



**RESPONSE OF THE COMMON FUTURES NETWORK
TO
THE RAYNSFORD REVIEW CALL FOR EVIDENCE**

THEME 3: THE SPATIAL STRUCTURES OF THE PLANNING SYSTEM

Context

This response to the Call for Evidence has been prepared by the Common Futures Network (CFN). The CFN has been established in response to a perceived need for a more explicit understanding of the spatial dimension in setting national priorities, particularly for England, which lacks any form of national development framework. This response therefore concentrates on answering the questions in Theme (Spatial Structures of the Planning System)

The CFN is independent of political, business or other sectional affiliations and our members include professionals with extensive experience in UK planning practice and consultancy, economic development, regeneration, transport planning utility planning and academia, across the UK and internationally.

Our recommendations arise from a symposium held in December 2016 supported by the US Regional Plan Association and the Lincoln Institute of Land Policy, following which the CFN published an Interim Prospectus in July 2017 which sets out eight key propositions for tackling short and longer-term national spatial priorities. A summary containing these Propositions is at Appendix 1, and a copy of our Interim Prospectus are attached as supplementary evidence.

Overarching this is the need to create a *New Agenda for England and the UK* to promote a portfolio of actions based on:

- The global role of England and London within the UK
- A new devolved development programme building on sub-national strengths
- The need to deliver a new urban agenda designed to recognise, support and nurture the inherent growth potential of the networked system of cities outside of London
- A new rural agenda as a basis for connecting the rural hinterland of England
- Securing the natural capital of England
- An integrated infrastructure strategy, rebalancing opportunities within England as part of the UK.

Review Question: How effective are the structures of the planning system in relation to the national, sub-regional, local and neighbourhood scales, and how effective are their inter-relationships?

It is the view of CFN that the effectiveness of the local and neighbourhood scales are hindered by the almost absence of spatially relevant national and sub-regional structures. At present, the planning system seems to expect almost all decisions to be made through local and neighbourhood mechanisms and this is not possible in reality.

The local and neighbourhood scale clearly has a valuable role in the planning system but it is unfair to assume that they can deal with strategic planning matters that are larger than local or neighbourhood in scale. Particularly, those that require interventions from a range of sectors and geographies.

Many local bodies have also been seriously weakened by austerity, particularly local government. Local bodies alone are not enough – strategic control of resources and their impact lies with government. Therefore, there needs to be some form of long term strategic planning to take account of the differential spatial impacts of policies and resource allocation, inside, close to, or, if necessary, outside the government machine.

The National Planning Policy Framework (NPPF) provides guidance on policies that need to be applied with consistency across England but it has no spatial dimension. It sets out a framework of criteria based policies that aim to be applied consistently across English local council areas. It is not however a spatial framework to lead change and to secure the required development of England. The NPPF and associated legislation leave cross-boundary issues to be dealt with through the Duty to Cooperate. Since its introduction the focus of this Duty has been on managing unmet housing needs. The outcome of this narrow focus has been very mixed with limited Local Plans in place that positively seek to address unmet housing needs in a co-ordinated manner.

You need look no further than the unmet housing needs of London to identify implications of relying solely on a legal Duty to Cooperate for managing strategic planning decisions. The unmet needs identified in the Further Alterations to the London Plan (FALP) remain unmet. The issue has been discussed at many of the Local Plan Examinations in Public across the South East. However, the absence of a mechanism for how to distribute the needs and subsequent infrastructure requirements has meant the needs remain unmet.

The question above (Raynsford Question 3) assumes a regional structure within the planning system which there is not. The CFN does not advocate for the re-introduction of former regional planning units, which in most cases were not functionally based and were too broad in their geography. However, a regional agenda based on the nested functional areas, unlocking potential (as opposed to the historic agenda based upon problem areas) is considered to be needed. There needs to be a structure that can address the fragmented boundaries and responsibilities. As set out in the prospectus the re-empowering of local communities through devolution is supported. City regions are the natural building block of devolution. Therefore, the creation of Combined Authorities is a major step forward in re-establishing the capacity of local councils to make strategic decisions for the future of their areas. Many of the worst failures on duty to cooperate are on the fringes of metropolitan areas or around smaller economically buoyant cities, which the current combined authority boundaries do not address. Devolution will be most effective where the areas of joint working:

- Are clear with regards to what they are working towards in terms of national agenda and ensure that local aspirations and growth are set within the context of wider need, investment and priorities;
- relate to the functional areas within which people live and work how they relate to the nationally agreed socio-economic;
- applied systematically and comprehensively across England; and
- prioritised, as is the case in Scotland, where joint working is encouraged but the Scottish Executive has identified where strategic planning across boundaries is a matter of national significance (i.e. the 4 major city regions) and therefore not optional

The CFN welcomes the recent initiatives of the NIC to establish sub-regional strategies and strategic planning context for infrastructure for example its proposed improvements to transport links between Cambridge-Milton Keynes – Oxford (CaMKoX). This is important not only to ensure that the major new infrastructure investment is itself planned and resilient but also to optimising its contribution to the agenda set out in the CFN. However, it is essential that proposals like this are developed and set in an agreed wider context. Amongst other things, this needs to take into account the relationship to the parallel strategic relationships (e.g. to the wider South east and South Midlands). This cannot be generated bottom-up, but requires a national spatial framework.

