**Stakeholder views on the impact on the West of England**

**of the abolition of the SW Regional Spatial Strategy and the emerging national planning framework**

**Final report**

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Professor Martin Boddy, University of the West of England

Martin.boddy@uwe.ac.uk

Hannah Hickman, Hannah Hickman Consulting and

Visiting Research Fellow, University of the West of England

hannah@hannahhickman.co.uk





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**SUMMARY**

1. Regional Spatial Strategies were introduced across England in 2004 replacing county-wide structure plans. Based initially on existing Regional Planning Guidance, it was intended that each region would develop and implement new RSSs based on detailed evidence-gathering and consultation, and that they would be subject to examination in public.
2. Implementation of RSSs became increasingly contentious. The Conservative Party announced in August 2009 its intention to abolish them if elected and in May 2010 the incoming Coalition Government duly announced that it would revoke RSSs. In July 2011 it published the Draft National Planning Policy Framework (NPPF) setting out its intentions for the planning system and how it would operate following abolition.
3. This report sets out findings from research into stakeholders’ views on the abolition of RSS and the emerging national planning framework, focused on the West of England. The city-region has a history of economic prosperity, and the draft SW RSS had set out plans for significant levels of continued economic growth and physical development in the West of England. It is, however, split administratively into four separate unitary authorities raising issues over effective collaboration. Once the intention to abolish the RSS had been announced, each authority also announced reductions in planned housing numbers compared with the draft RSS amongst the largest for all authorities.
4. The West of England is therefore of particular interest given the Government’s intention that the planning system should incentivise and deliver economic growth, the potential implications of removing strategic-level planning, and the reliance on cross boundary collaboration as set out in the draft NPPF.
5. The research was carried out between August and December 2011 and included face to face interviews with nearly thirty stakeholders including local authority elected members and officers, developers, consultants and professionals, civil servants, representatives of former regional bodies and of key national organisations. The primary research was completed prior to the publication of the final NPPF in March 2012.
6. This summary is provides an account of the main views of stakeholders on the abolition of RSS and on the emerging NPPF. A brief summary cannot do justice to the full spectrum of views, and the variety and nuances contained in what is a significant body of detailed discussion. For a much fuller account of this we refer you to the main report.

**RSS prior to abolition**

1. Views on the RSS itself prior to abolition varied greatly across different stakeholders. There was broad acknowledgement (somewhat begrudging from some) that the RSS process at least was a catalyst for strategic thinking, lifting the perspective beyond immediate local authority boundaries and supporting longer term thinking and a more positive narrative in relation to growth.
2. It was widely argued that the policy debate had, however, been dominated by housing and housing numbers – to the possible detriment of other areas where progress had been made, on waste, renewable energy and provision of gypsy and traveller sites.
3. It was also, however, acknowledged that the RSS had focused on housing, economic development and infrastructure in a joined-up way. The RSS was seen as addressing infrastructure needs as part of the growth agenda in a more positive and strategic way than previously – tempered by scepticism as to how this might be delivered in practice.
4. It was suggested by some that, at the time, the RSS process had led to acknowledgement and acceptance of the framework for growth on the part of local authorities. Whilst RSS still looked likely to be implemented, local authorities had to an extent, if reluctantly, come to terms with it based, at least on the housing numbers in the original submitted draft.
5. As the numbers were ramped up, however, by the recommendations of the EIP panel and the Secretary of State’s proposed changes, opposition at a local level hardened and the proposals lost credibility, even before the recession started to bite, and before the prospect of revocation. Particularly true of the local authorities, this view was also, to an extent, shared by the development sector who saw the levels of growth as undeliverable.
6. There were concerns over the lack of democratic legitimacy of the RSS process and the status of the Regional Assembly. The process was seen by some as having been ultimately driven by central government based on political choices – rather than by technical arguments around demographics or economic strategy as sometimes suggested.

**Views on abolition**

1. The views of different stakeholders polarised and hardened with the prospect that RSSs would be revoked, prompted by the letter from Caroline Spelman, Shadow Secretary of State for Communities and Local Government in August 2009, as the recession and housing market slowdown deepened and as the issue of housing numbers was increasingly politicised in the run-up to the election. The four local authorities had all indicated their intention to reduce significantly, planned housing numbers. There was an even clearer divide between different stakeholders once abolition became a reality following the election.

*The local authority view*

1. Local authority members were almost universally relieved and delighted, a view largely shared, with only minor regrets, by officers.
2. In an immediate sense abolition provided a high degree of certainty that authorities could follow-through on promises to reduce future housing commitments. Some uncertainty at the time the interviews were conducted still surrounded the implications of the NPPF but all four authorities moved swiftly to incorporate revised proposals into the evolving policy framework including revised Core Strategies.
3. More broadly, abolition was seen as providing a much greater degree of local determinism, despite uncertainty over the NPPF. Local authorities saw the future much more in terms of localism than as a ‘developer’ charter’ – a view largely shared by development interests. This was seen not simply in terms of reducing levels of housing development but the more positive pursuit of locally determined policy objectives in all four authorities.
4. The fact that authorities would now be clearly responsible for local decisions, lacking any form of external scapegoat or referee, and the threat to collaborative working developed under the auspices of RSS, were minor concerns voiced by some in local government. It was also argued that the prolonged recession and housing market downturn had in any case made the sort of targets set out in the RSS meaningless

*The development sector and other stakeholders*

1. Stakeholders from the development sector and former regional bodies were largely critical of abolition. In particular, they saw the lack of a strategic framework and a ‘larger than local’ dimension as creating a lack of certainty and support for future investment. More specifically, abolition and the commitment on the part of local authorities to cut back local housing targets was seen as impacting on a wide range of planned development projects including major urban expansions identified in the RSS. Abolition had the immediate effect of stopping a range of development schemes coming forwards or being progressed.
2. Whilst acknowledging the impact of recession in the short term, the view of these stakeholders was that without the RSS there would be lower levels of housing supply and economic development in the West of England at least in the medium to long term as the economy recovered.
3. This was seen as impacting on house prices, housing affordability and housing supply including of affordable housing. It was also seen as having major implications, in turn,for employment growth and the future economic performance of the West of England.

**After abolition: the emerging National Planning Policy Framework**

1. The draft NPPF published in July 2011 gave some clear indication of the intended framework for planning that would take the place of that planned under RSS. The brief document prompted widespread, heated debate, and speculation from a wide range of stakeholders nationally. A national inquiry by the House of Commons Committee on Communities and Local Government collected extensive evidence, publishing its report in December 2011.
2. Interviews for this report were conducted over the period August to December 2011 as this debate unfolded. They therefore reflect the variety of knowledge and understanding of stakeholders at the time that discussion took place. But, with this proviso, they provide a useful perspective on the prospects for post-abolition planning.
3. The general view from stakeholders across the spectrum was that the draft NPPF was broad brush, somewhat vague and lacked clarity and detail, particularly as a basis for actual decision-making. The view at the time was that there was considerable potential for further development of the draft NPPF.

*Developer’s charter or triumph for NIMBYISM?*

1. Much of the debate focused on whether the emerging national planning framework represented what had been polarised nationally as a ‘developers’ charter’ versus a ‘triumph for nimbyism’. Locally, there was, at least at the time, some concern on the part of local authorities (members more so) that the reforms could result in a free-for-all for developers.
2. There was concern that developers would seek to capitalise on the proposed ‘presumption in favour of sustainable development’, challenging the existing planning framework through opportunistic applications and the pursuit of appeals – the series of challenges mounted by Cala Homes heightened awareness of this potential.
3. There was growing confidence however, that established core strategies would provide a strong measure of protection. This view was reinforced when the Bristol Core Strategy, incorporating significantly reduced housing numbers, was found sound in June 2011.
4. Development sector stakeholders also rejected the ‘developers’ charter’ view, in part because in contrast to some of the strident national voices at the time, they saw core strategies and the draft NPPF as reinforcing locally determined policy. Uncertainty, coupled with the depressed market further removed the likelihood of any sort of development free-for-all.
5. They also saw localism as reinforcing NIMBYISM in the sense of that the four local authorities appeared increasingly to be focusing on issues relevant to their own territories with little concern for relationships across the city-region as a whole.
6. Development stakeholders saw a contradiction between the government’s support for localism on the one hand and its broad growth agenda and objectives in terms of housing delivery on the other, which had not been resolved in the draft NPPF.
7. A variety of stakeholders from different sectors questioned whether, when the rhetoric had abated, the planning system, once it settled down, would in practice be significantly different from how it had operated in the past.
8. Given the key role of Core Strategies, a number of stakeholders noted the onus or burden this placed on Planning Inspectors, their views on the evidence and decisions on soundness. Private sector stakeholders saw inspectors as under pressure to find plans sound and, at the time, questioned the rationale for the Bristol decision and potential outcomes for the other three authorities in the face of demographic evidence.

*The duty to cooperate*

1. Views again varied on the likely operation and success of the duty to cooperate. The local authority view was that effective working relationships had, if anything, improved more recently (in part through the RSS process) and that cooperation in the future was not an issue.
2. Local authority representatives stressed that whilst there were boundary issues, each authority had their own set of issues to deal with on an individual basis. All had reduced planned housing numbers and did not perceive that there was unmet need to be met on a collaborative basis.
3. Developers on the other hand were highly critical of the past record of collaboration with only limited exceptions, and were sceptical that any meaningful cooperation would be achieved in the future under the auspices of the duty to cooperate. Even those more optimistic based on the recent record (particularly around transport initiatives), saw political pressures and the power of local groups strongly asserting the localist agenda to the detriment of development.
4. A minority view was that the duty to cooperate was the only game in town and that reflecting something closer to a ‘business as usual’ view, development could be made to work pretty much whatever the planning system.
5. Non local authority stakeholders were particularly sceptical of the capacity of inspectors taking one-off decisions on core strategies to rule on or enforce the adequacy of the duty to cooperate.

*Role of the Local Enterprise Partnership*

1. The West of England LEP was amongst the first wave to be established and was perceived to have established its profile and credentials with considerable success both locally and nationally. It was seen as building on a positive history of partnership working locally including over the RSS and the West of England Partnership which prepared the ground, whilst bringing business interests more centre stage with a stronger emphasis, therefore on economic issues.
2. The LEP was seen as a focus for advocacy and aspiration. At the same time, it was thought to lack the power or resources to drive forward city-regional strategy. It lacked the strategic scope of the RDA. More specifically it was observed variously that it lacked any formal role in the planning system and, as such, had seemed reluctant to seek to influence this arena. It was thought that any such move was likely to be strongly resisted on the part of the local authorities. The minimal involvement of the LEP in the core strategy process so far was noted.

*Infrastructure provision*

1. Much of the debate had focused on housing numbers, this being reflected in the views of stakeholders. There were particular concerns, however, around infrastructure provision, transport in particular but also schools, community provision and other issues. Local authority and development sector stakeholders alike saw the need to ensure that future infrastructure needs are met. The local authorities saw this largely in terms of effective cooperation locally, also pointing to collaboration over rail electrification for example. Others were more sceptical that this would deliver in the absence of the RSS and saw the need for a broader regional, strategic perspective, arguing that an element of cohesion had been lost.
2. There was a view that levels of infrastructure provision required by RSS targets had been unachievable making the growth targets themselves unrealistic. At the same time, the reduction in housing numbers now made it harder to argue for significant investment going forwards – investment needed in part to address current deficiencies.
3. More optimistically, collaboration in support of the recent success in securing funding for transport infrastructure was acknowledged by different stakeholders, with the LEP building on a longer history of collaborative effort. This, it was thought might pave the way for future dialogue and counter tendencies towards local retrenchment.
4. There were particular concerns about investment needed to kick start delivery of infrastructure once the market recovers. The private sector was likely to be cautious, the public sector less willing to cover upfront costs and new funding mechanisms as yet unproven.

**The future of the West of England as growth region**

1. The West of England has had a history of prosperity and growth and was identified by the RSS as a focus for continued economic growth. The newly established LEP subsequently set a challenging target of 95,000 new jobs by 2030 and GVA at 3.4% pa by 2020. Nationally, the new Coalition Government itself stated its commitment to planning reform that would incentivise and support economic growth. The West of England thus represents a pertinent test particularly of the possible economic impact of RSS abolition and of the emerging national framework.

*Local authority perspectives*

1. All four local authorities significantly reduced planned housing numbers in their draft Core Strategies compared to those in the draft RSS – down by 35 thousand compared to the final ‘Proposed Changes’ (10,500 compared with the initial draft RSS). All four supported the view that given the recession and the slump in the housing market, these reduced targets were consistent with future needs and would not in themselves represent any brake on future economic growth.
2. Their aim was also explicitly to remove pressures for large scale, green-field development or review of the greenbelt in areas including major urban extensions identified in the RSS where they were now no longer needed to meet future targets, and to focus instead on local priorities. Political expediency was an acknowledged factor, given opposition in local communities to the threat of such development. But members had increasingly focused on the technical aspects of growth forecasts and implied future housing need.
3. There was opposition to the planned provision of housing which would support in-migration on a local or wider geographical scale and which would encourage out-commuting to neighbouring areas. The fact that Bristol’s reduced level of provision was found early on to be ‘sound’ without reference to the need to accommodate growth beyond its immediate borders reinforced this view.

*Development sector and other stakeholders*

1. On the other hand, whilst acknowledging the immediate economic context, other stakeholders questioned the extent to which the recession justified the scale of reduction in housing numbers, particularly given historic under-prediction of household growth and under provision in planning terms.
2. Short-term planning, even with periodic review on say a five yearly basis, did not give the degree of certainty to encourage investment – a succession of 5 year plans was not the same as a 10 or 15 year horizon, and localism it was argued, equated to short-termism. Significant developments had already stalled. And whilst much of the focus has been on housing numbers, problems were identified as well with the potential failure to provide for employment land in the longer term – significant provision historically had been a key factor in past economic performance.
3. Private sector and former regional body stakeholders saw under-provision of housing numbers, employment land and infrastructure coupled with the levels of uncertainty and short-termism as a potentially serious threat to future economic growth, jobs and employment, housing affordability and availability (including low cost housing).
4. This in part reflected the fact that these stakeholders typically thought in terms of the functional economic city-region as a whole and had a model of growth driven in part, at least historically, by immigration of skilled labour from elsewhere in the country. This contrasted with local authority stakeholders (elected members in particular) who saw the aim as responding to local needs or local jobs growth – and in some cases saw in-migration as more of a threat than an opportunity, and therefore as a process to be discouraged.
5. A more pragmatic view expressed by a minority of both local authority and private sector stakeholders was that given the right political will, and if the government followed through on its proposals, then the system would still deliver the right levels of development in terms of housing or economic development, albeit not necessarily by the same route.

