Models for Sub-Regional Spatial Planning

Report of a Research Study Commissioned by

The English Regions Network
Communities & Local Government
The Planning Officers Society

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PREFACE

This Study was commissioned by the Department for Communities and Local Government, The English Regions Network and the Planning Officers Society.

Members of the Steering Group were: Louise Barr and Eike Ndiweni-Muller (*Department for Communities and Local Government*), Kate Docherty (*English Regions' Network*), Catriona Riddell and Catherine Rose (*South East England Regional Assembly*), Rob Murfin (*Yorkshire and Humber Regional Assembly*) and Roger Hargreaves (*Planning Officers Society*).

The report was researched and written by Roger Daniels and John Hack, Associates of POS Enterprises, the project contractor (General Manager, Andrew Wright).

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MODELS FOR SUB-REGIONAL SPATIAL PLANNING

Appendices, including the bibliography are in a separate volume.

GLOSSARY OF ABBREVIATIONS AND ACRONYMS

The following abbreviations and acronyms are used in the report. They are defined when first used and are listed here for reference.

AAP	Area Action Plan
DCLG	Department for Communities and Local Government
DPD	Development Plan Document
EPISP	Effective Practice in Spatial Planning (RTPI Research Project)
EU	European Union
GIS	Geographical Information System
GOR	Government Office for the Region
HMA	Housing Market Area
LAA	Local Area Agreement
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Scheme
LGA	Local Government Association
LPA	Local Planning Authority
LSP	Local Strategic Partnership
LTP	Local Transport Plan
MAA	Multi-Area Agreement
ODPM	Office of the Deputy Prime Minister
PACEC	PA Cambridge Economic Consultants
PAS	Planning Advisory Service
PCPA	Planning and Compulsory Purchase Act 2004
PINs	Planning Inspectorate
POS	Planning Officers' Society
PPS	Planning Policy Statement
PTE	Public Transport Executive
RDA	Regional Development Agency
RES	Regional Economic Strategy
RPB	Regional Planning Body
RPG	Regional Planning Guidance
RSS	Regional Spatial Strategy
RTPI	Royal Town Planning Institute
RTS	Regional Transport Strategy
SCS	Sustainable Community Strategy
SEA	Strategic Environmental Assessment
SNR	Sub-National Review (Review of Sub-National Economic Development and Regeneration)
SPA	Special Protection Area
SPIP	Spatial Plans in Practice (DCLG Research Project)
SRS	Single (Integrated) Regional Strategy
UK	United Kingdom

1   BACKGROUND

1.1   Need for the Study

1.1.1   Following the Planning and Compulsory Purchase Act 2004 (PCPA), new Regional Spatial Strategies (RSSs) are being prepared to replace the former Regional Planning Guidance in each English region.   The new RSSs are designed to provide a spatial framework to inform the preparation of Local Development Frameworks, Local Transport Plans and relevant regional and sub-regional strategies and programmes. They are put on a statutory basis by the Act, including becoming part of the statutory Development Plan.

1.1.2   The emerging Regional Spatial Strategies (RSSs) that are being prepared demonstrate a wide range of approaches to sub-regional planning in terms of the definition of sub-regions, the degree of detail, the use of evidence and the approach to implementation.   As all regions are well advanced in preparation, it is timely to review current practice, investigate the reasons for the different approaches and see what lessons can be learned for the benefit of future regional work. At the same time, local authorities are preparing the documents that form the Local Development Framework (LDF).   These documents, especially the Core Strategy Development Plan Document, have a relationship to the sub-regional context, whilst in some areas joint documents are being prepared to plan over a wider area than one local planning authority.

1.1.3   An important consideration was the move to a spatial approach to planning, set out particularly in the relevant Government guidance – PPS1[1] for general planning policy and PPS11[2] in relation to RSSs. In addition, continuing developments in Government policy, briefly described in this report, have highlighted the role of bodies at both regional and local levels in contributing to a culture change to positive spatial planning.   Planning is seen as an instrument of sustainable economic development and as key to the development of sustainable communities. Bodies preparing strategies and plans need to be able to carry out this task effectively.   It is hoped that this report, by providing information on the first round of RSSs and by raising questions about the role of sub-regions, can assist in this.

