



Planning Reforms & the Role of Strategic Planning

Author

Catriona Riddell is a chartered town planner with substantial experience working on the development and implementation of planning policy at the local, regional and national levels. Since her company was established in 2011, Catriona has supported local authorities and partners on a wide range of planning issues but specialises in strategic planning. Previous roles include Director of Planning for the South East England Regional Assembly and Head of Strategic Planning for Surrey County Council.

Catriona is the Strategic Planning Specialist for the Planning Officers' Society, Vice-Chair of the Town and Country Planning Association and a member of the Royal Town Planning Institute's England Policy Panel. She is a regular columnist for Planning Magazine and speaker at conferences and other planning related events. A full list of Catriona's work can be found in Appendix 4.

Steering Group

To oversee and input into this project, a steering group was established to provide expert advice into the preparation of the report from across the planning sector. The group met virtually at the beginning of the project and participated in a roundtable discussion on the principles of the work and the recommendations. A draft report was also shared with the group for feedback and input.

The steering group was made up of the following people;

- Bev Hindle, Oxfordshire County Council
- Kevin Lloyd, Enterprise M3 LEP
- Janice Morphet, Visiting Professor, Bartlett School of Planning, UCL
- Lisa Michelson, Buckinghamshire Council
- Richard Wood, Richard Wood Associates
- Angela Jones, Cumbria County Council
- Karen Chapman, Suffolk Growth
- Sue Janota, Surrey County Council
- James Harris, Royal Town Planning Institute
- Andrew Donnelly, Birmingham City Council
- Joe Battye, Derbyshire County Council
- Dawn Redpath, Surrey County Council
- Zack Simons, Landmark Chambers

Preface

The County Councils Network has long advocated for a stronger approach to strategic planning in order to achieve better place-making outcomes. Our work to date has assessed the non-statutory and statutory strategic planning practice that is happening across the 36 county and unitary authorities we represent. We have called for stronger strategic planning mechanisms, but have not suggested a particular way forward. With the proposal in the Planning for the Future White Paper to scrap the duty to cooperate, there has never been a better time to think about how things can be done differently.

The issues with the planning system are well versed. There has rightly become much focus in national policy on housing numbers, but these must be considered in conjunction with the other key issues that really make places work for communities, like supporting infrastructure – from roads and railways, schools and doctors surgeries and parks and leisure centres.

All too often authorities have large infrastructure funding gaps resulting in difficult decisions over what investment gets prioritised, and in two tier areas this brings additional challenges as different authorities try and meet competing demands. Planning will also have a big role to play in recovery and levelling-up post COVID-19 and the system will play an enabling role for business and industry growth and reshaping town centres. It will also play a vital role in tackling the climate emergency, helping to make places easy to travel around and protecting places from adverse weather events.

CCN commissioned this report by Catriona Riddell, a strategic planning expert, to work with representatives from across the planning sector to design an effective solution to bridge the strategic planning gap.

The solution set out in this report would bring partners together, allowing areas to set out a vision across a broad area and agree investment and strategic infrastructure priorities, under which local plans would then be prepared. CCN will be considering the recommendations in this report as part of the networks response to the Planning for the Future White Paper, and will work with it's members and stakeholders to explore the merits of these proposals in further detail.

Contents

Executive Summary	5
Introduction	10
Getting the Basics Right	14
An Effective Approach to Strategic Planning	20
Conclusions & Recommendations	30

Executive Summary

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 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

Recommendation 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.

Recommendation 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.

Recommendation 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.

Recommendation 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:

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.

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.

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.

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.

Figure 1: Summary of proposed strategic planning arrangements

New powers to support sustainable development (placed on all local authorities)

Strategic Planning Advisory Body

Statutory function with each SPAB appointed by the SoS

Although strategic planning would be a specific function of the SPAB, it could be part of a governance structure with responsibilities beyond spatial planning e.g. Growth Board or MCA

Spatial area covered:

Geographical context to be agreed with partners & Government but could be county, city region or MCA geography (provided this is not considered too big to adequately reflect local context and circumstances).

Membership:

- Core membership requirements would be set out in legislation, allowing for different models of governance to be used in different areas e.g. Growth Boards, MCAs or other strategic collaborations.
- Key partners would comprise: all relevant local authorities, Combined Authority Mayor (where relevant), Local Enterprise Partnerships, Sub-national Transport bodies and leaders from health and environment sectors.

Summary of core functions:

- Provide collective **‘place leadership’** on behalf of strategic partners .
- **Align strategic investment priorities** of key partners around ‘place’ to support sustainable growth.
- Set out **long term ‘vision & ambition’** and strategic spatial and investment priorities in an **Integrated Strategic Framework**.
- Manage **integrated infrastructure funding**.
- **Formal role in advising Government on local plan housing targets** and other national priorities impacting on place-based growth.
- **Monitor implementation of shared vision and priorities** through individual partners’ plans and strategies to ensure general conformity. Potential for ‘challenge’ role.
- Manage **Data & Information Hub** (optional but would ensure consistent approach to metrics and other supporting evidence).



Integrated Strategic Framework

- Articulation of how LAs and partners will **execute their ‘Powers to support Sustainable Development’**
- **Vision-led and outcome-focused** strategic framework for integrating collective priorities around ‘place’.
- **Spatial strategy for investment priorities**, including distribution of growth, providing framework for LPs in relation to growth, renewal and protected areas.
- **Key evidence to support statutory development plans** - Local/Joint Local Plans, Minerals and Waste Plans, Neighbourhood Plans and MCA Spatial Development Strategies - particularly informing housing targets, infrastructure priorities, strategic growth areas and conformity with the proposed new national Sustainable Development Test for LPs.
- **Key evidence to support LEP and STB priorities**
- **Local flexibility in model** used but would have to conform to some national prescription.
- Would be supported by a **10 year rolling Strategic Delivery Plan**



Main Outcomes

Co-ordinated approach to national objectives around sustainable growth and local delivery

Alignment between sub-national and local spatial & investment priorities

Vision led/ outcome based spatial strategy for statutory development plans

Coordinated support for delivering strategically important Growth Areas

Streamlined and more effective approach to infrastructure prioritisation

1. Introduction

The Government is proposing fundamental changes to the current (English) planning system with the ambition to make it simpler, faster and more predictable. The White Paper - Planning for the Future-[1] sets out the basis for a new planning system, which is to be implemented through consolidated planning legislation and updated national policy.

The White Paper recognises the central role planning plays in supporting national objectives and challenges around meeting housing needs, tackling climate change, improving the environment and supporting sustainable growth (see page 12 and 13 for a summary of the main proposals in the White Paper that have informed the recommendations in this report).

A specific proposal is to replace the legal Duty to Cooperate as the main mechanism for addressing strategic planning matters. The Government has attempted several times to make the Duty more robust (see page 21 and 22), especially in response to the government appointed Local Plan Expert Group's report in 2016 [2].

The group concluded that the lack of an effective strategic planning mechanism was one of the most significant constraints to plan-making and, due to the focus on process, did not necessarily deliver good planning outcomes. Although the Government clearly recognises the failures of the Duty, no specific solution is proposed in the White Paper[3].

The County Councils Network (CCN) has long advocated for a more effective approach to strategic spatial planning to support growth, especially with regards to housing delivery and strategic infrastructure, recognising that all local authorities have a role to play, not just local planning authorities[4]. In 2017, a report by Localis concluded that "Uprating the delivery of new homes where and when they are needed is something that all tiers of government have a stake in and which all, with different capacities and control of different policy levers, have a role to play" [5].

The need for a more integrated approach to spatial planning and the role it could play in bringing priorities for the economy much closer to how and where development is delivered is also key to securing long term sustainable growth. This has come into sharp focus recently as we potentially face one of the worst economic recessions in history as a result of the COVID-19 pandemic [6].



