the Future White Paper and wider views on a range of areas such as ambitions for housing and the state of infrastructure. The survey received an average response rate of 74% across the three parts conducted, with the full results in Appendix 4.



20%

were either confident proposals in the White Paper would achieve the aim of 'creating a simpler, faster and more modern planning system, ensuring homes and infrastructure can be delivered more quickly across England'.

96%

were concerned or very concerned about the 'Lack of proposals around strategic planning and replacement of the duty to co-operate' (62% very concerned).



93%

did not believe the proposed changes to the planning system would result in residents being more supportive of development.

96%

Support new homes in their area, if they are in the right places, support local housing need and are accompanied with infrastructure', including 73% who are very supportive.



58%

describe the pressure on local infrastructure as 'excessive' as a result of housing development in their area at present, with a further 39% describing it as 'pressured'.

73%

describe the 'infrastructure funding gap' in their areas as 'severe' with a further 27% saying it was 'moderate'.



100%

of county councils said better cross-boundary strategic planning, with county involvement, would lead to better outcomes from the planning system.

94%

said that their authority had 'strategic planning capability and capacity', with 100% of county councils supportive of a statutory approach to strategic planning with county involvement.



Recommendations

Recommendation 1

That in the short term (6 – 9 months) the government implements new arrangements for strategic planning as part of its ambitions for ‘levelling up’ the country and addressing the immediate challenges around economic recovery and housing delivery by:

(a) Ensuring that new strategic planning functions and the governance arrangements underpinning these are included in the future Planning Bill. In the short term, the new arrangements could be piloted through future devolution deals (or national framework for devolution in the forthcoming Levelling Up White Paper), with the designated accountable and advisory bodies for each area agreed between central and local government.

(b) Making changes to the National Planning Policy Framework (or other relevant national policy framework) to set out the scope and status of strategic growth plans. This should include clear reference to the relationship with local plans and how they should be taken into account in strategic applications, and other plans and strategies which have a spatial context (for example transport strategies prepared by Sub-national Transport Bodies or specifically, the Oxford-Cambridge Arc Spatial Framework).

(c) Allowing flexibility in terms of what form the strategic growth plan takes (e.g. joint strategic plan, spatial development strategy or non-statutory growth framework) to enable existing joint working arrangements to be used as the foundations of the new approach and for progress to be quick. However, these should be reviewed to ensure that they are meeting the minimum requirements prescribed nationally - see 1(b) above.

(d) Requesting that all local authorities agree what strategic planning geography they will work across and confirm this with central government within six months (or this will be decided by the Secretary of State). The geographical extent of strategic growth plans should be large enough to translate and implement national policies and investment priorities but small enough to reflect local context and circumstances. Where a ‘County Deal’ is being implemented, the strategic planning geography should be the same as that adopted in the delivery framework – see (e) below for combined authority areas.

(e) Agreeing with the relevant local authorities and mayor in a combined authority area, the geography for the strategic growth plan(s) and who the accountable strategic planning body should be (i.e. the strategic planning geography does not necessarily have to reflect the combined authority’s area of responsibility and the accountable body does not necessarily have to be the combined authority).

(f) Including strategic planning capacity and skills as a specific function in the Government’s proposed skills strategy (as trailed in the Planning for the Future White Paper) with further consideration to be given to how this function will be resourced in future.

Recommendation 2

That CCN supports its members and the wider local government sector in testing and refining the proposition for new strategic planning arrangements and decision-making responsibilities set out in this report, within the parameters of the guiding principles set out at page 19.

Recommendation 3

That in the longer term, the Government considers whether there is a need to strengthen the approach to strategic planning through legislative changes and specifically, to formalise the introduction of both the accountable strategic planning bodies and strategic planning advisory bodies. Consideration should also be given at this time as to the status of strategic growth plans and particularly whether they should form part of the statutory development plan system or be elevated to statutory status (outside the planning system).



1. Introduction

In August 2020 the Government set out proposals for reforming the statutory development plan system in the White Paper, Planning for the Future[1]. Whilst this recognises that the current system is significantly weakened by the lack of an effective approach to strategic planning, no specific solutions were proposed. In responding to the consultation, therefore, the County Councils Network (CCN) and Catriona Riddell Associates Limited (CRA) developed a new ‘systems-based’ approach, set out in the report [Planning Reform and the Role of Strategic Planning](#) (see Executive Summary in Annex 1).

The new approach responded specifically to the proposals and questions asked in the White Paper and consisted of three main components (see Box 1 below). Some of this could be implemented immediately without the need for primary legislation, some of it would need to be delivered in the longer term through the wider planning reforms proposed in the White Paper. It also aimed to go beyond the role of the Duty to Cooperate by maximising the full potential of planning at this scale, including:

- A strategic planning layer that acts as **the essential pivot between the national and local levels**, helping to translate national policies and priorities on the ground in a way that reflects local context and circumstances.
- **Aligning long term economic, environment and spatial investment decisions of different tiers of government around ‘place’**, ensuring that development is being directed to the right places at the right time, supported by an integrated approach to funding for all bodies and organisations involved.
- **Providing a bigger spatial canvas** and therefore more choice in how growth is supported, helping to ensure that development is directed to the most sustainable locations and overcoming the problems created where different functions do not necessarily reflect administrative boundaries.

In developing the new approach, it became clear that, no matter what form strategic planning takes, a critical component is the need for clear accountability for decision-making, supported by a robust governance structure. This is essential to address the most politically and technically challenging issues, such as overall scale and distribution of growth, and delivery of large scale developments and strategic infrastructure. It is also considered to be vital to ensure that strategic level decisions have traction on partners’ plans and investment strategies, particularly on statutory development plans and the priorities of the Government’s own delivery agencies. CCN therefore decided to explore this issue in more detail and develop a solution for the Government to consider in taking forward reforms to the planning system.

Since the initial proposals were published in the White Paper in August 2020, the Government has decided to pause the process of planning reform. This is mainly to address some of the criticisms raised through the consultation, particularly in relation to the impact some of the proposals would have on democratic accountability and on community engagement in planning.

The pause in progressing the reforms will also provide an opportunity for the Government to ensure that any changes to the system reflect the overarching objectives around supporting 'Green Growth' and addressing climate change, as well as levelling up the country[2]. Although the details of this wider agenda are not yet known, some proposals have been trailed around how devolution will be expanded and specifically, how local leaders will be empowered through new 'County Deals' outside the city region areas[3]. These would be bespoke devolution deals for each area and would, where appropriate, include enhanced governance models and strategic leadership, with the potential for high profile local champions at the county level, alongside more collaborative and effective decision-making and service delivery between local authorities in county areas. This new approach could therefore have significant opportunities for how we manage strategic planning matters and make decisions around priorities and investments, especially where these cross local authority boundaries or where there are different tiers of local government involved.

This report therefore takes the established CCN/CRA proposal for strategic planning set out in Box 1 as its starting point and focuses on what the options are for taking this forward in order to secure a more effective approach to governance and decision-making. It aims to provide a solution to the existing problems identified in Section 3 of this report but also to facilitate a positive approach to growth that can help deliver national priorities through strong strategic leadership at the local level.

Key components of the study include:

- (1) A review of current strategic planning practice across England in relation to existing partnership arrangements through a series of roundtable and 1:1 discussions with senior local politicians and officers, governance experts and stakeholders (see Section 2 of this report).
- (2) A survey of CCN members on planning reform which also provided an audit of members' views on a range of related issues such as ambitions for housing, the state of infrastructure and permitted development rights (see Annex 4 for the full results of the survey).
- (3) A better understanding of why a new approach to strategic planning governance is needed and what problems this is trying to solve, building on current practice where possible.
- (4) Identification of core functions and responsibilities that should be included in any strategic planning governance arrangements aimed at delivering an integrated approach to sustainable growth.

(5) The need to ensure that the proposed arrangements can work within the different local government structures across England, particularly two-tier local authority areas. It also considers mayoral combined authorities or other distinct governance structures (e.g. in London) and any potential reforms as a result of the forthcoming Government White Paper on Levelling Up. The proposed model will have to be resilient to changing roles and responsibilities of individual partners over time, providing stability to deliver transformation over the long term.

(6) The need to take account of the Government's overarching ambition for the planning system which is to keep it simple and transparent, and to support faster delivery of local plans.

(7) The need to reflect other existing and emerging national policies and legislation, such as the Environment Bill and national infrastructure priorities, and the emerging trend of different government departments thinking more strategically around places as opposed to specific functions.

Section 2 of this report examines the case for change, exploring current practice and the issues identified in relation to governance and decision-making. Section 3 sets out a proposed model which attempts to address many of the current weaknesses in the system by providing clear accountability for strategic planning decisions. This will not be the only option available but it offers a credible and effective solution to deliver the outcomes the Government is seeking for both planning reforms and levelling up the country. It is also a model that could be introduced relatively quickly as it does not rely on changes to primary legislation and could build on established relationships through existing strategic partnerships. Unlike other potential planning based solutions that would need to be taken forward through the statutory planning system, it offers a more systemic and flexible response to the Government's wider sustainable growth agenda, where statutory planning will play a key role in delivery but would be part of a more integrated approach to growth.



