the need for a city-regional approach

Duncan Bowie sets out the context for the Special Section on Strategic Planning for the London and Wider South East region

Network Rail

The planning of London and the Wider South East is a matter of national significance, especially post-Brexit

The articles in this special feature have been written by members of the London and Wider South East Strategic Planning Network. The network was established in early 2017 and grew out of the TCPA Policy Council's London and South East Task Group. The original task group produced a series of articles for a special feature in the August 2016 edition of *Town & Country Planning*. The group was then restructured to include a number of academics who had been engaged in research on the subject, as well as practising planners who had been engaged in previous consultations on the London Plan and other policy proposals relating to strategic planning in the London city region.

The starting point of the group's discussions was that the planning of London had to take into account the relation of London to its hinterland, and that strategic planning in the Wider South East had to have regard to London. The existence of the Mayor of London as a regional planning authority within the London administrative boundary did not in itself generate a city-regional approach. The abolition of SERPLAN[1] in 2000 left the Mayor of London in a position in which he had to liaise with nearly 100

different statutory planning authorities in the wider city region, and the inter-regional forum which operated until 2010 proved ineffective.

The abolition of regional planning structures outside this boundary in 2010-11 increased the difficulty of city-regional planning as the strategic planning structures for the South East and the East of England regions were dismantled. The 'duty to co-operate' arrangements introduced in the 2011 Localism Act have proved to be an inadequate substitute for the pre-existing regional planning system, while the Local Enterprise Partnerships were not given an explicit role in the statutory planning framework.

While successive Mayors of London have sought to demonstrate that London planning can move forward on the basis of the compact-city principle advocated by Lord Rogers and others, London has failed to meet its own housing needs, while other aspects of strategic planning – including transport planning, employment and retail growth and location, parking provision, waste disposal, and a range of environmental planning issues – have demonstrated points of conflict between both the requirements and the policies of different planning authorities within the wider city region.

'This approach to chasing the housing numbers has disregarded the social consequences of the compact-city approach, notably in terms of whether the housing built at higher densities, and often in the form of high-rise developments, is appropriate in terms of size, type, built form and affordability for the range of housing needs in London'

These problems have been explicit at successive London Plan Examinations in Public (EiPs), while there have also been conflicts in relation to the Mayor's response to consultation by Home Counties planning authorities in relation to their Local Plans, often in relation to whether or not authorities should be making contributions to meeting London's housing requirements.

In his report on the London Plan EiP in 2014, the Inspector questioned whether the compact-city approach to London planning remained viable,

given his concerns as to both the quantity and the quality of housing output achievable through densification, while at the same time he called for more collaborative planning between the Mayor and neighbouring planning authorities. However, the then Minister, Brandon Lewis, rejected any suggestion that a formal structure for city region planning should be established or that SERPLAN should be re-established.

Although both Boris Johnson and Sadiq Khan have sought to improve collaborative planning discussions with Home Counties districts and unitary planning authorities and their representative groupings at both political and officer level, as described in Corinne Swain's article in this Special Section, the draft of the 2020 London Plan still seeks to pursue the compact-city approach and meet London's needs for both housing and employment growth within the London administrative boundary. This objective, taken together with the need to protect London's employment capacity and the policy to protect the Green Belt within the London administrative boundary from development, has generated a focus on densification as the only means to respond to the actual and forecast growth in London's population, projected at the time the draft London Plan was published at a significantly higher level than was the case when the 2015 London Plan was adopted.

This approach to chasing the housing numbers has disregarded the social consequences of the compact-city approach, notably in terms of whether the housing built at higher densities, and often in the form of high-rise developments, is appropriate in terms of size, type, built form and affordability for the range of housing needs in London. The densification approach has not significantly increased the number of new homes built each year, even if planning consents have increased. The approach also ignores the inflationary impact of densification on land and property prices, both residential and non-residential, never mind the impact on London's landscape and skyscape.

The network's discussions have had a number of dimensions. The first element has been the need for an evidence base relating to the wider city region. While the evidence base for planning within London is extensive, it is by no means comprehensive, and there is a sad lack of data which is consistent across the wider city region. This is partly attributable to the winding up of the two regional planning bodies. The failure to agree on population projections and inter-regional migration data for the 2014 London Plan EiP demonstrated that these technical issues have significant implications for strategic planning. Corinne Swain's article reviews some of the current deficiencies and the efforts taken so far to fill in some of the gaps and puts forward a proposal for further collaborative work.

The second element in the network's discussions, which follows from the first, has been the case for giving consideration to strategic planning development options different from the compact-city self-containment option assumed in all the pre-existing versions of the London Plan since 2004 and in the proposed new London Plan. The London Plan review process, despite the Integrated Impact Assessment scoping report,[2] has not fully considered alternative spatial options, and, moreover, the IIA's analysis of the social impact of the proposed compact-city densification approach is seriously deficient.

The London Plan process has not considered the relationship of London's growth to that of the rest of the UK, or the options for planned population dispersal – including the potential for new 'garden communities' in the Wider South East, the potential for extensions to Home Counties towns, or the possibility of urban extensions to London's existing built-up area, whether in the Green Belt or within or beyond the existing London boundary. The London Plan discounts the work of Transport for London on the London Infrastructure Plan 2050,[3] more recent work on the Cambridge-Milton Keynes-Oxford (CaMKOx) growth arc and by the UK Innovation Corridor Partnership, developed from the former London-Stansted-Cambridge-Peterborough growth area, the proposals from URBED in relation to the Western Wedge,[4] and the work of consultants AECOM on city regional planning.[5]

The London Plan fails to consider which, or which combination of, a range of possible strategic development options is most sustainable in economic, social and environmental terms. Some of these options were discussed in my article 'Beyond the compact city', published in *Planning in London* 18 months ago,[6] and so are not repeated here.

The third element has been a discussion of alternative governance structures to develop a more effective approach to city-regional planning. The article by Vincent Goodstadt in this Special Section relates the needs of the London city region to the debate over the recovery of a framework for national, regional and sub-regional strategic planning being made by the Common Futures Network, also drawing on the approaches in other world cities. Martin Simmons' article considers the prospects for finding a way forward, while reflecting on previous initiatives such as the South East Study, the Strategic Plan for the South East and SERPLAN.

As a contrast, in the final article, Ian Gordon reviews the limitations of strategic planning at city-regional level and expresses caution over establishing new governance structures and grand plans, preferring a greater focus on incentivised collaboration between existing bodies with a much greater emphasis on delivery. He sees planning as a 'process rather than a blueprint'.

It is hoped that these articles, together with the continuing work of the London and Wider South East Strategic Planning Network, will help to generate a wider understanding of the need for city-regional planning at various levels within national, regional and local government and among planning practitioners and other interested parties. In the short term, it is hoped that the forthcoming London Plan EiP will give greater consideration to these issues than has been the case at previous EiPs.

However, our objective is somewhat wider, as these issues impact on planning across the city region and it is important that national government recognise that their resolution cannot be achieved solely through voluntary collaboration between the planning authorities in the London city region; and that the planning of London and the Wider South East is a matter of national significance, especially in the post-Brexit context – and consequently a matter which requires both the attention and the support of Ministers and senior civil servants at national level, not just within the Ministry of Housing, Communities and Local Government, but across the whole of government.

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Notes

1   The London and South East Regional Planning Conference – a regional planning forum in the South East, established in the early 1960s and in operation until 2000. It was constituted by the London borough councils and the county, unitary and district councils in the county areas of Bedfordshire, Berkshire, Buckinghamshire, Essex, Hampshire, Hertfordshire, Kent, Oxfordshire, Surrey, East and West Sussex and the Isle of Wight. As such, it covered the whole of the area of the South East Government Office, part of the area of the Eastern Region Government Office, and London

2   *Integrated Impact Assessment of the London Plan: IIA Scoping Report*. Mayor of London. Greater London Authority, Feb. 2017. www.london.gov.uk/sites/default/files/london_plan_iia_scoping_report_feb_2017.pdf

3   *London Infrastructure Plan 2050: Transport Supporting Paper*. Mayor of London, 2014. www.london.gov.uk/what-we-do/business-and-economy/better-infrastructure/london-infrastructure-plan-2050#acc-i-43214

4   J Manns and N Falk: *Re/Shaping London: Unlocking Sustainable Growth in West London and Beyond*. White Paper 3. London Society, Oct. 2016. www.londonsociety.org.uk/product/reshaping-london-london-society-white-paper-no-3

5   *Big, Bold, Global Connected: London 2065. A Manifesto for the Long Term Growth of the London City Region*. AECOM, Mar. 2015. www.aecom.com/content/wp-content/uploads/2015/10/AECOM-Manifesto-for-the-London-City-Region.pdf

6   D Bowie: 'Beyond the compact city'. *Planning in London*, 2017, Vol. 97, Apr.-Jun., 59-70

towards a London city-regional intelligence base –
the art of the possible

Corinne Swain looks at the need for an evidence base relating to the London and Wider South East city region, the efforts made to rectify deficiencies, and how further collaborative work could be undertaken

The artificiality of the administrative boundary between London and the surrounding local authority areas is once again thrown into sharp relief by the approaching Examination in Public of the draft new London Plan.[1] The fact that this time there are two policies related to the Wider South East (WSE) in the spatial strategy section of the Plan is testament to the collaboration that has taken place between the Greater London Authority (GLA) and its neighbours since the last examination.

But is there an adequate regional intelligence base on which to formulate these policies? And is the current method of 'deal making' which underlies at least one of the policies a sufficiently transparent basis on which to consider planning for growth locations in the wider city region?

In addition to the forthcoming London Plan Examination in Public, there are wider considerations which suggest that now is a good time to accelerate progress towards a more strategic approach. Drivers of possible interest to actors in the WSE include:
- the desire to increase productivity through the production of a 'Regional Industrial Strategy', rather than multiple Local Industrial Strategies as envisaged in the national Industrial Strategy;
- the perceived risk of falling behind the other nations and inter-regional groupings such as the Northern Powerhouse and the Midlands Engine in making a case for government infrastructure funding; and
- the opportunity to produce a shared transport vision incorporating the aspirations of the emerging sub-national transport bodies in the WSE, as well as Transport for London's ambitions to take over rail franchises on London commuter routes.

Current collaborative arrangements

Current collaboration (instituted in 2015) between London and the WSE authorities is derived in part from recommendations made by the Outer London Commission. It comprises a Wider South East Political Steering Group made up of a small number of representatives from the GLA, London Councils, the South East England Councils (SEEC) leaders group and the East of England Local Government Association (EELGA) leaders group. A councillor from each of the 160 or so local authorities can attend the annual Wider South East Summits. Links with the Local Enterprise Partnerships (LEPs) and transport organisations are now being developed.