CCN is not a lone voice in its call for a more effective approach to strategic planning; the Royal Town Planning Institute, the Town and Country Planning Association and the UK 2070 Commission, amongst many others, have all recognised the value of clear vision around ‘place’, a less fragmented approach to supporting growth and stronger strategic ‘place’ leadership.[7] They have also highlighted the role a more effective strategic planning response could have in delivering national objectives around climate change and health, and in ‘levelling-up’ socio-economic disparities across the country.

At the same time as the Government is proposing fundamental changes to the planning system, there is likely to be changes to local government responsibilities and potentially, to structures, as a result of the Government’s devolution agenda. Although the details of this are yet to be published, Ministers have indicated that an increase in both the number of unitary authorities and mayoral combined authorities (MCAs) could be part of the overall approach to devolving powers and responsibilities [8].

Reform of the planning system and potential changes to local government offer a window of opportunity to ensure that spatial planning plays a key role in supporting long term sustainable growth and in the immediate response to economic recovery. But the potential of the planning system to maximise the role it plays in supporting growth and delivering the wider outcomes set out in the White Paper[9] will not be fully realised without an effective solution to strategic planning. This would add significant economic, social and environmental value, addressing areas of productivity disparities, identifying networks and connectivity that could drive efficiency benefits in terms of future infrastructure, addressing challenges around climate change and building investment confidence for both public and private sectors.

The focus of this report is therefore on how the Government’s proposals for the planning system could support long term sustainable growth within the context of both the existing and a changing local government landscape and specifically, what role county and unitary authorities should play in this, and what value a more effective approach to strategic planning could add to aligning national and local objectives, with recommendations for what this could look like.

Summary of main proposals in the Planning White Paper

- The Government's overarching objectives are for a *faster, fairer and simpler* planning system, with some wider ambitions to ensure it is outcome focused and addresses key national policies around growth (and recovery), climate change, healthy place-shaping and design, with a strong emphasis on digitisation of the system.
- Emphasis is on a plan-led system with public participation and local democratic input front-loaded into the plan-making process and less involvement at the development management stage. Development management policies will largely be set nationally through government policy. [WP Proposal 2]
- Local Plans are to be 'rules-based' and will allocate land into 3 broad area based categories – *Growth, Areas and Protected Areas* where different rules will apply with regards to plan allocations, what type of development is allowed and how it is permitted (e.g. more use of permitted development & permission in principle). [WP Proposals 1 and 5]
- Housing targets set out in local plans will be mandatory, developed through a two stage process; stage 1 will establish needs based figure through revised Standard Methodology and stage 2 will set the (non-negotiable) target with constraints (and other things?) applied to the stage 1 figure. No indication how other policies or vision/ambition for growth of an area will be applied to the LP target or whether there will be any right of challenge. Five year housing land supply requirements are to be axed as a result of mandatory housing targets but housing delivery test will be retained. [WP Proposal 4]

- The Duty to Cooperate will be abolished and although there is recognition that some form of more effective strategic planning mechanism is needed (e.g. to deal with strategic infrastructure, cross-boundary growth areas) no specific solution is offered. [WP Proposal 3]
- Statutory timetables for local plan preparation to be imposed (30 months) with sanctions to be imposed on those that fail to meet it. [Proposal 8]
- Current examination tests (SA/SEA, tests of soundness) will be replaced by a single Sustainable Development Test and new frameworks for assessing environmental impact and addressing climate change. [WP Proposals 3, 15 to 18]
- S106 and CIL are to be replaced with a new consolidated Infrastructure Levy for developer contributions. This would be a nationally set flat rate (therefore no viability testing), based on final value and levied at point of occupation. Affordable housing contributions would also have to be taken from this but it could be extended to some permitted development, with more flexibility in how it is spent. Potential for LAs to borrow against levy revenues to forward-fund infrastructure. [WP Proposals 19 to 22]
- New development is expected to provide 'net-gain' to an area's appearance with several proposals to boost quality and design e.g. design codes, fast track for 'beauty', new national design body established and a chief officer responsible for design and place-making in each local planning authority. [WP Proposals 11 to 14]
- Proposal for a comprehensive skills and resources strategy for the planning sector to help implement reforms, recognising significant issues in public sector. [WP Proposal 23]

2. Getting the Basics Right

Maximising the potential of strategic planning

The starting point for a well-designed planning system that supports long term sustainable growth is to consider what the functions and added-value an effective approach to strategic planning could offer. The main criticism of the Duty to Cooperate is that it is process driven and therefore does not necessarily deliver good planning outcomes.

However, it also does not reflect the wider purposes of strategic planning. An effective strategic planning system provides a larger spatial canvas for ensuring that development and infrastructure is directed to the best locations; it supports strategic developments that impact on more than one local planning authority area; and provides a collective and integrated response to delivering all three pillars of sustainable development (economic, environmental and social), as well as improving health and wellbeing outcomes. Specifically, the added value of an effective approach to strategic planning is:

- To **effect structural change in response to national policy and priorities**, especially to support clean and inclusive growth, national infrastructure priorities, delivering new homes, improving health and wellbeing, and tackling climate change. Many of these issues demand a national framework for change but are more effectively delivered through the sub-regional level which is more able to reflect the particular local context and circumstances.
- **Greater ability to secure long term (vision-led) transformation across an area** especially in places that require a different investment model and therefore a different spatial strategy and distribution of growth, with a larger spatial canvas to facilitate this.
- **Stronger collective ‘place leadership’ to influence the decisions of others** which is particularly important for local authorities around large cities, near major growth areas (e.g. Heathrow) or where national infrastructure is being delivered (e.g. Lower Thames Crossing, East-West Rail, HS2).
- To provide **collective clarity for the public about the long-term vision/ ambition for a place** and ensure that the different partners involved in supporting place-based growth (including Central Government departments and agencies) are aligning their investment priorities.
- To **secure additional government resources, freedoms and flexibilities**, providing increased confidence in local delivery of strategic priorities with all partners aligned e.g. through growth deals or competitive funding processes.

- **Increased ability to deliver and improve infrastructure** and support an ‘infrastructure first’ approach to growth (as advocated by the Government), with the shared vision underpinning the business case and increased investor confidence because of the strength of collaboration (and increased credibility of the partnership).
- Increased **ability to seek a different approach to business cases and project appraisal** related to new outcome-based objectives, which value other (quality of life) deliverables and outcomes in addition to financial return on investment.
- **Reduced risks in relation to delivery of statutory development plans** as a result of clarity around the collective vision - it will be much harder to undermine a local plan that has been developed to deliver a vision shared by other local authorities and strategic partners; a more defensible, shared evidence base; and a quicker timetable if key strategic matters have already been resolved.
- **Reduced risk of speculative and unsustainable development** as a result of a more robust framework of development plans (and other partner plans and strategies) that are all pointing in the same direction and therefore more resilient to change (especially political and organisational change) providing a more stable delivery context.
- Potentially **significant cost savings and better use of resources** as a result of a shared strategic evidence base and efficiencies of scale, the ability to lever in more funding to support the development and testing of evidence, and shared access to technical resources (data and information, skills and expertise) .

What is the duty to cooperate?

The Duty to Cooperate was introduced through the 2011 Localism Act to replace the previous statutory approach to strategic planning through Regional Strategies. Whilst various legislative and policy changes have been made over the last few years to strengthen the Duty, it has largely failed as an effective strategic planning mechanism to manage key local plan issues, particularly in relation to housing provision and distribution, and has been a key matter in a number of local plan failures and legal challenges.



Since the previous statutory system of strategic planning was abolished following the 2010 General Election, there has been various attempts to fill the void with a sliding rule of models from detailed statutory joint plans and governance arrangements, to strategic frameworks prepared through voluntary collaboration (see Appendix 1) and outside the scope of the statutory development plan system. Each model has its pros and cons but none have been able to achieve the full suite of potential benefits set out in the recommendations of this report.