Box 1: Proposals for a new and effective approach to strategic planning

The proposed approach set out in Planning Reform and the Role of Strategic Planning (October 2020) was based on three main components:

(1) **New powers placed on all local authorities to support sustainable development** with specific duties to demonstrate how local areas are supporting key national objectives, especially around housing delivery; facilitating green and inclusive growth; improving overall health and wellbeing; addressing the challenges around climate change; and levelling up regional socio-economic disparities. This would be used to demonstrate compliance with the new Sustainable Development test for local plans which was proposed in the White Paper.

(2) **The designation of new Strategic Planning Advisory Bodies (SPAB)** appointed by the Secretary of State for each strategic planning area. This was to ensure that any national level decisions made on planning, particularly on the scale and distribution of growth, were properly informed by the local context and by those democratically accountable for delivery through the statutory planning system.

(3) Preparation of **Integrated Strategic Frameworks and Delivery Plans** by local authorities in collaboration with key strategic partners for each strategic planning area (covered by the SPABs). This would play a key role in guiding development plans, particularly in testing the most appropriate spatial strategies but would not form part of the statutory development plan to allow a more flexible and responsive approach to supporting growth over the long term. The ten year rolling Delivery Plan would set out what strategic interventions (including any specific delivery vehicles) would be needed to implement the framework, when these interventions should be delivered and how key partners are contributing to the shared vision and objectives.

2. The Case for Change

Since 2011, choices about the location of housing, transport and jobs have relied largely on voluntary cooperation through the Duty to Cooperate. Whilst many LPAs have managed to successfully comply with the Duty, it has proved to be a relatively weak, process-driven mechanism and has resulted in unsustainable patterns of development, contrary to the main purpose of the planning system[4] as well as slow progress in plan-making in many areas. Joining up spatial and infrastructure priorities has been a particular issue in two-tier areas where county councils have no spatial planning responsibilities, and also around many city regions where the core city is reliant on neighbouring LPAs to meet many of their development needs. In 2016, the government appointed Local Plan Expert Group concluded that:

“ local plans are rarely coordinated in time and, whilst the Duty to Cooperate may encourage joint working between pairs of authorities, it is not sufficient in itself to generate strategic planning across wider areas..... Apart from calls to revise SHMAs, the call to facilitate strategic planning was the most frequent point made by respondents to our consultation – respondents in both the public and private sector – who recognise that some issues of agreeing the distribution of housing needs may prove intractable without a wider plan.” [5]

More recently, Parliament’s Housing, Communities and Local Government Committee has also reflected the challenges of delivering strategic priorities but specifically through the lens of the role devolution has been playing to support growth. In its progress report on devolution[6] the Committee identified the short term focus and availability of funding streams to support growth, fragmented responsibilities across local government and the siloed culture across government departments as barriers to sustainable growth. The report therefore includes a recommendation for spatial planning powers to be included in a devolution framework for combined authorities and local government.

The Government’s proposed approach to planning reforms, set out in the White Paper, was an attempt to solve some of these problems but it did so by creating others. In a recent survey carried out by CCN of its member authorities in relation to the proposed planning reforms (see Annex 4) 58% were either not at all confident or not confident that the proposals in the White Paper would achieve the aim of ‘creating a simpler, faster and more modern planning system, ensuring homes and infrastructure can be delivered more quickly’. Key concerns identified in the survey were the loss of democratic accountability and increasing pressures on infrastructure. Nearly all respondents to the survey were concerned that the reforms would lead to a ‘loss of local democratic oversight’ and a ‘loss of meaningful community involvement’. In response to questions about pressure on local infrastructure as a result of housing development in their area, the majority said it was already under ‘excessive pressure’ and that the infrastructure funding gap was severe.

Despite the limitations of the current system, many local authorities recognise the value in working together across boundaries and have attempted to supplement this by either developing new style joint strategic plans through the statutory planning system or collaborating on strategic frameworks progressed outside of the planning system. Key drivers for this have been:

- To provide a **larger geographical canvas** for testing spatial options with the aim of directing growth to the most sustainable locations, particularly where there are significant constraints (e.g. due to Green Belt, national environmental designations or infrastructure capacity) and where a transformative approach to growth is sought.
- To help **integrate spatial priorities better with wider economic, environmental and social policies**, particularly where strategic partners have a role to play in facilitating sustainable growth.
- To provide a **more efficient basis for managing funding** across different partners and funding streams, particularly to support delivery of strategic growth locations and infrastructure.
- To **address resource and skills challenges** within the public sector.
- To provide a **stronger leadership model** for supporting growth and accessing funding.

The three main strategic planning models that have emerged over the last decade are Joint Strategic Plans (JSPs) and combined authority Spatial Development Strategies (SDS), both of which form part of the statutory development plan alongside local plans, and non-statutory growth frameworks (see Map in Annex 3 and Box 2 below). Although the first two are delivered through a statutory process and all three models are considered to provide a more effective basis for managing strategic priorities than the Duty to Cooperate, they are all considered to have weaknesses to varying degrees, largely as a result of the governance arrangements underpinning them and the decision-making process.

There are two other strategic planning models currently being used, both of which are being developed through partnerships but have a single decision-maker. The London Plan is a spatial development strategy like those being progressed by MCAs and is underpinned by its own legislation^[7]. However, unlike MCAs, the London Mayor is ultimately responsible for the plan with the Greater London Authority playing a scrutiny and challenge role. The Oxford-Cambridge Arc Spatial Framework currently being prepared by Government, will not form part of the statutory development plan but will have national policy status, sitting alongside the national planning policy framework (NPPF). The Government will therefore ultimately be responsible for any decision-making.

Box 2: Existing Strategic Planning Models

(1) Joint Strategic Plans (JSPs)

Although there have been provisions within the statutory planning system for joint plans since 2004[8] most cover relatively small spatial areas and are not necessarily considered to be either strategic in nature or sufficiently ambitious. A new breed of joint ‘strategic’ plans has therefore emerged over the last five years. These are long term, high level investment plans covering larger sub-regional geographies and providing a framework within which more detailed local plans will be prepared. However, of the five initial JSPs being prepared in England, only three are currently being progressed[9]. Although the provisions of the 2004 Act allow for joint decision-making structures (S29 joint committees), these are considered to be too restrictive, especially as they cannot be used where there are both county and unitary councils involved. None of the JSPs currently being progressed therefore have joint structures, with decisions at each stage in the process resting with each individual LPA (county councils have no decision-making role in JSPs).

(2) Combined Authority Spatial Development Strategies (SDS)

Agreement to prepare an SDS is set out in bespoke legislation underpinning the roles and responsibilities of each individual Mayoral Combined Authority. As such, only two are currently being prepared, for the Liverpool City Region and for the West of England[10]. Unlike JSPs, there is a single body responsible for decision-making, the combined authority, but there still has to be unilateral agreement from all local authority partners. As with JSPs, the need to build in consensus impacts on both the time it takes to prepare the SDS and the final outcome, with the level of ambition potentially watered down.

(3) Non-Statutory Frameworks

As a result of the restrictive nature of the statutory options for managing strategic planning, an increasing number of local authorities are working together to prepare high level growth frameworks outside of the statutory development plan system, although local plans play a major role in delivery. These are more common in two tier areas where there is a need to align the different areas of responsibility for supporting growth of counties and districts. In some cases, these are focused on strategic infrastructure priorities but in other areas a more holistic ‘place-based’ approach to growth is being taken. As with the other models, these are based on consensus but unlike SDS and JSPs, they are not part of the statutory development plan system and therefore have less material weight given to them in the local plans.

The governance arrangements around most of these approaches is based on a partnership model which includes all the relevant local authorities and, in most cases, the key strategic partners such as local enterprise partnerships (LEPs), local nature partnerships (LNPs) and sub-national transport bodies (STBs). Increasingly, these are operating as ‘growth boards’ to help align the local planning priorities and deliver strategic scale developments and infrastructure. In most cases these have emerged as a result of receiving government funding, for example Growth Deal or City Deal funding. Although some, like the Oxfordshire Growth Board[11], have matured into formally constituted joint committee with some joint decision-making functions, the formal role of those partners outside of local government is very limited.

Following a review of current practice with key people within local authorities, partner organisations and experts in strategic planning and governance (see Annex 2), a number of common themes and problems have been identified across all three current models of strategic planning.

Fragmented governance arrangements and decision-making

Planning for growth (and the planning system generally) is considered to be the biggest challenge impacting on central/local government relationships. The general view is that the Government’s approach to Localism has not been managed effectively, resulting in a lack of clarity around accountability for some of the most difficult and politically contentious decisions, such as housing numbers and distribution of growth across the country. This has been particularly challenging in two-tier areas and where there is a combined authority involved with a split in responsibilities for spatial planning and strategic infrastructure. It has also not been helped by the increasing number of organisations and bodies created over the last ten years to support different aspects of growth, causing confusion around roles and responsibilities.