1.1.4   Among recent developments in Government policy is an interest in 'functional areas' as a basis for implementing policy more effectively across local authority boundaries. This interest was highlighted in the White Papers on Local Government and Planning, and in the Review of Sub-National Economic Development and Regeneration. The use of functional areas is being applied progressively through inter-authority co-operation over a range of policy and funding initiatives, including Multi-Area Agreements. This study seeks to address questions about

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[1] Office of the Deputy Prime Minister, 2005, PPS 1: *Delivering Sustainable Development*
[2] Office of the Deputy Prime Minister, 2004, PPS 11: *Regional Spatial Strategies*

the relationships between sub-regional spatial planning and other partnerships or policy initiatives that are based on functional areas.

1.2 Objectives of the Study

1.2.1 The aim of the project was to investigate current practice in sub-regional spatial planning, and put forward recommendations as to how it can best be organised in future based on good practice and to enable proper account to be taken of the circumstances of the particular sub-region. To this end, we investigated current approaches to sub-regional spatial planning through the system of Regional Spatial Strategies, Local Development Frameworks and other related areas of policy making. The investigation included:

- approaches to the definition of sub-regions;

- arrangements for policy making, decision-taking and implementation within sub-regions;

- linkages between the spatial planning system (RSSs and LDFs) and other sub-regional strategies;

- the use of shared evidence bases, monitoring systems and structures for political engagement, community engagement and technical support;

- mechanisms to co-ordinate investment in infrastructure and implementation programmes at the sub-regional level;

- approaches to policy-making, including scope and levels of detail; and

- institutional structures and working arrangements for sub-regional spatial planning and related areas of policy.

1.2.2 Because the legislative and administrative arrangements are somewhat different in London, it was agreed that this study should not include London. However, some of the conclusions may be relevant to a discussion of planning in London, provided the differences are taken into account.

1.2.3 It was also not the intention to make any criticism of the approaches adopted in any of the regions, either in the preparation or examination of the RSSs. or in the preparation of LDFs by local authorities. We understand that the diversity of approach seen so far has come about through a combination of the effects of existing guidance, starting positions, evidence about sub-regions and other factors that are described in this report. Issues that could usefully be addressed in future rounds of RSS preparation, and in the developing arrangements for regional strategy, are raised in the concluding sections (Sections 7 and 8).

1.3 Initial questions

1.3.1 At the outset of the work, a number of questions were being asked about the role of sub-regions in RSSs, which suggested that a structured approach to understanding sub-regions should be taken. These questions were expressed initially in separate study briefs prepared by the English Regions Network and the Planning Officers Society, which were drawn together for this study, with the participation of the Department for Communities and Local Government. Questions included:

- What pattern of sub-regional approach exists in current practice across different regions; how have sub-regional issues been considered following the requirements of the PCPA and PPS11, and how is this being worked though the stages of RSS preparation, based on information available at these stages?

- What changes in approach to sub-regional planning have resulted from the different 'drivers' such as the RDAs and RESs, urban regeneration programmes, EU funding programmes, Sustainable Communities Plan, Core Cities Programme, New Growth Points, Local Transport Plans and Housing Market Areas?

- Have these various 'drivers' resulted in different sub-regional arrangements for different purposes; is sub-regional working on RSSs and the preparation of LDFs joined-up with these other arrangements and should it be? Are there blockages inhibiting the joining-up of sub-regional working, for example caused by statutory procedures for development plans (RSS and LDDs, different timescales affecting different sectors and the requirements for different geographical areas for different areas of policy?

- What are the implications for the future, in response to the new 'drivers' of sub-regional working including outcomes from the Sub-National Review and the Local Government White Paper (including the emphasis on LAAs and MAAs); Local Government Reorganisation; and the proposed Single Integrated Regional Strategy? Are there increasing pressures for more explicit sub-regional consideration, either through spatial planning for delivery of sustainable development across functional areas, or from more effective financial and governance arrangements at a sub-regional scale?

2   STUDY METHODS

2.1.1   Research methods were devised to explore current practice in sub-regional spatial planning in the context of sub-regional working on economic development, housing, transport, urban regeneration and other areas of policy and against the background of emerging Government policy for sub-regional devolution and new local authority structures.

2.1.2   The main themes for investigation were:

- sub-regional definition

- the scope and level of detail of sub-regional spatial planning policy and

- sub-regional working arrangements, including decision-making and technical support.