Outside of spatial development strategies (SDS) prepared by Mayoral Combined Authorities (MCAs), the Government's model of choice recently has been statutory joint strategic plans (JSPs).

These are probably the most reflective of an effective strategic planning approach, with local authorities attempting to provide a robust framework for long term place-based investment priorities to support transformation across a large area. However, it has proved extremely challenging to deliver these through the current statutory development plan system, which was designed to support local plans, rather than high level strategic frameworks[10]. The local authorities involved have also struggled to manage these within the limitations of voluntary governance structures which can prove unstable if there are changes, for example, as a result of local elections or differences in priorities.

Managing strategic planning outside of the statutory system has therefore become an increasingly attractive option amongst local authorities and their strategic partners for supporting place-based growth in recent years[11] (see map in Appendix 1). These are still evidence-based, relying on evidence prepared by all partners involved in supporting sustainable growth, but can cover a wider range of issues beyond the scope of the statutory planning system.

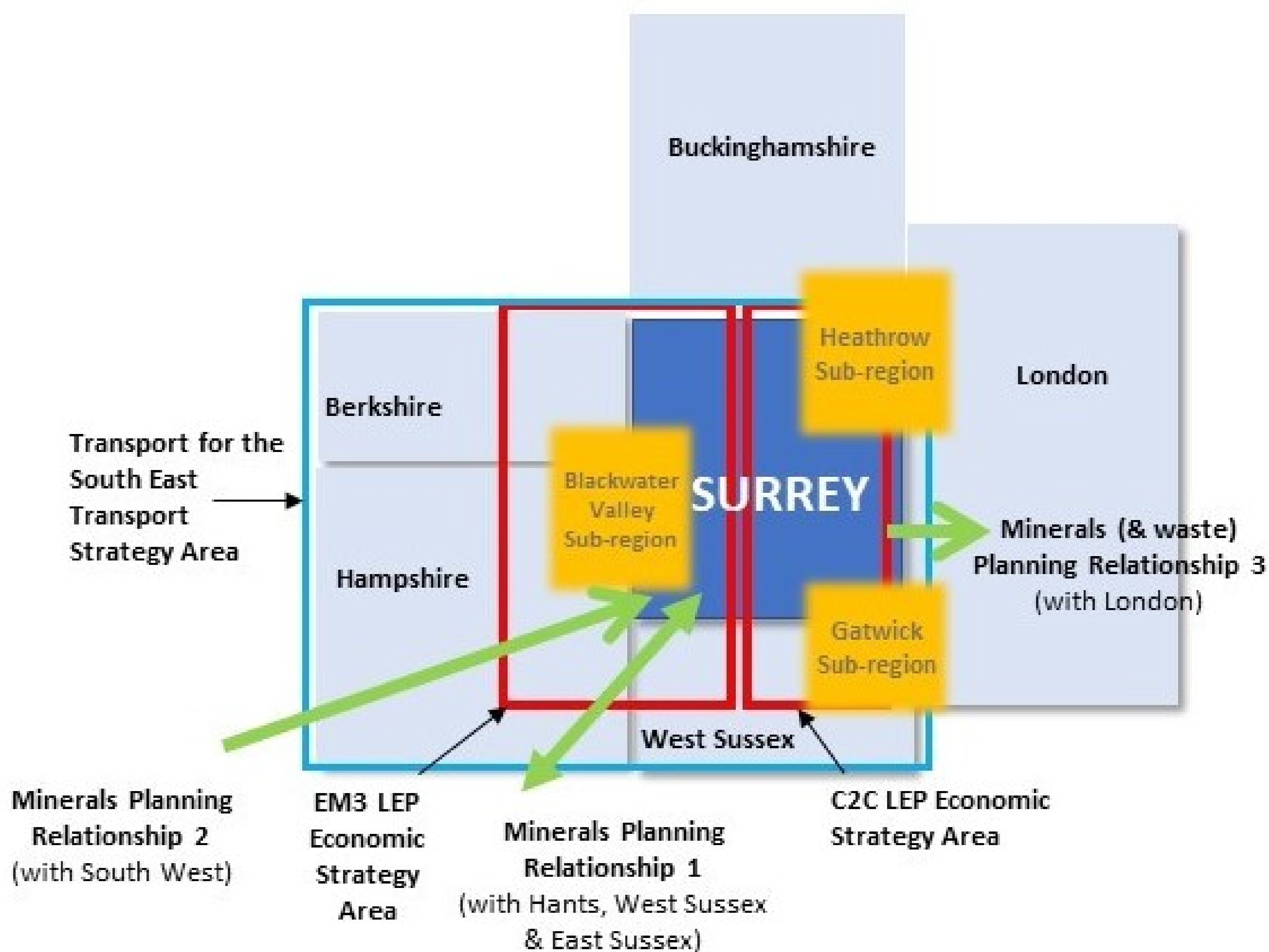
A key benefit is that they are usually much quicker to develop because they are not prepared through a heavily regulated process and therefore can evolve (and be reviewed) on a more flexible timeline than statutory development plans.

Strategic planning geography

The search for the perfect strategic planning geography is always a key debate every time the planning system is reformed and always alludes the architects of the system each time it changes. The main reason for this is that strategic planning is managed at different spatial scales for different strategic matters and these often overlap.

There is therefore no perfect geographical solution. What is needed is a core strategic planning area – building blocks - that can be used to manage the different components of sustainable growth and the different, and often very complex, relationships at both the sub-national/ pan-regional level– see illustrative example in Appendix 2 and in Figure 2 below.

Figure 2: Different spatial scales used for managing strategic planning in Surrey



The scale of geography used should therefore be large enough to implement national priorities and offer genuine choices in spatial distributions to support sustainable growth, but small enough to reflect local circumstances and relationships.

In most two-tier areas, this is likely to be county geography but it could also be managed on functional geography (provided this is coterminous with local authority boundaries) or on the geography of a single unitary authority that covers a large geographical area (e.g. Cornwall, Wiltshire, Buckinghamshire). MCA areas may serve this purpose, especially where a Spatial Development Strategy is being prepared, but some are likely to cover an area that is considered too large to capture local context and therefore to plan effectively.

Strategic planning provides a mechanism for managing growth over long timescales, especially where the ambition is to transform an area, for example, through the delivery of strategic infrastructure or a new community. Any effective mechanism therefore needs to endure changes to functional relationships over time, and to organisational arrangements, which again, could change over time (e.g. changes to LEPs or STBs). It is important, therefore, that the geography used as a basis for strategic planning ‘building blocks’ provides a stable context for managing change.

Strategic planning resources & capacity

Since 2010 and the abolition of statutory strategic planning, capacity of strategic planners within local government has reduced significantly. This is particularly evident in two tier areas where resources to support strategic planning have been diminishing since 2004 when structure plans were abolished.

County Councils no longer have any spatial planning responsibilities and therefore receive no direct Central Government funding for any support they provide to districts in their local planning roles. Although some local authorities have tried to build some capacity, especially in areas where joint strategic plans are being prepared, this is usually very limited and can be affected by changing priorities, for example, where local planning authorities within the partnership choose to direct resources to their individual local plans, rather than any shared strategic planning function.

It is vital, therefore, that in introducing a new approach to strategic planning, the capacity of this part of the profession is given significant support, recognising the different skill-set and disciplines needed to ensure an integrated approach to sustainable growth. It is also vital that, in setting any budgets to support future planning and growth related activities, both Local and Central Government recognise strategic planning as a specific function and ensure that it is resourced adequately.

The Government must therefore include this as a key component to be addressed in the comprehensive resources and skills strategy, proposed in the White Paper [12]. This will also be an important consideration in any proposed local government restructuring where there may be opportunities to redefine existing roles and bring together multi-disciplined strategic planning teams with the right skills and expertise to support place-based growth.