One of the main successes of this collaboration has been to reach agreement on strategic infrastructure priorities for investment in the WSE (as reflected in Figure 2.15 of the draft London Plan – reproduced as Fig. 1 in the article by Martin Simmons, 'Time for a turn of the tide'[2] in this Special Section). Much of the background evidence for their identification came from the regional planning era, but was also supplemented in some

Source: GLA 2016-based central projections. GLA Planning, Dec. 2017. Contains OS data © Crown copyright and database right (2017)
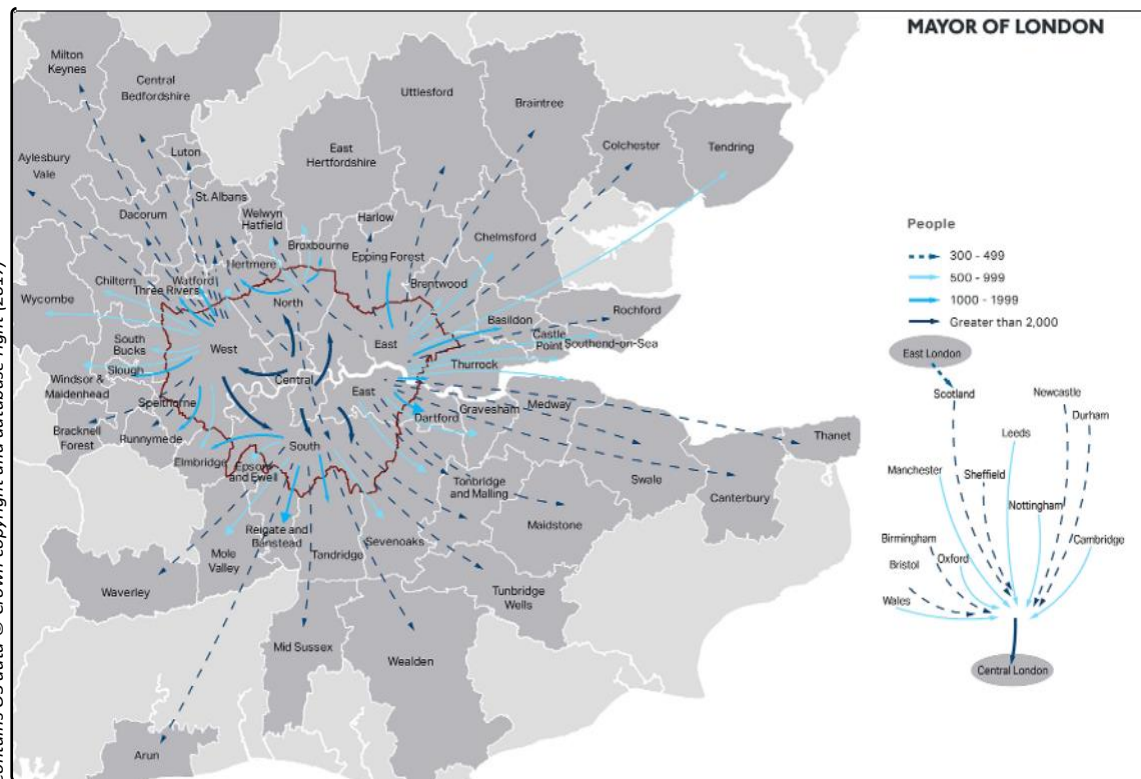
Fig. 1 Average annual net domestic migration flows, 2007-16

Source: London Plan: promotional folder - maps. www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0

counties by more recent Growth and Infrastructure Frameworks, inspired by London's work on its Infrastructure Plan 2050.

Meaningful work on wider issues such as economic connectivity and improving productivity would arguably be easier if there was better intelligence at the city-regional scale. Building a regional evidence base might involve some of the following activities.

Extending city-regional understanding

There are already examples of evidence gathering at a larger-than-local scale, but nothing ties them together. One attempt was to piece together the findings from the numerous Strategic Economic Plans of the LEPs[3] covering the WSE and London. This had the potential to identify gaps, duplication and mismatches, but it is not clear what, if any, actions were taken as a result.

Most technical studies have related to specific sub-regions or corridors, such as the Independent Economic Reviews (for Essex, and Cambridgeshire and Peterborough), Growth and Infrastructure Frameworks (for example, for Kent) and Suffolk's Framework for Inclusive Growth. At the very least, it would be worth trying to stitch together the mapped outputs to begin to produce a GIS database

of the city region. The findings from such studies could also usefully be synthesised to identify the factors driving economic change within the city region.

Examples of more detailed research exist, particularly that commissioned by the London-Stansted-Cambridge Corridor Growth Commission,[4] including a range of comparative international studies identifying key factors in their economic success. The outputs of this, and any similar research conducted during the regional planning era that still had currency, could be usefully brought together into an online regional research repository, giving it greater prominence and enabling wider access.

Academics, think-tanks and consultants have also undertaken work at both the regional and the sub-regional levels. Leaving aside any recommendations for planning policy or governance that some in the public sector have found controversial, there may be background evidence and mapping that could be culled. Exposing such work to wider cross-sectoral scrutiny, perhaps through an annual research conference, would help to raise the profile of city-regional issues, and to create regional awareness.

Box 1

Migration trends – case study example of research needs

One example of an area where a better regional understanding would be of benefit is on migration trends between London and the WSE. Visualising domestic migration flows from 2007 to 2016 is a useful start (see Fig. 1 on the preceding page of this article). The causes behind such flows and the variations in scale in response to the 2008 financial crisis are well explored in work led by the London School of Economics.[i] It is also helpful that the GLA has produced consistent future projections for all London boroughs and WSE authorities (and indeed for the rest of the country).[ii] This database would be worth exploring in more detail than appears to have been the case so far.

Understanding demographic trends is not just about informing housing numbers for Local Plans; they also tell us about people's responses to job opportunities. Preliminary analysis of this database shows how much international migration is attracted into certain towns in the WSE, which are increasingly important economic hubs. For example, for both Oxford and Brighton net gains from international migration are projected to be over 90,000 over the 2016-2039 period (2016-based central projection), roughly equivalent to or exceeding domestic net out-migration.

Little is known about how economic functions in key towns are linked across the WSE, rather than through London. These relationships were last explored in the Polynet study in the mid-2000s, and a refresh may now be timely. This could be one element in justifying a more polycentric approach to planning in the WSE. It might give weight to some of the jointly agreed orbital priorities in Figure 2.15 of the draft revised London Plan – a diagram that has previously caused angst among WSE authorities in terms of the Mayor's inference that growth areas could be located along these orbital routes.

i   I Gordon, T Champion, N McDonald and C Whitehead: *Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East*. London School of Economics for the East of England Local Government Association, Dec. 2017 (edited version). www.lse.ac.uk/business-and-consultancy/consulting/consulting-reports/review-of-research-on-migration-influences-and-implications-for-population-dynamics-in-the-wider-south-east

ii *GLA-Based Population Projections: Explanatory Note and Results for the WSE*. GLA Intelligence, Greater London Authority, Jul. 2017. https://files.datapress.com/london/dataset/projections-documentation/2017-12-01T12:33:49.25/2016-based%20projections%20WSE%20results.pdf

Other research needs

A case study example of research needs is given in Box 1. Other topics that would benefit from exploration at a city-regional scale include, for example:

- commuting patterns as a reflection of changing relationships between housing costs, transport costs and travel-to-work time;
- employment demand and capacity, examining possible synergies across the London boundary; and
- data on rental levels in the local authority/ registered social landlord and private rented sectors, helping to unravel the extent of displacement outwards of those no longer able to get social tenancies or to afford to live in London.

So in terms of the art of the possible, an early aim of greater collaboration across the wider city region would be to set up a city-regional intelligence base and use that to identify a future regional research agenda. This could be done as a collaboration between different sectors and perhaps the Research Councils. This might be less threatening than anything that hinted at a return to regional spatial planning. But it would provide a more informed basis on which to take decisions about the allocation of funding, and might avoid missed opportunities for actors in the WSE to influence the Mayor and central government's decision-taking.

The need for more technical capacity

All these activities would require expert knowledge and financial resources to commission new work, organise new events, and set up online platforms.

There is currently a lack of technical capacity in the local authority sector outside London. The Strategic Spatial Planning Officers Liaison Group (SSPLOG) provides technical support in a low-key fashion within limited resources. Much of the staff input comes from the GLA, which may itself raise suspicions over any research findings being produced to 'London rules'. But perhaps this is not

so different from years gone by, when SERPLAN was largely funded by the Greater London Council?

To my mind, a full-time joint technical team is now essential to support the work of the London and WSE Political Steering Group. There are various sources of funding that could be explored (the GLA/Transport for London, the LEPs, Homes England, and local authorities, perhaps claiming some new burdens funding from government), together with possible secondments from the academic and business sectors.

> ‘For now, leaving aside any discussion of strategic planning, the focus should be on getting a better understanding of what unites rather than divides the city region. Good evidence and the intelligence that comes from its interpretation would put regional actors in a stronger position to safeguard their interests and to bid for targeted funding’

But of even greater importance would be equal involvement of WSE interests in the appointment of staff, to avoid the perception of a London bias. There could be lessons here from the Greater Sydney Commission, where independent commissioners (a mix of academics, consultants and retired civil servants) oversee the dedicated technical research and intelligence capacity. This independence would cut across rivalries of party politics, and in the WSE between counties and districts. However, whether elements of this approach could be replicated in the WSE is a topic beyond the scope of this current article.

Moving towards more integrated strategic planning

In the longer term, it would be good to think that collaboration at the technical level on a more equal basis between WSE and London might be a precursor to strategic planning initiatives. The justification, as ever, is to ensure that major new development (residential and business) is aligned with infrastructure investment (transport, utilities and social).

If a regional intelligence database were to be set up, it would be possible to expand it over time to add policy overlays, such as base mapping of

regional assets and constraints, and combined spreadsheets of Local Plan housing targets and other numerical evidence. Information from utility companies giving an up-to-date picture of new investment and remaining constraints could also be mapped.

It would also be possible to establish common methodologies across the London border, involving a consistent approach to identifying potential development land capacity based on local density assumptions, including redevelopment of under-utilised land close to stations, and even a common methodology for undertaking a strategic Green Belt review.

But, for now, leaving aside any discussion of strategic planning, the focus should be on getting a better understanding of what unites rather than divides the city region. Good evidence and the intelligence that comes from its interpretation would put regional actors in a stronger position to safeguard their interests and to bid for targeted funding. Building the case for the WSE to be seen as a polycentric region, and not just as a dormitory of London, would be a useful start.

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Notes

1 Details of the forthcoming new London Plan Examination in Public are available at www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan
The latest version of the plan is the draft new London Plan including the Mayor's minor suggested changes (Aug. 2018), available at www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0

2 M Simmons: 'Time for a turn of the tide – re-creating effective regional planning for the wider London region'. *Town & Country Planning*, 2018, Vol. 87, Oct., 409-13

3 *Strategic Economic Plans in the Greater South East – Overview of Strategic Economic Plan Key Housing and Transport Objectives*. Enzygo Environmental Consultants, for the Greater London Authority (but initiated by the wider officers' group, the Strategic Spatial Planning Officers Liaison Group), Apr. 2015. www.london.gov.uk/sites/default/files/item_4_-_seps_overview_-_final_-_revised_post_meeting.pdf

4 London-Stansted-Cambridge Corridor Growth Commission resources and research reports are available at www.lsccgrowthcommission.org.uk/

a national priority—

the governance of the london and wider south east region

Vincent Goodstadt considers the needs of the London city region in the context of the wider need for a framework for national, regional and sub-regional strategic planning

There is an urgent need nationally for an integrated approach to tackling the three overarching issues of rapid urban growth, increasing social polarisation, and climate change. However, in England attempts to take such an integrated approach are blighted by the gap left by the lack of a long-term explicit spatial framework that guides the development of the country or its spatial inter-relationships with the devolved administrations. This gap must be filled by a national spatial strategy if the following common goals of all parties are to be delivered:

● the best possible conditions for British business in the long term;
● successfully building on the nation's strengths and potential, especially those based on advanced manufacturing, low-carbon energy, the universities, professional services, and the creative industries;
● an economy that works for everyone, and especially the most vulnerable;
● regeneration, innovation and job creation pursued in an integrated rather than 'policy silo' manner;
● an urban agenda built around coherent city regions and an understanding of the networks of cities, responding to the potential of each area; and
● the opening up of opportunities to rural communities and smaller towns, including former-industrial and coastal towns, as well as the major cities.