2.1.3   The approach comprised the following elements:

- literature review

- questionnaire survey

- workshops and other meetings and

- discussion with study partners in the Steering Group

2.1.4   The literature review included Regional Spatial Strategy documents; Panel Reports and the Secretary of State's proposed changes where available; some of the background documentation of the RSSs and their public examinations; Government policy statements and guidance; and some recent academic research on regions, sub-regional planning and city regions. (See attached bibliography.)

2.1.5   Having considered the documents, we decided to opt for a wide-ranging, self-completion questionnaire to all regional planning bodies and to a selection of other regional and sub-regional bodies and local authorities, rather than rely on telephone interviews – in response to resource pressures on the study team, the RPBs and other likely contributors. (The questions are reproduced in Appendix 2.)

2.1.6   We received completed questionnaires from 6 of the 8 RPBs: all providing valuable information. Telephone follow-ups were made where necessary, and additional questionnaires were sent to interested parties in local authorities, regional and sub-regional bodies, who had been identified through the research.

2.1.7   Two workshop meetings were held: one mainly with regional organisations (RPBs, RDAs and GORs) and the other with sub-regional partnerships and local authorities. Both workshops were structured according to the themes of the study, with introductory presentations from the study team. We also held meetings with local planners involved in other research programmes on Local Development Frameworks and with RSS Panel members. The workshops and meetings provided valuable information about current arrangements for sub-regional spatial planning and views about the scope for future change.

2.1.8 We prepared a number of working papers for discussion with the Steering Group, including:

- a brief and study programme;

- research hypotheses;

- a summary of the statutory framework;

- experience of joint working on Local Development Frameworks;

- a bibliography of publications on city-regions and sub-regions;

- a summary of existing sub-regional arrangements by region, including RSS sub-divisions, strategic economic partnerships, growth areas, new growth points, delivery vehicles and joint LDDs (where known, following their submission to PINs);

- a summary of sub-regional approaches in the current round of RSSs;

- a note on implications of the Sub-National Economic Review;

- questionnaires (in draft) for RPBs and local authorities;

- formats for workshops;

- preliminary findings from the RPB questionnaires; and

- an outline report.

2.1.9 We should like to thank the Steering Group for their contributions to the study including their guidance, ideas and practical assistance with information, contacts and facilities for the meetings and workshops.

3   POLICY

3.1   Legislation and guidance:

(i)   Legislation

3.1.1   The main provisions are set out in the Planning and Compulsory Purchase Act 2004 (PCPA) and the associated regulations governing the procedures for preparing regional spatial strategies and local development documents. The PCPA was the culmination of a comprehensive rethinking of the role of planning in the delivery of sustainable development. Selected details of the legislation and associated policy guidance are set out in Appendix 1. This section of the report summarises the main conclusions relevant to our study of sub-regions.

3.1.2   The planning system is more than ever before focused on the delivery of outcomes.   Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development and has a key role in the creation of sustainable communities. PPS1 sets out the broad principles and outlines the new approach to plans (see box below)[3]

Extract from PPS1, paragraph 7:

The Government's Objectives for the Planning System

To help meet these broad objectives, the country needs a transparent, flexible, predictable, efficient and effective planning system that will produce the quality development needed to deliver sustainable development and secure sustainable communities. National policies and regional and local development plans (regional spatial strategies and local development frameworks) provide the framework for planning for sustainable development and for that development to be managed effectively. Plans should be drawn up with community involvement and present a shared vision and strategy of how the area should develop to achieve more sustainable patterns of development.

3.1.3   The provisions in the PCPA relating to regional planning in Part 1 include the principle that references to a "region" include references to any area within it that includes all or part of more than one local authority. The Regional Planning Body (RPB) must keep under review the matters that may be expected to affect development in its region or any part of the region. To this end, advice must be sought from each county council, unitary council and National Park authority in the region, including advice relating to the inclusion in the RSS of specific policies relating to any part of the region.   Moreover, the RPB must have regard to the desirability of making different provision in relation to different parts of the region.   Regulations govern the procedural aspects of revising RSSs, including procedures for making proposals

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[3] Office of the Deputy Prime Minister, 2005, PPS 1: *Delivering Sustainable Development*

for different parts of the region. Unlike the former situation with regional planning guidance, the policies of the RSS are part of the development plan for the local planning area.