Figure 3: Key components of an effective strategic planning system

Vision led & outcome focused strategy

- **Clear narrative** for an area setting the shared level of ambition for growth amongst partners, the anticipated outcomes and how the strategy will support national and local sustainable development objectives and priorities.
- **Spatial articulation of the vision** diagrammatically represented, including clear distribution of development, and main areas of change (strategic priority areas) – with different scenarios tested to see how effective they are likely to be against anticipated outcomes.
- **Strategic interventions** and other collective responses that need to be employed by partners (e.g. policies, funding, specific delivery vehicles) to deliver the anticipated outcomes.
- **Phased delivery plan** focusing on the immediate challenges (e.g. economic recovery) and providing a framework for longer term priorities.
- **Measurable metrics** to monitor implementation of the vision underpinned by a robust framework for risk management to identify where change in strategic interventions/ approach may be needed.

Vision led & outcome focused strategy

- **Economic priorities** e.g. to address priority sectors, support ‘green’ growth, facilitate changing role for town centres, skills gaps and social-economic disparities.
- **Spatial priorities** setting out spatial distribution of growth, strategic growth priority areas and main areas where development should be constrained.
- **Strategic infrastructure priorities** over short, medium and long term period.
- **Environment and Climate Change priorities** with strategic response to climate change, managing natural capital assets and addressing other key issues such as air quality.
- **Health and Wellbeing priorities** to ensure actions are being targeted to support ‘healthy growth’.
- **Public sector assets** to ensure focus on supporting shared vision and outcomes e.g. delivering housing to meet priority sectors/ ageing population.

Robust governance structure to support strong place-leadership

- **Based on a sensible strategic geography** to act as the interface between national and local levels and co-ordinate place-based functions (likely to be county, city region or other defined functional geography). Could be MCA geography where this is considered to operate across a suitable scale i.e. It is not too large.
- **A partnership based on a culture of collaboration, shared vision and trust** to ensure all those with responsibilities for delivering place-based growth (e.g. LAs, LEAs, STBs, MCAs) can align their priorities and investment frameworks and can make difficult decisions around spatial distribution and investment prioritisation.
- **A robust, formally-constituted governance structure** that can provide strong place-leadership, can build a mutually beneficial relationship with Government and government departments and has sufficient accountability to manage funding and investment risk.
- **A place-based approach to skills and resources**, with increased number of multi-disciplined teams across local authorities and partners where this builds capacity and expertise.

3. An Effective Approach to Strategic Planning

The Government clearly recognises in the White Paper that something is needed to replace the Duty to Cooperate and that this needs to be more effective, particularly to address cross boundary growth priorities and strategic infrastructure delivery. If current practice and experience is taken together with the aspiration to maximise the wider added value of strategic planning an effective response would:

- **be vision based, with clear outcomes for what sustainable growth should look like;**
- **provide a framework for integrating all the main functions and activities to support sustainable growth; and**
- **be managed through a strong strategic partnership.**

The proposals set out in the following paragraphs aim to cover all of these requirements, providing a workable solution to strategic planning and an approach that could improve the overall function and impact of the planning system.

Fundamental to these proposals is the need for a clear definition of what is meant by ‘sustainable development’ and acknowledgement that the statutory planning system has an important but not exclusive role in supporting this. The proposed approach comprises three main components:

(1) New **powers, enshrined through primary legislation, to support sustainable development** (to be defined nationally) placed on all local authorities, which would be implemented primarily through:

(2) Designation of **Strategic Planning Advisory Bodies (SPABs)** appointed by the Secretary of State, with a statutory responsibility to carry out specific functions in relation to supporting sustainable development for a defined strategic geography.

(3) A requirement on all local authorities to prepare (through the SPABs) an **Integrated Strategic Framework and associated Delivery Plan.**

Evolution of strategic planning context since 2011

2011

Localism Act revokes regional planning, replacing it with the **Duty to Cooperate**

“This government is committed to localism and greater local decision-making in planning. The flawed top-down targets of regional planning, centrally imposing development upon communities, built nothing but resentment. They will hang over communities no more.” [Eric Pickles, Secretary of State]

2016

Government Technical Consultation highlights “the advantages of strong strategic plan-making across local planning authority boundaries, in particular in addressing housing need across housing market areas” .

Local Plan Expert Group identifies challenges around strategic planning as key barrier to local plan preparation and growth and recommends changes to provide ‘more teeth’ to the Duty to Cooperate, most of which have subsequently been taken forward by Government

2017

Government set out initial proposals for planning reform in **Housing White Paper** - new ‘strategic’ local plan option preferably with “...more and more local authorities working together to produce a strategic plan over a wider area on the functional economic geography that is right for their part of the world...” ; more robust approach to be introduced to Duty to Cooperate through mandatory ‘statements of common ground’ (to include county councils) and new examination ‘tests of soundness’. Further details set out in **Right Homes in Right Places** consultation published later that year.

Neighbourhood Planning Act 2017 provides statutory requirement to set out ‘strategic priorities’ through planning ‘portfolio’, more LP intervention powers and new powers to allow the Secretary of State to direct the preparation of a joint local plan where this would “facilitate the more effective planning of the development and use of land in the area” .

Joint working over strategic areas key criterion on Government decisions on **Housing Infrastructure Fund** and **Planning Delivery Fund** aimed at supporting “**greater collaboration between councils, a more strategic approach to planning, housing and infrastructure...**”

SoS LP intervention process initiated for first 15 LPAs- SoS decisions to be “**informed by the wider planning context in each area (specifically the extent to which authorities are working cooperatively to put strategic plans in place)**” .

Need for more effective strategic and infrastructure planning emphasised in wider Government announcements with **Budget 2017** endorsing Cam-MK-Ox Corridor and proposals for new ‘strategic infrastructure tariff’ (SIT) and 5 new towns in South East; and **Industrial Strategy White Paper** emphasising support for “**greater collaboration between councils, a more strategic approach to planning housing and infrastructure...**”

2018

New LP examination ‘**tests of soundness**’ and requirement for ‘**statement of common ground**’ introduced through NPPF to strengthen the Duty to Cooperate.

2020

First new style **Joint Strategic Plan (West of England)** is **withdrawn** following failure at Examination.

North Essex Aligned strategies withdrawn after failure at Examination.

Budget March 2020, Government outlines plans to overhaul the planning system and to prepare a new spatial framework for the Oxford-Cambridge Arc

Government published **White Paper ‘Planning for the Future**’ with proposals to significantly reform the planning system to deliver a **simpler, faster and more predictable system** which includes proposals to revoke the Duty to Cooperate with no firm proposals to replace it with an alternative strategic planning mechanism.

New powers for supporting sustainable development

The Government is proposing that all local plans be subject to a new single Sustainable Development Test. However, there are many different functions performed by local authorities that support the delivery of sustainable development, beyond their role as local planning authorities. For example, they support economic development activities, facilitate and provide infrastructure, manage waste, plan for minerals and have responsibilities for responding to climate change and for public health.

In two tier areas, county councils are directly responsible for many of these activities but also co-ordinate and facilitate strategic partnerships that contribute to these functions, for example Health and Wellbeing Boards, Skills Boards and increasingly, Growth Boards. In single tier areas, unitary authorities are responsible for all of these activities as well as acting as local planning authorities. Many of these wider roles are already recognised in the existing ‘Duty of Wellbeing’ placed on local authorities which, until 2015, was largely implemented through the preparation of a sustainable community strategy [13].

In order to give proper effect to this new test, powers to support sustainable development should be placed on all local authorities[14] within the context of a national framework for assessing how they are responding through their wider functions, not simply through their role as local planning authorities. This would replace (or complement) existing wellbeing duties, reflecting a more up to date context and national priorities for supporting sustainable growth.