The Government’s focus on housing delivery (and housing numbers as a measure of success) as the main priority for supporting long term sustainable growth is considered to be increasingly outdated and misaligned with the more rounded approach of local government (and strategic partners). Attention within local government is shifting away from housing exclusively to some of the other national challenges around building climate resilience, addressing economic and social disparities, improving health and wellbeing and dealing with the economic recovery. Again this is reflected in the CCN survey with 96% of respondents concerned or very concerned that the proposed planning reforms would lead to a ‘focus on housing numbers over infrastructure and wider place-making’.

Coordination of priorities

'Institutional messiness' is impacting significantly on the effective coordination of long term priorities, with a lack of accountability at both the national and local levels for an integrated solution to growth. The complexity of organisations involved in strategic planning within the Oxford-Cambridge Arc has already been identified by the Government as a major barrier to the effective delivery of long term sustainable growth[12] but this is also a barrier in many other areas. There are simply too many organisations involved in both planning for and delivering growth, many of which work across different geographical areas and have different, often competing, priorities. This is further frustrated where there is a two tier local government system in place, with county and district councils having different responsibilities for supporting place-based growth. This is resulting in misaligned investment decisions; a lack of proper sequencing to ensure development and infrastructure is delivered in the right order; and short term decisions being made in the absence of a long term strategic framework, with development often directed to the wrong place or the 'least-worse' place.

Although there are considered to be some strong relationships between individual government departments and their respective local government departments (particularly on transport), the lack of a single accountable department for ensuring integration across the different government functions and on their respective priorities is having a significant impact on local government's ability to join up long term spatial priorities with wider transport, energy, environmental and other infrastructure priorities. The newly redefined Department of Levelling Up, Housing and Communities may help address this.

Fragmented governance

The fragmentation of governance structures is also hindered by the silo culture across tiers of government and government agencies, which is making co-ordination around place-based growth difficult. The statutory planning system has been doing all the heavy lifting around growth over the last ten years and split functional responsibilities is resulting in territorial tensions with no clarity around who owns the growth agenda. Strategic planning (and delivery) needs to cut across institutional barriers and parochial responsibilities to work effectively and it needs to be championed and managed corporately (including within central government) to ensure effective integration of policies and priorities.

Current strategic partnerships are often focused on short term issues and on delivery and are not addressing the longer term challenges where some big decisions are urgently needed but have been put in the 'too difficult' box. A strong focus on delivery can help strengthen partnerships around a common purpose, especially if tied together through a deal with financial benefits for all partners. However, this is resulting in an imbalance between getting things delivered on the ground and planning for the future to ensure investment is being deployed now in order to address some of the longer term challenges. This is not helped when the business planning activities of many (central and local) government departments, agencies and other stakeholders, especially utilities companies and providers, have a short term focus and do not take account of what is needed to deliver in the longer term. This is further impacted by Government's bias towards funding delivery through both deals and competitive funding pots, and not properly resourcing forward planning activity, especially strategic planning.

Scale of growth ambition

There is often no common understanding or agreement around the scale of growth ambition, what the added value of working together is and what the individual roles and responsibilities are. There is currently no robust framework and collective vision holding partnerships together in many areas. Growth and devolution deals are providing a framework to bind some partnerships together but strategic planning is not given sufficient profile in many of these, resulting in a fragmented approach to planning strategy and delivery. Clarity is needed around what outcomes are expected and why a different approach to decision-making is needed to secure these and particularly, what can be achieved through the partnership that cannot be achieved individually. This helps to diffuse some of the politics around growth and can ensure all technical work is aligned to deliver the same outcomes. But it must not be seen as just problem solving as the benefits and positive outcomes from working together towards a common purpose must also be obvious.

Funding

The fragmented approach to governance arrangements with disparate funding pots to facilitate growth is impacting on alignment of investment programmes and resulting in significant inefficiencies in the use of public sector funding, particularly for infrastructure. There are very few partnerships that pool funding and deploy this strategically due to the complexity around public sector funding at the national, sub-regional and local level. This is even more challenging in two-tier local government structures, or where combined authorities are involved, where spatial planning decisions are being made separate to strategic infrastructure investment decisions. Fiscal accountability needs to be streamlined, especially where funding is being negotiated through any deal with Government but more fundamentally, the disconnect between who raises infrastructure levies and how these are invested locally needs to be addressed through a more strategic and joined-up approach across local government.

Communication

Complex governance arrangements and decision-making processes, with too many voices and no shared vision are also resulting in poor communications, both externally across partnerships and internally within individual organisations, with a knock-on impact on the speed that the shared ambition for growth is implemented. A robust governance model requires good internal and external communications with consistent messaging across the partnership. It is also vital within individual organisations (vertically and horizontally) to ensure everyone knows what is going on and understands where they fit in. Local councillors who are not directly involved in setting the strategy should be fully informed as they will be expected to support it and can potentially do the most damage if they are not taken along with the strategic leadership, as was recently experienced in Greater Exeter.[13]

Limited support structures for strong strategic leadership

The lack of leadership at the sub-regional level with clear lines of accountability for strategic planning and investment decisions in many parts of England means that there is no single point of contact for joining up national and local priorities to support sustainable growth. There is generally support for a more effective sub-regional governance structure where this does not already exist, as with combined authorities. However, even where this does exist, there is often confusion around areas of responsibility for supporting growth and too many competing priorities between the different tiers, especially in relation to infrastructure investment.

Even where there is a governance structure with strong strategic leadership at its core, it is still considered to be too difficult to make some of the necessary, but often locally unpopular, decisions needed to address some of the country's greatest challenges, especially around climate change, economic recovery and development needs. Recent experience in Greater Manchester clearly demonstrates this, with work on developing the Greater Manchester Spatial Framework being abandoned after years of progress as a result of one local authority partner pulling out because of the decisions around housing distribution.[14]

Although the current consensus politics model used to manage strategic planning (whether part of the statutory planning system or not) is aimed at being inclusive with all partners having a voice, it often results in decisions based on lowest common denominator with the final outcome watered down to keep all partners satisfied. This is very unlikely to secure the scale of ambition needed to tackle some of the very challenging issues where decisions need to be made in the interests of the greater good and for the longer term. Even where the partnership is formally constituted through a local government joint committee structure such as a growth board, the involvement and therefore ownership of strategic partners is limited due to the lack of any voting rights.

Most strategic partnerships are based on voluntary collaboration around a shared set of mutual benefits which helps ensure that no single body is responsible (or is blamed) for politically difficult decisions. However, strong leadership is necessary to see the bigger picture and to make the challenging decisions needed to deliver transformation of an area over a long period of time. Too often the brave (political) decision-makers at the local level make themselves vulnerable and end up losing their position through either internal leadership challenges or through elections. Therefore, there needs to be a governance structure that, as far as possible, ensures mutual benefits for all partners, albeit to varying degrees, but also provides more stability of administrations in individual councils, especially if the benefits for communities (or some partners) are not immediately obvious or tangible.

Gaps in strategic planning resources and technical capability

There are very few dedicated strategic planning resources within local authorities, therefore any work to support this activity draws heavily upon already constrained resources. There is a strong view that local government is doing as much as it can to support growth and deal with immediate challenges around the economic recovery within a system that is fragmented and where councils have been stripped of resources, especially over the last ten years. This is having a particular impact in two-tier areas where the districts' priority is individual local plans and counties are not directly funded to support spatial planning activities.

The lack of specialist resources is not helped by the fact that there is considered to be a general lack of understanding across all tiers of government (and strategic partners) about what strategic planning is as an activity and therefore what skills and resources are needed to support it. Since the demise of regional planning and county structure plans before that, there has been a significant loss of strategic planning capacity and technical capability across all tiers of government. This has led to a loss of experienced strategic planners that are capable of 'systems thinking' and acting as the ringmasters around the different functions that ensure an integrated approach to both the planning for and delivery of sustainable growth.

The reliance on LPA resources is not helped by the fact that most are focused on housing delivery and development management functions to ensure that they do not fall foul of government imposed sanctions. The result of this is that strategic planning is usually considered as an 'add-on' to the core function of local authorities and is therefore not considered a priority.

The limited availability of strategic planners and dedicated resources also means that the shared technical evidence base needed to support sustainable growth and ensure that all spatial options are fully explored and can be delivered, is often restricted, with a knock-on impact on investor confidence. An effective approach to strategic planning for growth requires a robust technical evidence base to help expose choices and test alternative strategic solutions for meeting the shared outcomes. This is particularly important where the statutory planning system is to play a key role in delivery. However, the lack of dedicated funding resource in most areas and increasingly competing pressures to support other local government functions (especially in upper tier authorities), has resulted in strategic planning activities being pushed further and further down the list of priorities.