Review Question : Is there a case for an English national plan? If so, what would be its scope and governance?

Yes, we believe that England needs a framework that has a spatial focus as to how key policy decisions within and beyond planning inter-relate to achieve the highest economic, social and environmental benefits and provide the highest returns for the economy. So far, the range of policy interventions set out in the Industrial Strategy, NIC infrastructure Assessment and Housing White Paper are not sufficiently integrated locally or departmentally. More than ever, public policy needs to be underpinned by sound place-based and place-sensitive evidence, but currently such a resource does not exist.

The Common Futures Network has prepared a Prospectus (*Towards a Common Future: A New Agenda for England & the UK*¹) for how a New Agenda for England and the UK could be a benefit for all. This Prospectus sets out an immediate and longer-term agenda to fill this gap in England to benefit all communities.

This Framework needs to be underpinned by an evidence base which is fit-for-purpose. Current tools are inadequate for the job, they are generally short-term, trend based, and inconsistent. Most importantly they are generally insensitive to their spatial implications and impacts on specific communities – whether at the neighbourhood, city or region scale. Evidence for policy making cannot be based solely on trends since the past is no simple guide to the future. Evidence has to be longer term than any election cycle. It must be spatial. It must be carefully constructed as it will inevitably shape policy discussion as well as serving it.

A national Agenda for England is needed to address existing weaknesses and deliver a wide range of benefits (refer Boxes). It does not replace national sectoral initiatives or programmes of action but gives them greater impact by aligning them within a common framework.

Similarly, a national Agenda for England will also have demonstrable local benefits. It will provide confidence that actions taken locally will be supported and not undermined by action taken elsewhere. It is therefore seen as key to strengthening devolution by providing a context within which local strategic initiatives can work with confidence in terms of their national role and support. It also has a critical role in addressing the relationship that needs to be struck between London and the wider south east in terms of managing London's regional growth in terms for example of housing and economic development, these goals are reflected in the Propositions 4 5 & 6 within the Prospectus.

There are many governance models for preparing a national spatial framework and they all have strengths and weaknesses, but can all work if their latent weaknesses are compensated in the associated checks and balances. Whatever model is chosen it should deliver the National Influence and Local Benefits set out in the following tables

¹ <https://urbandynamicslab.files.wordpress.com/2017/05/interim-prospectus-low-res.pdf>

The National Benefits of a Framework for England

- Provide a shared ambition across sectors and interest groups
- Set long-term priorities for the nation for the next 30 years
- Bridge the silos of Government to ensure the contribution of all sectors – health, social welfare, education, etc.
- A shared evidence base to support key policy decisions at national and local levels to leverage the greatest economic, social and environmental benefits
- Increase clarity and certainty for future national and international investment
- Provide coordination and support for devolved powers making local decisions and plans better and more effective
- Capture the greatest “bang for your buck” for infrastructure and public and private investment
- Avoid the confusion and missed opportunities of an uncoordinated and unplanned England.

The Local Benefits of a Framework for England

Policies and investments for regeneration and growth that benefit local communities through:

- Local and regional transport systems that connect to national and international transport modes;
- Strengthened research universities and teaching hospitals, and create technology transfer institutions to ensure that technologies in these places benefit the local, regional and national economy;
- Empowered local and metropolitan governments to innovate and invest in these activities and in improved education and other public services that open up new opportunities for people, locally;
- Protection of valuable and cherished places and spaces that are of more than local significance within a wider economic and social context.
- Provide the spatial context for the relationship between London and the Wider South East

The UK is blessed with great wealth and opportunity, but faces socio-economic challenges and spatial needs and ways. Even though the UK is the fifth global largest economy, with a disproportionate number of globally ranked universities, it has amongst the highest inequalities in terms of wealth, skills and education. Internally the UK is not only imbalanced but there is also concern that various component parts of the nation are ‘decoupling, dislocating and disconnecting’ into three different (regional) economies.

The nation needs a plan to drive growth and jobs up and down the country - from rural areas to our great cities. On the sub-national level a consistent frame of reference is needed related to labour market and connectivity between areas, allied to a geography of governance that reflects labour market areas. The challenges are ones of linking up strategies at a national level, and in making sure national and local strategies work in partnership. This requires us to tackle some of the economy’s structural problems that hold people back. Things like the shortage of affordable homes. The need to make big decisions on and investment in our infrastructure.

We need to build on the existing initiatives by harnessing fully the potential opportunities created by England’s position as a global economic region. A new agenda is needed to translate government objectives into their spatial implications throughout England. Conversely, we need to consider geographical implications much more explicitly than at present when national policy decisions are taken, including those related to mainstream funding.