Such an initiative would stand as a practical implementation of the United Nations' New Urban Agenda[1] – the primary outcome from the UN Conference on Housing and Sustainable Urban Development (Habitat III) held in Quito, Ecuador in October 2016, to which the UK Government was a

signatory. The New Urban Agenda makes clear that:

'At this critical juncture in human history, rethinking the way we plan, build, and manage our urban spaces is not an option but an imperative. Our work to realize this vision begins now... We commit ourselves to ... integrate urban and rural functions into the national and subnational spatial frameworks and the systems of cities and human settlements.'

A key component of any national strategy is the role of its capital region – i.e. in England the role of London and the Wider South East (L&WSE). For example, although London is, on many measures, the world's leading financial and cultural centre, its competitiveness cannot be taken for granted, particularly post-Brexit. It needs to be diversified and less polarised. In addition, its future viability is highly and increasingly interdependent with its wider capital region – with each side of the relationship equally affected.

Similarly, the scale of interaction within the L&WSE region is reflected in the 1 million people daily making cross-boundary commuter trips, with an increasing length of the average commuter trip and a net 70,000 annual domestic out-migration of residents from London. These flows are combined with a high level of under-delivery of housing completions. As a result, there are acute problems of affordability and social polarisation. The challenge is to reverse these adverse impacts without damaging London's overall economic success and to invest in transport without generating house price inflation, in the context of the whole capital region.

Zoltan Gabor/Thinkstock

'The wider London region has increasing constraints upon its capacity to absorb the further pressures of growth'

In particular, the wider London region has increasing constraints upon its capacity to absorb the further pressures of growth anticipated from within London and local demands in the surrounding region. Infrastructure (road and rail, water and drainage, and social and health services) is increasingly at or over capacity, depending on the area. There is, however, no forum for debating and managing the relationships within the capital region. This would involve engaging with over 100 statutory bodies and councils. To quote AECOM's *London 2065* manifesto:[2]

'To effectively balance London's growth and make informed choices about priorities for infrastructure investment we need to look at London differently as one of the UK's city regions – looking beyond current administrative boundaries.'

A key part of any new agenda therefore will be to support London's global role as Europe's only global mega-region and top-ranked global city – which will need to be done within the context of the UK as a whole. This is central if we are to deliver the full benefits of an urbanised agglomeration made up of the 60 million+ population of the UK, comparable to Boston-Washington and the Shanghai mega-regions.

The economic role of the L&WSE region also lies in its network of towns outside London (for example Cambridge, Oxford, Reading, and Brighton). There is, however, a level of disconnect between the housing needs of London and the calculation of local needs. There needs to be rebalancing between London and the network of outer centres, and in its relationships with other major UK cities. The risks are that London might end up in a 'housing lock' which so excludes labour that it undermines its

economic potential, and that the communities outside London are unable to absorb the necessary levels of new homes through normal planning processes.

The future role of this mega-region is also critical to the rebalancing of the nation as a whole and to addressing the deep-rooted inequalities within it. The L&WSE region needs to be seen as one of the four English mega-regions recognised in the recent report on economic justice by the IPPR.[3] These mega-regions, together with the three devolved administration areas of Scotland, Wales and Northern Ireland, frame the future of the country. Five of these mega-areas already have, or are working on the development of, a strategic spatial development framework – the national frameworks of Scotland and Wales, the regional framework for Northern Ireland, and frameworks for the Northern Powerhouse and the Midlands Engine. By contrast, the lack of a spatial strategy for the L&WSE region is a significant gap.

The planning, management and governance of the L&WSE region therefore is not a mere local planning issue to be met through a requirement to fulfil the 'duty to co-operate'. It is in the national interest that the current gap in strategic planning is filled through a comprehensive approach to the UK's capital region. This has been debated for over half a century and has from time to time been used as a political football. Despite the recent efforts through the Wider South East Political Steering Group (WSE PSG) to overcome this, the current arrangements are not fit for purpose in terms of:

- the internal challenges that the region faces;
- the need to rebalance the nation's economy, social wellbeing and environmental pressures; and

• the external challenges that London faces to its global competitive role.

The closest comparator to London is arguably New York, in terms of its role, its size, its ageing infrastructure, and the need for participatory democratic processes. There is, however, a degree of long-term strategic planning of the greater New York tri-state region, managed through a non-statutory Regional Plan Association of private sector and public interests. The approach taken is light touch and strategic. It has been proposed by the Common Futures Network that a similar high-level non-statutory public-private forum should be created, with the express remit of preparing a strategy for the capital region covering L&WSE. This could have as its goals:

• To secure the global role of London.
• To create the capacity for the potential scales of future growth.
• To ensure that all London's residents and workforce benefit from its economic success.
• To rebalance the focus from being solely on London to one including its network of outer centres.
• To relate its economy and growth to the planned changing connectivity to the rest of the country.

The following sections of this article therefore set out some reflections on this proposition in terms of:

• those matters which have to be determined at a mega-regional level or the wider city region level;
• the adequacy of the current arrangements;
• the benchmarking of current arrangements in relation to international criteria for effective strategic arrangements; and
• some issues highlighted at a Common Futures Network roundtable in 2017.[3]

These reflections also have regard to the wider conversations taking place nationally on devolution and the planning system. They address two overriding questions which should determine the most appropriate governance arrangements in terms of the competences, capacities and inclusiveness of the body that takes these decisions – namely, which decisions need to be taken at the wider city region level; and how adequate are the current arrangements?

Which decisions need to be taken at the wider city region level?

The L&WSE region is not a single functional urban area. Interdependences operate at various levels, many of them local or sub-regional. The key interdependences relate to the functioning of labour and housing markets and the associated journey-to-work areas. The natural resources of the region (its natural ecosystems and landscapes) are also clearly shared and interdependent. It is recognised that such matters are functionally interdependent – for example, in current planning processes local housing market areas have been identified and form a practical basis for dealing with local cross-boundary inter-relationships.

However, the planning of these areas depends upon underlying assumptions about the matters that require a perspective for the whole L&WSE region. These include:

• The **overall scale and balance of demand** in terms of people, housing and jobs for the region and its sub-regional areas. This is recognised in the extensive liaison that has taken place through the WSE PSG in responding to the requirements of the latest revision of the London Plan.
• The **external relationships** that need to be taken into account – especially, for example, links to the South Midlands and Milton Keynes/Northampton area and the M4 corridor to Bristol. This has been particularly exemplified in the debate about the role of the Cambridge-Milton Keynes-Oxford (CaMKOx) proposals, and their wider relationships.
• The **development priorities** that drive the economic and social future of the region, including transport hubs, strategic growth points (for urban regeneration, urban extensions or new communities), metropolitan commercial and cultural centres, and natural assets. The case for such a programme of integrated projects has been set out and illustrated in AECOM's *London 2065* manifesto.[4]
• The **region-wide networks** upon which all communities in the L&WSE region are dependent, including rail (passenger and freight), road, the canal and river systems, telecommunications, power grids, the water catchment, and ecosystems.

How adequate are the current arrangements?

The system inherited after the abolition of regional planning outside London by the coalition government has depended upon the 'duty to co-operate'. This has failed as a means of providing consistent and comprehensive coverage on key issues such as the assessment of housing need and capacity. This problem has been reinforced by the lack of any spatiality to the National Planning Policy Framework (NPPF). Even in its revised form, the NPPF's approach to housing needs assessment is formulaic and trend based, rather than needs based.

The need for a fresh approach to collaboration between authorities is a national priority. In recent years there has been a significant level of political and technical engagement prompted by the review of the London Plan. As a result, there is an expressed desire for continued collaboration in the Wider South East and beyond. This is based around corridor growth area policy for investment in strategic infrastructure to support housing and business growth.

This collaborative approach is reflected in two key policies in the draft London Plan, Policy SD2: 'Collaboration in the Wider South East' and Policy SD3: 'Growth locations in the Wider South East

and beyond' (regarding strategic infrastructure investment). These policies are put forward in recognition of the need for a common and consistent approach to planning issues across the L&WSE region – an approach that at present does not exist. They seek to overcome this by committing the Greater London Authority (GLA) to ongoing joint planning work to resolve, specify and implement a more collective framework for the area, especially along the key corridors. The draft Plan proposes to achieve this through the current informal liaison arrangements, which are linked to annual Wider South East Summits between the 156 local authorities and 11 Local Enterprise Partnerships. This is a welcome initiative by the GLA and its partners, but it is not the vehicle for delivering agreed outcomes. This is illustrated by the outcomes of the latest Wider South East Summit, referenced in footnote 7 of the draft London Plan.

However useful the current approach to co-operation has been in preparing the London Plan, it is uncertain that it will provide an effective ongoing mechanism once the Plan has been approved. This risk arises from two factors in particular. First, there is its dependence on setting up a series of local partnership arrangements without any stated means for dealing with their interdependencies. The resulting set of individual projects and programmes will not of themselves provide the strategic context for the L&WSE. Secondly, as stressed in the draft London Plan, the whole process is to be based on the co-operation of *willing partners*.

There is therefore concern that, as things stand, Policies SD2 and SD3 have limited power to deliver the desired co-operative outcomes. The processes envisaged are clearly related to the current duty to co-operate, which the government itself in its review of the NPPF recognised as weak and less effective than was intended. There is therefore the risk that the highly desirable aims of Policies SD2 and SD3 could remain unfulfilled aspirations, and that the status quo will continue to constrain the future of London. These matters will be examined at the forthcoming Examination in Public of the draft Plan.

This view is reflected in the responses from a range of consultees on the draft London Plan – for example those with a development, infrastructure, or green interest. It is also reinforced by the position of the South East authorities outside London. Their position reflects the GLA's position, with collaboration being based on the Plan process and strategic projects, but in a sustained and integrated approach. The key gap is that there is no overall vision for the long-term sustained development of this global region.

As Duncan Bowie has demonstrated,[5] there is a wide range of options in how the region could develop, including:

- hyperdense development in city centres and fringes or in Opportunity Areas;
- suburban intensification, including in suburban town centres;
- planned urban extensions;
- a new programme of Garden Cities within or beyond the Green Belt; and
- residential dispersal to other parts of the UK (with or without employment dispersal).

Some issues

Current arrangements result in significant cross-boundary policy conflicts – on housing, employment, retail provision, parking, and waste management. In addition, there is no linkage between spatial planning decisions and infrastructure investment decisions at national or metropolitan regional level.

There is, however, a consensus over the need for an improved approach to secure the future of the L&WSE region, including the need for a more consistent approach to estimating need and reducing discrepancies between national and local housing estimates. This is recognised in the Ministry of Housing, Communities and Local Government's proposed approach to determine local housing need. However, the latter exemplifies the problem of formulaic approaches that are essentially trend driven, and thus only reinforce areas of greatest pressure.