3. A New Approach to Decision-Making & Governance

The approach set out in this section builds on both the objectives of a better, more effective and efficient strategic planning system and on the evidence provided from current experience and practice (set out on the previous section of this report). There are therefore two key intended outputs; the first is to achieve administrative efficiency, with all strategic partners involved and investment priorities aligned; and the second is to deliver good sustainable development outcomes in terms of overall quality of life, economic performance and addressing the challenges of climate change. The proposed new approach has therefore been developed around the following guiding principles:

- **It should provide an adaptable model** capable of responding to the different local government structures across England and the role the area plays in delivering national priorities (as in the case of the Oxford-Cambridge Arc[15]).
- **It should be inclusive and collaborative**, acknowledging the different roles and responsibilities of partners involved in supporting sustainable growth.
- **It will require strong strategic leadership** at both the political and technical level, with clear accountability for policies, investment priorities and funding. In the interests of transparency and good governance, the decision-maker should be open to scrutiny and challenge, both internally and externally.
- **It should be based on a clear mandate for the decision-maker** to develop and deliver strategic planning priorities with the specific arrangements for each area agreed through a contract (or deal) between local and central government and strategic partners, where relevant.
- **It will require clear accountability at the central government level** for the role that both government departments and national agencies need to play in supporting delivery of the strategic planning priorities in each area.
- **It should provide a stable and responsive governance model** for delivering a shared long term vision, which can adapt over time as the roles and responsibilities of individual partners change.
- **It should fill a gap in existing structures** by streamlining fragmented governance arrangements as opposed to fundamentally changing responsibilities, including local planning responsibilities. As such, it should also be based on the principle of subsidiarity with decisions made at the appropriate level.
- **It should be based on a ‘whole systems’ approach to facilitating growth**, with functional priorities and policies aligned both vertically between tiers of government and horizontally across different functional responsibilities.
- **It should support a faster and simpler local planning system**, with key decisions made through the local democratic process and a more streamlined plan-making and testing process.
- **It should be managed at a spatial scale that is capable of implementing national policies and priorities but can also sufficiently reflect local context and circumstances.** Where possible, this should reflect the administrative geography of local authorities working together to deliver a County Deal to help align priorities around growth.

- **It should be properly resourced** with the sufficient strategic planning capacity and the right (multi-disciplined) skillset.
- **It should be capable of being delivered quickly** to help tackle the immediate national challenges around climate change, economic recovery and housing delivery and should, therefore, build on existing partnership structures with mature relationships already established, where possible.

Taking all of this into account, the proposed model set out in Figure 1 below comprises two simple components; a **body accountable for strategic planning** decisions and a representative **advisory and challenge body**.

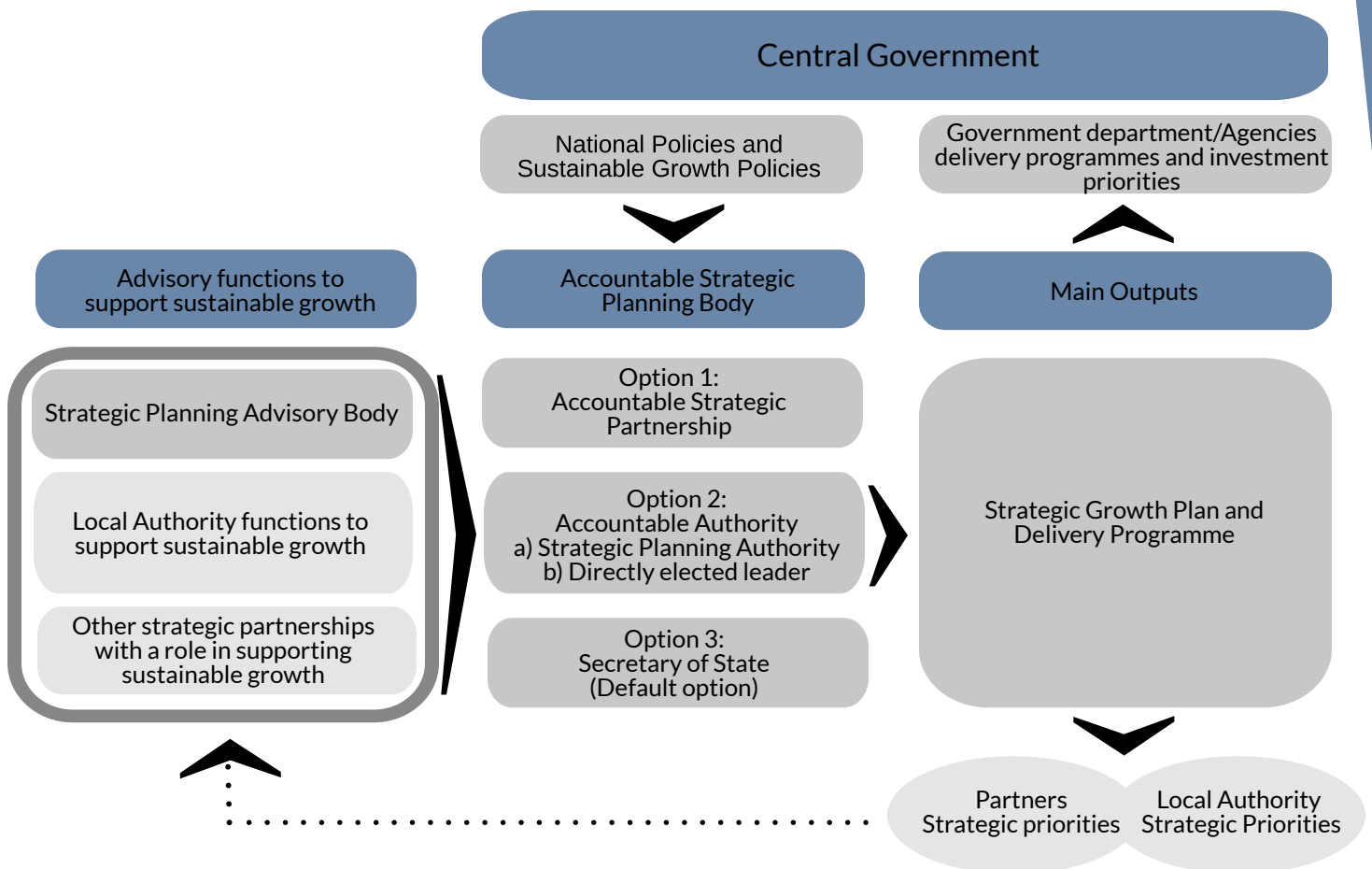


Figure 1: A new approach to strategic planning decision-making and governance

Accountable Strategic Planning Body

The accountable strategic planning body would have ultimate responsibility for strategic planning and would therefore have to be designated by the Government for this purpose. Designation would be agreed through a contract for that specific purpose or through a wider deal to support devolution, including any potential County Deal. This should also set out the geographical extent of responsibilities, with a clear strategic planning area agreed.[16]

There are considered to be three main options which would comply with the ‘guiding principles’ set out above (see Box 3). Options 1 and 2 would ensure that decision-making responsibility ultimately lies with those that understand the local context and circumstances and can therefore implement national policy and priorities in a way that reflects the different needs across the country. Option 3, where the Secretary of State would have ultimate responsibility for key issues such as spatial distribution of growth and housing allocations, should only be considered either as a default option when there is no agreement across the relevant local authorities on an alternative option or where the strategic planning areas is of national significance, as in the case of the Oxford Cambridge Arc.



Box 3: Options for Accountable Strategic Planning Body

Option 1: Accountable strategic partnership with responsibility for strategic planning either formalised through a deal or other bespoke contract between the relevant body and central government. This would operate on the principle of ‘majority voting’ with the chair having the casting vote. This would provide a stable governance structure as it is not dependent on one single person or authority and therefore can survive changes to individual partners over time as the long term vision is delivered. This also provides a governance structure that allows the ‘minority voices’ within the partnership to be heard and their views protected.

Option 2: Accountable Authority

(a) Strategic Planning Authority where accountability would sit with one single authority which would be the relevant upper tier authority. Where more than one upper tier authority is involved, the Government would designate a specific one to take on this role, following discussion with the relevant authorities or Option 1 would apply. In the absence of any wider reforms to the planning system, the strategic planning authority should be designated through a formal bespoke contract between the local authorities and central government or through a devolution deal.

(b) Directly Elected Leader (e.g. Mayor) with responsibility for strategic planning formalised through the relevant devolution deal with Government. The only current example of this is the London Mayor who is individually accountable for the spatial development strategy for Greater London (the London Plan).

Option 2, particularly 2(a) would provide a stable structure for delivery of the long term ambition but would be heavily reliant on the role of the strategic planning advisory body (see Paragraphs 3.6 below) to ensure that all local authorities affected by the decisions own the vision and play their part in delivery, especially in two tier areas where the districts have a statutory planning role.

Option 3: Secretary of State which should be considered as the ‘last resort’ and default position where the relevant local authorities choose not to participate in Options 1 or 2 or where there is a case to be made for direct Central Government responsibility, as is currently proposed for the Oxford-Cambridge Arc Spatial Framework.

The main purpose and core functions of the ‘accountable strategic planning body’ would be agreed between the relevant local authorities and the Government either as part of a wider deal to support growth or through a bespoke contract specifically related to strategic planning. Although there will have to be a degree of flexibility in the form and function of the accountable body (and the SPAB referenced in Paragraphs 3.6 and 3.9) there should be some core functions common to all, as follows:

(1) Preparation of an evidence -based **Strategic Growth Plan**[17] setting out long term spatial, economic, environmental and infrastructure priorities including:

- Clearly articulated long term ‘Vision and Objectives’ for the strategic planning area;
- A spatial strategy which sets the spatial distribution of growth and housing allocations for each local planning authority area;
- Strategic growth areas such as new communities or major regeneration areas;
- Strategic infrastructure requirements; and
- Other strategic interventions to deliver national and sub-national priorities, for example, to address climate change and economic growth.