**Larger-than-local level planning**

1. Abolition of RSS and the draft National Planning Policy Framework effectively stripped out a longstanding commitment to a strategic or intermediate level to the national planning system, RSS having replaced county-level structure plans which had existed since 1968. This in effect leaves nothing between local Core Strategies and the Secretary of State.
2. There were strong views and a range of perspectives on the need for some sort of strategic, larger than local authority framework within the overall planning architecture. Some within local authorities, members more so than officers, were clear in their support for abolition, and saw the potential for local determinism once Core Strategies were established. Local cooperation was seen as as providing the right basis for any more strategic perspective that might be needed.
3. Elected members frequently observed that their support comes from their local area and the views of local constituents are therefore the priority. A number of officers, whilst acknowledging the political realities, felt from a professional planning perspective concerned at the lack of any strategic component to the new planning system.
4. Development stakeholders and those from former regional bodies and national organisations were close to unanimous on the need for some form of larger-than-local, strategic framework – ‘appalled’ and ‘aghast’ were two views on the new system. Locally-driven planning, it was argued, would inevitably be short-term, opposed to significant development in the local area, lack any more strategic focus on the West of England as a whole and deliver lower levels of growth in the future.
5. There were clearly different perspectives on the meaning of ‘strategic’. Local authority stakeholders typically saw ‘strategic’ issues in terms of cross-boundary collaboration. Development stakeholders and others typically saw strategic issues more broadly, focusing on the functional city-region as a whole and also the need to address a wider regional and national agenda around growth, sustainability, infrastructure provision and other issues, rather than simply cross-boundary issues.
6. There was less clarity from proponents of a strategic framework as to what this might consist of. There was little enthusiasm for a return to the RSS which even amongst those who had supported it at the time was perceived as too complex, lacking in focus and addressing too diverse a set of issues across the region as a whole.
7. There was significant support for city-region level structures including a single-tier authority or boundary extension expanding Bristol to encompass the existing built-up area and beyond – anathema to local elected members. Others referred to more effective models of local collaboration citing the Cambridge city-region or the Association of Greater Manchester Authorities (AGMA) as aspirational models.
8. Local authority stakeholders saw the ‘duty to co-operate’ as the basis for future city-region-wide thinking, with one national body representative suggesting that further guidance probably coupled with secondary legislation and more effective measures to ensure compliance might strengthen its impact in practical terms.

1. Introduction

1.1 Context

Regional Spatial Strategies (RSS) were introduced across England in the Planning and Compulsory Purchase Act 2004. They replaced county-wide structure plans introduced in 1968 and were to form the strategic planning framework at a regional level which in turn informed planning at a more local level in the form of Local Development Frameworks. Initially Regional Planning Guidance (RPG 10) became the SW RSS. Each region, however, was required to develop and implement a comprehensive new RSS based on detailed evidence-gathering, consultation and subject to examination in public.

The Draft Regional Spatial Strategy for the South West of England was submitted to government in April 2006, examined in public in 2007 and proposed changes were published by the Secretary of State in July 2008.

Final publication of the Strategy was, however, delayed by the Secretary of State in the light of further sustainability appraisal work and the threat of judicial review. In August 2009, Caroline Spelman, Shadow Secretary of State, then announced that a Conservative Government, if elected, would abolish RSS. The incoming Coalition Government duly announced in May 2010 its intention to revoke RSS, in a letter to all chief planning officers from Eric Pickles, Secretary of State for Communities and Local Government. The exact status of this intention remained a matter of contention but the Localism Act which gained Royal Assent in November 2011 included the legal power for abolition.

RSS Timeline

April 2006 Draft South West Regional Spatial Strategy Submitted to Government

April – July 2007 Draft RSS subject to an Independent Examination in Public

January 2008 Report of the Examination in Public published

July 2008 Secretary of State publishes Proposed Changes to the South West RSS for consultation

September 2009 Secretary of State announces delay to publication of South West RSS pending further sustainability appraisal, in light of threat of Judicial Review.

August 2009 Caroline Spelman, Shadow Secretary of State for Communities and Local Government announces that a Conservative Government, if elected, will abolish regional planning, including Regional Spatial Strategies.

May 2010 Coalition Government announces its plan to revoke Regional Spatial Strategies, through a letter to all Chief Planning Officers from Eric Pickles, Secretary of State for Communities and Local Government.

December 2010 Localism Bill published including intention to abolish Regional Spatial Strategies

November 2011 Localism Act published allowing for abolition of Regional Spatial Strategies.

The draft National Planning Policy Framework (NPPF) published in July 2011 had, meanwhile, set out the government’s intentions for the planning system and how it was intended that this would operate following abolition of RSS. Amongst other things, the draft Framework placed the onus on local authorities to set in place approved Core Strategies in order to establish planning frameworks shaped by local priorities. Following extensive consultation and debate, the Framework was published in March 2012.

The House of Commons Communities and Local Government Committee launched a national inquiry into the abolition of RSS in the summer of 2010 soon after revocation was announced, publishing its report *Abolition of Regional Spatial Strategies: a planning vacuum* in February 2011. It subsequently conducted an inquiry into the Draft NPPF, published in December 2011. These inquiries provide the context for the work reported here.

This report summarises the views of a wide range of stakeholders on the impact on the West of England of the abolition of the South West RSS. It also provides an account of emerging views on the Draft National Planning Policy Framework, although this inevitably reflects the fact that debate around the NPPF was developing over the period of the research. It thus provides an account grounded in a particular city-region, complementing the national overview.

1.2 The West of England

The West of England Housing Market Area (HMA) was included within the South West’s draft RSS as a distinct area requiring a city-regional strategy. It comprised the four unitary authorities of Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire that contained within them the ‘Strategically Significant Towns’ of Bristol, Bath and Weston-Super-Mare, plus Mendip and West Wiltshire district councils.

The West of England represents a specific city-region. Its characteristics, however, are such that it is of more general interest and significance. First, it has a recent history of economic prosperity, rapid growth and physical expansion. Over the last ten years, its population has grown faster than the UK average to more than one million people. The West of England Partnership describes it as “a prosperous area with an excellent quality of life and a growing national and international profile”. Up to the recession in 2008 it faced strong and continuing growth pressures both for housing and employment. The RSS saw the Bristol city-region as a major driver of growth within the region contributing, by implication, to national economic prosperity and the recently formed West of England Local Enterprise Partnership has set ambitious targets for jobs growth.

Second, the functional, economic city-region is split in administrative terms across four unitary authorities. Bristol City at the core, with limited scope for physical expansion, is closely bounded both by greenbelt and by the neighbouring authorities of South Gloucestershire, Bath and North East Somerset and North Somerset. A significant share of past growth in housing and jobs has focused on the three peripheral authorities. The draft RSS envisaged substantial growth in all four authorities, including a number of major urban extensions to the Bristol urban area spanning local authority boundaries, and including development in the green belt. The city-region was always likely therefore, to represent a test for strategic, cross-boundary working.

Third, the four unitary authorities collectively proposed amongst the largest reductions in headline planned housing numbers from the draft RSS proposals to those proposed in their Core Strategies – a reduction of 35 thousand, placing all four in the top ten nationally (see table 4.1). The scale and potential impacts of this reduction were likely, therefore, to prove contentious amongst the different stakeholders and a focus for views on abolition and on the new planning framework.

1.3 The research

We report here on research undertaken between August and December 2011. It sought to establish stakeholder views on the impact of RSS abolition focused on the West of England. It also sought views on the likely implications of the emerging National Planning Policy Framework. Face to face interviews were carried out with some thirty individuals from a wide range of organisations and professions. They included local authority elected members and officers, MPs, developers, consultants and professionals, civil servants and former employees of regional bodies. We also interviewed a smaller number of representatives of key national professional and trade organisations. We are indebted to all of them for so willingly sharing their time and views with us. The overall make-up of those included in the study is summarised in appendix one. The research was, however, conducted on the basis that none would be identified in the report of findings.[[1]](#footnote-1)

The current report aims to represent the variety of views of the different stakeholders as fairly as we can, letting them speak for themselves through extensive quotation. We have not at this stage sought to offer much in the way of our own interpretation or conclusions on the issues covered. We have, however, drawn together at the end of the report a number of questions and issues which we think it will be important to address as policies, roles and structures evolve and as the context, not least the economic environment, changes.

It is important to be aware that the research was conducted over a specific period of time, and that both policy frameworks and debates were evolving over time – and have continued to do so since. There is a wealth, also, of documentary material which has accumulated at a national and local level particularly around the emerging NPPF. This includes specifically that focused on the development of Core Strategies in the four local authorities in the West of England including the public enquiries. We have not attempted at this stage to incorporate this material but will do so as the study develops.

The report is structured as follows:

* Section 2 focuses on the RSS itself. It first presents the range of views on RSS as it evolved and before abolition. This includes reflections on its strengths and weaknesses, and on process and content terms. It then focuses more specifically on stakeholder views on its abolition and the implications of this.
* Section 3 summarises the views of different stakeholders on the emerging planning framework in the form of the draft NPPF and the possible implications of this. Given timing, this was to an extent speculative but the local perspective adds an important dimension to the often strident national debate. It considers the balance of views which have variously portrayed the NPPF as a ‘developer’s charter’ or ‘the triumph of nimbyism’, views on the ‘duty to cooperate, the possible role of LEPs, and the implications for infrastructure provision.
* Section 4, finally, draws out stakeholder views on two key issues addressed by the research: first, the possible implications of abolition and the NPPF for the future growth and development of the West of England; and, second, the possible need for planning at a greater than local level.

2. Regional Spatial Strategies

2.1 Views on Regional Spatial Strategies prior to abolition

Background

When Regional Spatial Strategies were introduced as part of the 2004 Planning and Compulsory Purchase Act, they were viewed by many as representing a new era in planning. This was not simply because, unlike previous Regional Planning Guidance, planning at a regional level, became part of the statutory development plan (and therefore of greater weight in decision making), but because RSS was seen as promoting a new kind of approach to planning: one which was focussed on strategic, cross boundary issues, and one which sought to integrate different policy spheres and sectors at a spatial scale. This was best represented by the intended close integration of RSS and Regional Economic Strategies (RES), and the engagement of social, economic and environmental partners in RSS preparation through the wide composition of Regional Assemblies charged with RSS preparation.

In the South West the ‘new style’ RSS never reached the point of formal adoption. The draft RSS was at the Secretary of State’s ‘Proposed Changes’ stage, at the point at which the revocation announcement was made in May 2010. Nevertheless, during the 6 year period leading up to 2010, significant progress had been made to produce the region’s RSS which had been through substantial testing through the Examination in Public in 2009.

“The RSS was the best evolution of strategic planning we have had. It actually was setting genuine strategies. It was getting the decisions made and it was dealing with the right things. It was dealing with the relationships between settlements” (planning consultant).

“I'm completely politically incorrect here because I thought the RSS was really good” (development professional).

“I didn’t have a lot of time for the RSS … I don’t think it really addressed the issues in the way it should have done” (ex senior local authority officer).

“Everything kept coming back to numbers, and people messing around with numbers, and it did sort of smack of the ivory tower technocrat” (civil servant).

“Did the RSS work? They weren’t there long enough to say you know, so you can’t say they were a failure, you can’t say they were a success” (national body representative).

Prior to abolition – or more precisely the Conservative Party’s pre-election commitment to abolition - the range of attitudes to RSS (described with hindsight) ranged from overall if not always unqualified support on the part of developer stakeholders and those from regional and national bodies through to opposition on the part of many (albeit not all) in the local authorities. In tandem with opposition at a local level there was begrudging acceptance of the need to accommodate and live with the new system – a perspective that was increasingly tested as the planned numbers were ramped up from the initial Draft RSS, generating increasing anger.

**The RSS as a catalyst for strategic thinking**

The vast majority of participants expressed a view, albeit in differing terms, about there being an advantage to thinking strategically, beyond local authority boundaries. The RSS was undoubtedly seen as a tool for getting leading politicians and stakeholders to think in this way.

“I think that if we were really honest we saw the RSS as an opportunity to be brought into a more strategic scenario and actually get away from the fact that Bristol there, Bath there, borders at Keynsham. I think we actually did see this as an opportunity to be in a bigger game… I think most of the really intelligent politicians said ‘Hang on a minute, if we play this in a willing way we can actually get strategic advantage out of this, we can be seen to be part of a bigger conversation with Government.” (senior local authority officer).

Local authority participants tended to describe the RSS as acting as ‘catalyst’ (positive) or a ‘push’ (perhaps more ambivalent) to help lift their perspective beyond their immediate boundaries. The benefit of being part of a ‘bigger picture’ was another repeated phrase. Some local authority officers talked about narrative. Words like ‘aspirational’, ‘picture painting’ and ‘future scanning’ were all associated with the RSS. It was thought to have facilitated local authorities in coming up with a story about where they were now and what they wanted to achieve in the future. One officer suggested that this would not have happened so proactively without the RSS.

“We came under pressure from the RSS in its process, what are we going to be saying into the West of England, what is our story, what the hell are we fighting for, of of course we had no bloody idea, not a clue…. The RSS created us having a really good bloody story of our own, and I am still claiming we still have the best, not the biggest, but the clearest story” (senior local authority officer).