The roundtable therefore explored and identified a range of issues that need to be taken into account in framing any alternative to the current system, which can be summarised as follows:

- 'Who are we are planning for? There was strong agreement about the need for development decisions to be much more sensitive about their social impacts. The current emphasis on delivering housing 'numbers' is at the expense of the impact on the quality of life of existing and new communities (especially for those on benefit).
- New approaches are required to the funding of infrastructure and the capture of land values.
- There is a need for clarity on the national spatial context within which the L&WSE region sits.
- The status of any spatial strategy for the L&WSE region is crucial: it must involve government departments, engage widely and align funding – a voluntary approach is not good enough.
- The form of the plan needs to be light touch and clearly focused – being a loose-knit investment framework and setting out a clear regional narrative.
- Although there has been progress in setting out common ground on the least-contentious issues, the wicked issues are difficult – or are avoided – because there is not the institutional capacity to take decisions. The Green Belt typifies this problem.
- The role of central government is crucial in terms of setting expectations, incentivising action, initiating flagship projects, and setting the national overlay.
- There is a need for new approaches which allow the business sector has to be brought into the

plan-making process (not treated simply as consultees) without undermining the democratic strength of the process.

The issues faced are not unique to the UK. EU and OECD policy directions in tackling these issues are based around:
- comprehensive networks – i.e. a corridor approach which cuts across boundaries;
- integrated investment strategies – as are being pursued in Cornwall but which have equal applicability to the L&WSE area; and
- the use of soft powers around social welfare policies and the application of a combined authority model generally.

Benchmarking the L&WSE region
It is also useful to systematically benchmark the strength of the components of the current system. The European METREX network for metropolitan planning[6] has given much consideration to this, and has established a set of governance arrangements for the strategic planning of metropolitan regions.

Table 1 provides indicative results through a checklist of the current arrangements for strategic planning, decision-making and implementation for the L&WSE region. This benchmarking identifies a range of factors that critically affect the effectiveness of the planning system. The criteria are grouped under three key themes:
- *the competences* – the ability to take effective decisions;
- *the capabilities* – the ability to take fully informed decisions; and
- *the processes* – the level of engagement, and the ability to deliver the strategy.

There is often a relationship between these themes, for example between the power to prepare a plan and the power to implement them. There is, however, no necessary dependency between them. International experience is that they can be delivered in a range of governance arrangements, from top-down to bottom-up systems or from decentralised to federal systems. Experience also shows that weakness in one area can be offset by compensatory arrangements. Most notably this applies where the lack of formal powers to prepare and implement a strategy can be offset by embedded and extensive engagement processes with external arbitration. The benchmarking does, however, provide a practical starting point for a structured discussion on where and how the current arrangements for strategic planning in the L&WSE region can be enhanced.

From Table 1 it can be concluded that the following key issues need to be addressed if there is to be an effective strategic planning arrangement for the region:
- *Competences:* The lack of a responsible organisation and national spatial context limits what is done

collectively, and makes strategic planning dependent on secondary mechanisms to have any bite (for example the duty to co-operate).
- *Capabilities:* The technical resources are very constrained and fragmented; technical work therefore tends to be limited mainly to housing numbers and transport priorities, although there is joint working on development corridors and environmental issues.
- *Processes:* The lack of a non-statutory or even formal status for joint work is partly offset by the general duties of transparency and engagement on local government, but the current processes are set up on a sustainable basis of longer-term commitment.

Strategic options for the governance of the L&WSE region
Governance is not simply about the territorial responsibilities of different public bodies, but about the distribution of powers between them. This is not limited to which organisation has plan-making and/or planning decision-making powers, but also concerns which organisation owns the land and has the power to acquire land, which has the funding, and which has powers of regulatory intervention – the power to direct development as well as the power to stop development.

The status of an L&WSE strategy will determine the appropriate form of the decision-making body. There is consensus that if any L&WSE strategy is to be effective it must be more than advisory, and not discretionary and subject to the whim of political cycles. It therefore needs to have teeth. The options range from the strategy being:
- a material consideration through a secondary instrument – for example endorsed as government policy in some form (letter, circular, or part of the NPPF);
- incorporated as part of the development plan system; and
- some form of hybrid, whereby the whole document is a material consideration in the system but those components that are recognised national priorities are built into the National Infrastructure Commission process.

Any strategic planning arrangements for the L&WSE region must have the capacity to agree the basis for metropolitan-region district-level population and household and employment projections in order to ensure that local planning authorities and boroughs in the region have regard to their interdependent relationships. Any arrangement to establish a strategic planning capacity needs to be:
- flexible and strategic, with a clear focus on key issues;
- serviced by a metropolitan region strategic planning team with the capacity to undertake technical

work at a regional level in terms of, for example, population and household projections (including migration forecasts), Strategic Housing Market Assessments, Strategic Housing Land Availability Assessments, employment need and capacity studies, and retail demand and capacity studies;

- permanent (i.e. not convened on an ad hoc basis); and

Table 1

Benchmark analysis of the current arrangements for strategic planning, decision-making and implementation for the L&WSE region

Benchmarks	Current system		
	Good/general	**Partial**	**Minimal/missing**
Competence to plan strategically			
1 Higher-level context			No national framework
2 Responsibilities			Split/indirect
3 Scope of strategy		Housing and transport	
4 Extent of the area	Functional urban area		
5 Status of joint working		'Duty to co-operate' only	
Competence to implement the strategy			
6 Power to implement and safeguard strategy			Indirect or local
7 Linkage of strategy to implementation resources			Indirect links
Capability to take informed decisions			
8 Professional resources:			
• Survey and data collection		Fragmented	
• Urban development potential		Fragmented	
• Scenario planning			Limited
9 Components:			
• Economic development			Separate bodies
• Transportation		Fragmented	
• Housing and social development		Just housing numbers	
• Retail development			Local
• Environmental quality			Fragmented
Process of participation			
10 Legal rights of involvement	Statutory		
11 A proactive and inclusive approach			High-level only
12 Stakeholder involvement	High level		
13 Transparency	Statutory		
14 Independent testing of the strategy			Indirect through Local Plan process
Process of implementation and review			
15 Implementation			TBC
16 Monitoring			TBC
17 Review			TBC

● independently advised (i.e. with its own permanent technical support).

The following four formal organisational options have been identified, in order of their ease for implementation in terms of timescale, established arrangements, legislative implications and effectiveness (based upon meeting the benchmarking standards of best practice):

● an annual forum – based on the current approach, but set up on a permanent basis and with full commitment by the bodies involved;
● an ad hoc statutory joint standing committee of local government, using powers for delegated joint working under the respective local government Acts;
● statutory body advisory powers – for example a Royal Commission, requiring Ministerial approval; and
● a statutory regional body with planning powers, requiring legislative action.

In principle, and from experience, a properly established regional planning arrangement for the metropolitan region is most the effective and efficient option (i.e. the last of the four options above). It has, however, been argued that, in the short term, it is unlikely to be established for practical reasons and because of the political challenges it would face. However, there is no reason not to establish immediately a more effective mechanism than that currently in place.

There are examples of bespoke arrangements which may have relevance to the London situation, such as in Sydney and Greater Barcelona. It might be worth considering the following two options:

● The first is the establishment of a public-private sector board with a permanent core group of technical officers and administrative staff, as recommended in the Common Futures Network's *Towards a Common Future* prospectus.[7] This is based on the approach of the closest comparator to the L&WSE region in terms of role, size and ageing infrastructure, and participatory democratic processes in the region – namely New York, where, as noted above, the long-term strategic planning of the greater New York tri-state region has been supported through the light-touch and strategic non-statutory approach of the Regional Plan Association of private sector and public interests.
● The second is the development of a bespoke model based on strategic functions being divided between a London city-regional body and lower-level planning authorities (including intermediary strategic planning tiers based sectoral groupings of local planning authorities). This could be an organisation with a board including indirect representation (i.e. from the Mayor and sub-regional groupings) and involving Ministry of Housing,

Communities and Local Government / Department for Business, Energy and Industrial Strategy/ Department for Transport input, with a specialist strategic planning team. Formal consultation might also be strategic – for example statutory planning bodies, and possibly new sub-regional transport bodies if they have a statutory basis.

The early establishment of such a body would help to re-position the policy debate. It could be set up on an interim basis (for example with a five-year programme of action), with a remit to sort out the truly strategic region-wide issues and explore a more permanent arrangement.

In response to the challenges set out in the Common Futures Network *Towards a Common Future* prospectus,[7] an independent UK2070 Commission has been set up,[8] chaired by Lord Kerslake, which among other things will test these propositions. It has set out the following goals:

● Illuminate the imbalances in the nature of economic activity.
● Illustrate the potential of a national spatial economic framework.
● Identify the range of policy interventions required to deliver change.

The Commission will report by the end of 2019. The time is right for action – as Lord Kerslake said in his address to the 2018 RTPI Convention: 'Watch this space!'

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Notes

1   *New Urban Agenda*. Adopted Oct. 2016. United Nations, 2017. https://habitat3.org/the-new-urban-agenda
2   *Big, Bold, Global Connected: London 2065. A Manifesto for the Long Term Growth of the London City Region*. AECOM, Mar. 2015. www.aecom.com/content/wp-content/uploads/2015/10/AECOM-Manifesto-for-the-London-City-Region.pdf
3   Papers relating to the Common Futures Network Roundtable on the Wider South East are available from the Common Futures Network website, at http://commonfuturesnetwork.org/mdocuments-library?mdocs-cat=mdocs-cat-33&att=null
4   *Prosperity and Justice: A Plan for a New Economy*. Final Report of the IPPR Commission on Economic Justice. Polity Press, Sept. 2018. www.ippr.org/research/publications/prosperity-and-justice
5   D Bowie: 'Beyond the compact city'. *Planning in London*, 2017, Vol. 97, Apr.-Jun., 59-70
6   See the METREX website, at www.eurometrex.org/ENT1/EN/
7   *Towards a Common Future: A New Agenda for England and the UK*. Interim Prospectus. Common Futures Network, May 2017. http://commonfuturesnetwork.org/mdocuments-library?mdocs-cat=mdocs-cat-28&att=null
8   The website of the UK2070 Commission is at http://uk2070.org.uk/

time for a turn of the tide —

re-creating effective regional planning for the wider London region

Arguing that London and the Wider South East will need much stronger organisation if growth pressures across the metropolitan region are to be sustainably planned, Martin Simmons explores alternative scenarios for bringing this about

The London Mayor's draft new London Plan,[1] to be 'examined in public' by an appointed panel this winter, throws into focus the relationship between administrative Greater London and the Wider South East (WSE). Despite an apparent close numerical match between London's housing needs (assessed at 66,000 homes per year) and residential development capacity (estimated at 65,000 homes per year), the scale of historic under-provision within London and the out-migration of Londoners means that a significant proportion of London's housing requirements will need to be met outside the administrative London boundary. At the same time, general growth pressures throughout the wider region, but particularly to the west and north of London, are continuing. There is no guiding strategy for this since the 2010-elected Conservative-led government's dogmatic abolition of regional plans.

This article starts from the premise that an effective revival of regional planning is essential to provide the London region's co-ordinated and sustainable growth, balancing what can be achieved within London with provision elsewhere, and taking account of the reality that, despite enhancements, strategic transport and other infrastructure capacity is virtually exhausted by the extensive development of recent decades. This means planning to locate growth where new infrastructure capacity can be most efficiently provided.

Considering the possibilities from today's perspective, I see two scenarios worth exploring. The first I call 'Business as usual'. This is based on what the draft London Plan envisages, using the liaison arrangements that have been established between the Mayor and the regional bodies existing for the South East and the East of England, and the extent to which these might be advanced by agreement. The second is based on my understanding of how South East regional planning has evolved since 1960: I term this 'Transforming event', a clear shift of circumstance which would change the governance mind-set and convince central government that it would need to act with local government to establish effective regional planning between London and the wider region.