(2) The Strategic Growth Plan would be a **material planning consideration**, albeit not part of the statutory development plan system (unless delivered through either a Joint Strategic Plan or Spatial Development Strategy – see Paragraph 3.4) but would need to have sufficient status as to have traction on local plans and investment priorities of partners, including sub-national Transport Bodies and national delivery agencies. As such, consideration should be given as to whether it should form part of a suite of national policy documents (on the same lines as the Oxford -Cambridge Arc Spatial Framework) or be a statutory requirement of the designated decision-maker, which would need to be underpinned by legislation.

(3) Preparation of a **Strategic Delivery Programme** setting out roles and responsibilities of key delivery agencies authorities (e.g. statutory development plans, local transport plans, climate change strategies, economic strategies, local nature recovery plans). This should include the establishment of any necessary delivery vehicles such as locally led development corporations. The Delivery Programme would have to be agreed with central government to ensure government departments and agencies are aligned in their priorities and can be held to account.

(4) **Fiscal Accountability** for strategic growth and infrastructure funding required for the Delivery Programme. This should include clear identification of links to the corporate strategies of infrastructure and other funding bodies (as above) and a proportion of developer contributions secured through the planning system[18].

(5) **Monitoring and Risk Management** of the Delivery Programme with annual reports on progress signed-off by the SPAB (see below) as part of its scrutiny and challenge function and by central government.

Strategic Planning Advisory Body

In order to ensure that the strategic growth plan is prepared collaboratively and engages the expertise and resources of all relevant competent stakeholders (from public, private and civic society), a Strategic Planning Advisory Body (SPAB) would be appointed by the designated decision-maker to undertake the functions set out on page 23 which cannot be carried out internally. These should be set up in a way that complements and does not duplicate the established advisory bodies/ partnerships supporting sustainable growth e.g. covering economy & skills, health and well-being, climate change, infrastructure.

Each SPAB would be formally constituted and should include all relevant local authorities within the strategic planning area (including National Park Authorities) and other public bodies with strategic statutory responsibilities (e.g. for infrastructure provision). They should build on existing partnerships where possible, having regard to established relationships and levels of trust between partners. However, the scope and membership of existing partnerships should be reviewed or redefined to ensure ‘form follows function’ and bring in new partners where they are needed. Although they operate in a non-executive capacity for any functions related to strategic planning (which could include advisory role for individual partners), core functions for all SPABs should include the duty / responsibility in terms of the matters set out at page 23, and in particular:

- (1) To test and advise the designated decision-maker on the spatial options needed to deliver the overarching shared Vision and Objectives, including distribution of growth and housing;
 - (2) To set out strategic infrastructure and development priorities (e.g. strategic scale expansions or new communities) and identify where any review in principle to Green Belt boundaries or other national level designations will need to be managed through the statutory development plan process;
 - (3) To advise the accountable body on wider regional and national spatial and infrastructure priorities, including those of the National Infrastructure Commission;
 - (4) To monitor ‘general conformity’ of local plans/strategic planning applications with the Strategic Growth Plan;
 - (5) To perform the ‘challenge and scrutiny’ function, ensuring that the strategic growth plan and delivery programme is in line with the shared vision and objectives;
- Consideration should be given as to what sanctions could be imposed on the accountable body where there is does not happen.

The model of choice for each strategic planning area would depend on its particular circumstances. In some cases, existing structures and responsibilities may have to be reviewed to ensure that they are fit for purpose, including whether the right partners are involved in either the relevant decision-making body or the SPAB. Membership should be reviewed periodically to ensure that all parts of the governance structures remain relevant within the current context. There may be organisations or bodies that play a key part in setting the long term priorities and/or in delivery of the shared vision but operate on a different (larger) geography, such as Local Enterprise Partnerships and Sub-national Transport Bodies (or in the specific case of the Government’s emerging Oxford-Cambridge Spatial Framework). It will therefore be important for the accountable bodies and their SPABs within these geographies to work together to ensure investment and other priorities are aligned.

In relation to existing Mayoral Combined Authorities (MCA), where there is already agreement to prepare a Spatial Development Strategy (see page 21 and Box 2 on page 25), the decision-making responsibility should be moved from the Combined Authority to the mayor (as in the case of London), with the Combined Authority acting as the appointed SPAB. Where the MCA has not agreed any strategic planning functions as part of the devolution contract, the relevant local authorities and Mayor should consider whether an amendment is needed to allow the Mayor to take on this function or whether an alternative approach is needed. This is likely to be a particular issue in some of the larger MCA areas where it may be more appropriate to have a small number of strategic planning ‘building blocks’ and decision-makers across the region, reflecting the different functional relationships both within the region and with adjacent areas.

Relationship to central government

Central Government departments and agencies have a critical role to play in supporting long term sustainable growth. If the current fragmented approach to growth is to be improved through a more streamlined system from national down to local level, there will need to be much clearer responsibility for co-ordinating and integrating investment priorities across government. In short, the relationship between central and local government needs to be reset to ensure co-ordination across the relevant departments and to hold government delivery agencies to account in terms of their role[19].

Strategic planning resources and capability

One of the key issues that emerged during the course of the discussions examining current practice was the significant lack of strategic planning capability, not just in terms of resources (i.e. people) but also in terms of experience. Professional planners are very much involved in all strategic planning activity, acting as the ‘ringmaster’ to bring all the different functions supporting growth together and providing the strategic thinking in terms of high level and long term. However, strategic planning also requires a multi-disciplined approach to ensure that all the different facets of sustainable growth are included. Since the demise of regional planning in 2011 and structure plans in 2004[20], there has been a significant loss of specialists, which has not been helped by the fact that strategic planning is not identified as a specific function of the planning system and therefore has no dedicated funding. In two tier areas, many of the county councils have retained a small resource but any support given to the LPAs is provided without charge.

Any new arrangements to support strategic planning must therefore be properly resourced or this function will simply continue to be treated as an ‘add-on’ to the already constrained resources within local authorities. As there is unlikely to be any ‘new’ money available, resources will need to be managed from existing funding streams but should also form a core part of any negotiations around a devolution or county deal. Past experience has shown that any additional costs in funding a strategic planning service is more than off-set by:

- Cost effective investment decisions through coordinated action;
- The additionality from investment being better located in terms of its socio-economic and environmental benefits (e.g. promoting modal shift to more sustainable forms of transport or reducing the rate of urban expansion and greenfield loss);
- Harnessing contributions from development through strategic arrangements; and
- More efficient use of time and resources - time in terms of transaction costs and speed in processing major planning applications.

As well as the need for strong political leadership, strategic planning needs strong officer leadership, someone with the right competencies, skills and status to successfully bring all the different people and organisations together. This will help ensure an integrated approach and with sufficient authority to work effectively with senior government officials and politicians and give the right level of advice and support to the decision-maker.



Recommendations

Recommendation 1

That in the short term (6 – 9 months) the Government implements new arrangements for strategic planning as part of its ambitions for ‘levelling up’ the country and addressing the immediate challenges around economic recovery and housing delivery by:

(a) Ensuring that new strategic planning functions and the governance arrangements underpinning these are included in the future Planning Bill. In the short term, the new arrangements could be piloted through future devolution deals (or national framework for devolution in the forthcoming Levelling Up White Paper), with the designated accountable and advisory bodies for each area agreed between central and local government.

(b) Making changes to the National Planning Policy Framework (or other relevant national policy framework) to set out the scope and status of strategic growth plans. This should include clear reference to the relationship with local plans and how they should be taken into account in strategic applications, and other plans and strategies which have a spatial context (for example Transport Strategies prepared by Sub national Transport Bodies or specifically, the Oxford-Cambridge Arc Spatial Framework).

(c) Allowing flexibility in terms of what form the strategic growth plan takes (e.g. Joint Strategic Plan, Spatial Development Strategy or non-statutory growth framework) to enable existing joint working arrangements to be used as the foundations of the new approach and for progress to be quick. However, these should be reviewed to ensure that they are meeting the minimum requirements prescribed nationally - see 1(b) above.

(d) Requesting that all local authorities agree what strategic planning geography they will work across and confirm this with Central Government within six months (or this will be decided by the Secretary of State). The geographical extent of strategic growth plans should be large enough to translate and implement national policies and investment priorities but small enough to reflect local context and circumstances. Where a ‘County Deal’ is being implemented, the strategic planning geography should be the same as that adopted in the delivery framework – see (e) below for combined authority areas.

(e) Agreeing with the relevant local authorities and mayor in a combined authority area, the geography for the strategic growth plan(s) and who the accountable strategic planning body should be (i.e. the strategic planning geography does not necessarily have to reflect the combined authority’s area of responsibility and the accountable body does not necessarily have to be the combined authority).

(f) Including strategic planning capacity and skills as a specific function in the Government’s proposed skills strategy (as trailed in the Planning for the Future White Paper) with further consideration to be given to how this function will be resourced in future.

Recommendation 2

That CCN supports its members and the wider local government sector in testing and refining the proposition for new strategic planning arrangements and decision-making responsibilities set out in this report, within the parameters of the Guiding Principles set out at page 19.