Overcoming this fragmentation and rebalancing the nation needs policies and programmes which are informed and monitored by an evidence base about the scale and

nature of the challenges. Overseeing the extent of the challenges is another matter. There is a need for a fresh approach to decision-making which provides an integrated, consistent and sustained approach to the evidence and analysis used by the national policy community. This is in part related to the limitations on those traditionally responsible to undertake this role. However, it goes beyond a question of resources.

Some actions needed include:

- The need to secure the global role of the nation through flagship projects which re-engineer the nation's infrastructure to future needs and assist the rebalancing of opportunities within England
- A new devolved development programme building on sub-national strengths
- The need to deliver a new urban agenda designed to recognise, support and nurture the inherent growth potential of the networked system of cities outside of London
- A new rural agenda as a basis for connecting the rural hinterland of England
- Securing the natural capital of England.

The national framework needs to be light-touch, updateable and not proscriptive. It should provide a clear and robust evidence base for the public, private and third (voluntary) sectors to develop policy and action. It should focus on the national interest characterised in the:

- National Economic Hubs and Corridors which drive and secure the future of Britain
- National Networks upon which all communities are dependent for accessing the national hubs and major urban centres;
- National Flagship Projects which will transform the competitiveness and quality of life of England.
- National Priorities for Collaborative Action where the level and scale of change nationally significant in terms of potential or from being at risk from either failing economies or physical threats e.g. sea level rise.

Review Question : What is the role for New Towns legislation in responding to housing needs across the nation?

The New Towns legislation may well have an important role to play in delivering the housing needs across the nation but alone it is unlikely to be enough. The way it is used needs to be aligned to devolution and the issues set out as part of the questions above. Most important is the institutional capacity of sub-regional bodies internally to work across boundaries and functional responsibilities to deliver growth. The New Town model also has the significant benefit of access to dedicated front-loaded funding for core infrastructure linked to its capture in any uplift in land values that it generates by such investment. These advantages are critical if we are to breakout of the inertia of incrementalism that limits the ability of current policy to promote housing development of a scale related to the needs of the country and which is fully serviced in terms of supporting infrastructure (physical, social and green infrastructure). .

Development Corporations under the New Towns Act were set up as independent bodies reporting directly to Government, and were therefore less democratically accountable than perhaps would be expected today. However, in practice the New Town Corporation did undertake levels of engagement especially in those which were associated with an established town (e.g. Redditch). Any future application of this legislation therefore would need to be refreshed to ensure it is participatory. We also recognise that a new model of Development Corporation is currently being established at Ebbsfleet, providing greater Local Authority involvement over its operation. Nevertheless, a more democratic method, offering single purpose but also involvement for the local communities and flexibility to adapt to local circumstances would be more beneficial.

As set out above, a key element of a National Framework is to focus on the matters that need to be dealt with at the national level. This need not include a dictate on the specific location of new strategic towns managed by a traditional development corporation. Instead, modernised powers could be devolved to regions seeking to address needs through strategic new towns.

APPENDIX 1

The Common Futures Network Propositions for a New Agenda for England and the UK

Proposition 1: Creating a New Agenda for England to promote a portfolio of actions recognising geography based on:

- The global role of the London mega-region within the UK
- A new devolved development programme building on sub-national strengths
- An urban agenda to support the networked systems of cities
- A new rural agenda as a basis for connecting the rural hinterland of England
- Securing the natural capital of England
- An integrated infrastructure strategy rebalancing opportunities within England as part of the UK.

Proposition 2: Introducing a Place-based Industrial Strategy to harness the agglomerative capacity of the UK, and England in particular, as a global mega-region, and a refreshed regional development programme reducing peripherality, identifying areas of industrial specialisation, linking research and development, and setting priorities and goals for underperforming parts of the country.

Proposition 3: Integrating Infrastructure to move the agenda beyond re-engineering the nation to rebalancing opportunities within England; also, opening up new development areas required to meet the additional 9m population by 2040.

Proposition 4: Building Networked Systems of Cities: Understanding and maximising functional linkages between cities, building upon, but not confined to, the three existing trans-regional priorities (Northern Powerhouse, Midlands Engine, and the Cambridge-Milton Keynes-Oxford Corridor), and other nationally significant opportunities (e.g. Heathrow-Swindon-Bristol), as well as the HS corridors.

Proposition 5: Securing the Global Role of London: Ensuring action throughout the London Capital Region supports the commercial, labour and housing markets upon which the future of London as a global city depends, through a high level non-statutory public – private forum, and also strengthening London's relationships with other major UK cities.

Proposition 6: Facilitating Devolution: Reinforcing the potential created by the emerging framework of Combined Authorities through a more structured and incentivised basis for collaborative action, whilst retaining a safety net for vulnerable towns.

Proposition 7: Identifying the Components of a Framework: Based on these propositions identifying the key issues that must be decided at a national level for England in terms of the *National Economic Hubs, Corridors and Networks* in support of the *National Flagship Projects* and the *National Priorities for Collaborative Action*.

Proposition 8 : Linking Devolved National Frameworks through the British Irish Council's Working Group to provide a common context for cross-border cooperation, creating synergies and identifying cross-boundary and external relationships and nation-wide approaches to increasing self-sufficiency in food, raw materials and energy