'Business as usual'

The 'Business as usual' scenario starts from what is stated in the draft London Plan's policies on collaboration with the WSE.[2] It relies on the 'recently developed' strategic co-ordination arrangements. While non-statutory, the Mayor expects these to increase in effectiveness, especially as recognition is evident in the policies that, despite the intent to accommodate all of London's growth within its boundaries, the out-migration situation could mean that the WSE will need to house more Londoners to 'alleviate the pressure'. The Mayor will seek to work

consensually with 'willing partners' to explore co-ordinated growth opportunities related to infrastructure.

It is clear that these arrangements will be closely scrutinised by the Inspectors at the Examination in Public this winter, in the light of responses to the consultation draft and any mayoral elaborations or modifications. This could result in the Examining Panel recommending improvements to the effectiveness of the arrangements.

Indeed, 'Business as usual' does not mean the status quo. Three developments affecting the scenario are in prospect:

● *A progressive increase in research capability:* Steps are already in hand to provide a common methodology for population and household projections, and these could include joint work on migration flows, leading to a shared understanding of the bases for calculating future housing requirements. This could be expanded incrementally, as resources allow, creating a wide-ranging regional evidence base,[3] including data on changing travel-to-work relationships and functional economic linkages across the city region. There needs to be a recognition that, for such research to be authoritative, a dedicated joint unit will be required, with a common budget; this should provide the ability to commission work on agreed issues from appropriate consultant bodies.

● *The emergence of sub-regional strategies:* The government appears to be recognising that delivering its target for new housing (300,000 per annum nationally) with the infrastructure required cannot be done by individual local authorities, and is now encouraging groups of local authorities to come together via Statements of Common Ground to agree 'housing deals' with the Ministry of Housing, Communities and Local Government (MHCLG), which will commit to shared infrastructure funding. The first such deal is in Oxfordshire, where Oxfordshire County Council and the five districts have formed the Oxfordshire Growth Board, which includes the Local Enterprise Partnership (LEP), to deliver 100,000 homes by 2031, with the government promising infrastructure funding. The deal includes production of a 'statutory' joint spatial plan.

Such an arrangement is now being pursued in South Essex, where Essex County Council and six local authorities have committed to the preparation of a joint strategic plan, aimed at delivering 90,000 new homes over 20 years in a situation where there are important Green Belt constraints. An 'Association of South Essex Local Authorities' (ASELA) has been formed to manage joint arrangements, and the preparation of a 'statutory growth study' has begun.

It will be interesting to see whether, in a situation where there is a lack of infrastructure

capacity to sustain growth in much of the WSE, government commitments to infrastructure funding will stimulate further such sub-regional groupings. Also notable is the involvement of county councils, with their infrastructure powers: is a revival of the county scale in strategic planning now on the cards?

● *Strategic transport arrangements:* Prospects for a London city region transport-led framework seem to be increasing. Transport for London has already developed a good case to take over some of the commuter routes extending into inner parts of the WSE, although this is currently blocked by the present Secretary of State for political reasons. The formation of the regionally based Transport for the South East and Transport East bodies could lead to collaboration with Transport for London to produce a shared 'transport vision' as a lobbying tool with government, advancing city region wide priorities (set out in Figure 2.15 of the draft London Plan). This would be related to providing additional strategic development capacity and perhaps the 'willing partner' concept.

'Transforming event'

The 'Transforming event' scenario assumes that:

● The joint arrangements do not have the success hoped for in the draft London Plan's collaboration policies, including a lack of 'willing partners'.

• Housing delivery within London fails to get near the 66,000 per annum target, with a significant shortfall and a worsening crisis.

• Net out-migration from London into the WSE increases sharply to over 100,000 per annum, driven by a lack of choice in housing type and increasing unaffordability (average house prices in London are now 14 times average earnings, compared with six times nationally).

● 'Housing deals' become discredited as infrastructure funding levels are inadequate to overcome a lack of capacity in both physical and social infrastructure.

• Popular dissatisfaction with the planning system grows, affecting the attitude of local politicians to the perceived inability of the MHCLG to deliver.

This sets the scene for a new transforming approach to how planning operates. In considering the case for this, a look back at past transformations of the status quo is illuminating.

The 1960s

The 1944 Abercrombie Greater London Plan and the post-war Town and Country Planning and New Towns Acts were based, for the South East, on population redistribution from London – driven by war damage reconstruction and slum clearance – to planned new and expanded communities. They assumed a stable population and economy. By the
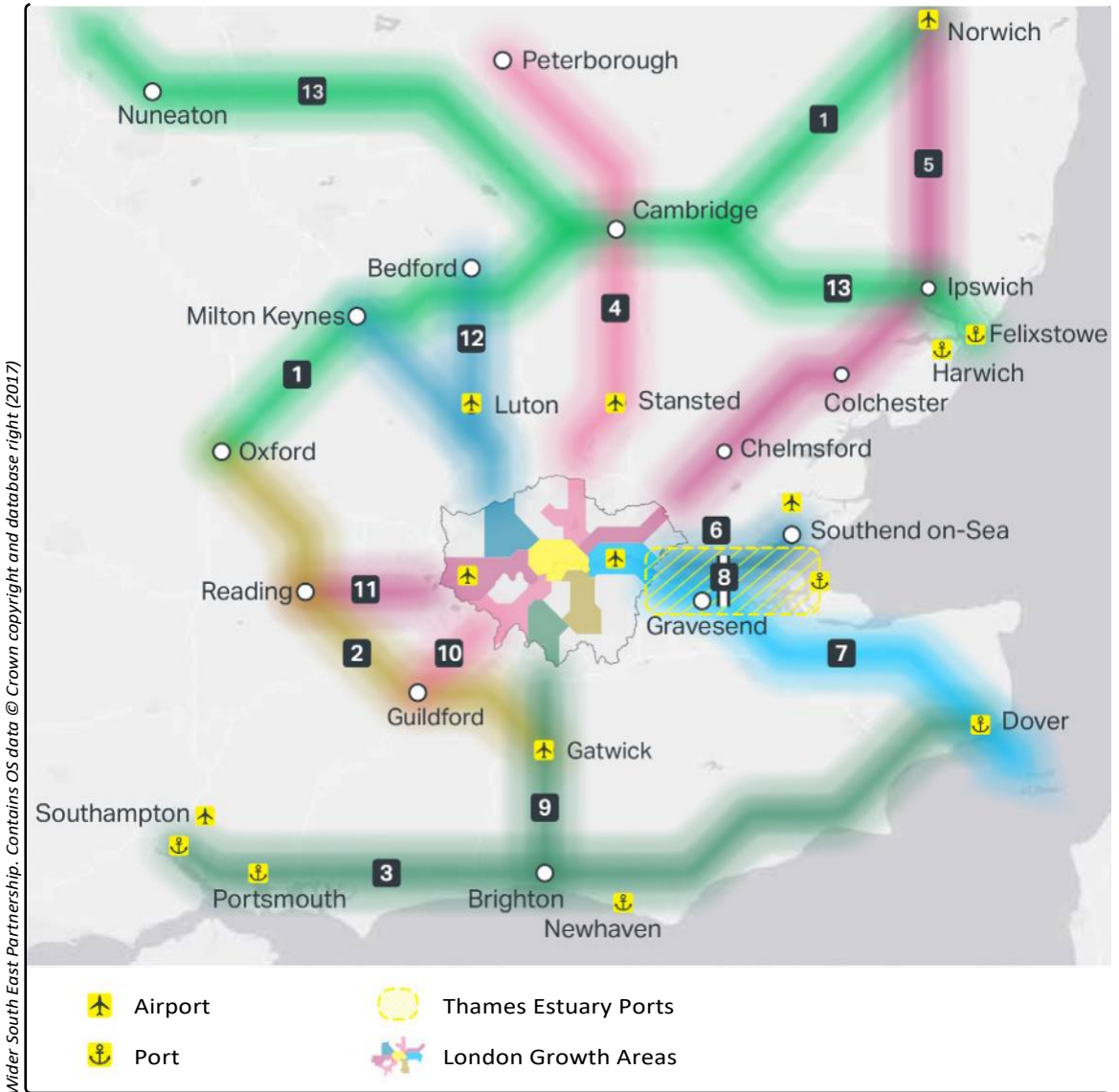
Wider South East Partnership. Contains OS data © Crown copyright and database right (2017)

Strategic infrastructure priorities – Fig. 2.15 from the draft new London Plan

early 1960s, however, it was becoming apparent that rapidly rising economic prosperity (Harold Macmillan's 'never had it so good') was causing rapid overall growth, for which the post-1947-Act London and County Development Plans did not provide. The government decided it had to act.

The seminal document was the Ministry of Housing and Local Government's (MHLG's) South East Study 1961-1981, published in 1964. This projected a growth in the regional population (for the pre-2000 South East region) of 3.5 million – over 20%, of which at least 1 million would be moving out of London.

A study was needed on the best distribution and locations for this growth, in housing, employment and

infrastructure terms. MHLG Circular 5/66 gave effect

to this. Alongside government action on a further round of New Towns in the outer parts of the WSE and just beyond – Milton Keynes as it became, Peterborough, Northampton – the South East Joint Planning Team, led by the government's Chief Planner (an MHLG Deputy Secretary!), was established, staffed by civil servants and secondees from the London and South East Regional Planning Conference (of which I was one). This produced the Strategic Plan for the South East (SPSE) in 1970; its planning recommendations, including designation of major and medium growth areas, were adopted by the new Conservative administration in 1971, although not its proposals for reorganising local government.

This set the scene for the production of the new county Structure Plans, which gathered pace after

the 1974 changes to local government, together with the Greater London Development Plan (GLDP, approved in 1976.

The key point about this period is that it was a top-down central government response to a transforming regional situation, to be implemented mainly by a new generation of strategic (county-scale) plans. Having been party to the production of the SPSE, the county-led local planning authorities were generally content (there was some negotiation) and willing to incorporate its regional strategy – an effective interaction between central and local government.

The late 1980s

The 1979 Conservative government, seeing Structure Plans well advanced and the GLDP in place, saw no need to continue government involvement in South East regional planning: it issued a complacent two-page 'guidance' letter in 1980. The local planning authorities' regional body, the London and South East Regional Planning Conference, which now became known as SERPLAN, continued in existence and was the recipient of this letter. SERPLAN monitored development plan progress and produced reports on emerging issues, such as the widening economic imbalance between the buoyant west side of the region and its east (suffering from the decline of traditional port, manufacturing and defence industries), and the developmental significance of the M25, nearing completion. SERPLAN was able to feed this work into an increasingly receptive Department of the Environment.[4]

Population growth and demand for housing continued, and the volume housebuilding industry became increasingly vocal as the 1980s continued. Notable was the formation of Consortium Developments Ltd, a group of leading housebuilders, which proposed major new private sector developments in sensitive parts of the WSE. The absence of any effective regional growth strategy began to alarm Home Counties politicians, largely Conservative. A seminal event was an 'Early Day Motion' in 1987 which was accepted by the Secretary of State, Nicholas Ridley, who responded by issuing a 'holding' six-page Planning Policy Guidance Note in 1988 and asking SERPLAN to advise on more comprehensive guidance.

Thus began in the South East a mechanism whereby an active representative body of the local planning authorities advised what its members required as regards regional planning policy to manage continuing growth, for reviews of their Structure Plans. SERPLAN responded in 1990, which led to new Regional Planning Guidance, RPG9, issued following consultation, in 1994 – a 36-page document with six maps, providing a much fuller geographical framework for the region's development.