Recommendation 3

That in the longer term, the Government considers whether there is a need to strengthen the approach to strategic planning through legislative changes and specifically, to formalise the introduction of both the accountable strategic planning bodies and strategic planning advisory bodies. Consideration should also be given at this time as to the status of strategic growth plans and particularly whether they should form part of the statutory development plan system or be elevated to statutory status (outside the planning system).

EXECUTIVE SUMMARY: PLANNING REFORMS AND THE ROLE OF STRATEGIC PLANNING (October 2020) [Zooming Out: The Benefits of Strategic Planning - County Councils Network](#)

[**Note:** This was written in response to and within the context of the proposals and reforms to the planning system set out in the White Paper, Planning for the Future.]

The Government is proposing fundamental changes to the current (English) planning system with the ambition to make it simpler, faster and more predictable, as well as being capable of delivering 300,000 new homes annually. The new system is to be introduced through consolidated legislation and changes to national policy, with the expectation of 100% up to date local plan coverage by the next General Election in 2024. The current proposals for reform, as set out in the White Paper Planning for the Future, include replacing the Duty to Cooperate which has been the main mechanism for addressing strategic (cross boundary) planning matters since the revocation of statutory regional planning in 2011. The Government recognises that the Duty has failed to deliver good planning outcomes, despite various attempts over the last few years to make it more robust, but no specific replacement solutions are proposed.

The County Councils Network (CCN) has long been arguing for a more effective approach to strategic spatial planning to support place-based growth, one that recognises the wider roles of local government beyond local planning and ensures that infrastructure funding, timing and delivery is managed in a way that supports sustainable growth. CCN is not a lone voice; there has been a considerable amount of research undertaken since 2011 with the same conclusions reached, especially in relation to planning for housing, employment and infrastructure.

At the same time as the Government is proposing a radical overhaul of the planning system, there is likely to be reforms to local government responsibilities and structures, as a result of the Government's devolution agenda. Although the detail of this is not yet known, an increase in the number of unitary authorities and mayoral combined authorities is anticipated.

The scale of change to the planning system together with possible changes to local government, offer a window of opportunity to ensure that spatial planning plays an integral role in supporting long term sustainable growth but also in addressing the immediate challenges around the economic recovery, as the country potentially heads into one of the worst recessions experienced. But the full potential of the planning system to do this will not be realised without an effective solution to strategic planning, one that reflects the wider, pivotal role of planning at the strategic scale. Any new arrangements must therefore provide a mechanism for stronger, collective place leadership around a shared vision and narrative; a framework for prioritising and managing the strategic interventions needed to support sustainable growth; and a robust basis for managing risks to delivery, providing stability through structural and organisational change and different political cycles, especially where transformation of a place is being implemented over a long period of time.

The proposals and recommendations set out in this report offer a way to strengthen the proposed new planning system, deliver new strategic planning arrangements that will support the Government's ambition for sustainable and green growth and could be implemented in the context of the current or changing local government landscape.

RECOMMENDATIONS

(1) CCN should work with other national organisations involved in supporting long term growth to **raise awareness of the critical and pivotal role that effective strategic planning arrangements could play in delivering the Government's overarching objectives** for a simpler, faster and more predictable planning system. A key outcome of this would be government recognition of the added value of spatial planning at the strategic level, bringing together the variety of different perspectives that are required to facilitate sustainable growth, supported by a more integrated approach across different government departments.

(2) **CCN should advocate a new approach to strategic planning which supports place-based growth** with long term spatial, economic, environment and infrastructure priorities fully integrated and investment strategies aligned; a robust delivery framework with clear, measurable outcomes demonstrating progress; and responsibility for delivering the new approach shared collectively across all local government structures (both counties and districts in two tier areas). The key components of the recommended new approach are:

(a) New powers placed on all local authorities to support sustainable development. The powers would replace (or complement) existing powers to promote wellbeing and should be linked to the proposed new government definition of 'sustainable development'. The powers would be effected by all local authorities, working collectively with strategic partners, through specific duties to demonstrate how local areas are supporting key national objectives, especially around housing delivery, facilitating green and inclusive growth, improving overall health and wellbeing, addressing the challenges around climate change and levelling up regional socio-economic disparities. This would also be used as evidence to inform national (and sub-national) funding allocations and to support the Government's proposed new single Sustainable Development Test for local plans. The core duties carried out by local authorities would be to act as designated Strategic Planning Advisory Bodies to the Government – see (b) below - and to articulate the shared ambition and how partners are expecting to implement it – see (c) and (d) below.

(b) Designated Strategic Planning Advisory Bodies (SPAB) appointed by the Secretary of State for each strategic planning area. This would be a statutory designation with specific responsibilities to advise the Government on local growth priorities and how these support national objectives, and on local plan housing targets, ensuring that different spatial strategies have been fully tested and can deliver specific sustainable outcomes. The form of SPAB would be flexible to reflect different governance structures across England but would have to comply with some nationally prescribed elements and be agreed by the Secretary of State. At a minimum, membership should include all local authorities (both counties and districts in two-tier areas) and combined authority mayor (where relevant), Local Enterprise Partnerships, Sub-national Transport Bodies and leaders from the environment and health sectors. The SPAB designation could be appointed to strategic partnerships with a role that goes beyond input to spatial planning, for example Mayoral Combined Authorities or Growth Boards. It is anticipated that there would be a SPAB covering all parts of England, with the area of geographical responsibility for each identified by the relevant local authorities (and would have to be agreed between counties and districts in two-tier areas) and approved by the Secretary of State.

(c) An Integrated Strategic Framework (ISF) prepared by local authorities in collaboration with key strategic partners. Although the ISF would be required (through legislation) for each strategic planning area (covered by the SPABs), it would not be part of the statutory development plan. However, ISFs would play a key role in guiding development plans, particularly in testing the most appropriate spatial strategies (including distribution of growth) for delivering the shared vision and objectives, and providing a framework within which the proposed new approach to local plan land allocations could be implemented (i.e. the Growth, Renewal and Protected Areas proposed in the White Paper). Key spatial proposals in the ISF would then be taken forward and tested fully through the planning process.

The ISF would also form the main evidence demonstrating how local authorities are meeting the new powers to support sustainable development – as set out in (a) above - with clear metrics to monitor performance against both national and locally developed objectives. ISFs would both inform and be informed by the strategic priorities in Mayoral Combined Authority Spatial Development Strategies (where relevant), economic strategies prepared by Local Enterprise Partnerships and transport strategies prepared by Sub-national Transport Bodies. Although the specific model used in each area could differ to reflect local context and circumstances, there should be some nationally prescribed components. The geography each ISF covers would be expected to align with the SPAB's area of responsibility.

(d) A ten year rolling Strategic Delivery Plan prepared as part of the ISF. This would set out what strategic interventions (including any specific delivery vehicles) would be needed to implement the framework, when these interventions should be delivered and how key partners are contributing to the shared vision and objectives. It would also provide a basis for infrastructure funding and other strategic investment prioritisation. There would need to be clear responsibilities and accountabilities set out for all partners involved, with a robust risk management system with associated review mechanism(s) to highlight where a change in approach or intervention may be needed.

(3) **CCN should work with its members, government departments and other key partners to test and refine the proposition** in 2 (a) to (d), ensuring that it provides a workable solution to strategic planning, supporting long term sustainable growth, and to ensure the right balance between national prescription and local flexibility.

(4) **Local and Central Government ensure that there is adequate strategic planning capacity and resources** (including at county level where relevant), acknowledging that strategic planning is an essential and specific function to support sustainable growth. This should be a key component of the national resource and skills strategy proposed in the Planning White Paper and should apply regardless of whether the Government accepts the need for new powers to support sustainable development or not, as set out in Recommendation 2(a).

The **main benefits** of the proposed approach set out in (2) above are:

1. **A workable solution to the strategic planning void** which will be left when the Duty to Cooperate is removed, providing parity of role across all tiers of local government and stronger ‘place leadership’ in supporting growth; an effective ‘ringmaster’ role for bringing together the key functions supporting sustainable development (including those beyond the statutory planning system); confidence in local delivery, particularly through the plan-led system; robust partnership foundations to help build investor confidence (public and private sector) due to shared long term vision and aligned investment priorities; and a resilient governance structure that can endure and respond to organisational and political change.
2. **A faster and more deliverable planning system** with reduced risk of challenge (locally and legally), especially in relation to distribution of growth and housing targets; a clearer framework for developing the area based approach set out in the Planning White Paper; and a single framework for identifying infrastructure priorities. Critically, the proposed planning arrangements could be put in place and initiated in advance of any required legislation (e.g. through a Ministerial Statement setting out the direction of travel) as the Integrated Strategic Framework would not be part of the statutory development plan.
3. **Alignment between local and national priorities** to deliver sustainable development (based on a national definition and set of indicators) with the strategic interface acting as a critical pivot between both and the right amount of national prescription around key functions and responsibilities (and framework for measuring progress and compliance), but with sufficient flexibility to apply different locally specific interpretations and responses.
4. **A clearer framework for allocating and prioritising national and sub-national funding** to support growth, with a more robust ‘outcome-focused’ approach to business cases/ project appraisal across all organisations and government departments.