The new powers should be linked to a national definition of ‘sustainable development’, focusing on meeting key objectives around housing delivery, supporting green and inclusive growth, improving overall health and wellbeing, and addressing the challenges around climate change. Performance would be measured against a national framework and would be used as evidence to inform funding allocations and the proposed new Sustainable Development Test for local plans.

Many other strategic partners have specific roles and responsibilities for supporting sustainable growth, especially LEPs, STBs, MCAs where they exist, and strategic environment and health partnerships. It is vital, therefore, that in executing the new powers, a co-ordinated approach to aligning long term priorities around supporting sustainable growth should be taken, with strong, collective leadership at its heart.

Whilst any partnership arrangements will have to reflect local relationships and organisational structures, a degree of national prescription would be needed to ensure that all the right partners are around the table, especially where they have any specific roles in delivering national priorities or managing national funding allocations (see page 25 setting out the proposed new role of Strategic Planning Advisory Bodies).

Strategic Planning Advisory Bodies

The second key component of the new approach to strategic planning is the **Designation of Strategic Planning Advisory Bodies (SPAB)**.

These would be statutory bodies in their own right, appointed by the Secretary of State for each strategic planning area. The key roles of SPABs would be prescribed nationally but would include advising the Government on local growth priorities and how these would support national spatial objectives (e.g. the ‘Levelling-up’ agenda and the Oxford-Cambridge Growth Arc) and on distribution of growth (including local plan housing targets).

Affording these bodies statutory status would ensure there is a clear and specific relationship between each SPAB and the Government, with clear accountabilities, and would provide a more secure process for managing critical planning and investment decisions over a long period of time, for example, through different electoral cycles or changes to individual partners. Although there is currently no exact model for this, experience could be drawn from other existing and past strategic governance models (See Appendix 3).

The geographical extent of each SPAB’s responsibility would need to be defined by the relevant local authorities (all tiers) in collaboration with strategic partners and agreed with the Secretary of State. The intention would be that all areas of England would be represented by a SPAB, with the advice provided to the Government collectively adding up to a national spatial response to sustainable growth.

The form of designated SPAB should be flexible to reflect the different governance structures across England but would have to comply with some nationally prescribed requirements set out in legislation. Each SPAB would formally be appointed by the Secretary of State, with governance structures based on the advice of the local authorities in collaboration with strategic partners.

At a minimum, membership should include all respective local authorities and combined authority mayor (where relevant), plus representatives from the LEPs, the STBs and leadership from the health and environment sectors. Mayoral combined authorities could be the designated SPAB where they have a statutory duty to prepare a Spatial Development Strategy depending on the scale of geography covered. Designated SPABs should therefore be established around a common set of ground rules which are detailed on the next page:

Designated SPABs should be established around a common set of ground rules which include:

All relevant local authorities would have equal status within the partnership (although issues such as voting rights should be considered through individual SPAB governance arrangements).

A partnership based on a culture of collaboration and shared vision, to ensure all those with responsibilities for delivering place-based growth can align their priorities and are in a strong position to make difficult decisions around spatial distribution and investment prioritisation.

A robust, formally-constituted governance structure that can provide strong place-leadership, can build a mutually beneficial relationship with Government and government departments, and has sufficient accountability to manage funding and investment risk. These would also have to be resilient to organisational change (e.g. local government restructuring, changes to LEPs and STBs, or the introduction of a new combined authority) and to political change (e.g. as a result of local elections or leadership changes).

Clear responsibilities and accountabilities especially in relation to any national requirements (e.g. the suggested new sustainable development powers set out on page 23 which would be a statutory function of local authorities) and fiscal accountability (e.g. for managing government funding allocations).

A place-based approach to skills and resources, with an increased number of multi-disciplined teams across local authorities and partners to help build capacity and expertise.

Support at the local and neighbourhood level, especially in the context of the proposed new planning system and the focus on community engagement at the development plan preparation stage and through design mechanisms.

A number of new voluntary collaborations already exist across England in the form of Growth Boards and these could potentially fulfil the role of the designated SPAB, provided they conform to any statutory conditions and are agreed by the Secretary of State. Growth Boards operate across many parts of England, bringing together those bodies with spatial, economic, environment and infrastructure responsibilities. They are playing an increasingly important role in infrastructure and funding prioritisation, especially where a growth deal has been negotiated with government, where strategic infrastructure is playing a critical role in transforming an area and where joint plans are being prepared, for example in Oxfordshire and Greater Norwich[15].

Growth Boards currently have no formal status or role in spatial planning but can act in an advisory capacity which has proved useful in two-tier areas where counties have no statutory spatial planning role, especially where a joint plan is being prepared, for example in Hertfordshire[16].

More recently, Growth Boards across the nationally important Oxford-Cambridge Arc have become key advisory bodies to the Government in its plans for preparing a Spatial Framework to manage growth and strategic infrastructure across the Arc area. A few Growth Boards also have responsibility for non-statutory strategic planning frameworks that have been prepared primarily to help align spatial and strategic infrastructure investment priorities in the absence of anything formally part of the planning system, for example the Surrey Future Steering Board (and emerging Growth Board) [17].

Integrated Strategic Frameworks

Compliance with the new sustainable development powers should be demonstrated at a local level by setting out what the shared ambition is for an area and how this will be implemented over a 20 to 30 (or longer) year period. The third main component of the proposed approach is therefore preparation of a strategic framework – an Integrated Strategic Framework (ISF) – delivered across an agreed strategic geography and through collaboration through the SPAB. Although not part of the statutory development plan, participation in the preparation of an ISF would be a statutory requirement placed on all local authorities.

The ISF would provide the main evidence for demonstrating how local authorities are meeting the new powers to support sustainable development, with clear metrics to monitor performance against both national and locally developed objectives. They would be used to inform (and would be informed by) a range of strategic influencers, particularly the sub-national priorities of LEPs and STBs (see Figure 4). They would also inform local plans, testing the most appropriate spatial strategies (including distribution of growth) for delivering the shared vision, and identifying strategic growth areas, especially where changes are needed to deliver these (e.g. changes to existing constrained areas).

Key spatial proposals in the ISF would then be taken forward and tested fully through the statutory development plan process. The ISF would also be used to inform the statutory Spatial Development Strategies (SDS) being prepared by some Mayoral Combined Authorities.

Figure 4: Integrated Strategic Framework: The Circle of Influence



Although the specific model used in each area could differ to take account of local circumstances, there should be some common components prescribed at the national level to ensure consistent metrics for monitoring and evidence to support the new sustainable development powers.

Generally, an Integrated Strategic Framework would:

Be **vision-led and outcome focused** with clear articulation of scale of ambition and specific metrics around sustainable growth (as defined at the national level).

Be **place-based** with all key strategic factors supporting growth integrated and investment priorities aligned and clear outcomes around improving health and wellbeing, addressing climate change challenges and facilitating economic growth.

Be **spatially specific** (but not site-specific) with clear distribution of growth to support delivery of the shared vision and identify where change is needed to current spatial patterns and designations.

Identify strategic priority areas and what interventions and delivery vehicles should be needed to implement these e.g. strategically important ‘Growth Area’ such as new community or where strategic scale town centre regeneration is needed. The ISF could also recommend broad Growth, Renewal and Protected Areas that could then be refined and tested through the statutory local plan process, especially where there is only one local plan involved (i.e. where there is a single UA).

Provide a **framework for strategic infrastructure prioritisation (and other strategic interventions)**, illustrating how this will support growth and what the anticipated outcomes will be as a result of the investment.

Be **resilient and responsive to change over time** (economic, climate, demographic, technological change), with a phased delivery framework that can adjust actions and interventions needed to deliver the overarching vision and strategy.

Be **used as key evidence to support growth or other multi-area deals**, to inform local plan housing targets and compliance with new local plan Sustainable Development Test at examination.

Be **evidence based** with strategic evidence developed to support the framework (and delivery through local plans and other statutory plans and strategies) and as part of the recommendations on housing targets and distribution.