This was supplemented in 1995 by governmental sub-regional guidance for what became known as Thames Gateway, also based on SERPLAN advice. LPAC (the London Planning Advisory Committee), the London boroughs' joint committee set up following the 1986 abolition of the Greater London Council (which had as one of its statutory functions representing London in SERPLAN), was required to advise on strategic guidance for London, which it did in 1988 (resulting in a disappointingly thin response from government in 1989) and again in 1994, which produced a fuller and more satisfactory RPG3 for London in 1996. This sat alongside RPG9 for the WSE.

The key point about this period is how planning for the wider London region recovered from its low point in 1980 through a gradual recognition during the decade that planning policy on a region-wide scale was necessary if urban growth and environmental management were to occur effectively (we would now say sustainably) in the public interest. The catalyst for this revival was the existence of SERPLAN as a well resourced organisation of the local planning authorities, with county councils to the fore. SERPLAN came to have increasing influence, albeit of an advisory nature.[5]

Not unrelated to this was the growing concern of Home Counties MPs on the dangers of a lack of policy to manage growth. Government realised it had to act: the outcome was the emergence of the Regional Planning Guidance (RPG) process, which existed with increasing authority and detail up to the creation of the new Regional Assemblies and Regional Development Agencies alongside the Greater London Authority in 2000. The government had extended the RPG system to the rest of the country through the publication of Planning Policy Guidance Note 12: *Development Planning and Regional Planning Guidance*, in 1992.

A new transformation for the 2020s

In my judgement, based on the above narrative, I do not see any organisational framework arising from the present situation being able to grasp the essential macro-issues facing this large city region. We therefore need to consider the scope for a transformational approach which identifies and faces up to these macro-issues.

The first matter to consider is the position of the London city region, and particularly its economy, in the national context. This would give meaning to the superficially attractive concept of 'rebalancing': the aim of stimulating growth in the northern and midland parts of the country (furthering the 'Northern Powerhouse' and 'Midlands Engine' concepts). This would, if successful, relieve pressure on the London region.

The necessary vehicle for this would be the production of a national spatial strategy. It would need to be led by central government, involving

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A key problem in London and the WSE is the increasing lack of capacity in regionally strategic infrastructure

MHCLG, the Department for Business, Energy and Industrial Strategy, and the Department for Transport, and touching the Cabinet Office and the Treasury. The outcome of Brexit (including its impact on the prime London economy – global financial and business services) would be included in this. Such a national spatial strategy would then set the scene for considering how best to formulate a strategy for the London city region in terms of the organisation and governance required.

Secondly, it is essential that such governance is able to address the key problem facing (and in practice constraining) growth in the London city region, particularly the WSE: the increasing lack of capacity in regionally strategic infrastructure. Public consciousness of this is now noticeable in transport – growing congestion on the M25 and the radial motorways around London; and overcrowding on the commuter railways exemplified by the timetable shambles on the Thameslink franchise. Lack of infrastructure capacity is also critical in the water supply industry, in waste disposal and in social infrastructure – the NHS, schools, etc. There has been a failure of governance to understand these problems at the regional scale, really since the 1970s, despite warnings from environmental bodies, the (now much missed) Royal Commission on Environmental Pollution, and county councils.

This poses a 'wicked' dilemma. If London and the WSE are to grow in line with current projections,

massive resource investment in transport and other regional strategic infrastructure will be needed, epitomised by the near £30 billion Crossrail 2 project championed by the London Mayor. To the extent that this massive investment occurs, it is not available to meet the regional infrastructure needs of the North and Midlands. Resolving this dilemma requires a national spatial strategy and is something only central government can undertake. The outcome of Brexit, although unclear, seems to be trending to be very disruptive to London's future growth prospects, which could reduce the current (trend-based) projections.

We have to take into account the critical asymmetry between the planning systems in London and the WSE. In London, devolved Mayor-led governance produces a statutory London-wide plan, on which the 33 London local planning authorities must base their Local Plans. In the WSE there have been no regional plans since 2011, leaving 156 local planning authorities to produce their own Local Plans, charged by central government to base them on 'objectively assessed need' for new housing, and a 'duty to co-operate' with adjoining local authorities where housing markets straddle boundaries. This 'duty' is widely seen as failing, with new exhortations to formulate Statements of Common Ground across local authority boundaries.

This asymmetry has to be addressed before any enhanced governance arrangements are feasible. It

will be necessary to find ways to redress the balance. We cannot expect this to come from the local authority organisations: the furthest we can expect from the present arrangements is indicated in 'Business as usual' scenario. It will therefore need to come from central government becoming convinced that it is necessary (and would be publicly acceptable), if there is to be a balance between development, environment and infrastructure in the wider region. The question then becomes how the government can be convinced.

In much of the WSE, particularly the Home Counties, there is growing popular discontent (expressed in local media) at the levels of housebuilding that local planning authorities are asked to provide. This seems bound to be enhanced by the new National Planning Policy Framework's standard method of calculating housing need, which will increase requirements significantly in these higher-cost housing areas, on the (in my view spurious) assumption that more provision will make housing more affordable.

'The situation suggests a parallel with that in the mid/ late 1980s. It can be exploited to stimulate awareness among Ministers. The time would then become ripe for a transformation in the government's approach to the WSE'

There is increasing awareness that the planning system is becoming rigged in favour of developers, particularly the volume housebuilders, with comments that it will allow them to 'game' the system to their advantage. This growing discontent is linked to a perceived inability to provide commensurate strategic infrastructure and address adverse environmental consequences and pressure on treasured Green Belt. Local politicians will increasingly be aware of this discontent and seem bound to transmit it to national politicians. The situation suggests a parallel with that in the mid/ late 1980s reported above. It can be exploited to stimulate awareness among Ministers. The time would then become ripe for a transformation in the government's approach to the WSE.

To achieve this, there would need to be a coherent lobby to *articulate* the case. One possibility could be formation of an All-Party Parliamentary Group of WSE politicians which – working with the regional local authority groupings and perhaps the House of Commons Housing, Communities and Local

Government Select Committee – could recommend that MHCLG and other relevant departments set up a 2020s version of the 1964 South East Study as the first stage of a new jointly produced (with the Mayor of London) metropolitan region planning framework.

Conclusion

How to judge the two scenarios set out here? From today's perspective, 'Business as usual' seems likely to prevail for the foreseeable future – however long that is – with the incremental enhancements referred to above. The outcome of the Examination in Public on the draft London Plan will be important in this, assuming that the Panel regard it as a key issue: they may recommend that the Mayor strengthen the arrangements in concert with the wider regional bodies.

However, if the assumptions I make at the start of my 'Transforming event' scenario are realised – and there does seem to be a reasonable chance of this – the mind-set change I posit may well come about, at government, regional and local levels. It is difficult to speculate, but this could well occur about 2022, which is, of course, the due date for the next general election – and for the next review of the London Plan. The tide, then, will have turned.

• **Martin Simmons**, *now retired, has had a 50-year regional and strategic planning career in London and the South East. The views expressed are personal.*

Notes

1 *The London Plan. The Spatial Development Strategy for Greater London. Draft for Public Consultation*. Mayor of London. Greater London Authority, Dec. 2017. www.london.gov.uk/sites/default/files/new_london_plan_december_2017.pdf
The latest version of the plan is the draft new London Plan including the Mayor's minor suggested changes (Aug. 2018), available at www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0
Details of the forthcoming new London Plan Examination in Public are available at www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan

2 See, in the draft London Plan (see note 1), Chapter 2, 'Spatial development patterns', Policy SD2: 'Collaboration in the Wider South East', and Policy SD3: 'Growth locations in the Wider South East and beyond', together with supporting paragraphs

3 C Swain: 'Towards a London city-regional intelligence base – the art of the possible'. *Town & Country Planning*, 2018, Vol. 87, Oct., 398-401

4 Credit for this must go to the late John Delafons, then the Department of the Environment Deputy Secretary responsible for planning

5 For an outline of SERPLAN's existence and how it operated, see M Simmons: 'How to meet London regional housing needs? A new SERPLAN?'. *Town & Country Planning*, 2015, Vol.84, Jan., 20-25

getting (more) real in planning for london and the wider south east

Ian Gordon proposes a model that, while not centred on a conventional regional planning document, would involve a substantial amount of collaborative 'planning' activity – much of it opportunistic and sub-regional in coverage, but encouraging the shared understanding and habits of co-operation (underpinned by but not subservient to central government) required for regionally appropriate strategy to evolve through a series of deals realistically anticipating political and market reactions

In South East England, at least, interest is rising again, after the years when localism was the gospel, in the possibility of more strategic, regional approaches to steering spatial and economic development. This does not necessarily entail resurrection of the idea of a regional plan for a 21st century version of the Greater South East, although others currently argue for this.[1]

Rather, the challenge now is to find a (new) combination of ways of infusing the governance of this territory with the wider temporal, spatial and functional perspectives required to respond coherently and positively to the particular challenges that this extended, polycentric region presents. The need for such a strategic approach is peculiarly strong here (and now) because of both:

- *high-stakes issues with wide spatial ramifications*, notably the chronic under-supply of housing, and the potential impacts of major infrastructure projects; and
- *unusually extended patterns of interaction and interdependence*, with very complex migrational and commuting networks, reflecting the joint effects of densely overlapping housing/labour markets and strong development constraints around its core.[2]

Having one 'strategic' authority covering the core of the region (i.e. the Greater London Authority) does not greatly help. And neither extending nor replicating this over a larger functional region is a relevant solution, given both the lack of a sense of common identity/priorities across sub-regions and the impossibility of national government standing back from directions of change in its capital city region. A more organic approach to building-in a strategic capacity is required, and the moves that local authorities have taken since 2014 towards recognition of a Wider South East (WSE) super-region as a realistic framework for building political collaboration among local authorities represent a significant and hopeful step in that direction.[3]

However, despite participation of both Mayor Johnson and Mayor Khan in WSE summits, and explicit rejection in the draft new London Plan (heading for its Examination in Public in the New Year) of the notion that 'London is an island', little else there implies recognition of interconnectedness with the South East mainland.

This disconnect is suggestive of the real political difficulties to be overcome in moving on to the (re)creation of a pan-WSE strategic planning capacity, as some suggest.[4] The impressive

example of what has been achieved in Greater Manchester suggests that to a large degree this may be an (unfashionable) question of time, persistence and hard work.[5] But important questions also are begged about the realism and salience of the regional strategic plan model (in a UK context), and about what is required to make strategic regional guidance an effective reality in situations such as that of the WSE.

Getting real about limits on strategic regional planning in the UK

The most basic of the begged questions is about whether, from the experience of the last 50-70 years 'we know how to do strategic regional planning', and we *just* need to overcome a set of extraneous prejudices and vested interests that have cut short previous periods of effective strategic planning activity. *More realistically*, I would contend that obstacles experienced in the past are not just ones that can be shrugged off in considering how we move forwards, *and* that there is a record of under-achievement, frustration and ineffectiveness (in relation to strategic goals) – from which lessons need to be learned (now) if the next round of strategically oriented regional planning is to last longer and make the real difference that is both desired and required.

'A crucial element is to *get realistic* about the power of both economic and political forces outwith the control of 'planners' – with reactions that need to be worked on, rather than taken for granted, as has been the norm'

I'm not here thinking of some version of Peter Hall's 'great planning disasters', nor even the perverse effects (that he noted) from a skewed implementation of Abercrombie's regional strategy – but rather more about what simply doesn't get implemented. For me, two flagship projects from the real hey-day of British enthusiasm for strategic planning in the late-1960s/early 1970s are illustrative of a wider tendency:

- The first involves the 1966-71 inter-departmental Long Term Population Distribution (LTPD) initiative led by the Department of Economic Affairs, which came up with a national strategy involving the development of half a dozen major new cities and then undertook pilot studies of three estuarine sites for their location. The stimulus for this was a (rather short-lived) projection of massive population growth, of some 20 million by the end of the century; but a substantially broader case was made for new city development, with the proposed number being limited by the pool of mobile jobs, rather than the scale of new housing need. The choice of pilot study areas (Severnside, Humberside, and Tayside) clearly reflected political as well as feasibility factors, and when the initiative lapsed (from our memory as well as from action) this reflected not only a down-turn in birth rates but political/institutional shifts, including the demise of national economic planning.