3.1.4 Part 2 of the PCPA concerns local planning. There are requirements for keeping matters under review (the survey function), including involving neighbouring authorities (including counties). Local Development Frameworks (not defined in the Act) are essentially a suite or "portfolio" of local development documents (LDDs) that deliver the spatial planning strategy for the authority's area. The Local Development Scheme sets out the local development documents that will be prepared. The Act facilitates joint local development documents between two or more local planning authorities. However, any step that has to be done in relation to a local development document must be done by or in relation to each of the authorities that agree to prepare the joint document. There is, however, a more specific provision to form a joint committee where a local planning authority and a county council (in a two tier area) wish to prepare documents together. This committee then becomes the local planning authority for the area and specified matters, and is enabled by an Order. This does not apply to minerals and waste LDFs, where the county and unitary authorities are the relevant planning authorities.

3.1.5 The Local Planning Regulations govern the procedural aspects of preparing LDDs, and a set of conformity rules between documents. Policies in all LDDs other than the core strategy development plan document must be in conformity with the core strategy and Supplementary Planning Documents (which are not part of the development plan) must be in conformity with the core strategy or other DPD.

> The legislative provision is essentially permissive and procedural, and allows a wide variety of approaches to planning for sub-regions and jointly between local authorities (provided the procedural requirements are met to ensure transparency and fairness in the process). However, the procedures have not necessarily been found to be straightforward or easy to understand.

(ii) Guidance:

3.1.6 The expected level of detail in RSSs is set out in PPS11[4]. RSSs should confine themselves to "matters of genuine regional and, where appropriate, sub-regional importance". Policies may be provided to manage regionally or sub-regionally significant uses and development, and the examples of demand management policies to reduce traffic volumes and housing figures for sub-regional housing market areas are given.

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[4] Office of the Deputy Prime Minister, 2004, PPS11: *Regional Spatial Strategies*

3.1.7 The RSS should address sub-regional issues having regard to two principles:

- The need for a sub-regional approach should be based on an assessment of the functional relationships between settlements. The concept of a "city region" is noted in sustaining economic competitiveness and spreading the benefits of a prosperous city to the surrounding region.

- Sub-regions should be based on a need for policy at that scale which cannot be adequately addressed by general RSS policies or by LDDs on their own. In some cases the RPB may need to encourage joint LDDs, but in others sub-regional policies may be required.

3.1.8 It is up to each RSS to decide how best to take sub-regional matters forward. Areas for policies might need to be defined in relation to the strategic planning issues that need to be addressed. County authorities have a specific role to advise the RPB, recognising the expertise those authorities have had in relation to sub-regional matters. In addition, more complex sub-regional issues may need a sub-regional study to develop proposals.

3.1.9 PPS12[5] encourages joint working on local development documents. Authorities may agree to undertake any of the procedures jointly, but each authority must be able to demonstrate that they have complied with the procedures. In addition, two of the "tests of soundness" refer to the consistency of the plans of adjoining areas:

iv. – it is a spatial plan which is consistent with national planning policy and in general conformity with the regional spatial strategy for the region…and has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas

vi – the strategies/policies/allocations in the plan are coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant.

3.1.10 In its proposals for streamlining LDFs[6], the government intends to amend the process for preparing DPDs and the details of the "tests of soundness". These changes will affect the details of managing the process but not the principle of joint working, and will be articulated in a Manual expected during 2008. The draft revised PPS12, which accompanies the consultation, emphasises the role of local planning authorities as *'place shapers'*, the relationship with Sustainable Community strategies and the requirement for local authorities and their partners to co-operate to agree targets in the Local Area Agreement. Local authorities are enjoined to "explore and exploit" opportunities for joint working on core strategies (para 4.16).

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[5] Office of the Deputy Prime Minister, 2004, PPS12: *Local Development Frameworks*
[6] *Streamlining Local Development Frameworks:* Department for Communities and Local Government, November 2007.

> The guidance follows on from the permissive nature of the legislation, and encourages flexibility. However, national policy is developing: for example, whereas PPS11 sees sub-regions as only filling a gap caused by a deficit of policy, the proposals for the replacement of PPS12 more firmly encourage joint working on LDFs at a sub-regional level.

3.1.11 The importance of a more sub-regional view and joint working at the local level is a feature of other recent planning guidance. Examples can be found in other relevant planning guidance. The following are some of the more recent provisions:

- PPS3 (Housing): The level of housing provision should be determined taking a strategic, evidence-based approach that takes into account relevant local, sub-regional, regional and national policies and strategies. Local and sub-regional evidence of need and demand will be set out in Strategic Housing Market Assessments and land supply in Strategic Housing Land Availability Assessments. RSSs should identify broad strategic locations for new housing developments and particular circumstances across the regional or sub-regional housing markets may influence the distribution of housing development.