Appendix 2

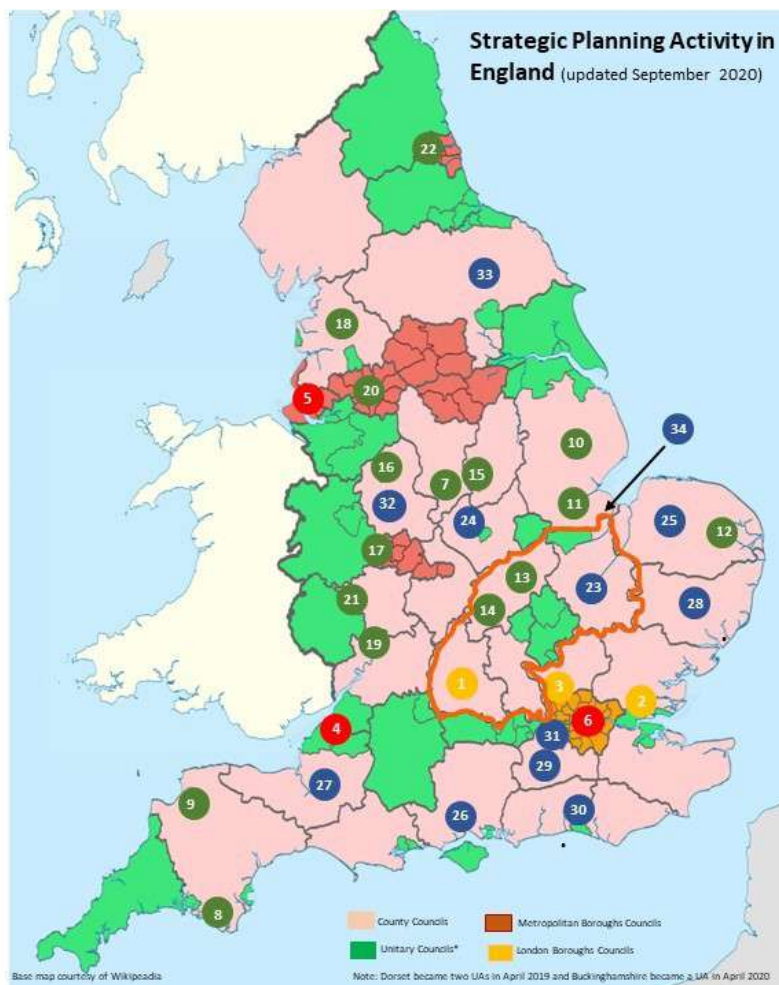
1:1 Interviews

Derbyshire	Cllr Barry Lewis	Leader, Derbyshire County Council
East Sussex	Cllr Keith Glazier	Leader, East Sussex County Council and Chair, Transport for the South East
Gloucestershire	Cllr Mark Hawthorne	Leader, Gloucestershire County Council
Hampshire	James Potter	Assistant Director for Waste, Planning & Environment
	Keith Willcox	Assistant Director for Strategic Transport
	Laura McCulloch	Strategic Manager – Planning
Hertfordshire	Cllr Richard Roberts	Leader, Hertfordshire County Council
	Cllr Linda Haysey	Leader, East Herts District Council and Chair, East of England LGA
Kent	David Godfrey	Policy Adviser to Kent County Council and the Thames Estuary Growth Board
Lancashire	Phil Green	Director of Growth, Environment and Planning
Norfolk	Cllr Martin Wilby	Cabinet Member for Highways, Infrastructure and Transport
	Tom McCabe	Chief Executive and Executive Director of Community and Environmental Services
Oxfordshire	Giles Hughes	Chief Executive, West Oxfordshire District Council and Oxfordshire Growth Board
Surrey	Joanna Killian	Chief Executive, Surrey County Council
	Michael Coughlin	Deputy Chief Executive, Surrey County Council

Roundtable Participants

Mike Allgrove	Mike Allgrove Planning Ltd
Richard Blyth	Head of Policy, Royal Town Planning Institute
Karen Chapman	Suffolk Growth Programme Partnership Manager
Adrian Colwell	Lead Officer, Oxfordshire Joint Plan
James Cutting	Head of Planning, Suffolk County Council
Patsy Dell	Director, Hertfordshire Growth Board
Mark Dickens	Lead Officer (Spatial Planning), Liverpool City Region Combined Authority
Paul Frainer	Assistant Director Strategy and Economy, Greater Cambridge Partnership
Vincent Goodstadt	UK2070 Commission
Andy Gutherson	Executive Director of Place, Lincolnshire County Council
Cllr Lewis Herbert	Leader, Cambridge City & Lead Member for the Ox Cam Arc on behalf of Cambridgeshire Combined Authority
Kevin Lloyd	Enterprise M3 Local Enterprise Partnership
Bev Hindle	Director, Ox-Cam Arc Leaders
Sue Janota	Spatial Planning Manager, Surrey County Council
Andrew Jones	Cities Programme Leader, <u>Aecom</u>
Tim Marshall	Oxford Brookes University
Rhiannon Mort	Head of Economic Infrastructure, Surrey County Council
Mark Parkinson	Head of Planning Policy and Enabling, Staffordshire County Council
Liz Small	Growth and Heritage Manager, North Yorkshire County Council
Andrew Taylor	Group Planning Director, Countryside Properties
Robert Thornhill	Planning Manager, <u>Leicester</u> and Leicestershire Strategic Growth Plan
Prof Tony Travers	London School of Economics
Dr Dave Valler	Oxford Brookes University
Pat Willoughby	Head of Housing and Regeneration Policy, West Midlands Combined Authority
Richard Wood	Richard Wood Associates

Strategic Planning Activity in England



Statutory Joint Strategic Plans (statutory)

1. Oxfordshire Joint Strategic Spatial Plan*
2. South Essex Joint Strategic Plan*
3. South West Herts Joint Strategic Plan*

Spatial Development Strategies (statutory)**

4. West of England Spatial Development Strategy
5. Liverpool City Region Spatial Development Strategy*
6. The London Plan

Joint LPs and Joint/Aligned Strategies (statutory)***

7. Greater Derby Aligned Core Strategies
8. Plymouth and SW Devon Joint Local Plan
9. North Devon & Torrridge Joint Local Plan
10. Central Lincolnshire Joint Local Plan
11. South East Lincolnshire Joint Local Plan
12. Greater Norwich Joint Local Plan
13. North Northants Joint Core Strategy
14. West Northants Joint Core Strategy
15. Greater Nottingham Aligned Core Strategies
16. Newcastle Upon Lyme & Stoke Joint Local Plan*
17. Black Country Joint Core Strategy
18. Central Lancashire Joint Local Plan*
19. Gloucester, Tewksbury & Cheltenham Joint Core Strategy
20. Greater Manchester Spatial Framework*
21. South Worcestershire Development Plan
22. Newcastle and Gateshead Core Strategy
- 23 (a) Greater Cambridge Plan

Strategic planning and/ or Growth Frameworks (non-statutory)

- 23 (b) Cambridge & Peterborough CA Spatial Framework*
24. Leicester & Leicestershire Strategic Growth Plan
25. Norfolk Strategic Planning Framework
26. PUSH Spatial Position Statement*
27. Somerset Growth Plan
28. Suffolk Growth Framework
29. Surrey 2050 Place Ambition
30. West Sussex & Greater Brighton Local Strategic Statement
31. Heathrow Strategic Planning Framework*
32. Staffordshire Strategic Infrastructure Plan
33. York, North Yorkshire, East Riding and Hull Spatial Framework
34. Oxford – Cambridge Arc Spatial Framework*

* Emerging plans/ frameworks (or under review)

** Subject to their own defined legislation & Regulations i.e. not development plan documents

*** Does not include all joint local plans – only those considered to be strategic in nature



Appendix 4

CCN recently undertook a survey of its members on the planning reforms proposed in the Planning for the Future White Paper, and also used this as an opportunity to undertake an audit of members' views on a range of areas such as ambitions for housing, the state of infrastructure and permitted development rights.

The survey was split into two parts. The first asked questions relevant to CCN's county council and unitary council members. For this part, we received a 75% response rate with 27 of 36 councils submitting a response. The second part of the survey was split into two – with one part for county council members, and another for matters concerning unitary authorities. The county council part of the survey received a 78% response rate, with 18 of 23 county councils submitting a response. The unitary part received a 70% response rate with 9 of 13 of CCN's unitary members submitting a response.

Overview of the responses

Part 1 – All CCN members

Planning Reform

This section asked members about their main concerns of the review of the planning system, and how informed and engaged they have felt as proposals have emerged.