- The second, much better known, case is that of the (1970) Strategic Plan for the South East (SPSE), produced by a multi-disciplinary joint planning team, and uniquely sponsored by central, regional and local levels of government. Commitment to this was broader and longer lasting, but when a follow-up 'Development' of the SPSE was undertaken (six years later), it was reported that the plan had not 'been of significant influence on the allocation of public or private sector resources within the region', nor had there been any 'direct connection between [its] conclusions and the processes of [public] resource allocation'.[6]

These cases are emblematic of what happened to a much wider array of attempts at regional/national scale strategic planning (including those undertaken by Economic Planning Councils and Regional Assemblies). In their various forms they were certainly educational (particularly for those involved), and picked up on some real-world trends, but left minimal substantive positive legacies. Times have changed greatly (and more than once), but recognisable, and indeed recognised, problem sets remain. The two recurring reasons for this frustrating pattern have been:
- a disconnect of the strategic/planning work from implementation processes; and
- a lack of committed guarantors of continuity in terms of action, policy or institutions.

Both basically reflect situational factors, rather than failures of effort or intelligence on the part of those who set up and undertook these various strategic initiatives. But since (in my judgement) those situational factors have not eased, proposals for more effective strategic approaches need to start off by considering the kinds of *process* required if their effects are to be at least mitigated – and if we are to avoid simply getting on the roundabout again. A crucial element in this is to *get realistic* about the power of both economic and political forces outwith the control of 'planners' – with reactions that need to be worked on, rather than taken for granted, as has been the norm.

London and the Wider South East will need much stronger organisation if growth pressures across the metropolitan region are to be sustainably planned – but if 'the priorities here are to 'get things done' and 'keep the show on the road'... more pluralistic and opportunistic (but still strategic) approaches may be entirely appropriate'

In slightly more specific terms there is a need to think much harder, at the stage of designing an initiative as well as in formulating interventions, about ways of:

- actively planning for *implementation:* – not simply in terms of listing required instruments, agencies and budgets, but also of:
  - starting to *build* appropriate relations and sources of support to secure lines of action through unexpected changes in circumstances; and
  - working with an understanding of likely *responses* of those outside planners' control; both of which much are more important than simply producing a good one-off plan; and
- securing greater *continuity* in pursuit of these processes and their strategic objectives.

These factors are clearly crucial to this inherently long-term activity. But they are (and will be) continually threatened by the dynamics of national political fashion/pressures, and by the chronic short-termism of those involved in central government with very limited stakes in longer-term outcomes – which may well apply also to elected mayors. The 'dignified' etiquette of governance suggests that those involved in strategic activities should pretend otherwise. But – if these long-term activities are to be 'efficient' – a resilience to such shocks must somehow be built into the (political) infrastructure of the initiative.

This line of argument suggests that formal arrangements, formal planning documents and all the apparatus of consistency-building that they prioritise (for some very good reasons, as well as some which may be less so) could prove less crucial than informal ones in which agents invest individually and depend less on a specific structure or external policy agenda.

Local development plans require formality for legal reasons, to convey certainty about policy in relation to property rights even when the environment is highly uncertain. Accounting and financial disciplines make similar demands of other kinds of plan. And, so long as there is a general bias toward NIMBYism, it is reasonable for Local Plans and housing 'assessments' to embody specific targets that can be related to wider policies and need assessments.

At a regional scale, however, neither these considerations, nor those for a plan with consistent coverage of a set of issues across a whole territory, need apply. If the priorities here are to 'get (good) things done' (implementing) and to 'keep the show on the road' (securing continuity), then the requirements of formal plan-making have very much less relevance, and more pluralistic and opportunistic (but still strategic) approaches may be entirely appropriate.

Evading the lure of new structures

Following this line of argument, I would be very much more cautious than others in linking the development of a strategic governance capacity in

regions such as the WSE to new or broader formal structures.

Specifically, I would resist ideas[7] of pursuing any kind of national physical plan, combining together regional planning issues within the super-regions of the North and South, with the regional policy one of (re)balancing the two halves of the nation. A general reason for resistance is that this creates another vulnerable degree of linkage (adding to the likelihood of discontinuity) for no very good reason, beyond a nominal consistency. More specifically, I would add that the inter-regional dimension is quite inescapably political, in all senses – including that of frequently being more symbolic than real – and is unable to draw on any likely continuing consensus independent of circumstances, both political and economic.

It is much better, I think, to concentrate strategic planning effort on making the best of each of the extended regions, including (slowly) building and sustaining a capacity for coherent, purposive action, and separate this from economic actions (of more or less seriousness) to rebalance North and South and reduce dependence on London.

For similar kinds of reason I would also question any moves to restore county-level formal institutions. I share the view that there are important gaps in terms of strategic competences/ appetites which make coherent planning across the Wider South East more difficult than it need be. Some possible counter-arguments are suggested by the sense that localism and its evident inadequacies have spurred the recent interest in co-operation outside London. But the crucial point is that in this country new spatial fixes just don't stay fixed, which is very bad for sustainable forms of strategic planning.[8] Being able to draw on some of the leadership potential of people in larger functional units, with a real capacity to make a difference when they commit to doing something, is a plus – but, as planning units, counties remain clumsy, inappropriate and liable (like the GLA) to think they can do things on their own.

Developing the institutional and behavioural basis for WSE collaboration

What matters much more than any such formal restructuring is how political actors (and their electors) think about the functioning of the extended region in which they operate, and how this affects common interests (as well as more local ones) and their capacity to collaborate where appropriate in pursuit of their interests.

As both an effective and a symbolic element in this,[9] I share the (common) view in favour of promoting some post-SERPLAN[10] kind of pan-WSE capacity for generating, sharing and debating knowledge about what is going on, how the regional system works, and the differences that

policies make. Just preferably *not* through an institution subject to central government's pleasure (or maybe even that of the London Mayor). The key requirement is to build up a *common understanding* of the processes, trends, interdependences, market dynamics – and sensitivities – with which all have to deal, and which all can *makes deals* in relation to. Independent research should be an element in this,[11] but so too should be dissemination events, such as perhaps an annual Greater South East conference.

'The crucial point is that in this country new spatial fixes just don't stay fixed, which is very bad for sustainable forms of strategic planning'

Beyond this, the three elements that seem necessary to make this distributed kind of strategic activity work are:

- *Encouragement*, including maybe some financial incentives for joint work *of all kinds*, in relation to ad hoc issues with which different groupings of local areas (for example corridors) have inter-related stakes. This would be with a view not only to achieving practically useful outcomes, but also to developing *habits of co-operation* (and skills in this), and also hopefully securing some *demonstrable successes*, which seem key to taking this process further forward.

- *Minimisation of the incentives for non-co-operation and wasteful competition* (as, I would say, in the repatriation of the business rate): This would involve working further on compensation of one kind or another for the local costs of taking on residential development, or shifting Green Belt boundaries (say) to make solidaristic behaviour easier to accept (and sell to electors).

- *A specific national contribution to the necessary leadership role*: This should be in the form of a Minister/Super-Prefect for the WSE/Southern England: with a decision-capacity of some political weight; motivated and able *both* to provide a single cross-departmental point of decision/commitment to strategic infrastructural and comparable issues; *and* to bang together the heads of unco-operative local authorities, Local Enterprise Partnerships, etc. A Northern counterpart would be a natural complement. But although this could greatly facilitate strategic development in the WSE, that aim and activity should not be allowed to depend on how (or if) a current national government chooses to pursue it.

Conclusion

The model I am proposing for developing strategic governance across the Wider South East (and for relations with the fringe beyond it) would also involve a substantial amount of collaborative 'planning' activity – although not centred on a conventional regional planning document. I would say 'planning as process rather than blueprint', although I recall this as being a widely endorsed idea in the 1970s (from Andreas Faludi and others). The difference this time should be: a more honest/realistic recognition of the crucial importance of both (strategic) market behaviour and the political dimension; and anticipatory planning for their reactions, to avoid those undermining implementation/delivery of strategic outputs.

This is an undeniably challenging prescription, and some of *the Threepenny Opera's* 'Song of Human Inadequacy' runs through my head:

'Well first you make a plan
Just be a shining light
And then you make another plan
But none of them will work
Because for this existence man is not bad enough'

'Badness' here I take to relate to the powerful economic and political forces bearing down on the people and their personal plans. But as a weaker first approximation for public planning, we might think of a diagnosis of not being 'real/realistic enough' in recognising and engaging with relevant political and economic processes. In the Wider South East, particularly, it is not the case that strategic plans simply get implemented, or that they are the main determinant of the patterns of development (except where they simply say that nothing should be built!).

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Notes

1 See, for example, the discussion by the other contributors to this Special Section (in *Town & Country Planning*, 2018, Vol. 87, Oct.) by Duncan Bowie, Corinne Swain, Vincent Goodstadt, and Martin Simmons

2 IR Gordon, AG Champion, N McGregor and CME Whitehead: *Migration Influences and Implications for Population Dynamics in the Wider South East: Providing State of the Art Evidence to Local Authorities in the East of England*. Report to the East of England Local Government Association. London School of Economics, 2018. http://lselondonhousing.org/wp-content/uploads/2018/01/EELGA-MIgration-Project_Main-Report_plusExec.pdf

3 The territory covered by the WSE includes London and the two former administrative regions of the South East and the East of England. For the development of cross-WSE collaboration see IR Gordon: 'Functional integration, political conflict and muddled metropolitanism in the London region: 1850-2016'. In A Cole and R Payre (Eds): *Cities as Political Objects*. Edward Elgar, 2017, pp.31-55; *Coordinating Strategic Policy and Infrastructure Investment across the Wider South East*. Fifth Report. Outer London Commission. Greater London Authority, 2016. www.london.gov.uk/sites/default/files/olc_coordinating_strategic_policy_and_infrastructure_across_wider_south_east.pdf; and R Brown, S Eden and N Bosetti: *Next-Door Neighbours – Collaborative Working across the London Boundary*. Centre for London and Southern Policy Centre, Jan. 2018. www.centreforlondon.org/publication/collaboration-across-london-boundary/

4 Let alone one integrated with a national framework for securing regional balance, as suggested in *Towards a Common Futures for England: A New Agenda for England and the UK*. Interim Prospectus. Common Futures Network, May 2017. http://commonfuturesnetwork.org/?mdocs-file=317

5 IR Gordon, M Harloe and A Harding: 'The uncertain development of metropolitan governance: comparing England's first and second city-regions'. In R Keil, P Hamel, J-A Boudreau and S Kipfer (Eds.): *Governing Cities through Regions: Canadian and European Persepctives.* Wilfrid Laurier University Press, 2017, pp. 355-76

6 'Implementation'. In *Review of the Strategy for the South East: Report of the Resources Group*, Development of the Strategic Plan for the South East Team. Department of the Environment, 1976, p.46

7 Such as those advanced in the Common Futures Network Interim Prospectus *Towards a Common Futures for England* (see note 4)

8 A particular British tendency to see local governance problems as a function of inappropriate spatial units in need of reform (rather than of central-local relations) was noted in DE Ashford: *British Dogmatism and French Pragmatism: Central-Local Policymaking in the Welfare State*. Allen and Unwin, 1982

9 Rather than as the kind of top-down target-setting body that a Planning Minister saw as 'building up nothing but resentment' (Brandon Lewis, Minister of State for Housing and Planning, writing to London Mayor Boris Johnson – 'Further alterations to the London Plan'. Jan. 2015 (www.london.gov.uk/file/21921/download?token=jm_WVHqp), after the Inspector at the last London Plan Examination in Public enjoined regional collaboration)

10 The London and South East Regional Planning Conference – a regional planning forum in the South East, established in the early 1960s and in operation until 2000

11 The East of England Local Government Association's sponsorship of the WSE migration study (see note 2) is an example, intended in that case to inform debate on the (then forthcoming) draft new London Plan

towards efficient and meaningful consultation

Penny Norton, **from the Consultation Institute, considers the potential for greater community involvement in planning and looks at the characteristics of involvement good practice**

I am frequently asked whether consultation is a legal requirement in planning. The fact that it is impossible to answer in fewer than 100 words exemplifies just how complex community involvement in planning has become. And so I, and other associates of the Consultation Institute, very much welcomed the Interim Report of the Raynsford Review[1] and the very constructive steps that it recommends in bringing about greater clarity and consistency.