For those in the private sector, the benefit of thinking strategically was equated with the ability to make decisions that crossed local authority boundaries. Indeed, some consultants hailed the perceived decision making capacity of the RSS process, which they identified as being ‘the only way’ of effectively allocating strategic land. One developer spoke of the benefit of having an external organisation making decisions on the RSS, where quite clearly, he considered the four local authorities of being incapable of doing this on their own:

“So there was a change in terms or actually getting the things done and thinking bigger and more creatively than perhaps people had thought before. And that was probably most notable within the four authorities that make up the West of England, because it is quite clearly a disaster politically and administratively to have four authorities based around Bristol that is the engine of growth for that area. It is just nonsense. So the RSS actually took that on. Looking at then what they did is actually to identify some key areas within those settlements that needed to be addressed.” (house builder).

**The RSS as a tool for collaboration**

“I think it served its purpose for acting as a platform for discussion and created some pretty good strategic allegiances, relationships to carry on the debate” (government body representative).

Closely related to strategic thinking, several participants saw the RSS as a tool promoting what was described variously as ‘collaboration’, ‘alliance’, ‘cross-boundary working’, and ‘dialogue’. A number of politicians and officers expressed a significant benefit to arise from the *requirement* for joint working in terms of shared experience and learning from others. The process by which the four local authorities came together to input jointly to the RSS was described as a time when the authorities started to come together with greater ease:

“it was a time when we started, you know, to sort of grow up and improve about relationships between the four councils … it was probably, in some ways, the catalyst, you know, for improving the dialogue to some degree? … it sort of chimed in with the point where everybody was starting to think, well, no, actually, we can look outside our boundaries, we are more confident as an organisation.” (local authority chief executive)

“Any opportunity that you’ve got to bring people together is the right thing and so it’s almost irrelevant what the kind of strategy is that you’re working to … you’ve got people who are genuinely working together and thinking beyond their own little place and its boundaries.” (elected member)

One politician perhaps more candidly stated:

“I think you know you don’t like the fact that you are being told to do something but it’s not unhealthy to have some general guidelines about where you might be and people did come together” (elected member).

This was mirrored by the views of two different senior local authority officers who stated:

“There hasn’t always been complete agreement across all boundaries, as the politics has flexed and changed but the structure has been there and the mechanism to enable it to work has been very positive and helpful” (senior local authority officer)

“I give the regional spatial strategy a lot of credit, not in itself, but the effect of it, to get the West of England to come together out of necessity”. (senior local authority officer)

One stakeholder talked quite enthusiastically of the ‘big push’ provided by the RSS for the West of England to work out how to work together, and described the RSS as providing a ‘reality-check’ for local authorities which demanded, because of the scale of growth being considered, that local authorities work together and not in insolation.

“I think the RSS brought a greater sense of realism to the way the West of England perceived both itself as an entity but also the roles of the four local authorities. And, I think, certainly my perception over the evolution of those arrangements, which paralleled RSS, so there was clearly an interaction going on between them there and understanding that if they needed, if they were going to deliver the scale of growth and change that was identified for the city-region. They had to work much more closely together.” (civil servant)

One consultant commented that it was a period of ‘collaborate’ or ‘lose out in the debate’. Perhaps surprisingly, only one participant commented on the benefit arising out of collaboration across sectors as well as administrative boundaries:

“What I think they were surprised about is how well the working relationship with the voluntary sector and the business community was over the RSS.” (national body representative)

Several participants were full of praise for the technical work that went into informing the development of the RSS. One house builder said: “it was underpinned by evidence, serious evidence that was critically analysed by both private, public and third party inquiries. I thought it was a pretty robust document.” Particular value was attributed to housing need assessments being done on a consistent basis across authorities. Several local authority officers spoke of the RSS being viewed as a “technically sound basis” from which to consider the distribution and allocation of growth and development. Private sector participants in particular, highlighted the evidence base as being a core part of the RSS’s value, and felt the evidence would endure as a benchmark for testing core strategies against in the future.

Some national organisations we spoke to took an essentially pragmatic view about the benefits of RSS, in that they perceived making an input to 9 regional plans to be much more effective than seeking to shape 350 local plans. The view was also expressed that it is much easier to get a clear picture of how ‘England plc’ was performing in relation to key issues such as housing, when totalling the performance of 9 regions rather than piecing together a myriad of local pieces of the jigsaw.

**RSS policy content**

One consultant was keen to express the view that the draft RSS was the first strategic planning document that adequately dealt with the role and function of settlements and the relationships between them. Others referred to the “good work” done on policies relating to waste, renewable energy and gypsy and traveller sites. One national body highlighted the fact that as a number of policy areas were non contentious, they received little coverage:

“There was never much debate about any other aspects of the regional spatial strategy waste you know, all those policies.” (national body representative)

The opportunity to look at growth - economic development, housing and infrastructure - in a joined up way was seen as positive. Indeed, more than one politician spoke of the value of the broad view provided by the RSS and in particular the connections between employment and housing strategy:

“Everybody concentrates on housing figures but there was a lot more good stuff in there. I mean one of the things that I think some of us felt quite devastated about [on announcement of abolition] was all that work that had been done to give us a robust environmental position so that we could get ahead of the building regs” (elected member)

Interestingly, despite the perceived benefits of the interconnection between the RSS and the Regional Economic Strategy, very few participants saw this relationship as having been meaningful in the end with many private sector participants criticising the Regional Development Agency for not making enough of the opportunity to influence the content of the RSS.

It was almost universally acknowledged that perceptions of the RSS were shaped, indeed, dominated by, housing targets in general and the so called ‘areas of search’ as possible locations for major development in particular. Some participants clearly felt this to be to be detrimental, in that other potentially more positive aspects of the RSS received little attention, and if greater focus had been given to these, the RSS project may ultimately have had greater success.

Several participants talked positively of the real progress that the RSS made in getting local authorities to accept the reality of growth and concomitant housing need over a long period of negotiation. One politician talked of managing to take “local authorities further than they wanted to be”. Another, that the West of England had “come a long way on housing” through the RSS process. These views were shared by others:

“I think there was an acceptance of the process, people understood what it was about, worked really hard on arriving at a response to the RSS. That was sensible, sensitive, made sense locally, and was coordinated with the other four UAs, and at that time, I mean there were some very serious high-level political discussions about, you know, kind of how that worked…” (local authority chief executive).

“There was an acknowledgment and acceptance that was going to happen, and actually a reasonable comfort with it, I don’t say everybody was happy, but it had become established through the process because there had been a proper process of examination of looking at what was required … I felt we got there, I mean I really did feel we got there” (planning consultant)

But this ‘success’ was clearly severely undermined at the point at which the Secretary of State published Proposed Changes in July 2008, in which housing figures for all four West of England Authorities were substantially raised above the figures in the original draft RSS.

“I think increasingly though from a political perspective it lost its legitimacy as a result of the increasing degree of viewed imposition and an increasing political view of an inability to influence sufficiently” (senior local authority officer)

“I got rather annoyed with the interference of the Secretary of State which just seemed to get worse. Maybe it didn’t, but it was apparently getting worse, you know, when we came to do the final RPG there seemed to be going to be a great big overturn of all the work that we had done trying to meet that compromise between what the local aspirations were, what the local council aspirations were I should say perhaps, and what the Secretary of State was trying to put upon us” (elected member)

“At some point Government just said no, the answer is 18 or 20, and at that point our politicians said right, that is effectively a swizz, that is you have lost your honour” (senior local authority officer)

Several participants talked of the ‘loss of credibility’, ‘the dishonouring of agreements’, resulting from the publication of Proposed Changes, where local authorities felt pushed too far, with numbers ‘running out of control’ and increasingly ‘not delivering on local political agendas’, and the RSS ‘literally falling apart’. One local authority chief executive said, “it wasn’t reasonable, it wasn’t a credible or a deliverable process because it had kind of stepped away from the general consensus”.

It was not just local authorities who talked of this loss of credibility. Others, including private sector stakeholders, considered the then Government to have pushed local authorities too far, and that a more pragmatic approach by Government, accepting the progress the region had made in reaching consensus could have worked. RSS became instead: ‘literally a politically imposed set of housing numbers’. One developer was ‘incredulous’ that Government hadn’t simply accepted the position the region reached on growth at the EIP. Two consultants questioned the rationale for the Government’s approach to housing figures, perceiving the sorts of numbers in the Proposed Changes document to be simply ‘undeliverable’ even if they had been politically acceptable – a view shared by many local authority stakeholders.

**The RSS and democratic legitimacy**

There was some unease as to the democratic legitimacy of the RSS process – either because of concerns about the structures and workings of the Regional Assembly and the perception that certain geographical interests dominated, or because of perceptions that the RSS process was ultimately driven by Central Government. This latter unease clearly became more pronounced towards the end of the process. One participant felt that Government sought to convince and persuade with evidence [on economic growth and housing need] but ultimately, planning is about hard political choices, and therefore the RSS should have been presented more clearly as such by Government. One senior local authority officer suggested that almost despite itself, the RSS created an incredible amount of agreement, and might have had “tremendous strategic and comprehensive benefit” but was always going to be a lousy idea because “it was a foreign body being brought into the body politic locally, that didn’t meet the aspirations of individual voters”.

**The RSS and infrastructure provision**

“There’s no question we’ve moved on in the thinking about infrastructure. The RSS process accelerated this thinking, aligning transport, growth with spatial strategy” (planning consultant)

A real benefit of the RSS process was seen by some as the stimulus it provided to look at the infrastructure requirements of growth, and recognition that the scale of growth proposed in the RSS was such, that planning required a thorough assessment of the associated infrastructure needs. Indeed, several local authorities commented that they saw infrastructure as the requisite return for accepting growth, and therefore used infrastructure as a ‘bargaining’ tool for conversation with the region and Government. This perhaps reflected the approach of the Labour Government that was clear that infrastructure spend would be prioritised in high growth places. One consultant commented that he felt the RSS process was the first time he considered planning to have sought to address infrastructure needs in a comprehensive way, and reflected that it was only because of the strategic nature of the RSS that cross-boundary infrastructure could be sensibly identified:

“There was quite a lot of discussion at the West of England level about the infrastructure needs of greater requirements in the RSS, which some would see beneficially in terms of being able to operate together to make the case for funding … And, to be fair, that has worked very well. And we do absolutely have common ground and common agreement on those issues.” (elected member)

“We saw infrastructure that we could get connected to that we wouldn’t otherwise have got connected to and we saw capacity being built to deal with that. That was great” (senior local authority officer)

Others were less positive about the relationship between the RSS and infrastructure. In stark contrast to the view expressed by local authorities, one participant clearly felt that local authorities were in fact far less positive about infrastructure:

“We tried to sit down with the West of England authorities about the rationale for investing to overcome some of the higher upfront infrastructure costs and I got the distinct impression this was seen as unhelpful politically because you are potentially providing part of the solution to delivering growth on that scale.” (former regional body employee).

The above point was reinforced, by the representative of a national body, who complained that the anti-development lobby had got ‘too firm a grip on infrastructure arguments’ and used them as a way of providing real opposition to growth. Opinion was also quite clearly divided as to, in the end, how successful the RSS process actually was as a mechanism for identifying infrastructure, despite the incentives and strong push given to local authorities. One participant was dismissive, stating that the RSS was simply too high level to be meaningful, and another, that the RSS was a real missed opportunity and that it had had real potential to identify important ‘bits of kit’ but failed to do so successfully. Blame was put at the door of local authorities for not being proactive enough in quantifying need. Interestingly, one local authority participant expressed hesitancy about the input from the West of England to the wider Regional Strategy:

“I don’t know that the input was as strong from the West of England as it might have been and there were always concerns that we would get sidelined for some big, highly expensive .. scheme somewhere else in the South West” (Elected member).

Two participants cynically suggested that one of the rationales of the current administration for abolishing the RSS was simply the infrastructure costs of delivering growth. Abolishing targets was a clear way of abrogating Governmental responsibility for future infrastructure spend to support growth:

“Funding the consequences of implementation is probably one of the reasons why this guy got rid of it, bloody hell this is going to cost us a shed load of money” (Senior local authority officer).

Comments on infrastructure were fewer from private sector participants, although, interestingly, two consultants expressed a clear view that the infrastructure requirements arising out of the scale of growth in the version of the RSS at the Proposed Changes stage were completely undeliverable.

2.2 Views on abolition of RSS

**Background**

On 27th May, 2010, two weeks after the Coalition assumed office, Eric Pickles wrote to all Local Authority Chief Planning Officers stating his intention to revoke Regional Spatial Strategies with immediate effect. Since this time there has been much coverage of the legality of revocation, which has proceeded through the courts led by a challenge brought by CALA homes.

Nevertheless, the passing of the Localism Act in November 2011 provided the statutory provision for the abolition of RSSs and the revocation of existing RSSs, bringing to an end any doubt about their final demise even if the date of this remained uncertain well into 2012.

There has been much coverage of responses to abolition, nationally, most notably through the CLG Select Committee’s report *Abolition of Regional Spatial Strategies: A Planning Vacuum”* (2011)*.*

“I think we were all relieved” (elected member).

“Yes, dancing in the aisles really … I think you see that right across the four authorities so yes, in terms of releasing that pressure on green belt” (senior local authority officer)

“They [members] were delighted the RSS had gone” (local authority chief executive)

“I’m just aghast that the government can think of taking away a complete tier of planning policy so that you’ve got nothing between national guidance which is being reformed anyway and local aspiration which is, frankly, always going to be anti-development for those closest to it” (development professional)

Unsurprisingly, initial reactions to RSS abolition seemed to follow the dividing line between those who were most angered by the previous administration’s approach to housing targets and those who felt more positively about the RSS, albeit with reservations about overall levels of housing.

The former, largely made up of local authority participants (both politicians and officers) said that their initial response to abolition had released emotions of ‘relief’ and ‘delight’. One chief executive was convinced that campaigning on opposition to the RSS influenced the outcome of the general election locally. The latter group, largely made up of private sector participants and those from regional bodies, were instinctively much more negative, with several mentioning the hole or vacuum in the planning system, and some highlighting the consequential lack of certainty, as a major and immediate impact of abolition:

“Without certainty you don’t invest, and the lack of certainty that exists currently is sufficient to halt anyone’s plans” (house builder)

One consultant described abolition as an “ill-mannered swipe at something they [the coalition] didn’t understand and which left a huge hole”. One lawyer expressed surprise at the abolition announcement, stating that he thought the Government would “trail RSS abolition and then drop it”. Several were surprised by what they perceived to be the lack of a plan for the replacement of the planning system at the time abolition was announced.