- Proposals for a new PPS4 (Sustainable Economic Development[7]): This advocates regional planning bodies and local planning authorities working together on a sub-regional basis. Housing market areas are suggested as the basis for the economic assessment, including joint local planning authority studies to better reflect functional planning areas.

- PPS6: (Planning for Town Centres) sets out the role of RPBs and LPAs in implementing government objectives for town centres by planning positively for their growth and development. Local need assessments should take account of the strategy in the RSS and the catchment areas of each of their centres and catchments of centres outside their boundaries, which extend into their area *'rather than merely focusing on centres within the authority's administrative boundaries'.*

- PPS10: (Planning for sustainable waste management) is written in the context of Waste and Minerals LDFs (where counties and not districts are the responsible authorities outside unitary areas). Tonnages of waste are apportioned in the RSS by waste planning authority area, or to sub-regions comprising more than one waste planning authority where they are working jointly.

- Annex B of PPS11 sets out the requirements, content and procedure for preparation of RTSs. Objectives should reflect the issues and problems specific to functional sub-regions. The RTS should provide a regional and sub-regional transport context for the preparation of LTPs by local transport authorities and LDDs, and a

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[7] *Consultation Paper on a new Planning Policy Statement 4: Planning for Sustainable Economic Development*: DCLG December 2007.

policy framework for the identification of transport priorities at the sub-regional level. There should also be a more consistent approach to accessibility planning at the sub-regional level, to assist a strategic framework for public transport.

- PPS22 (Renewable energy): The RSS should include a target for renewable energy capacity. They may, where appropriate, be disaggregated into sub-regional targets. Criteria-based policies may be across "clearly identified" sub-regional areas.

- PPS25 (Development and flood risk): There are benefits in several authorities joining together to undertake a sub-regional Strategic Flood Risk Assessment. This enables a view to be taken of issues raised by flooding (on river catchment or coastal cell) and to contribute to the Environment Agency's River Basin Management Plans.

> It is clear that the concept of sub-region as a functional area has gained importance in recent planning guidance. It is inevitable (for physical reasons) that the same sub-regions may not always be being suggested, for example a river catchment may not necessarily be co-incident with an economic sub-area. However, the increasing importance of a concept such as housing market area is notable. Inevitably, this means planning across local authority administrative boundaries.

3.2 'Spatial Planning'

3.2.1 There has been a welter of consultation, policy advice and research advocating spatial planning. Some are briefly referred to in the literature review, and we only refer briefly to the main threads here.

PPS1:

3.2.2 PPS1 sets out the overarching policies on the delivery of sustainable development. Paragraphs 30-32 highlight the spatial planning approach, including a simple definition:

3.2.3 *'Spatial Planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they can function'.* (Para.30). Spatial plans are based on:

- Setting a clear vision for the future pattern of development

- Considering the needs and problems of communities

- Seeking to integrate the wide range of activities relating to development and regeneration (co-ordinating strategies and plans).

Shaping and Delivering Tomorrow's Places: Effective Practice in Spatial Planning:

3.2.4 DCLG, RTPI, the Joseph Rowntree Foundation and the Greater London Authority commissioned this report.[8] It sets out to define "spatial planning" by looking at how it is being delivered in RSSs and LDFs. As well as looking at the planners' view of spatial planning, it summarised the extensive public sector reforms that have been rolled out during the first two years or so of the new planning system, including a description of the "place shaping" role set out in the Lyons Inquiry into Local Government (see below). It found that LDFs and other public sector activities are converging at the local level. Whilst many of these will be co-incident with the local authority area (at both district and county levels in two tier areas), wider partnerships are becoming increasingly important to recognise the reality of place rather than historic boundaries. Planning needs to be fully connected with these. This is reflected in the report's main summary of spatial planning (see box below).

3.2.5 The report makes 60 recommendations to support the delivery of spatial planning and for planners and others to meet the challenges of the changes introduced by the new approach to planning.

Extract from summary of the EPiSP Report.