- When asked if members felt that the proposals in the White Paper would achieve the aim of 'creating a simpler, faster and more modern planning system, ensuring homes and infrastructure can be delivered more quickly across England', 58% of respondents were either **not at all confident or not confident**, with a further 23% responding neutrally. Only 20% were confident.
- When asked what their **main concerns** were surrounding the impact of planned reforms;
 - 88% were concerned or very concerned it would lead to a 'Loss of local democratic oversight'.
 - 85% were concerned or very concerned it would lead to a 'Loss of meaningful community involvement' (50% very concerned)
 - 84% were concerned or very concerned it would lead to a 'More power to major developers'
 - 96% were concerned or very concerned it would lead to a 'Focus on housing numbers over infrastructure and wider place-making' (62% very concerned).
 - 94% were concerned or very concerned about the 'Lack of proposals around strategic planning and replacement of the duty to co-operate' (62% very concerned).
- Only 35% felt they well engaged with the overall principles and proposals that may be forthcoming in the Planning Bill.
- Some 93% **do not believe** the proposed changes to the planning system would result in residents being more supportive of development.

Housing

This part of the survey asked respondents about the appetite for new homes in their areas, the type of homes that are most needed and whether Green Belt land is restricting the number of new homes that can be built.

- When asked if they ‘support new homes in your area, if they are in the right places, support local housing need and are accompanied with infrastructure’ **96% were supportive, including 73% who are very supportive.**
- The survey asked respondents to rank what they believe to be the most needed type of housing across their areas. **68% stated that affordable housing was most needed,** followed by 17% that stated housing for older people
- When asked if they were ‘concerned about under delivery of affordable housing in your area’ some **81% stated that they were.**
- The survey also asked respondents to identify the types of affordable homes that are needed. In response to this, **55% stated a mix of affordable tenures were most needed,** with 39% stating that social rent was the most needed in their area.
- **Only 27% support a top-down approach to housing targets** to meet local needs, with 58% disagreeing and 16% neutral.
- When asked if Greenbelt land prevents authorities meeting their housing need, 32% agreed, and some 60% were in favour of a ‘strategic greenbelt review’ to help identify land that would meet housing need.

Infrastructure

This part of the survey asked questions around the pressure on infrastructure, infrastructure funding gaps and reforms to developer contributions.

- When asked to describe the pressure on local infrastructure as a result of housing development in their area **at present,** 39% said it was ‘pressured’ with **58% saying ‘excessive pressure’.**
- When asked to describe the ‘infrastructure funding gap’ in their areas some **73% said it was ‘severe’** with a further 27% saying it was ‘moderate’.
- The survey asked members how confident they are that development that is built will contribute appropriately to infrastructure and affordable housing. 69% said they were either not very confident or not at all confident that it would.
- When asked to describe how well the ‘infrastructure first’ approach to housing development **was currently** being delivered in their areas, **only 12% said ‘well’** with 44% stating ‘not very well’ and 36% ‘not at all well’.
- Finally, we asked members for their views on the proposals to scrap Section 106 and the Community Infrastructure Levy and replace it with a new Infrastructure Levy. 38% said they were not supportive, with a further 31% stating that they were unsure. Just 31% stated that they supported it.

Permitted Development

This part of the survey asked questions around the permitted development rights to turn offices into homes.

- When asked their opinion, just 8% were supportive, with **46% stating they are supportive of it in some locations**, and a further 46% stating they opposed the rights.
- When asked to list their **main concerns** about housing delivered through permitted development:
 - 92% were concerned about the fact that homes delivered through PDR do not contribute to local infrastructure.
 - 85% said homes delivered through PDR are often in poor locations and are not supported by adequate infrastructure.
 - 81% said they were concerned about poor housing quality.
 - 62% said they were concerned about the fact that homes delivered through PDR do not contribute to affordable housing.
 - 58% said that homes delivered through PDR doesn't meet specific local needs.
- We also asked members to comment on whether they believe the new permitted development right to convert units within the 'Class E' use to residential use would undermine town centre regeneration efforts. 42% thought that it would, whilst 58% said it was too early to say.

Part 2 – County Council members

Relationships with District Councils

Part 2 of the survey for upper tier members focused on the relationships with the district councils in their areas, in addition to questions around the benefits of, and capacity and capability to deliver, strategic planning.

- When county councils were asked about their relationships generally on planning with the districts in their areas, 24% had good relationships with all, 59% had good relations with some, and 12% had bad relationship with some.
- **Only 6% of county councils feel involved in 'all aspects' of their districts local plans**, with 53% involved in only the aspects of the plan that concerns county council functions. 12% feel very little involvement in any aspect of local plans, with 24% saying it varied from council to council.
- On developer contributions negotiations with district councils, 24% said they were involved with all districts, 41% said some districts, 24% said they are involved with very few districts, and 12% said they were involved with no districts.
- When county councils were asked whether better cross-boundary strategic planning, with county involvement, would lead to better outcomes from the planning system **100% said yes.**
- In addition, **94% said that their authority had 'strategic planning capability and capacity'**, with **100% of county councils supportive of a 'statutory approach to strategic planning with county involvement.**

Part 2 – Unitary members

Part 2 of the survey for unitary members asked further questions in their role as planning authorities, including the housing delivery test, local planning department resources and climate change.

Housing Delivery Test

- When asked if the Housing Delivery Test had made a positive difference on the supply of new homes, none answered yes. Instead, a third said no, a third were unsure and a further third said that it was mainly an administrative task.
- When asked what powers would make the biggest difference to housing supply, many members support ‘use it or lose it’ planning permissions, but were also keen to see more incentives and penalties for developers in order to speed up supply.

Resources

- When asked how well resourced they consider their planning departments to be, **63% said their department was ‘under resourced’, with a further 25% saying ‘very under resourced’**. Only 12% considered their planning department to be well resourced.

Climate Change

- Finally, when asked how well the planning system is set to assist in tackling climate change, **78% said either ‘not well set’ or ‘not at all well set’**, with only 22% believing it is ‘well set’.

Footnotes

- [1] [Planning for the future - GOV.UK \(www.gov.uk\)](https://www.gov.uk).
- [2] [Ambitious plans to drive levelling up agenda - GOV.UK \(www.gov.uk\)](https://www.gov.uk).
- [3] [PM sets out new 'County Deals' to devolve power to local communities in Levelling Up speech - GOV.UK \(www.gov.uk\)](https://www.gov.uk).
- [4] The National Planning Policy Framework (NPPF) sets out the purpose of the planning system which is to contribute to the achievement of sustainable development – see Paragraph 7 [National Planning Policy Framework - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk).
- [5] Page 3 - [Local Plans Expert Group: report to the Secretary of State - GOV.UK \(www.gov.uk\)](https://www.gov.uk).
- [6] Paragraphs 109 to 113 - [Progress on devolution in England \(parliament.uk\)](https://parliament.uk).
- [7] [Greater London Authority Act 1999 \(legislation.gov.uk\)](https://legislation.gov.uk).
- [8] Joint plans can be prepared under S28 of the [Planning and Compulsory Purchase Act 2004 \(legislation.gov.uk\)](https://legislation.gov.uk). Joint decision making can be introduced through the provisions of S29.
- [9] Of the five JSPs initially being prepared only three are currently being progressed (as at Sept 2021) in South West Herts, South Essex and Oxfordshire.
- [10] Although the Greater Manchester MCA has provisions to prepare an SDS, it is currently progressing a joint development plan across the city region instead of an SDS - [Greater Manchester councils to set out next steps with Places for Everyone joint plan - Greater Manchester Combined Authority \(greatermanchester-ca.gov.uk\)](https://greatermanchester-ca.gov.uk).
- [11] [Home - Oxfordshire Growth Board](https://www.oxfordshire.gov.uk)
- [12] See Paragraph 1.24 of [Planning for sustainable growth in the Oxford-Cambridge Arc: an introduction to the spatial framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk).
- [13] The Greater Exeter (Joint) Strategic Plan is no longer being progressed as a result in the partner authorities disagreeing with the proposed draft plan - [The Greater Exeter Strategic Plan - A development plan for the future of the Greater Exeter area \(gesp.org.uk\)](https://gesp.org.uk).
- [14] In December 2020, Stockport Council pulled out of the development of the GMSF after years of preparation. The remaining local authorities in the Combined Authority are now progressing a joint development plan.
- [15] The Oxford Cambridge Arc Spatial Framework is being prepared by a Central Government team and will have the status of national planning policy when finalised - [Planning for sustainable growth in the Oxford-Cambridge Arc: spatial framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk).
- [16] The CCN proposal for new arrangements recommended that the geographical basis for strategic planning should be at a scale that is large enough to implement national policies but small enough to reflect local context and circumstances. Given that there are different functional areas for strategic planning activity, it was suggested that a core 'building block' should be used with wider and more local 'strategic' relationships managed through this arrangement and that this should reflect administrative boundaries, such as county boundaries.
- [17] In the 2020 proposal from CCN, this was called the Integrated Strategic Framework but the principles involved are the same.
- [18] The Government proposed that the current system of developer contributions (CIL and S106) is changed in the 2020 Planning White Paper.
- [19] The recently established Department of Levelling Up, Housing and Communities may help with the integration of priorities around growth given its widened remit over the previous department (MHCLG).
- [20] Between 1968 and 2004 county and unitary authorities were responsible for preparing structure plans which provided the strategic tier of the statutory development plan system.

CCN

COUNTY COUNCILS NETWORK

Founded in 1997, the County Councils Network is a network of 23 county councils and 13 unitary authorities that serve county areas. The network is a cross party organisation, expressing the views of member councils to the Local Government Association and to the government.

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