**RSS abolition and local determinism**

The corresponding self-determinism for local authorities resulting from RSS abolition was highlighted as a key positive response to the abolition announcement. However, on further reflection, self-determinism was also viewed as a double-edged sword.

Several participants noted that one of the benefits of having a regional process for housing allocation through the RSS was that it gave local authorities a scapegoat - somebody else to blame for development levels unpopular with the local electorate:

“Local politicians kind of liked it that way, they could object, they could blame the regional assembly for all this, but they understood the process really, it isn’t a vote winner is it to say I support the development of part of the Green Belt, a Green Belt review to accommodate these areas of search, but actually they kind of knew, a lot of them knew it was probably the right thing, even if they couldn’t get up and say that, so cynically, I think that’s exactly what the Labour government recognised a long time ago” (development professional)

So whilst local authority participants hailed the freedom to set levels of housing according to their own priorities, they acknowledged that the evidence base around demand and supply had not changed radically, meaning that ‘tricky’ decisions would in future need to be taken at a local authority level and not deferred to the regional. So perhaps unwittingly, the same participants who hailed the demise of the RSS also acknowledged the challenge for local authorities of having ‘nowhere to hide’ when it came to assessing the evidence:

“No I don’t think it [abolition] makes that much difference to us, I think the rural authorities were very pleased, however, we still have the problem that we need more housing and coinciding with the fact that the recession, the land values have gone down, viability of producing more housing in much more difficult now, if we are going to continue to be a successful economy in Bristol we’ve got to have more housing” (elected member)

“You seem to have actually lost more than you have gained, but there isn’t somebody saying ‘You have got to do this’. I mean you really just don’t know where you are, and if you did have the regional framework you would know where you were” (elected member)

“To a certain extent we always saw that it was quite useful for the local authorities, the, if you call them anti-development authorities it is grossly unfair but if one sort of stereotypes them in that way, they were quite happy with that [the regional] process as well we saw because they could blame somebody else. I think there is a dawn in realisation in some places and it hasn’t got there that much with local politicians that actually this is going to become very uncomfortable for them. Because actually the one thing the regional spatial strategy did give you on housing is somebody else to blame.” (elected member)

In contrast to some participants, one chief executive felt that Members were, in fact, very aware of the consequences for local decision making resulting from the loss of the RSS, and highlighted the political challenges that potentially ensue:

“They always knew that [responsibility for housing numbers] was a consequence of the abolition…They also know how difficult it is, especially in balanced authorities. Very difficult. Because creatively and constructively you use it as a way of trying to negotiate a debate. You know? The minute it becomes a barrier politically then I don't know where you go with something like housing. It’s not a good thing then.” (local authority chief executive)

One local authority officer spoke negatively about the consequence of local determinism in terms of a lack of ‘referee’:

“I think the demise of the RSS leaves the west of England with a challenge because in a sense we don’t have a referee anymore, yes? So there is a really tough call on leaders and Chief Executives to broker deals, so that X is not getting one over on Y and Y is not getting one over on Z and A is not feeling he is being stitched up because he thought he had a deal with B. Hang on a minute, what happened to that deal, you know and the Chief Executives are not seeing a disproportionate amount of advantage going to one place because nobody is holding the ring” (senior local authority officer)

**RSS abolition and housing supply**

“The minute we had the opportunity and one thing we did do was, you know, take out any development in the green belt, because we saw the green belt as sacrosanct…There were a couple of companies who had progressed quite far with proposals to build next to Long Ashton when the regional spatial strategy was in full flow and so, you know, we did cut their feet from under them” (elected member)

Many participants commented on the impact that RSS abolition has had in the West of England on overall levels of housing provision in local plans. Housing schemes across the city-region were described as having been quite literally “kicked into touch” (Planning consultant) as described by the Councillor above. The recession and collapse in the housing market from 2008 on was widely considered to have mitigated any impact of the reduction in housing targets. Demand was perceived to have ‘dropped out of the system’, and ‘houses were not going to be built anyway’. Indeed, one politician commented that:

“I can’t see that it [the RSS] would have made a huge difference because of the economic situation we’re in. I mean if the economy was booming now, I might be thinking that it would have been good to have kept at least a level of the housing target numbers, but as nothing very much is happening at the moment and I suppose I’m faced with immediate events rather than thinking long term at the moment” (elected member)

Nevertheless, the majority of participants were convinced that if the RSS was in place now there would be more development activity in the West of England, notwithstanding the state of the economy.

“I certainly believe that there would be less overall significant housing supply across the south west and particularly in the west of England. Is that a good thing? Is that a bad thing? I think it has given back local determinism.” (senior local authority officer)

Several participants were clear that lower levels of housing supply would be a bad thing. One lawyer talked passionately of the relationship between housing and opportunity:

“Where I think that there may be issues and problems is the polarisation of society, because without housing, without opportunities you are going to get a lot more people who are going to be isolated and polarised from the so called wealthy city, and I think the RSS going doesn’t help that. That is the issue as I see it going forward, and without that certainty and people being able to take risks at best develop or whatever whilst many people will say that is concrete over some fields or whatever, there is a balance to be made.” (planning lawyer)

One house builder also raised the negative consequences of lower housing supply:

“It [the RSS] was job led, it was looking at jobs. Some of the growth that was identified within there was actually to satisfy the level of job growth required for that settlement. And again I think so many people forget with the RSS is that if they get rid of all these houses it actually means that they are going to continue to have a suppressed economic performance and that may need to increase or at least no reduction in unemployment”. (house builder)

Another consultant talked of the ‘perversity’ of pushing house prices up: “is there anything more crazy than that, why should house prices be so high in this country?” Certainly, some were of the view that levels of intended provision had been pushed down so far that it was suggested that achieving reasonable levels of affordable housing out of schemes would be challenging. One civil servant suggested that “It will be difficult for anyone to deliver affordable homes because the numbers just aren’t there in the first place” and a planning professional argued that:

“... some of it has been pushed down … to a level where it will be very, very difficult for anyone to deliver affordable homes because there just won’t be … the numbers aren’t there in the first place, to be able to then get sufficient value out of the building of those numbers and generate the affordable homes. I think my instinct tells me, and the evidence so far suggests that we will not be able to deliver as many homes as the evidence nationally points to us needing … So, whether that holds back economic growth still further, particularly in a place like Bristol, if we haven’t built the houses so that they’re ready, you know, almost ready for migrant workers, people moving into the area to, I don't know, to work in whatever sector here in Bristol in the future, if the system isn’t fleet of foot, and it probably isn’t going to be because for, one, because the policies are not being formulated, two, because most local authorities are actually getting rid of or are about to get rid of the very people they need to formulate those policies” (planning consultant)

None of the politicians, on the other hand, specifically raised the potential negative effects of lower levels of housing provision. Issues of housing affordability did not figure strongly in any discussion of the effects of abolition and large reductions in housing targets.

In many interviews, the impact of RSS abolition on particular ‘areas of search’ for development and urban extensions in the West of England, were discussed in detail. Elected members were generally very pleased at the removal of locally controversial urban extensions seen to be encroaching on green fields and potentially threatening the Green Belt. Private sector stakeholders and those from regional bodies, bemoaned these losses on the basis that they perceived many of the sites to offer sustainable ways of managing future growth – although it should be noted that a number of private sector stakeholders were acting for those with a material interest in these potential developments.

3. The Emerging National Planning System and the National Planning Policy Framework

Background

In July 2011, the draft National Planning Policy Framework (NPPF) was published for consultation. This stated the intention to streamline national policy guidance into one consolidated set of priorities. Its core principles included: primacy to the local development plan as the starting point for decision making; a presumption in favour of sustainable development, and twelve core land use planning principles including protection for the green belt.

Consultation on this draft closed in 2011 and it was published in final form at the end of March 2012. As the primary research for this report was completed in 2011, participants’ comments related solely to the draft NPPF. For those interviewed for this research in the summer of 2011 the draft NPPF had only just been published. Others, interviewed, later had the benefit of more time to reflect on its content.

3.1 Headline views on the draft NPPF

“A lot of it’s okay. And very clearly where it’s silent about things, you know, we’re very clear that that means, you know, you’re giving us the freedom of responsibility for deciding” (local authority chief executive)

“On the basis of the NPPF, you know it basically says do good planning, make sure that you have economic growth, make sure you have social goods such as housing and make sure you protect the environment. And planning has always tried to balance those three things” (national body representative)

The extent of responses on the draft NPPF varied between stakeholders. This partly reflected the timing of the research which for some was early in the consultation process, but also reflected the fact that others saw the initial draft as lacking substance and fully anticipated that it would be altered significantly as it developed.

Some were essentially dismissive, “I don’t understand it” (senior local authority officer), “frankly it is just eye wash” (consultant/land agent); others commented on how easy it is to abolish a system, but “less easy to put something sensible back in its place” (former regional body employee). One local authority officer accurately summed up the spectrum of views by saying:

“Some are seeing the NPPF as being too vague in its statements and others are seeing it as the opportunity for great creativity to come forth.” (senior local authority officer)

Reflecting the opportunity for ‘great creativity’, one chief executive was pragmatic about its content, highlighting positively the potential freedoms for local authorities resulting from having less detailed national guidance. For one councillor however:

“Greater simplicity always sets alarm bells ringing, because what’s greater simplification for local government usually means more problems for us”. (elected member)

Indeed, we heard the phrase ‘too broad brush’ from several participants, although one did state, “it’s too broad brush, but probably ok” (national body representative).

Interestingly, another Councillor was quick to assert that they actually did not see the draft NPPF as being that radical:

“I don't think things are going to change as dramatically as people think they are so, you know, we’ll have to wait and see”. (elected member)

This view was reflected by two others. One national body (quoted on the previous page) asserted that as he saw the basic tenets of the planning system remaining the same, the draft NPPF did not reflect a significant change in direction. One Consultant was also quite pragmatic and emphasised his view that all planning systems can deliver or prohibit development dependent on “political will”, and that being the main decider, “I am not too hung up on the policy framework”.

A view we heard more than once was that the draft NPPF was lacking in narrative with little, if any, spatial content. Interestingly, one participant asserted that ‘spatial’ as a concept was seen to be aligned with the political left and was therefore out of favour with the current administration. One stakeholder asserted strongly the need for a much wider context for the NPPF not a return of planning to a development control function which is how they perceived the draft document:

“Quite how you are going to make a decision on the NPPF when it has no spatial element for it I’ve no idea”. (national body representative)

Some local authority participants were quick to raise technical concerns, particularly over the influence of the draft NPPF on core strategies currently being prepared.

Perhaps unsurprisingly, a number of private sector participants raised the importance of certainty for the development industry. In this context, they were keen to see the NPPF finalised. One house builder picked up the emphasis that the NPPF and localism puts on local plan making and he expressed a fear that in the West of England “most of them will come up short”.

3.2 NPPF: ‘Triumph for NIMBYISM’ or ‘Developer’s Charter’?

“What we were going to do is an unbelievable contrast from where we are with localism … we have gone from the sublime almost to the ridiculous in terms of individual modular approach to building up from the bottom, and the contrast is massively stark and extremely quick, and difficult to even comprehend” (senior local authority officer)

Whilst participants were not very expansive on the detail of the NPPF, they were more interested in commenting on their perception of the political intentions of the NPPF. This possibly reflects the comment from the consultant (in the previous section) about political will determining development outcomes not policy frameworks, but also probably reflects the lengthy debate that occurred in the press in the summer of 2011 following publication of the draft NPPF. As with the debate nationally, our participants expressed a range of somewhat contradictory and contrasting opinions about whether the NPPF as an expression of ‘localism’ would allow local authorities and communities to hinder/restrain development – and can therefore be interpreted as a NIMBY’s charter, or whether the ‘presumption in favour of sustainable development’ contained within the NPPF would in fact have the opposite effect of unconstrained development.

It was a clear concern amongst all the elected members we spoke to that reform could/would result in a free-for-all for developers:

“There is a lack of confidence on the part of the officers that they can say no, and you know this at the moment looks like hay day for developers while we have got this hiatus with no core strategy and old local plan, and the Minister saying ‘If you haven’t got an up to date planning document we will overrule you”. (elected member)

“There’s a worry that everything has been handed over to developers”. (elected member)

“Developers will walk all over us [if we have to raise our numbers]. the council is adamant that it doesn’t want to develop in the green belt and I think that’s probably the biggest challenge we will face because those developers who want to develop in the green belt around Long Ashton, you know, will challenge us in terms of the fact that we haven’t got the land available to build the numbers of houses that have been demanded”. (elected member)

Interestingly, whilst members felt they were on the back-foot, officers seemed more sanguine. Two of them highlighted a potential ‘threat’ coming from developers, but highlighted the importance of getting core strategies adopted as ‘protection’, perhaps thereby acknowledging that they felt there to be some risk arising from the ‘presumption in favour of sustainable development’ should plans not be in place.

In contrast, private sector participants, including developers, argued that the lack of certainty that exists currently – particularly as the NPPF was still only in draft at the time of this research and only one core strategy in the West of England adopted – has had the opposite effect resulting in less certainty and less appetite for development. Some participants did hypothesise that lack of certainty could result in more appeal-led development, but qualified that by saying there is little evidence of that in the West of England, and that in the current market climate the development industry is being quite risk averse:

“A lot of the sites of the South East side of Bristol split the boundary which causes a real difficulty because you’re dealing with 2 authorities, but essentially there is almost an unchallengeable case about the justification for the land allocation in terms of numbers, but because it’s in the Green Belt the developer is not prepared to fight that battle at the moment…what they’re worried about is they’ll persuade an inspector and he will agree with them but Politicians will say it’s in the Green Belt we’re not having it.” (development professional).