Members of the Consultation Institute's Planning Working Group – all communications and/or planning professionals working in planning and development – have considered the Interim Report's recommendations and their potential implementation. There is no expectation that report's nine propositions will result in immediate changes to planning law, but much of what is recommended, along with the commentary on them presented here, can be regarded as good practice and is worthy of serious consideration.

A historic need

Despite growing concern about public disaffection with the planning system, there has been no comprehensive review of the relationship between planning and people since the 1969 Skeffington Report.[2] Although it received a positive reception, few of its recommendations were put into practice – apparently because they were considered intangible. And yet the Skeffington Report had an enduring influence on community involvement in planning – to the extent that Skeffington is said to have influenced the introduction of localism over 40 years later.

In 2011, embarking on the localism agenda which was to set the scene for community involvement in planning today, the coalition government said:

'Pre-application consultation provides an opportunity to achieve early consensus on controversial issues before proposals are finalised. This should encourage greater community engagement in the process, and result in better quality applications submitted to local authorities, which are more in line with community aspirations, and much less controversial. Such an approach is considered to be inclusive and transparent, with development outcomes more in line with what the community desires.'[3]

This statement was based on research carried out by the then Department for Communities and Local Government, which found that as a result of pre-application consultations there was a 10-15% fall in the number of appeals, hearings and enquiries. Additionally, a YouGov poll[4] for the National Housing and Planning Advice Unit had demonstrated that while 21% of respondents opposed new housing supply in their area, this number fell to 8% if the homes were well designed and in keeping with the local area.

Localism (which was itself instigated by the need to substantially increase the UK's housing stock) was based on the belief that local involvement would deliver greater consensus. In an environment in which local comment on development proposals was generally negative, this was a bold approach and one which should have begun by communicating the benefits of consultation in bringing about appropriate development. Unfortunately the government (unlike the Raynsford Review Interim Report) failed to do so.

The eventual Localism Act was significantly less bold on the requirement for consultation than was originally intended: while the Bill set out to enshrine a requirement to consult in law, the Act omitted the requirement to consult on planning applications, with the exception of planning applications for wind turbines.

And so while there are considerable obligations for local authorities to consult on the formation of a Local Plan, for Neighbourhood Plans to be determined by referendum and for Nationally Significant Infrastructure Project applications to follow a very prescriptive consultation strategy, there is little requirement on the average developer to consult, other than some vague wording in the National Planning Policy Framework (NPPF)[5] (regrettably unchanged in the 2018 revision), which states (in para. 39) that:

'Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.'

In a further watering-down, the NPPF continues (in para. 40)

'Local authorities ... cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage applicants... to engage with the local community... before submitting their applications.'

So the legal requirement for consultation in planning remains vague and widely misunderstood, and the work of the Raynsford Review in demystifying this is much to be welcomed.

Enriching planning through community involvement

While the legal requirement for developers to consult remains opaque, the notion that community involvement *can* benefit planning decisions is unequivocal.

Planning is ultimately about people: whether through a local authority-run strategic plan or a private sector-led development proposal, change to the built environment impacts on communities. While it is generally believed that those proposing changes should involve local residents as a courtesy,

additionally planners and developers have much to benefit from involving local people.

Consultation provides the opportunity to glean information and ideas from a local community. This might include knowledge of local history, which has the potential to enrich a scheme; otherwise unknown social issues which might have delayed the process; and the needs and aspirations of the community which may be met through the new development. With local input, proposals can be enriched and finely tuned to a specific neighbourhood, creating a unique scheme well suited to its location.

The local community, too, can benefit: community involvement can promote social cohesion, strengthen individual groups within it, and create a shared legacy.

Following local dialogue at an early stage and having had proposals either challenged or welcomed, a developer has a greater chance of building local support for a proposed scheme. And a well run consultation can build a trusting and mutually co-operative relationship between the developer and the community, which can minimise the potential for conflict and thereby remove risk in the process.

Clarification in a covenant

So it is without hesitation that the Consultation Institute supports the Raynsford Review's call for greater clarification on the role of community engagement in planning. Specifically, it welcomes the proposed covenant for community participation, which has the potential to formalise requirements for consultation in appropriate circumstances, rectify the uncertainty about when a developer is required to consult, and clarify the expectations that local communities should have of the planning system.

Such a covenant would require clear definitions of consultation/participation/involvement/engagement and the circumstances in which each should be used. All too frequently the terms are used interchangeably, at considerable risk to the developer or planning consultant. 'Engagement' and 'participation' refer to an ongoing, generally long-term dialogue and can vary significantly. 'Consultation', however, as a result of considerable case law), mostly outside the

development sector) has become very litigious. Specifically, the courts view consultation in the context of the 'Gunning principles' (see Box 1),[6] and where these are not upheld, decisions can be overturned by the courts. Similarly, the 'three pillars' (Articles 4-9) of the Aarhus Convention stipulate three public rights regarding access to information, public participation, and access to justice in governmental decision-making. Like the Gunning principles, they have become an important benchmark in consultation, specifically in relation to dialogue between the public and public authorities.

The Consultation Institute hopes to work with the TCPA on a draft covenant for community participation and would use both the Gunning principles and those of the Aarhus Convention as its basis.

Raising standards and encouraging innovation

There is an opportunity to raise standards in consultation. Specifically, a renewed focus on consultation can put in place measures to ensure that dialogue is efficient and meaningful without being excessive and that a wide range of groups in the local community are involved, and it can put in place some

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Box 2
Efficient and meaningful consultation

Consultation strategy
- Gain a thorough understanding of the target consultees, especially any 'hard-to-reach' groups.
- Determine how consultation responses will be used at the very start of the process. If community feedback is to advise, rather than determine the resulting decision, this should be clearly stated. It is also helpful to state how anonymous responses, petitions and comments from outside any defined geographical area should be used.
- Where possible, meet with community support/neighbourhood involvement officers to discuss how to ensure effective access for hard-to-reach groups.
- Carry out initial research, including stakeholder and issues analysis.
- Draft a consultation mandate, stating the target audience, the aims and objectives of the consultation, the subject for discussion, how the results will be used, the organisation initiating the change post-consultation, and the consultation process's timing. Ensure that the consultation mandate is communicated effectively, including on all consultation material.

Timing
- Hold the consultation at a formative stage, so that respondents have maximum opportunity to influence decision-making.
- Provide adequate time for consideration and response (both in the consultation and the analysis of it).
- Avoid a clash of consultations – for example, consulting on a development planning application during a Local Plan consultation.
- Allow no fewer than six weeks for a standard consultation – more if a significant holiday period falls during this period.

Selecting tactics
- Ensure a range of tactics to appeal to the range people within the community.
- Consider all tactics in terms of access – both physical and psychological.
- Consider using innovative tactics to make the consultation more engaging.
- Use a variety of tactics to inspire involvement.
- Consider tactics most likely to result in constructive responses.
- Understand the specific groups that make up the neighbourhood and ensure that consultation tactics are targeted suitably, investing in translations if necessary.

Determining questions
- Provide adequate information to enable consultees to make a fully informed response.
- Combine both quantitative and qualitative research techniques as appropriate.
- Ensure that questions and accompanying information are free from technical jargon.

Analysis, evaluation and feedback
- Evaluate the consultation responses as set out at the start of the consultation.
- Provide feedback to those who took part.

guidance on how consultation results are used. The latter does not simply concern issues with evaluation, analysis and reporting (although there are certainly opportunities for improvement at this stage), but also the need, at the start of any local dialogue, to agree and clarify how feedback is to be used.

Confusion on this issue is unsurprising. In the case of a Neighbourhood Plan, a local referendum determines the final decision, yet community responses to a development application are generally only regarded as 'advisory' and secondary to that of the professional team. Consequently, local communities remain confused about the intended use of their contributions, and this is a primary reason for dissatisfaction with the current system.

Promoting community involvement as a central tenet of planning – one that is structured by guidelines and inspired by best practice – has the potential to tackle many of the issues that continually perplex planners and developers.

While the Consultation Institute is a strong advocate of good consultation, it does not prescribe consultation in all circumstances. Each development proposal is different: some benefit from community input from the very outset, while in other cases viability issues prevent community involvement in all but a handful of decisions. But where consultation on a planning application is appropriate, it should be efficient and meaningful, without being excessive, and a selection of means by which this might be achieved is summarised in Box 2.

The Interim Report's proposal for 'a new professional culture and skills set directed at engaging communities' is long overdue. Planning consultants and developers are generally highly trained, their undergraduate and postgraduate degrees covering a wide spectrum of skills. With only a few exceptions, however, consultation has so far featured on very few syllabuses. In fact, when I published my book *Public Consultation and Community Involvement in Planning: A Twenty-First Century Guide* [7] last year, it was the only book specifically on consultation in planning to have been published since the Skeffington Report almost 50 years earlier.

Through other generally more litigious sectors, the Consultation Institute has contributed to a professionalisation of consultation through quality assurance, consultation industry standards of practice, professional accreditations, and CPD, and the Institute sees considerable benefit in these benefits applying to the development sector.

Similarly, the Consultation Institute is fully supportive of the Interim Review's proposition for a new 'creative and visionary' planner. There are some excellent examples of creativity and innovation in consultation – both within the planning sector and elsewhere – which could be communicated more widely across the planning sector and inspire more positive community engagement.

We look forward to the publication of the Raynsford Review Final Report. As a next stage, there is significant benefit in guides on consultation in planning for both the development industry and for local residents; the creation of a 'good' consultation kite mark for the industry; training for planning consultants on consultation; and a formalised means of delivering best practice across industry, specifically on subjects such as online consultation, evaluation and analysis, the use of co-production, and participatory planning.

There is no doubt, as a Raynsford Review 'Provocation Paper' acknowledges, that it is 'a challenge to define how much power communities should have as compared to the development industry or national government'.[8] Striking a balance between achieving growth and giving existing communities a voice is a perpetual problem, but one which can be lessened and in many cases overcome through an appropriate and considered approach to community consultation.

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Notes

1 *Planning 2020: Interim Report of the Raynsford Review of Planning in England*. Raynsford Review. TCPA, May 2018. www.tcpa.org.uk/raynsford-review

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