A ten year rolling Strategic Delivery Plan would be developed alongside the ISF.

This would set out what strategic interventions (including any specific delivery vehicles) would be needed, how key partners are contributing (especially, the LEPs and STBs) to the shared vision and objectives, and would provide a basis for infrastructure funding and other strategic investment prioritisation. This should also make clear the responsibilities and accountabilities (especially fiscal accountabilities) of all partners involved, with a robust risk management system to highlight where a change in approach or intervention may be needed.

The ISF would not be part of the statutory development plan system and therefore would not be subject to the same level of scrutiny as the local plan examination process.

However, they should be based on a clear set of commitments from partners, the evidence base developed to support the wide range of strategic plans and strategies being used to deliver sustainable growth (as set out in Figure 4 above) and would be tested in detail through the local plan process. They would also be subject to government scrutiny and oversight (as a result of the proposed new sustainable development powers) and would have to comply with a certain amount of national prescription setting out a common set of principles and ground-rules.

All of this means there is an opportunity to move forward quickly with preparing ISFs and in advance of any required planning legislation, provided there is sufficient guidance from Government to future proof the pre-legislative frameworks (e.g. through a Ministerial Statement or other formal commitment setting out the direction of travel).

This would therefore allow the ISFs to provide a state of readiness for the new planning system to be introduced and new local plans prepared; to play a role in responding to the immediate economic recovery; and to be developed through a potentially turbulent period for local government as a result of restructuring and devolution. The frameworks currently being prepared (see map in Appendix 1) could evolve to meet any new requirements, therefore providing a head start for some local authorities and their partners.

4. Conclusions & Recommendations

Conclusions

There is overwhelming consensus amongst many key organisations with a role to play in the planning system and in supporting sustainable growth that a new, more effective approach to strategic planning is needed and should form part of the Government's proposals for a new planning system. Although the Government clearly acknowledges this in the Planning for the Future White Paper, no specific solution is proposed.

The suggested response set out in this report, would provide an approach to strategic planning that can help deliver the overarching government objectives for a faster, fairer and simpler system and would support a number of specific proposals in the White Paper. Critically, the proposed new approach would provide:

- A **workable solution to the strategic planning void** which will be left when the Duty to Cooperate is removed, providing parity of roles across all local authorities and stronger place leadership for supporting sustainable 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.
- 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 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.
- **Alignment between local and national priorities** to deliver sustainable development (based on 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.
- 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 (LAs, MCAs, STBs, LEPs) and government departments.

However, this would need to be resourced properly, with the skills and capacity to support the approach considered in the context of a potentially changing local government landscape. It would have to be based on a strong culture of collaboration and trust both amongst strategic partners and between strategic partners and government, building on the partnership arrangements that already exist (or are emerging), where possible.

Some of the changes would also have to be underpinned by legislative or national policy changes, although there are mechanisms that could be used in the meantime to set out a clear direction of travel, for example through a Ministerial Statement.

Above all, the proposed arrangements would have to be based upon a wider understanding in government and amongst stakeholders of what strategic planning is, in its widest sense, and the significant added value that an effective approach can provide in meeting the aspirations for long term sustainable growth.

Recommendation 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.

Recommendation 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.

Recommendation 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.

Recommendation 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).



Appendix 1 - Existing Models of Strategic Planning in England

(a) Joint Strategic Plans and aligned spatial strategies (statutory)

- Joint strategic plans (JSPs) are high level vision-led strategic (Place-based) frameworks being prepared within the context of a statutory development plan (allowed under Section 28 of the 2004 Planning and Compulsory Purchase Act).
- JSPs usually cover large spatial geographies and involve a number of LPAs e.g. the Oxfordshire Plan is countywide with 5 LPAs and the South Essex JSP covers 6 LPA areas.
- Voluntary governance structures underpin the joint plans – although there is provision in the 2004 Act for statutory joint decision-making (Section 29), all current round of JSPs are being managed through voluntary collaboration with decision-making staying with the individual LPAs (i.e. county councils are involved but have no decision-making rights).
- The JSPs (or aligned strategies) set the spatial framework for the area but not site allocations, although they can allocate strategically important sites and can propose a redistribution of growth/ housing across the areas to support the long term vision.
- There have been major challenges in terms of how these fit with the current local plan system as well as challenges in relation to the relative weakness of voluntary governance arrangements.

(b) Joint Local Plans (statutory)

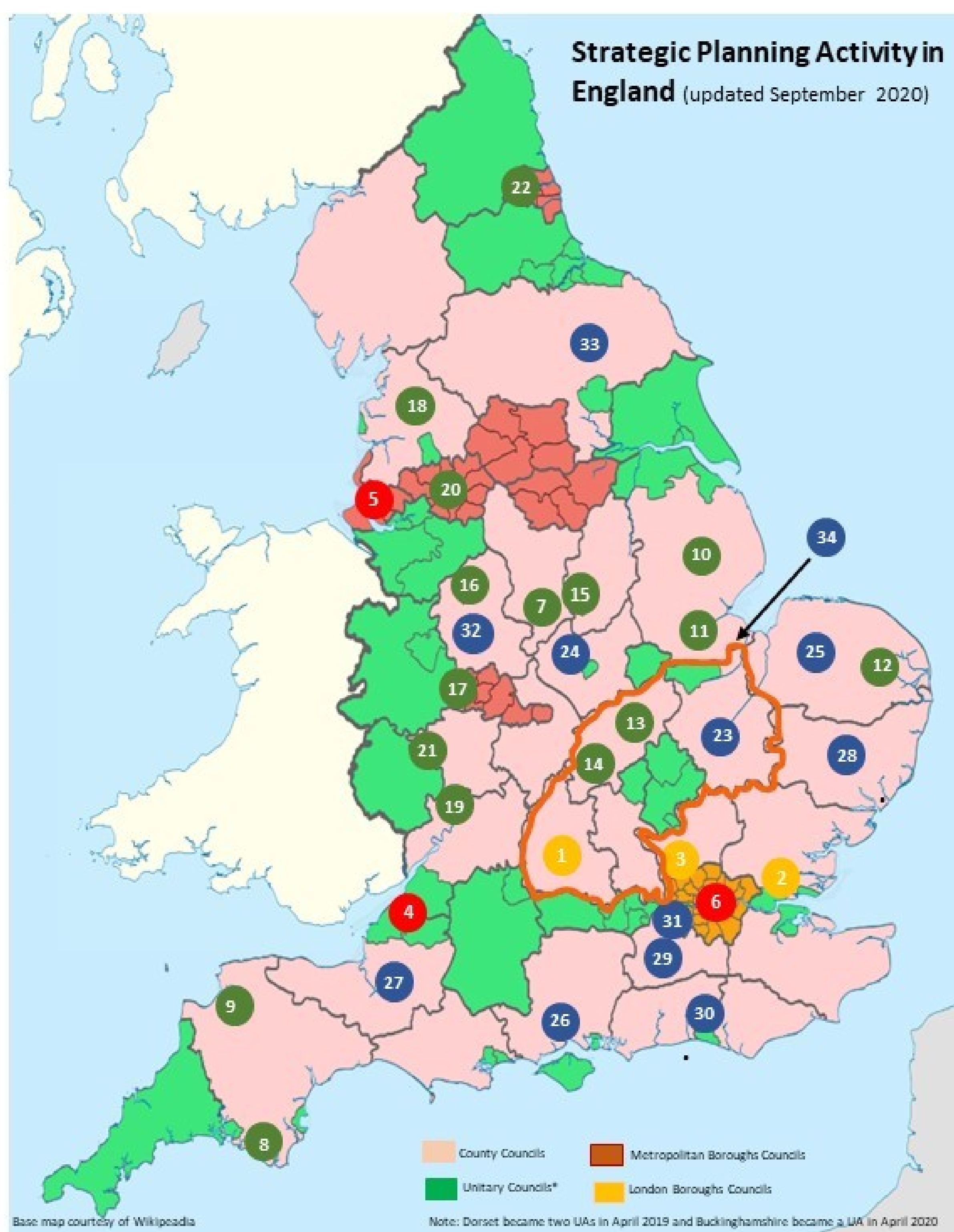
- Joint local plans are statutory joint development plans but, unlike JSPs, they provide a comprehensive planning framework with detailed policies and site allocations.
- They tend to cover a smaller geographical and administrative area than JSPs, with most covering 2-3 LPAs.
- Most are prepared with statutory joint governance arrangements through Section 29 joint committees which include the relevant county council in an equal decision-making capacity. However, this has proved too rigid for some e.g. the statutory joint planning arrangements for West Northants were revoked due (at the request of the partner authorities) as they were no longer considered to be effective or reflect the functional strategic planning geography.
- Not all joint local plans are considered to be ‘strategic’ in nature i.e. some are joint plans to cover 2 or 3 relatively small LPAs.