Unsurprisingly, several private sector participants argued that the significant lowering of numbers in all of the West of England’s core strategies since RSS abolition, directly reflected the rhetoric of localism, which they saw as a being reinforced through the NPPF. One stated that the justification for reduced housing figures in South Gloucestershire was based on public consultation about existing residents’ quality of life, another that localism was giving councillors in all West of England authorities an excuse to ‘bury their heads in the sand when it comes to the evidence’:

“Looking at North Somerset, which I suppose I’m most interested in, they have quite blatantly said we’re talking localism now, we just need to worry about our own area, we want to concentrate on Weston, we’ve got absolutely no consideration for Bristol whatsoever, so we’ll forget 10,500 homes from our allocation, just wipe them out completely, it’s just so unrealistic, it’s ludicrous.” (development professional).

These perceptions were reinforced by two local authority officers who acknowledged that:

“there is a real danger that localism will mean nimbyisim… In terms of North Somerset my arguments are that localism isn’t nimbyisim. In North Somerset, Localism is about wanting actually increased development but employment led development rather than pure housing allocation centrally imposed and that’s the shift.” (senior local authority officer)

“…the big risk, the big , big risk is this localism idea that everybody can have a bloody view and that those views can be discreet….well I think the localism, individuality and pushing stuff down to the lowest level is a recipe for disaster bluntly”. (senior local authority officer)

These perspectives were somewhat substantiated by one Councillor:

“over 30 years ago now, I started a sort of pressure group – ‘no more houses’ - and that’s been well known as my mantra since. And there’s absolutely no doubt that one of the reasons I’ve been re-elected consistently over 34 years is because the people in my area who are on the edge of Weston and in villages don’t want more houses … yes, it is a political imperative… I’ve stopped it! I’ve stopped it for 30 years”. (elected member)

The variety of views expressed perhaps reflects a perceived lack of clarity about the Government’s intentions contained within the NPPF. One consultant simply stated:

“I don't give the Government a great deal of credit because they have quite simply made it up as they’ve gone along. The NPPF, it’s interesting, they moved almost from a no, no, no situation to a yes you can have development”. (planning consultant)

One senior local authority officer said, “I think Government speak with a forked tongue don’t they”, and another that, “it is very hard to see quite what it [the planning system] now is”.

Interestingly, several participants were of the view that when the RSS abolition announcement was made Ministers’ motivations were that localism should enable local authorities to determine their own views of development – liberalisation for local authorities - but that this had been followed by a growing realisation that Government cannot completely lose the narrative around supporting growth and delivering housing. This, they felt, resulted in the inclusion of ‘the presumption in favour of sustainable development’ within the draft NPPF. One MP put this very succinctly:

“I asked him [Grant Shapps] ‘well what is the purpose of all your reforms? Housing and planning. Is it to ensure more houses are built?’ Well the answer can't be no can it? So he said ‘yes’ and he said ‘building more homes is the gold standard by which this government will be judged.’ The problem he has then is how you link up all these local decisions if the sum total of what is agreed in the local plans doesn’t hit that national housing target which he has now set himself as building more houses than the Labour government were doing before the recession… If you simply leave it to communities, they might decide to build less homes than before and I think they have still got this circle to square between growth and localism that they haven’t done.” (MP)

Although, interestingly, one Civil Servant we spoke to felt that the intentions of the current and previous administrations are, in fact, not that different:

“Ministers have been quite upfront in saying that what they want is a planning system that is going to promote growth. But they need to bear in mind all the things that we value as well. And so to that extent, what they are actually saying in terms of those big headlines is no different from what the last government was saying, and which drove the very high numbers in RSS, both of jobs and of homes. I certainly don’t think there is a radical rethink here in terms of the re-balancing of policy” (civil servant)

This view was supported by a developer:

“I mean there has always been that presumption [in favour of development]. I mean the whole debate - national trust and telegraph - I never saw the NPPF as being that and it was just sort of either misinterpretation or misunderstanding, but the Government is going to have to make some changes, you know, because I think there is a large body of opinion that are of the view that this is going to fundamentally change the planning system and make it more developer orientated, and yet you work with developers and you say well actually there is no big change there, and in fact it is worse because we haven’t got the certainty. It is a really odd one, I don’t know.” (developer)

Many participants – particularly lawyers - were of the view that the system as proposed places far greater onus on inspectors to interpret the evidence.

“All these volumes of decisions and policy that have emerged over the years have been swept away effectively and will be swept away by this new framework and that means that Local Authorities and inspectors are going to have to plug the gaps and it’s all going to start again. I don’t think it will streamline planning I think you will just have arguments on the interpretation on policy and where you look” (planning lawyer)

“I think it’s going to be a bit of a shift to the national because of the politics of it and wanting to ensure that things are progressing, so if it goes to appeal then, the shift will go towards I think the national framework at the moment unless they alter it” (planning lawyer)

One respondent felt that inspectors will only judge plans sound if they have provided for growth concomitant of need:

“If the Government does what it says it’s going to do, the inspectors will declare the core strategy not sound on the basis of evidence. i.e. there is evidence that this is the level of growth and development that is required to meet x, y and z and either you are providing it or you are not and that for me, you know the messages from ministers is that’s what’s going to happen. We wait and see.”(ex senior local authority officer)

One lawyer felt that as soon as one inspector judges a plan unsound on the basis of evidence then it will force others to “plan properly”. In this context, several private sector participants expressed surprise at Bristol’s core strategy having been found ‘sound’ in 2011, “contrary to the evidence” and contrary to the inspectors own conclusions about the need for better cross boundary relations and expansion across boundaries. They also eagerly awaited the outcomes of current and on-going local plan enquiries in North Somerset, BANES and South Gloucestershire, where, they felt, housing figures in particularly were in stark contrast to the evidence on growth and need:

“It seems that they [inspectors] are in a massive political pressure. Reading between the lines on the Bristol one, in a different world you’d have thought he might have said, this is unsound, but he kind of said, well the trouble with all these, it seemed to me he was sort of saying, the trouble is all these bloody plans are unsound so we’ve got to have something, so but you know, I don’t really like it, but I’m going to say yes, and I’m going to say yes but actually you really need to concentrate on these areas and do something about it.” (planning consultant)

“Bristol’s core strategy has been approved, but is on a pretty unqualified basis…it got fudged didn’t it?” (planning consultant)

Several emphasised the difficulty for inspectors:

“Everyone is sat on their hands waiting to see what this national policy framework says, waiting to see what happens with the BANES core strategy which everybody seems to think is pretty much unsound and is going to be into a difficulty … have we got the confidence to go to an inspector, who will probably agree with us that there is an insatiable or an undeniable demand equation?” (planning consultant).

Inspectors, many thought, are under pressure to get plans approved. As the quote above states, “we wait and see” whether inspectors will support local aspirations and interpretations of evidence potentially underplaying demand, or support more recent statements from Government about growth.

3.3 The ‘Duty to Co-operate’

**Background**

Section 110 of the Localism Act 2011 imposes a ‘duty to co-operate’ on local planning authorities in preparing plans that would have a significant impact on at least two planning areas. Further detail on this new duty is contained within the draft NPPF, which states that Government expects joint working “to be diligently undertaken” (s.44) and could be expedited by joint committees, memorandums of understanding or even jointly prepared strategies (s47). The rationale for joint working is to “meet development requirements which cannot wholly be met within (their own) areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the objectives, principles and policies of this Framework” (s.47). The independent examination of plan documents for their ‘soundness’ will include an assessment of whether the planning authority has complied with the duty.

Many commentators see the “duty to cooperate” as the new mechanism for ensuring any strategic planning or dialogue on cross-boundary issues can take place. Indeed a recent note from the Planning Advisory Service is entitled “a guide to strategic planning and the duty to cooperate” (2011) seeing the two things as synonymous. The CLG Select Committee on NPPF found varying views on the likely success of the duty to co-operate, but concluded that simply waiting for inspectors judgements about ‘soundness’ of strategies would be insufficient as a way of ensure the duty had been adequately followed.

“The only game in town when it comes to strategic planning is the duty to co-operate, there is nothing else” (planning lawyer)

“it would take phenomenal political leadership to co-operate and particularly to co-operate to the extent where you will take development from another party” (developer)

“I haven’t seen a huge amount of evidence that local authorities are working together in the way that they were when the RSS existed” (civil servant)

On the capacity of the duty to co-operate to work effectively views were mixed. One national body representative was cautiously optimistic:

“We think the duty to cooperate can work, but the question is you know what is the impact on a place that resolutely won’t play… cooperation always works best when people are willing ” (national body representative)

As to whether players in the West of England would be willing to cooperate, local authority representative at least, both chief officers and politicians seemed buoyant about their capacity to cooperate:

“I think the duty to cooperate between the four of us is right and … should be meaningful… it’s right in terms of planning, it’s right in terms of economies of scale… it doesn’t feel like a risk here … it is just how we - just how councils operate” (local authority chief executive)

“there’s more to be gained from cooperating with authorities than to argue really … I don’t think we would worry about any duty to cooperate because we do, do it already” (elected member)

“I cannot see us allowing ourselves just to slip back to being four Unitaries that don’t look across boundaries, don’t work across boundary and don’t see the sub-region as a collective. I just can’t see that happening” (senior local authority officer)

Less optimistic about the duty to cooperate were those in the development industry with some saying that the local authorities “won’t talk” (planning consultant), “attempts to do joint working round here have been disastrous … they avoid making decisions” (planning consultant), and “I suspect that [the duty to cooperate] will have no meaningful outcome” (developer).

However, this dichotomy between local authority and development industry view is more nuanced. There were both consultants and lawyers we spoke to who were more optimistic about the potential for the duty to deliver based on what they described as a more recent history in the West of England of collaboration. But the same participants subsequently questioned their own optimism in the context of recent decisions on levels of housing provision, where the interest of political careers, and pressure from NIMBY groups, were perceived to have interfered. One politician was quick to highlight that people don’t vote for councillors because they “want to see 20,000 houses built in the green belt”, and one officer commented that politicians are of course by nature “very territorial, and that’s the problem”.

This hesitancy was further substantiated by comments from politicians themselves in the context of development pressures, despite their expressed commitment to the duty to cooperate. One clearly stated that each of the four local authorities had a very unique set of issues, and would need to reach its own democratic decisions and not interfere in the issues of others, and two talked of not wanting to be forced into having to provide for ‘unmet’ needs from elsewhere:

“I wouldn’t dream of speaking to the colleagues in other authorities would I, no, I mean more housing is needed in this area, but it is quite difficult because they are individual planning authorities” (elected member).

“We are having cross-boundary discussions. I’m not sure how easy it is for North Somerset to get its message fully across and I might be wrong but North Somerset is different from South Gloucestershire and Bristol and Bath in many ways “(elected member).

“I mean I gather that Bath and Somerset have pulled theirs [numbers] back dramatically and North Somerset as well, so whether all that is going to land on our doorstep?” (elected member).

This issue of ‘unmet’ needs is seen by many as acute in the West of England. The duty-to-cooperate is clearly intended to promote joint working to meet development needs that cannot be met within administrative boundaries because of a lack of physical capacity. But as one development professional put it:

“I look at it naively and I say what they’ve [BANES and North Somerset] done is they said those numbers relate to Bristol, they're not our numbers, Bristol can provide them, well Bristol can't because everyone knows that Bristol actually spills into BANES and there isn’t room in Bristol, for Bristol to do it. So that’s the fundamental point, the disaggregation of all of this is crazy” (development professional)

So, whilst politicians say they can and will work together in the context of the Duty, the evidence that they will work together constructively when it comes to taking development pressures that arise from elsewhere is seen as doubtful.

Several participants were highly sceptical about whether including the duty to cooperate as a measure against which an inspector will test a plan’s soundness, will be a sufficient way of ensuring the effective dispatch of the duty:

“I think the role of the inspector is going to be critical I think it’s risky for them, all of this” (national body representative)

“I can’t see how an inspector can really get at that, because nobody’s prepared to get up and say, no actually we haven’t cooperated, it’s a disaster, they won’t admit that, they all have to say yes we’re cooperating, and so the inspector gets the impression they’re cooperating, so then you’ve got to sort of challenge that to prove that they’re not and it almost becomes a little bit political in itself and he’s not interested in that is he, he doesn’t want to know that.” (consultant/Land agent)

Risk was a word used by several participants who felt that inspectors are now the only ‘police’ in the system. Many were unsure as to how inspectors can realistically find plans unsound, when they only have the plan of one local authority at one time. One participant suggested that an inspector should be able to find a plan from a neighbouring authority retrospectively unsound on the basis that it has not provided for need which he or she considers cannot be met in the area under examination. Another stated that no local authority is going to be prepared to say that they haven’t co-operated, so what evidence will an inspector use? One MP was particularly exercised about the issue of evidence, and the need for commonality of evidence in order to be able to co-operate:

“What is the point of the duty to cooperate … you can't do this unless there is some consistency of needs assessment … and then, who assess the housing assessment you do?” (Labour MP).

It is clear that in order for the duty to co-operate to be able to work effectively, there needs to be clear understanding of the interconnections between places and the challenges faced. On one level, local authorities in the West of England are, at least rhetorically, committed to working together. So the issues for the West of England are not about the players “resolutely not playing” as the respondent in the opening quote to this section questioned, but more about whether they are prepared to co-operate in a meaningful way to shape policy outcomes.

3.4 The Role of the Local Enterprise Partnership

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| **Background**  The West of England Local Enterprise Partnership covers the four unitary authorities of Bath and North East Somerset, Bristol, North Somerset, South Gloucestershire and was one of the first LEPs to be formally established.  The Board includes five leading business representatives, the leaders of the four councils and the Vice Chancellor of one of the city-region’s four universities. It has eleven sector groups (including Construction and Development) and a cross-cutting Infrastructure and Place Group. The four authorities themselves have a Planning, Housing and Communities Board and a Joint Transport Executive Committee outside of but linked to the LEP. The LEP built on the work of the West of England Strategic Partnership, comprised of the four unitary authorities and which continued to operate alongside but supportive of the LEP – it has had a broader remit for transport, planning, housing and waste.  The LEP has secured £51m from the Regional Growth Fund and Growing Places Fund and established one of the first Enterprise Zones in June 2011. |

Following abolition of the RSS and in the context of the emerging NPPF, the LEP was seen by many as potentially playing a strategic role at the level of the city-region as a whole, promoting effective cooperation between the local authorities, ensuring the business voice was heard and leveraging resource on behalf of the city-region. Views varied as to how effective it might be and it was recognised that it was early days in the evolution of its role (it continued to evolve over the period during which the research was conducted).