Spatial planning is the practice of place shaping and delivery at the local and regional levels that aims to:
- *Enable a vision for the future of regions and places that is based on evidence, local distinctiveness and community derived objectives;*
- *Translate this vision into a set of policies, priorities, programmes and land allocations together with the public sector resources to deliver them;*
- *Create a framework for private investment and regeneration that promotes economic, environmental and social well being for the area;*
- *Coordinate and deliver the public sector components of this vision with other agencies and processes (e.g. LAAs and MAAs).*

Research and good practice investigations:

3.2.6 The Spatial Planning in Practice research commissioned by ODPM (now DCLG) is a three-year, interactive project to ensure continuous learning and sharing of good practice. It is working with case study authorities to provide reliable evidence that will help in understanding how inclusive and proactive plan making contributes to creating sustainable communities. Several reports have already been published, including one on integration[9]. Strong corporate priorities are important, together with appropriate structures and partnership

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[8] UCL and Deloitte, April 2007, *Shaping and Delivering Tomorrow's Places: Effective Practice in Spatial Planning*
[9] Baker Associates et al' 2006, *Making Timely progress and the Integration of Policy,* DCLG

arrangements. The report notes that the engagement of other sectoral interests in spatial planning is taking time to happen. Connections and engagement with some sectors, for example health, is often still to be established.

3.2.7 The report did find examples of cross-boundary working, sharing ideas and information, development of an evidence base, the preparation of sustainability appraisal and development control policies. It makes the point that shared effort, including cross boundary working by a combination of planning authorities with complementary interests, presents great opportunities with potential resource savings as well as greater planning creativity and with the greater prospect of developing genuine strategic responses to spatial issues. The report considers that local authorities should be very positive in exploiting opportunities. Savings can be made from sharing work between authorities and others, particularly in the preparation of evidence and where there is a significant amount of common material. It is also desirable to look across administrative boundaries in making plans. This can be through collaborating to achieve complementary strategies or preparing joint LDDs for functional settlements that cross boundaries, or for urban extensions required to implement the Regional Spatial Strategy.

3.2.8 Other good practice has been reported through the activities of the Planning Officers Society working with case study authorities, and the Planning Advisory Service. Reports on all these initiatives are available on the PAS web site[10]. These include advice on aspects of preparing LDDs, including Core Strategies, and papers on collaboration, linking spatial planning and the sustainable community strategy, and putting planning at the centre stage of local authority activity.

The Planning White Paper:

3.2.9 The Planning White Paper[11] reviews progress made in reforming the planning system and looks to the challenges of climate change, economic development, housing supply, the environment, infrastructure and energy. It responds to Kate Barker's Review of Land Use Planning and proposes further reforms. As well as a clearer approach to national infrastructure, the White Paper proposes devolution of decisions to local authorities. The policy has been reflected in the proposals to strengthen sub-regional planning, already underpinning PPS3 (Housing) and trailed for the new PPS on economic development (noted above).

3.2.10 The White Paper sets out a desire to incentivise joint working between local planning authorities on plan making "because the geography of housing markets or functional economic areas are rarely confined to administrative boundaries". It will be important to identify opportunities for joint plans, notably joint core strategies, as part of developing sub-regional and city region approaches. Through the plan-making

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[10] www.pas.gov.uk
[11] Secretary of State for Communities and Local Government et al, May 2007, *Planning for a Sustainable Future*:

process (and the grant system) towns and cities or other sub-regional areas will be encouraged to work together where there are benefits from a cross-boundary approach.

> The key concepts running through the development of planning policy are <u>integration</u> and <u>collaboration</u>. These underpin many of the activities of those involved in rolling out the new planning system and researching into its effectiveness. Authorities need to work across sectors, between departments and with other stakeholders and the community in securing sustainable development. It follows from this that areas meaningful to the planning task need to be considered – no partner or authority can work in isolation.

3.3 Other related policy

The Lyons Inquiry into Local Government

3.3.1 Sir Michael Lyons' inquiry into local government[12] looked for a wider, strategic role for local government. He called this 'place-shaping' – the creative use of powers and influence to promote the general well being of a community and its citizens. It includes the following components:

- building and shaping local identity;

- representing the community;

- regulating harmful and disruptive behaviours;

- maintaining the cohesiveness of the community and supporting debate within it, ensuring smaller voices are heard;

- helping to resolve disagreements;

- working to make the local economy more successful while being sensitive to pressures on the environment;

- understanding local needs and preferences and making sure that the right services are provided to local people; and

- working with other bodies to response to complex challenges such as natural disasters and other emergencies.