(c) Spatial Development Strategies (statutory)

- Spatial Development strategies provide frameworks prepared by mayoral combined authorities (MCAs) where this has been agreed as one of their statutory functions – there are currently only three - West of England, Liverpool City Region and London (where the Mayor has the statutory responsibility). This may change in future if the Government decides to apply the same requirements for SDS across all MCAs as part of the devolution proposals.
- SDS set the spatial framework for an area but only allocate strategically important sites.
- They have a separate statutory process to local plans (and separate guidance).
- For SDS prepared by an MCA (i.e. not London) consensus amongst all CA members is needed.

(d) Spatial and growth frameworks (non-statutory)

- These provide a high level investment (vision-led) framework aimed primarily at integrating strategic infrastructure investment and spatial priorities across large spatial geographies e.g. county and city region based.
- Some have attempted to provide a (spatially specific) place-based solution to growth which provides a framework for local plans and other key plans and strategies (e.g. Surrey 2050 Place Ambition) whilst others focus more on strategic infrastructure (e.g. Leicester & Leicestershire Growth Plan).
- Ability to directly impact on local plans is limited, especially where transformation and therefore changes to current spatial distribution is needed to support growth (e.g. changes to Green Belt boundaries).
- Not part of statutory development plan and can therefore be prepared and implemented much quicker, although the testing process (and public engagement) is not as rigorous. This is one of the main concerns about the current non-statutory approach but could be addressed (in part) through stronger strategic governance arrangements.
- A recent addition to this approach is the proposed new Spatial Framework for the Oxford Cambridge Arc, announced in the March 2020 Budget. This is a government led initiative but the Framework will be co-designed by local authorities, the Government and other key stakeholders - <https://www.gov.uk/government/publications/the-oxford-cambridge-arc-government-ambition-and-joint-declaration-between-government-and-local-partners>. It is not clear yet as to the status of the Framework i.e. whether it would have the stamp of government policy or whether this is a model that the Government is keen to emulate in other parts of the country.



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 & Torridge 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 Tyne & Gateshead 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*

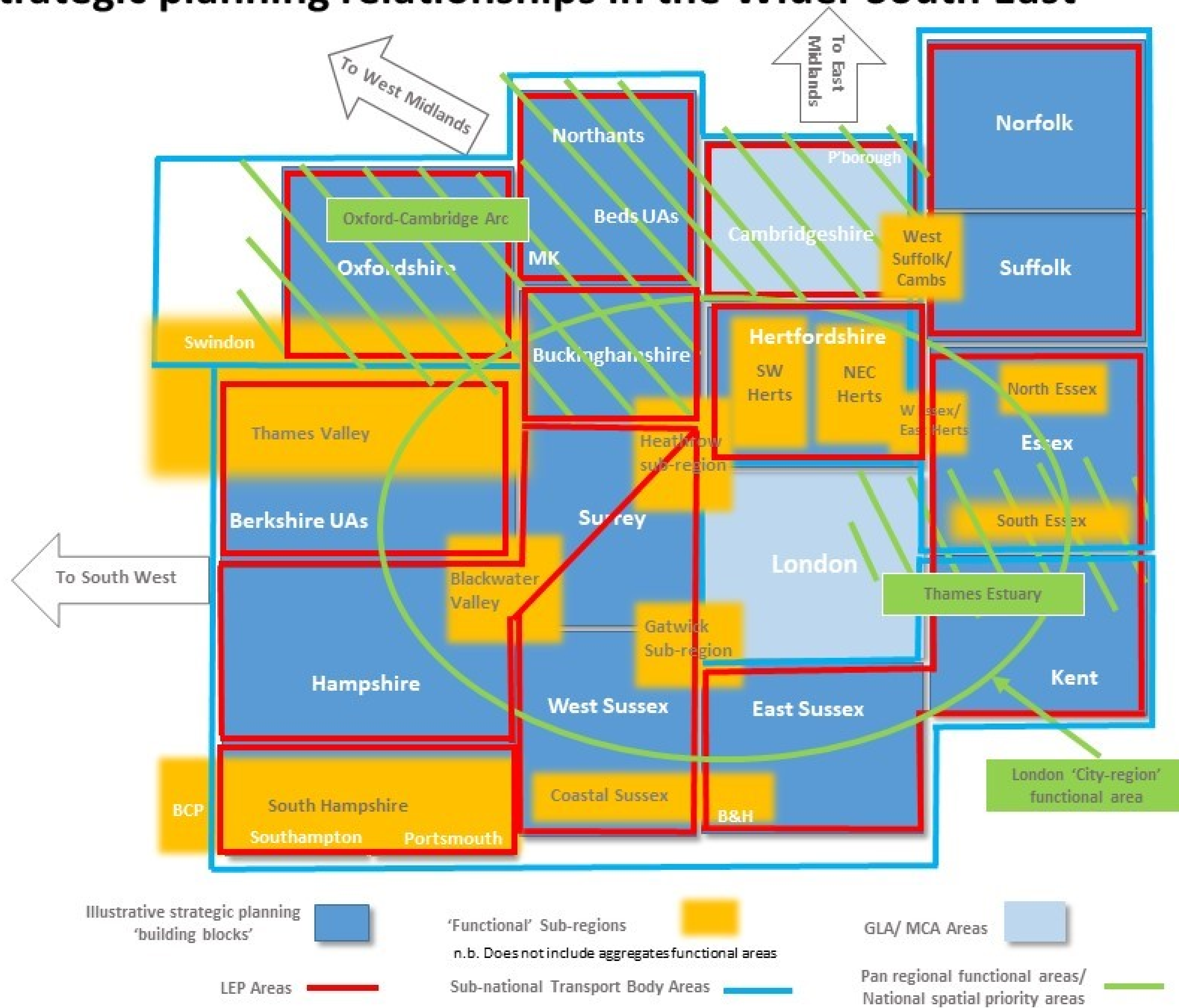
* Emerging plans/ frameworks (or under review)

** 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 2 - Illustrative example of strategic planning functional relationships in the Wider South East

Strategic planning relationships in the Wider South East



Appendix 3 - Summary of Governance Models

Formal Joint Committee (existing)

Joint committees are formally constituted structures [under s101 (5), 102 Local Government Act 1972 and s9EB Local Government Act 2000 and pursuant to the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012] and are commonly used by local authorities to manage shared decision-making on matters that impact on more than one authority. Although they cannot act as the decision-making body for the purposes of joint local plan making – see Section 29 Joint Committees below - these can be used for some elements of joint planning, such as for strategic development applications and for setting infrastructure priorities.