“Yes, yes, yes. It’s been a constructive addition, I think, here. I mean, again, you know, it’s a good basis on the partnership for the four UAs. The sense that business needed to be, you know, have a higher profile as a stakeholder as part of that – absolutely right … has it engaged business? Yes, you know, we hear the business voice better now as a consequence” (senior local authority officer)

“It’s still early days at the moment and I guess they have to prove themselves but again it’s equal partnership between the four authorities and business and certainly so far it’s been very positive” (elected member)

“I think it’s rather sad, they’ve got this sort of remit to come out with policy statements but they’ve got no staff and they’ve got no funds so, I’m not quite sure how much impact it’s likely to have, they might be an influence but I don’t think they’re going to be a particularly significant one” (property agent)

The readiness of the city-region to embrace the LEP approach was seen in part as reflecting the experience of the West of England Partnership which had itself been framed by the RSS:

“… the structure of the RSS pushed the West of England into having to work out how to work together as a necessity, I think a big positive. I think the integrated transport planning would not have happened without it, the spatial planning and the thinking about it would not have happened, and I think we were more ready for the LEP type approach because they bruised themselves and knocked a few chunks out of each other in another practice in the West of England partnership - which would never have existed without the regional spatial strategy I would surmise” (senior local authority officer).

And similarly:

“I think LEP has been quite an extraordinary synthesis, but I give the Regional Spatial Strategy a lot of credit, not in itself but the effect of it, to get the West of England to come together out of necessity, so these things are quite interesting, it is almost sort of the unintended effects are the consequences, you know.” (senior local authority officer)

Others thought the role of the LEP was less well focused in a strategic sense:

“Well they are in a state of flux at the moment because of the big changes with the LEP, I think they are coordinating but I am not quite sure how and on what … I don’t really get the feeling that they are getting to grips with a sub regional strategy like we have always had, because we used to have a structure plan and when the structure plan went …you were relying then on getting together to make your case at the regional assembly. And then that has all gone, so there doesn’t seem to be any form or any real reason for them to be looking … no documents that they are feeling into any, they are not feeding into a structure plan and they are not feeding into a regional strategy either” (elected member)

“I think along with everything else I think the jury is out at the moment. For me, again it’s a personal experience, the LEP feels very remote, I struggle to understand what they are doing.” (former regional agency employee)

There was a view that the LEP had brought business interests more centre stage:

“I think the injection of the LEP has given that an amazing injection and the authorities are now having to realise that we’ve got to work with the business community.” (senior local authority officer)

And that this in turn had led to greater emphasis on economic issues:

“The RSS was particularly weak in terms of developing that framework for employment regeneration. It was, it never. I suppose that’s one of my criticisms of planning, town and country planning as a whole in that it got very much into the detailed mechanisms of housing delivery but almost, you know, wasn’t able to express technically how it was going to actually impact and promote employment development. We have taken the opportunity to understand what our economic needs are more strongly.” (senior local authority officer)

The view that the LEP lacked resources in terms of funds, personnel and powers was not surprisingly quite commonly expressed. The counter argument was that the LEP had started to, and could in future, be both influential and also a conduit to capture, successfully what funds were available:

“I think there had been a big movement on the stock market or something the day before and I said ‘What moves markets then, Money?’ I said ‘No, confidence. Money is peanuts, confidence is billions’. What the LEP has done, I think it has become a container for confidence, aspiration …I think that the LEPs power is almost its power of advocacy, it is the power of confidence, it is the power of spin if you like but it is also the story.” (senior local authority officer)

There were mixed views as to how far the LEP should seek to involve itself or influence the planning framework and evolving planning policy. One take on the WoE LEP Prospectus was:

“that place remains the statutory duty of the unitary authorities and I got the impression, you know the subtext for that was, read between the lines, hands off the planning system, you’ve got no chance. So you know if that’s the line that’s already there and the red line that is in the prospectus then I think that limits the LEP really. I’d be interested to see where the government goes on this.” (former regional body employee).

Resistance to the involvement of LEPs in planning issues was perceived to be strong:

“…before authorities weren’t even in partnership with each other over that, let alone with the private sector in the LEP. So, it would be easy to conclude that the private sector is not going to be allowed to be too influential in that structure, and they as sure as hell, aren’t going to be handing over any planning - well, obviously they’re not a planning authority – they’re not going to hand over any strategic planning type … and that’s going on across the country … I certainly don’t hear anywhere that there’s any intent to let the LEP have a go at the serious stuff.” (development professional)

As one respondent noted:

“… it’s been a debate but again ministers have now made quite clear that that won’t happen. They will not give LEPs a statutory role in planning. That was made clear, oh I forget when it was, but certainly at a meeting between the LEP chairs and ministers. That won’t happen but clearly in the NPPF there is a duty to consult with the LEP and I think, you know from our point of view given that it is an area of sensitivity, that’s one thing we’ve actually just made absolutely clear generally. That’s where we stand. The LEP isn’t going to be pushing behind the scenes for planning powers, ministers have made it clear, take that one off the table. One sort of conflict you know out the way. But there’s still a need to consult the LEP, there still is a need for the local authorities to engage with the LEP about what the strategic planning framework should look like and there will be enormous tensions there. Enormous tensions but you know those were going to happen anyway. They just happen inside the LEP rather than outside.” (ex senior local authority officer)

This was reinforced from a local authority perspective:

“I think the organisation welcomes the LEP. I think it is still very early days and I think there will always be a nervousness … we still haven’t accepted that, and certainly don’t accept, that the LEP should take on the statutory planning duties.” (senior local authority officer).

From this perspective, the proper role for the LEP was seen much more in terms of delivering on the economy, skills and regeneration.

It was also, however, pointed out that the LEP’s primary focus on economic issues cannot be divorced from issues of housing supply and housing numbers, even though they cannot intervene in any direct way:

“They’re not the planning authority, how can they be? But I think people will say to them, they ought to try to be influential … how can you have economic goals and not … heaven knows the government set it out clearly enough in the Plan for Growth or whatever it was ... there’s a relationship between housing and the economy you can’t ignore.” (development professional)

Reflecting this it was also argued that:

“In terms of planning there is a role for the LEP in just ensuring that the debates take place and that there is proper engagement between the local authorities and the business community. On infrastructure…a lot of the noise being made by government is that they will look to the LEPs for, if not delivery of infrastructure … certainly for advice on infrastructure, yes, I think the LEP has a role there.” (ex senior local authority officer).

3.5 Implications for the provision of infrastructure

“Well the one thing I think is lacking from plans, because there is no regional dimension, is what happens to roads, what happens to minerals, and rail, so it’s those big infrastructure items … localism isn’t going to sort that out is it. So the big things we need as a society have been completely missed.” (house builder).

“There is definitely a need to coordinate infrastructure provision, whether it be transport, whether it be broadband, whether it be flood defences, because you know looking across an area as a whole, you need to make sure that the sites you said are going to come forward in particular stages do, the infrastructure required is often not going to be confined to that local authority area” (ex senior local authority officer).

Strengths of the RSS noted by a range of stakeholders included its potential capacity to address infrastructure provision. Little doubt existed amongst participants about the need to continue to plan proactively for the future infrastructure needs of the West of England, but a number of themes emerged around the likely future success of the city-region in doing so.

First, a number of participants felt that the reduction in housing targets across the West of England would change the nature of the discussion around its infrastructure needs. Even though many had felt the targets in the Proposed Changes version of the RSS to be undeliverable in infrastructure terms, several participants believed that lowering housing targets would reduce the leverage of the authorities in seeking infrastructure spend. There is an obvious contradiction here, but this was nevertheless a clearly held view:

“I think it’s fair to say that the whole strategy for development in the South West and the South East was linked to the completion of the ring road, to better links between Bristol and Weston on the one hand, Bristol and Bath on the other, and without that proposed new development it’s extremely doubtful whether some of those things will ever happen” (development professional).

“Why do you need it [infrastructure] now if we’re not going to have 10,000 houses down there, who are all these people who are going to use it?” (Elected member).

“If authorities are going into core strategy examinations, trying to restrict housing or green field, greenbelt development, they are obviously not planning for the kit that goes with that. (planning consultant).

Interestingly, two participants observed that although the case for infrastructure in the RSS had been made based on the impact of proposed new development contained within the RSS, in several cases proposed new infrastructure would have in fact been just as important in solving existing problems and shortfalls as it was in addressing future needs. They suggested, therefore, that the absence of some large developments contained in the RSS, would have a detrimental impact on the ability of local authorities to solve existing infrastructure shortfalls. These comments were not confined solely to transport, with school places being an oft cited example for both North Somerset and Bristol.

Second, mirroring many comments made about the duty to cooperate (above), marked scepticism existed amongst some participants about the ability of authorities to come together to identify and prioritise infrastructure needs without the carrot and stick of the RSS, and an overarching framework from which to prioritise.

“So you are going to have to reconcile it in some way in terms of cross boundary working and that is both on a policy basis and on an investment basis in terms of infrastructure. And very difficult to bring partners together again when a lot of the immediate incentives and the carrots have been taken away as well. Going back to the cynical definition of partnership working: “Putting aside mutual loathing in pursuit of financial gain”. When that financial gain isn’t there you just go back to the mutual loathing bit” (former regional body employee).

There was a degree of corroboration from one local councillor who said:

“We are losing a degree of cohesion as people look to their own individual interest in their own county or council and city-regional area and the link between housing and jobs and infrastructure begins to be lost and I think that’s become harder” (elected member).

Indeed, the same Councillor went on to talk about the inevitability of the need for separate discussions with Government on infrastructure based on individual rather than city-regional interests, and that this would necessarily result in greater fragmentation and less coherence. Already, some local authorities were expressing suspicion that funding would simply go to highest growth places (Bristol), but with the feeling that ‘the impact of growth would be felt elsewhere’ so rear guard actions would be needed to ensure other places did not ‘lose out’. One officer commented on this from both a positive and negative standpoint:

“So I think the RSS ability to leverage more strategic city-regional infrastructure, its loss is a disadvantage to us but the baggage that it brought, any politician here would exchange losing that baggage for the disadvantage, because they would say to me okay mate, we’d better go and find another bloody way of fixing it then” (senior local authority officer).

However, the third and perhaps contrasting theme to emerge on the future for infrastructure provision was altogether more positive. Several participants were actually keen to point out recent success by West of England partners in both prioritising the infrastructure needs of the city-region and achieving success in securing funding. This, they thought, paved the way for continuing dialogue on infrastructure needs, rather than likelihood of a retrenchment to singular positions.

“We have seen the joint LEP sponsored bid for 5 pieces of major infrastructure kit go off to Government collectively supported by the 4 authorities and private sector. It is a way it could work.” (planning consultant).

“You have seen post RSS you know a collective bid go from the West of England for transport funding you know and a common justification for that so in the absence of imposition nonetheless the four authorities have come together in relation to their bid to Government for key elements of their funding or growth points funding whatever else it might be, because there is a common, so the distribution of money into areas that have been identified for growth will force a degree of that cooperation irrespective of structural plan and it should lead to some level of discussion among the people about whether or not the way in which that is being approached is actually going to be consistent with their individual core strategies” (elected member).

The LEP was specifically mentioned by one participant as a positive aid to current and future infrastructure planning:

“Well I think with LEPs and the what I call the positive side of planning i.e. getting money for infrastructure and building things, you know, bridges, schools, roads, trains, whatever it is, I actually see the carrot is there and we have just demonstrated that, because it has been very, very proactive … With the infrastructure, you know, we have got five schemes now, we have got BRT2 we have got BRT3, we have got the Western package and Bath, you have got the infrastructure” (Planning lawyer).

Fourthly, and finally, irrespective of the presence or absence of a strategic framework, concern was expressed by many about levels of resource available for infrastructure, such that when the market becomes more buoyant, funding is available to kick-start delivery. Private sector participants in particular expressed scepticism about the ability and likelihood of the private sector to take risks without public sector intervention. A common held view was that the current administration was perceived to be less likely to cover upfront infrastructure costs than the previous administration. Two politicians referred once again to now having to ‘take the blame’ for development in the absence of a regional framework, and that this was in fact being made ‘doubly worse’ by development being seen to occur without the requisite infrastructure.

4. Implications for the future of the West of England

Finally, the research focused on stakeholder views on two key issues, first, the implications of abolition of RSS and of the emerging national planning framework for the future of economic growth in the West of England and, second, the implications of the demise of strategic planning in the sense that it had existed over previous decades, most recently, in the form of RSS. Both have obvious and immediate relevance to the West of England. They are also, however, of more general relevance given the Government’s growth agenda and the role it sees in this for the planning system.

4.1 The future of economic growth

The incoming government had prioritised economic growth and identified planning amongst a series of measures to address its key agenda:

The Government is committed to reforming the planning system so that it supports economic growth by providing the right land in the right place for development, enables an increased supply of housing that the country needs, and ensures the timely delivery of infrastructure. The reforms will ensure that the planning system incentivises growth with development driven from the bottom up, understands and is more responsive to changing demands of business, and is less bureaucratic (HM Treasury/BIS, 2010)

This raises the question of the extent to which abolition of RSS and the emerging NPPF was perceived as impacting on future growth prospects in the West of England. Lack of the right land in the right places, housing shortage and price inflation that might price out young people and deter skilled in-migrants from the rest of the country and lack of investment in infrastructure might all impact negatively on delivery against this commitment locally. So too could a failure to incentivise growth and to secure development driven from the bottom up. Potential impacts could arise from the lack of a strategic planning framework per se or reduction in planned new housing numbers.