Section 29 Joint Planning Committees (existing)

A Section 29 Joint Committee is the only option currently available where decision-making on joint plans (prepared under S28 of the Planning and Compulsory Purchase Act - <https://www.legislation.gov.uk/ukpga/2004/5/section/28>) is done through a statutory joint committee and not through the individual LPAs. However, whilst the legislation allows joint committees to be formed between districts and county councils, it does not allow county and unitary authorities to be party to the same joint committee so this could not be applied in a large number of areas, especially where there are unitary city councils surrounded by two tier governance structures.

Economic Prosperity Boards (existing)

Economic Prosperity Boards were introduced in the 2009 Local Democracy, Economic Development and Construction Act (<https://www.legislation.gov.uk/ukpga/2009/20/part/6/enacted>) and were originally established to focus primarily on economic development and regeneration. They have largely been seen as the precursor for establishing a combined authority and were overtaken by the 2010 Coalition Government's introduction of Local Enterprise Partnerships. Unlike joint committees and LEPs, however, they have a separate corporate identity and can take on some local government roles if linked to economic development or regeneration but not wider functions related to sustainable development.

Section 4 (4) Authorities (revoked)

Section 4 (4) Authorities were county, unitary and national park authorities who, under the 2004 Planning and Compulsory Purchase Act (<https://www.legislation.gov.uk/ukpga/2004/5/section/4/enacted>) had specific statutory functions in relation to regional planning. The main role was to advise Regional Planning Bodies (and ultimately Government which was responsible for the regional spatial strategies) on sub-regional growth and infrastructure priorities, as well as housing provision and local planning authority distribution, which was then tested through the statutory development plan process.

Appendix 4 - Summary of Catriona Riddell Recent Projects

Some of Catriona's most recent and current projects include:

- **South Essex Authorities** (2017 – present day): Currently advising the local authorities on their Joint Strategic Plan and South Essex 2050 Place Ambition.
- **Surrey Authorities** (2018 – present day): Currently advising the Surrey Authorities on developing a more robust and collaborative approach to supporting growth and infrastructure delivery through the Surrey 2050 Place Ambition.
- **Oxfordshire Authorities** (2014, 2017, 2019-present day): Advised the authorities on various issues related to the joint planning work in Oxfordshire. Currently advising on the development of the spatial strategy options for the Oxfordshire 2050 Plan.
- **South Hampshire** (2019-2020): Advised the Partnership for South Hampshire on developing a new approach to a joint spatial strategy.
- **Planning Advisory Service** (2019 to present day): Delivering strategic planning direct support to local authorities.
- **Oxford-Cambridge Arc partners** (2019-2020): Advised the local authorities and their partners on how to take forward work on developing the Arc Framework.
- **South West Hertfordshire Authorities/ Hertfordshire Authorities (2017 – 2019)**: Advised the local authorities in South West Herts on their Joint Strategic Plan and the wider group of Hertfordshire Authorities on their long term growth ambitions.
- **Suffolk Authorities (2016-17)**: Supported the Suffolk Authorities in the preparation of a new Strategic Planning and Infrastructure Framework.
- **Berkshire Authorities (2017)**: Advised all six Berkshire Authorities on options for working more collaboratively together, with a focus on strategic spatial and infrastructure planning.
- **West Sussex and Greater Brighton Authorities (2012- 2016)**: Supported the work of the Strategic Planning Board and was the lead author of the Local Strategic Statement (LSS). The work of Board was recognised with an RTPi Award in 2014 and is a PAS Strategic Planning Case Study.
- **Other recent examples of strategic planning support include**: Cambridgeshire & Peterborough Authorities and Combined Authority (2016-2017); Leicestershire Authorities (2015-2017).
- **Author of Counties and Strategic Planning (CCN, July 2018)**: A report on behalf of the County Councils Network exploring the different roles county councils are playing in strategic planning [<https://www.countycouncilsnetwork.org.uk/economic-growth-housing-infrastructure/>].
- **Working with LEPs and other strategic stakeholders**: Supporting LEPs to help them deliver the strategic planning priorities set out in their Growth Plans and Growth Deals e.g. Coast to Capital LEP (2015) and South East LEP (2016).
- **Local Plan Reviews**: Undertaking technical reviews of emerging local plans, in terms of evidence base, policies and process, particularly the Duty to Cooperate.

Footnotes

[1] The proposed reforms to the planning system are set out in a White Paper – Planning for the Future – published in August 2020:

<https://www.gov.uk/government/consultations/planning-for-the-future>

[2] **Local Plan Expert Group Report** (March 2016):

<https://www.gov.uk/government/publications/local-plans-expert-group-report-to-the-secretary-of-state>

[3] Paragraph 2.19 of the White Paper states that “further consideration will be given to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared in areas with significant strategic challenges”

[4] In England, districts and unitary authorities are responsible for spatial (local) planning, with county councils responsible only for minerals and waste planning. This has resulted in a significant disjoint between spatial planning and other key functions, particularly in relation to distribution of growth and infrastructure delivery, across large parts of the country since 2011 – see **County Councils and Strategic Planning (June 2018)**: <https://www.countycouncilsnetwork.org.uk/new-reports-back-a-larger-role-for-counties-in-planning-as-councils-warn-over-severe-need-for-affordable-homes/>

[5] **Disrupting the Housing Market** (Localis, October 2017):

<http://www.localis.org.uk/research/disrupting-housing-market/>

[6] See **Place-Based Recovery** (Grant Thornton, August 2020):

<https://www.countycouncilsnetwork.org.uk/almost-six-million-people-in-county-areas-working-in-at-risk-job-sectors-with-rural-areas-most-vulnerable-to-the-economic-impact-of-coronavirus/>

[7] **UK2070 Commission: Final Report** (Feb 2020): <http://uk2070.org.uk/publications/>

The Raynsford Review: Final Report (TCPA, November 2018):

<https://www.tcpa.org.uk/raynsford-review>

Smarter Approach to Infrastructure Planning (RTPI, May 2019)

<https://www.rtpi.org.uk/research/2019/may/a-smarter-approach-to-infrastructure-planning/>

[8] **Written Ministerial Answer from Simon Clarke MP** (29 June 2020):

<https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2020-06-19/61744/>

[9] See specifically Paragraph 1.1 of the White Paper

[10] Until recently 5 JSPs were being prepared but two have now been withdrawn.

[11] See case studies in CCN’s report - County Councils and Strategic Planning:

<https://www.countycouncilsnetwork.org.uk/new-reports-back-a-larger-role-for-counties-in-planning-as-councils-warn-over-severe-need-for-affordable-homes/> and Place-based Growth: <https://www.countycouncilsnetwork.org.uk/new-report-warns-that-the-levelling-up-agenda-cannot-overlook-shire-counties-calling-for-major-new-powers-for-those-councils-in-devolution-whitepaper/>

[12] See Proposal 23 of the White Paper

Footnotes

[13] Section 2 of the 2000 Local Government Act -

<https://www.legislation.gov.uk/ukpga/2000/22/section/2> places a duty of wellbeing on local authorities which was largely implemented through the preparation of sustainable community strategies. These set the overall strategic direction and long-term vision for promoting or improving the economic, social and environmental well-being of a local area and were a statutory requirement for local authorities until the legal provisions were repealed through the 2015 Deregulation Act -

<https://www.legislation.gov.uk/ukpga/2015/20/notes/division/5/99>.

[14] All proposals in this section apply to both counties and districts in two-tier areas.

[15] **Oxfordshire Growth Board:** <https://www.oxfordshiregrowthboard.org/>

Greater Norwich Growth Board: <https://www.greaternorwichgrowth.org.uk/>

[16] **Hertfordshire Growth Board:** <https://www.hertfordshiregrowthboard.com/>

[17] **Surrey Future Steering Board:** <https://www.surreycc.gov.uk/land-planning-and-development/development/surrey-future>

Catriona Riddell BA (Hons) MRTPI
Director, Catriona Riddell & Associates Ltd

T: +44 7710405957

E: catrionariddell@btinternet.com