“The west of England is very unique in having four local authorities that have reduced their targets, or reduced it from the RSS targets by the amount which they have.” (developer).

All four local authorities have significantly reduced planned housing numbers in their core strategies compared to RSS and are at different stages in the review and confirmation or otherwise of those strategies, with that for Bristol already confirmed and that for North Somerset likely to be found sound subject to minor changes.

All four have understandably pointed to the impact of the recession on levels of housing demand and put the case that planned levels of housing land allocations will not put a brake on development.

“… there was a growing realism in the industry. I mean we saw a huge reduction in the potential of the housing industry and the housing companies to actually be able to deliver the sorts of growth. The market had gone. The market had plummeted to the extent where I think, you know where you would expect the days of the HBF to be banging the door and to be driving, you know some negotiations we had in the south east with the redefining of regional strategy there in the 80s and 90s, it was driven by a very very strong commercial market. That commercial market is not where it was at the beginnings of doing the RSS.” (senior local authority officer)

Table 4.1: Projected housing completions, RSS and Core Strategies

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Local Authority** | **Draft RSS Housing Figures (2006)** | **EIP Panel Recommend-ation** | **SoS Proposed Changes** | **Latest Core Strategy Housing Figure** | **Comments** |
| Bath and North East Somerset | 15,500 | 18,800 | 21,300 | 11,000 | Draft Core Strategy EIP just closed. Level of housing provision proved controversial with significant discussion of it at the EIP. |
| Bristol | 28,000 | 30,000 | 36,500 | 30,600 | Bristol’s Core Strategy adopted June 2011. Inspector concluded plan ‘sound’ despite reservations on adequacy of housing provision levels. Early review required. |
| North Somerset | 26,000 | 26,750 | 26,750 | 14,000 | Inspectors Report published March 2012. Strategy found ‘unsound’ but if the inspectors suggested modifications are adopted strategy would become sound. No suggested increase to the 14,000 housing figure proposed in the latest draft. |
| South Gloucestershire | 23,000 | 30,800 | 32,800 | 26,400 | Core Strategy - incorporating post-submission changes - is awaiting EIP. 26,400 represents a significant increase from submission core strategy. The provision for housing on the windfall site of Filton airfield provides for this increase. |
| West of England | 92,500 | 106,350 | 117,350 | 82,000 | Reduction of 35,350 on Proposed Changes, 10,200 on Draft |

There was a strong sense, however, that this reduction in housing numbers was also politically expedient. One local councillor, commenting on the reduction in housing numbers once abolition of RSS had been announced said: “I think it has been what can we get away with”. In another case, once abolition was announced:

“The first thing that we did was challenge the fundamental premise of the RSS about having centrally, government directed, growth so actually what it prompted was immediate reconsideration … we wanted to express the opportunity that government was giving to express localism.” (senior local authority officer)

This contrasts directly with the objective expressed in the NPPF of incentivising bottom up growth. As a councillor from a different authority put it:

“We have been quite robust in some ways in saying that we do not want to be importing people into North Somerset who either haven’t jobs or who are just going to turn around and commute out again. You can’t control that absolutely but, you know, what we’ve- what we try to say is when we see a natural growth within North Somerset for, you know, local demand, and that’s the sort of figures that we’re looking at. So, you know, that’s really how we’ve been working it. Plus, taking out the green belt, if you like, and what we can reasonably accommodate and, indeed, what the historical number of houses being built has been over the years, because, frankly, the regional spatial strategy figures, even without the recession that’s come in were [over the top]…. “ (elected member)

North Somerset did not, however, see their strategy as ‘anti-development’:

“Well, I mean we wanted to continue to protect the green belt. That was the issue there. And from that perspective, therefore, we didn’t want to be building houses close to Bristol in the green belt area, and if you look at the green belt in North Somerset, it does sort of go around the edge of Nailsea and Backwell, which were, if you like, the most obvious places. But then you’re into the commuting again issue. So we wanted to get employment into Weston, that was part of the argument for reducing the numbers.” (elected member)

Limiting development close to Bristol (as provided for under RSS) was seen as a way of boosting investment in jobs and housing in the authority’s principle urban area of Weston.

“Certainly our view has been to be pro development but in the right location. We’ve been increasingly concerned about the scale of actual housing provision and North Somerset becoming a dormitory within a city region.” (elected member)

The recession was seen as playing into the political agenda in many ways:

“I think that was incredibly important in terms of the political view on growth and development and put a fundamental question mark about whether we weren’t just planning a complete over supply. Certainly, clearly it has been used as an argument about not blighting land unnecessarily if you haven’t got the economic drivers to actually deliver that based against a long term view. I think the heady days of major construction in the housing industry … I mean some of the completion levels that were just shown in the RSS were built on the most optimistic assumptions and were just projected forwards. … Whether over a 20 year development period you come back out the other side, it increasingly just looked over optimistic and lacking in sensitivity about the city-region and where it was.” (senior local authority officer)

So at one level, the reduction in targets compared to RSS were very clearly political: “It was tied into the re-election of the Conservative group who fundamentally challenged us about whether it was sustainable to actually have a further major urban extension.” (senior local authority officer). But politicians were also observed to have focused more strongly on the technical issues and the impacts of recession:

“Technically as well … I think the politicians are clever people nowadays and I think they fundamentally challenge the technical assumptions. They didn’t believe that the growth rates were justified and increasingly they questioned with us the deliverability against those allocations and wanted a different model to operate within. Not one where you plan for something that may not happen when land is a finite resource and is a very precious commodity.” (senior local authority officer)

Some development stakeholders on the other hand questioned the extent to which the recession justified significant reduction in planned-for housing numbers:

“We have got economic planners working with us on this, well it’s not our forte frankly, but we’ve got them working with us and they are absolutely adamant that the indigenous growth within the population is sufficient to take it to virtually the same level as proposed in the RSS.” (development professional)

A number of respondents noted in particular the need for longer-term assumptions and the dangers of planning on the basis of limited time horizons and recent history:

“The trouble with housing forecast is it’s based on a number of assumptions isn’t it and I think it is legitimate to say that in the recession as we stand today, that on a year by year basis, currently, demand has weakened. However, you can’t make a prediction for 25 years on the back of 1 year, 2 years, 3 years can you, you have to do it over longer periods… if you look at what was predicted previously and you look at what actually happened, the predictions are almost always an undershoot … everybody’s always resistant to these predictions because nobody can sort of believe the numbers that come out of it, and so politicians tend to err, or press down on those predictions.” (development professional)

Others argued that the longer term experience had been of continuing growth, that historic estimates had typically fallen short of demographic trends and that it made good sense to set generous targets:

“… we’ve been securing 3% growth for the last 10 years and why would you now plan for less. Okay we’ve just gone into a massive recession and that’s probably one reason but it’s almost like you are planning for climate change and you are doing flood defence measures, where you would make an assumption you’d probably allow a contingency on top just to make sure you didn’t end up with worse case scenario. So this was kind of, almost a safeguarding that you weren’t under-planning which was the suggestion certainly in the RPG, the assumptions that had been in there, including house hold formation had been significantly overshot.” (civil servant).

Similarly:

“It takes some wrapping your head around, we don’t plan long enough in advance and again arguably the core strategies were good at that, in taking the long-term vision. I think you would probably get to different outcomes if you planned on the basis of the sum of each two or more five year decision compared to the single decision of a 25 year decision.” (planning consultant).

This contrasts with the view expressed in the outcome of the Bristol Core Strategy process and probably also that for North Somerset, that allocations could be reduced in the short term and reviewed periodically on, say, a five year time horizon. Others saw the reaction of the local authorities as more opportunistic:

“If you look at the message coming out of BANES and less explicitly South Gloucestershire, one of their arguments for reducing the housing requirement is ‘Oh well you can’t do it anyway’ because of the current economic climate and my stance is ‘well you sure as hell can’t do it if you don’t plan for it and encourage it’. You mentioned the LEP area, it committed itself to 95,000 new jobs, any suggestion at a local level that it is inappropriate to plan for that 95,000 new jobs and all that means in terms of growth more generally and physically, is unacceptable, should be unacceptable, so yes looking back local authorities reduced the numbers left, right and centre pretty much with no reference to the evidence base.” (development professional).

The private sector view was typically that, despite the recession, the lack of a strategic framework created a level of uncertainty that would deter investment – compounded by the more general uncertainty around the NPPF and its implications on the ground:

“The thing is with most developments whether it is industrial, waste management, housing, across the patch you are going to need some funding and funding is very difficult at the best of times. It is very difficult now, and where you have a situation where you have less certainty of your product being developed and therefore an income stream coming back, the cautious instinct is not to actually invest.” (planning lawyer).

This was seen as having potential implications in economic terms in the form of jobs and housing. On the RSS specifically:

“Many people were not that happy, but actually it created that sort of level of certainty which industry needed, and that rug has just been pulled away from those developers. … and it remains to be seen whether that continues to increase our unemployment rate, continues to increase the lack of housing for young people.” (planning lawyer)

One private sector professional made the direct link between removal of the strategic tier and the potential impact on economic growth discussed in the previous section:

“The thought of just taking out a sort of fundamental part of the policy that talks about spatial distribution in the West of England as a whole is extraordinary to me … I believe, it’s the second most buoyant economy in the British Isles at the moment, certainly in England. There is a need for growth, we still have significant in-migration, there is a lot of indigenous growth as well within the existing population and, frankly, it needs to be tackled on more than just a local basis, in both employment and housing terms.” (development professional).

Another made a direct link between housing development and economic growth and the potentially damaging effects of reduced numbers:

“I’m really concerned as a Bristolian and somebody who’s interested in the local economy, that we’ve got a massive brake on the economic development and potential of Bristol, that’s delivered so well” (development professional)

One lawyer questioned the clarity of the Coalition’s thinking on ‘growth’ when the abolition announcement was made:

“Well the biggest impact was that it stopped schemes coming forward at a time actually when we wanted them to come forward I think.,. I’m not sure the Government realised that they [RSSs] were pro-growth” (planning lawyer)

This particularly revealing in the context of statements made by the Coalition subsequent to the abolition announcement on their desire to deliver higher levels of housing growth than achieved under the previous administration. Indeed, one MP questioned whether the sum total of housing agreed in local plans now would meet the Government’s notional target. If not, he thought that this would trigger politicians to start ‘getting twitchy with the planning reforms’. This was also the view of the representative of one of the national bodies:

“You could say that what the other Government thought it was doing was empowering regions to collaboratively come together, get the evidence base and see what they need. They then don’t comply because they don’t allocate the houses that the evidence says they need, or you can see the same thing about to happen with neighbourhood plans and local plans couldn’t you actually? Then what does Government do in those circumstances?” (national body representative)

Other participants suggested that the RSS had helped local authorities towards accepting a narrative of ‘growth’ that saw it as a positive driver of change to meeting wider ambitions and objectives. Their view now was that without the RSS this narrative would be unlikely to continue when the market picks up. One respondent concluded that this would provide an opportunity for developers, and another, that local authorities would necessarily be more parochial – to their own detriment:

“One of the potential really big downsides to the retrenchment that’s occurred since the plug was pulled on RSS, is that many local authorities, when the market picks up – and it will – will not be in a position to defend themselves, if I can put it in that sort of way … or to put themselves in a position of being able to work collaboratively with developers to shape what happens to their cities. I think we will have, for a period, at least, a return to the sorts of things that were happening in the late ’80s and early ’90s, which was effectively driven by development: Came in, did it, left, leaving local authorities further down the line and community groups to pick up the pieces.” (civil servant)

One participant concluded that despite abolition, the RSS still represented some sort of a benchmark against which local authorities could to an extent be held to account:

“Well ironically if you hadn’t had the RSS, and of course they’re all slightly prejudiced by what they agreed under the RSS process, if you hadn’t had that, we’d be in a real problem wouldn’t we, because we wouldn’t be able to say ‘well hang on a minute you can’t say that, because actually before you were saying this’. They would be actually challenging the whole basis on which the plans were coming forward so you’d be in real trouble, you’d have the development industry and others saying this is the projection, they’d be saying that’s rubbish and you’d have this massive hole, whereas at least inspectors are able to say, hang on a second, how do you explain the change” (development professional).

One private sector development adviser with long experience of development in the West of England drew a contrast between the historical availability of significant employment sites and the current situation:

“if you look at the growth in all those areas, and you observe the economic performance of Bristol, I can’t believe the two aren’t linked and what I observe is, in the current plans there isn’t any of that, there is no land, new significant land expansion allocated and my own theory is that that must be a massive brake.” (development professional)

Private sector observers were able to point to specific developments that had stalled and were unlikely to progress following abolition and the development of the NPPF. Commenting specifically on abolition of RSS one development professional said:

“I was very disappointed when I heard it because it was quite clear that the response was that’s pulled the rug out of under a number of schemes. Specifically from my perspective I was involved [in one scheme], I had just been instructed … all geared up to do a Section 106 agreement. The fact is that as soon as the decision came out that scheme, which was only supported through really through the South West RSS, there was no policy support and then that died and that was certainly the impact on a number of schemes that we were involved in which heavily relied upon regional policy, they just they stalled”. (planning lawyer)

There was, therefore, clear concern. Some, however, were more pragmatic with the way the new system might operate:

“Clearly for me I’m interested in ensuring that there is sufficient land and premises in the right places that can be delivered, to deliver on growth, I mean that’s what it’s all about and certainly there was a view that the revocation, abolition whatever you call it of the RSS might hinder that because it did take the top down approach and you know it tried to balance national and regional pressures with local concerns.” (ex Senior local authority officer).

Views also changed over time as the debate moved on and the implications of the new proposals became somewhat clearer. This same individual went on to say that:

“If they [the Government] do what they say they are going to do, I think you will end up with the same result but in a slightly different way … we will still end up with the right level of development, whether it be for housing, whether it be for economic development. We might end up with it in different places because it will be local choices about where the right places are rather than top down choices… I don’t have perhaps as great a concern as I might of had a few months ago that the actual overall levels of growth and development will happen … as long as it’s the right level to deliver the levels of growth we are looking for, then whether it comes from the top down process or the bottom up process, as long as it happens, I don’t think it matters that much. But of course then a lot does depend on the government doing what they say they are going to do.” (ex Senior local authority officer).

Going further, one private sector development professional put the onus on the political context more than the policy framework as such:

“Now I have always said that any planning system can deliver development if there is a political will to deliver … no planning system can deliver development if there is a political will for no development” (planning consultant).

4.2 The demise of strategic planning

Background

The abolition of RSS and the transition towards the system provided for by the 2011 localism bill will result in a planning system with no strategic framework between local plans at an individual local authority level and national policy.

The introduction of RSSs in 2004 saw the demise of structure plans, which had been in existence since 1968. Displacing structure plans was at the time itself seen by many as a dramatic shift in the national planning system. Abolition of RSS and the entire removal of the strategic layer has been arguably even more dramatic.

Commentary and evidence presented to both the recent CLG Select Committees on RSS abolition and the draft NPPF has suggested that some form of planning activity beyond the local level is needed. The former concluded: “There needs to be way of ensuring effective planning at a larger-than-local level. This does not need to be over-prescriptive, but a statutory underpinning of strategic planning is essential to ensure that all planning issues are dealt with fairly and consistently” (section 43).

“There are some things that are greater than local and need arrangements to deal with them … you know you have got to be realistic, it’s not all local” (national body representative).

“It would have been good to have kept the strategic overview rather than the ad hoc approach that we’ve got now” (elected member).

“I have certainly always felt that regional planning was important and regional working, because you actually find out how other people are thinking and how they are working” (elected member).

“Fundamentally we need some way of making strategic decisions, and I’ve never heard anybody actually say we don’t” (development consultant)

Participants presented a spectrum of views on the need for a strategic framework between local plans and national policy. At one end of the spectrum were a handful of participants who a felt no need for any kind of additional framework just the need to get on with the new system, and at the other were participants who even expressed a desire for the reintroduction of Regional Spatial Strategies.

With little exception, those most in favour of some form of strategic planning were from the development industry, those with experience of working at the regional level, or representatives of national bodies. These stakeholders believed that strategic, potentially cross-boundary land allocations would not be adequately dealt with without some strategic overview, and that the management of growth needs to be tackled on a more than local basis. Many also equated strategic planning with longer term thinking. Localism, they felt, had an inherently shorter time frame, to the detriment of good planning.

“Is it effective to have so many small unitary authorities, all with their own very tight area of influence? … You’ve got to have some sort of interim tier in my opinion, I just don’t believe you can have such a vacuum between national and local when localism is bound to be sort of very strongly opposed to an awful lot of development in their immediate area.” (planning consultant).

“There are issues and decisions that must be made at a different spatial level … People think at a level that’s comfortable for them and it’s rare, certainly in my experience, it’s rare to find politicians who can think at that sort of level. Whether you agree with the oft-repeated view from current ministers that decisions that affect certain places are always best made locally, personally and professionally, I’m actually quite a long way from that. The last people you should ask about what should happen to a city of the people who live there, because by and large, a lot of people, when you think about the length of time a city exists and how long it takes for things to change in cities. There’s a balance somewhere which we’ve not yet managed to crack between how you make life the best life you can for people who currently live in places but, at the same time, think about who’s going to be there next.” (civil servant).

This shorter term view of localism was substantiated by one councillor who stated:

“As long as you’ve got a six-year land bank that you can spend up and improve, then you don’t have to worry about the green and pleasant lands that you don’t want boots on. It’s as simple as that.” (elected member)

Views from local authority officers were mixed. Some officers were clearly of the view of the need for a planning at a greater than local level, although one participant hesitated to call it strategic planning preferring instead to refer to the need for business planning across boundaries. Others were more emphatic:

“How can we deliver for Bristol without delivering for the city-region, without delivering for the region, without delivering for the country as a whole, how are we going to manage our future to 2050 as a country nationally without having some coherent approach to where homes are delivered … I find it challenging to see how we are going to maintain a good future without some city-regional planning or regional planning” (senior local authority officer).

For some, larger-than-local meant simply necessary collaboration between neighbouring authorities. For others it implied a more holistic focus on the functional economic city-region as a whole together with a concern for wider regional and national issues and interests.

On this same theme two participants talked persuasively about ‘strategic’ being essential because localism in their view cannot think about the totality:

“Nobody is thinking whether the idea and the total is a good idea, because none of those individuals care about the totality of the issue” (senior local authority officer).

“An almost total faith in the ability of communities of existing communities to do the right thing for a place, not for their community, for the place, I think, is misguided. … Without someone thinking of that bigger scale, without politicians and other players being invited to think more widely to think about where this community sits in a big network of all sorts of things, everything will become extremely insular and, actually, the inertia that comes that we saw on occasions at the regional assembly where people would say, “I’m here to represent Little Snottington on the Wold” or whatever -that, that becomes the way everything is done.” (civil servant).

Other local authority officers felt the need to test out the current system’s ability to deliver more housing before deriding the proposed new structures suggesting that new hierarchies would/should only be reintroduced if a major collapse in housing allocations leads to a suppression of the economy at a national level. One declared that the authority was “definitely not rudderless without strategic planning”.

Whilst one local authority member expressed a view that they were “appalled” at there being no planning between the local and the national, members generally were more circumspect about the need for strategic planning. One stated, “how effective this system will be will depend on how sensible and how well we do work together at a local level”. Others stated potential benefits of a “wider more cohesive view” (but with the caveat that the benefits of having that cohesive view would need to come down to self-interest), to others wishing to simply defer their view waiting instead to assess the effectiveness of the system as proposed. Interestingly, some politicians made observations about the role of a strategic view, but out of the context of talking about whether additional frameworks might be needed.

“I think that all elected members gain their legitimacy from a community area, so that’s our first priority, so we see things from that level and the big central machine coming in and telling us what our communities have got to have it’s not really very welcome, I mean having said that, we do, we all need to be strategic, we need to have a more strategic vision” (elected member).

Another referred to the benefit of having a strategic view, as rather like the lid of the ‘jigsaw’:

“You’re in free-fall because where does your strategy fit if it doesn’t have to fit with the neighbour’s or the wider thing? One officer I used to have used to call it [strategic planning] the lid of the jigsaw. You know without the lid, okay, we’re all prepared to do the jigsaw but it would be useful to know what it is we’re trying to fit into.” (elected member).

One stakeholder talked about the relationship between strategic planning and leadership. He perceived Bristol to have a history of looking inwards rather than outwards – to the potential benefit of both itself and the city-region as a whole, and saw strategic planning providing an impetus to address this. The danger was that:

“If you’re Bristol the other thing you think of is you don’t want to be saying things that offend North Somerset, Bath and South Gloucestershire … A lot of it is driven by politics, which looks internally into places, and Bristol has always had a problem with its relationship with the rest of the region, that if it tries to exert influence or represent the region, it’s slapped down and accused of trying to tell the region, you know, push the region around and be the boss. So it has tended to look into itself, and even that period with the core cities aligned, it allied itself with other places rather than with its own patch” (Ccvil Servant).

For those in favour of some kind of strategic planning, views as to quite what sort of future structure should be implemented were inconclusive. Only one participant mentioned the desire to return to the RSS. Several concluded they did not favour the return to the wider (South West) regional concept because it was “too problematic” as one planning consultant put it, but instead referred to other potential governance models – the city-region model in particular:

“I think if I was designing a planning system now, it would have a level of regional planning in it. Whether or not that would be the RSS as we knew them I am not sure. I think it is important to plan on a city at least at city-region level, preferably having some wider context for that, so I think I would have liked a strategic context for making decisions.” (planning consultant)

There were a number of references to other localities which were perceived as having more successfully overcome the barriers to local collaboration and had a wider city-regional focus including the Cambridge city-region and the Association of Greater Manchester Authorities (AGMA):

“I think my instincts are that city regions are now where we are at. We wouldn’t recreate regions I don’t think. That’s just a personal hunch. I think that’s where instinctively we will be looking at and I think the AGMA model is seen as one.” (MP)

Two participants highlighted a desire for a single planning unit at the level of the functional economic city-region:

“I think in development circles, there’s a huge regret with hindsight that instead of going to 4 unitary authorities, we can’t have a single unit authority that wasn’t Avon. I mean Avon was very much disliked but simply in terms of planning and delivery of strategic infrastructure, the West of England would have been a much better unit to manage and try and deal with, because the politicians can’t cope with their contradictions.” (development consultant)

Two private sector participants concluded rather emphatically that the only strategic solution for the West of England would be a boundary review, resulting in the widening of administrative boundaries of Bristol, ensuring green belt that did not straddle boundaries:

“Well if they can’t work effectively with the authorities surrounding them the only solution is for someone to say there’s got to be a boundary revision.” (property agent).

Those who were less concerned by the lack of strategic framework typically referred back to the duty to cooperate as obviating the need for this. One stakeholder stated, “the duty to co-operate may be sufficient to ensure that strategic thinking takes place” (national body representative) but also asserted strongly that further guidance or indeed secondary legislation might be needed to ensure that the it deliovered. Another that, “it would worry me if the West of England didn’t cooperate and come up with a coherent view between us” (local authority chief executive).

5. Questions and issues

This final section draws together a number of questions and issues which we see as emerging from the findings as a whole.

*Core strategies*

1. The ‘presumption in favour of sustainable development’ proved highly controversial when first published in the draft NPPF being widely portrayed as a ‘developers’ charter’. The framework had made clear, however, that the system would be ‘plan-led’. The question remains, therefore, whether sound local plans will in practice provide a secure basis for locally determined levels and locations of development as maintained in the NPPF? Evidence from the West of England, including early decisions on core strategies, suggests that this will be the case with little suggestion of significant challenge to the system or a developer free-for-all.

*Duty to co-operate*

1. The ‘duty to cooperate’ now provides the only statutory basis to address ‘strategic planning priorities’ for planning at wider than unitary authority level. Will this prove adequate in practical terms as the basis for ‘strategic’ planning as the local authorities have generally claimed or will there in practice be a vacuum at the heart of the planning system? What might be needed to ensure that local authorities engage ‘constructively, actively and on an ongoing basis’? Is there a danger that evidence of co-operation will focus on process rather than outcomes? What follow-up evaluation of the duty is there once inspectors have declared that plans are sound? Will the duty to cooperate simply involve cross-boundary collaboration? What about engagement across sectors as well as spaces?

*Strategic planning and localism*

1. This also begs the question of whether ‘strategic planning’ is simply the sum of the local parts, cross-boundary collaboration done well, or more than this? Will anyone be taking a wider city-regional view? How might the emerging planning system deliver effectively on larger than local issues? Can ‘local’ and ‘strategic’ issues be combined in the same level of governance?
2. A key question as well is can localism do long-termism, or is localism inevitably also short-termism as some have claimed? A pattern of short-term planning horizons with provision for review is emerging from the Core Strategy process. Can this be effective or will it, as others have argued, undermine certainty and deter investment? How important is a longer term view to planning successfully?

*Housing*

1. On housing numbers, the recession has clearly had a short-term impact at least. The question is whether the pace of development will run up against constraints once the economy and labour market start to pick up? Or will investment and infrastructure provision in fact be deterred by the lack of certainty and long-term planning?
2. The four local authorities have argued that reductions in planned housing numbers are consistent with economic circumstances. Are they, however, committed to expanding provision in line with market recovery or is their aim to contain future levels of development per se in line with the wishes of local communities? Does localism in the West of England signal the intention of reducing future levels of housing development? Evidence points to the likelihood that levels of housing provision will be lower than they would have been otherwise, discounting the effects of recession.
3. The government has maintained that their proposals would stimulate housing development within a framework of local decision-making. The New Homes Bonus and Community Infrastructure Levy have been portrayed as effective fiscal incentives to communities to generate support for and to facilitate housing growth. Will this happen in practice? Or will councils and communities in more affluent areas be willing to forgo the inducements on offer?

*Employment land and other issues*

1. Headline concerns have focused on housing numbers. But can the new system provide the long-term supply of employment land argued by some as necessary to ensure future economic growth? And can localism deliver on a range of the more controversial and cross-boundary issues including gypsy and traveller sites, minerals, waste, water, renewable energy, climate change and transport?

*Evidence*

1. Government has emphasised that the new planning framework remains evidence-based and plan-led. Future debate over planned housing numbers, review of core strategies and other issues will clearly turn on the evidence presented. The evidence base itself, sources, definitions and analysis, is however increasingly fragmented and potentially contested by different stakeholders. Is there a danger of an evidence vacuum, a lack of consistent and reliable, transparent evidence?

*Local Enterprise Partnerships*

1. The West of England LEP has set out aspirational targets for economic growth and whilst the local authorities are central to the LEP, it has had little pro-active, overt involvement in the emerging planning framework in the city-region post-RSS. This raises the question to what extent is the emerging planning framework and its implications for the trajectory of the city-region consistent with the objectives of the LEP? There have been suggestions from some quarters that LEPs might play a more active role. Is there any potential and/or appetite for this in the West of England?

*Alternative planning structures*

1. Many stakeholders argued strongly in favour of an intermediate, strategic component within the overall planning framework and were highly sceptical of the duty to cooperate as an effective basis for larger-than-local planning policy. There was little clarity or consensus however as to what form this might take. Theoretical possibilities are in practical terms highly constrained by political considerations both local and national. The onus is nevertheless on those sceptical of current arrangements to explore the alternatives. What might an alternative solution look like at a national level? Are there examples of what might work from elsewhere? What might be appropriate more specifically in the context of the West of England?

Appendix 1: Interview participants by organisation

|  |  |
| --- | --- |
| Local authority elected members | 5 |
| Local authority officers | 5 |
| Developers | 2 |
| Development professionals | 10 |
| Ex regional body employees | 3 |
| Representatives of national organisations | 3 |
| Other | 2 |
| ALL | 30 |

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1. The research was carried out by means of semi-structured interviews conducted face to face using a common topic-guide. All interviews were recorded and transcribed in full. They were analysed thematically using the qualitative analysis software package NVivo. [↑](#footnote-ref-1)