3.3.2 His main conclusions were a need for:

- clearer accountability over who is responsible for what;

- greater flexibility, both over finances and to enable local government to manage local services in response to local needs;

- better incentives on local government to own and grow their tax bases and on both central and local government to develop a more productive relationship over time;

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[12] The Stationery Office, 2007, *The Lyons Inquiry into Local Government*,

- tackling perceived unfairness, in order to improve satisfaction and trust in the system of local government as a whole; and

- continued improvements in efficiency to help relieve pressures on council tax under the current system.

3.3.3   He observed that local government has an important role to play in fostering economic prosperity, and balancing it with the need for environmental sustainability. Much of what is needed revolves around local authorities' own sense of powerfulness and place-shaping role, and their ability to build coalitions with neighbouring authorities and others.   He suggested that Government can support this through ensuring that the Sub-National Economic Development and Regeneration Review and the Comprehensive Spending Review bring forward proposals for the devolution of resources and powers to local authorities working across sub-regional areas and with regional bodies (paragraph 10.24).

3.3.4   He warned against poorly developed or executed change in local authority structure, with special reference to two-tier areas, but advocated putting a much stronger emphasis on the responsibility of authorities to develop effective and flexible coalitions which transcend boundaries, and to seek joint solutions to problems where those offer potential advantages.   Nevertheless, he agreed with the Government that improved joint working is needed in two tier areas and that authorities in these areas need to aspire to operate as 'virtual' unitaries with greater efficiency through shared back office functions and integrated service delivery mechanisms.

The Local Government White Paper:

3.3.5   The Local Government White Paper[13] encourages more joint working, with particular emphasis on the development of Local Area Agreements, Multi Area Agreements and more effective integration with Sustainable Community Strategies.   As part of their place-shaping role, local authorities will have increased roles in the preparation of Sustainable Community Strategies and Local Area Agreements. Included in this is the duty for partners to co-operate with each other. These partners include bodies whose geographical extent may be wider than that of the local authority.

3.3.6   In cities, the development of Multi Area Agreements is to be developed to facilitate greater cross-boundary collaboration, particularly on key economic development issues.   Passenger transport responsibilities will be reformed to enable a more coherent approach.   The White Paper points to city regions (like Manchester), medium sized cities and surroundings (such as Partnership for Urban South Hampshire), and other medium sized cities working in partnership with their surrounding areas (such as Oxford).

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[13] DCLG October 2006, *Strong and Prosperous Communities: The Local Government White Paper*

3.3.7   The White Paper points out that local authorities often need to work across boundaries and with regional partners to increase economic development. In offering more powers to local government to integrate planning, community planning and housing, and undertake infrastructure planning, it recognises that some small districts may have issues of capacity. It encourages combining expertise at sub-regional level.

3.3.8   In parallel with these changes, there has been a move to create more unitary authorities in order to reduce a "tier" of government, provided various criteria are met. Following a consultation process, the government has[14] signalled its intent to create several unitary authorities. However, even where unitaries are not being pursued, all the councils concerned are enjoined to put in place new collaborative ways of working together. The aim is to secure thereby the efficiencies of the highest performing unitary councils.

The Eddington Transport Study

3.3.9   Sir Rod Eddington was jointly commissioned by the Chancellor of the Exchequer and the Secretary of State for Transport to examine the long-term links between transport and the UK's economic productivity, growth and stability, within the context of the Government's broader commitment to sustainable development[15]. He recommended that the strategic economic priorities for long-term transport policy should be growing and congested urban areas and their catchments; and the key inter-urban corridors and the key international gateways that are showing signs of increasing congestion and unreliability. These are the most heavily used and economically significant parts of the network. Government needs to ensure the delivery system is ready to meet future challenges, including through reform of sub-national governance arrangements and reforming the planning process for major transport projects by introducing a new Independent Planning Commission to take decisions on projects of strategic importance. Government was therefore requested to consider the case for reform of sub-national decision making, so that sub-national bodies have the right geographical scope, powers and responsibilities.

Proposals for transport governance:

3.3.10 The government has stated[16] that current arrangements for the administration of statutory transport functions do not work as well as they might. The existing legislation relating to local transport governance in cities needs to be updated to reflect changing patterns of transport needs and use and to encourage strategic decisions on

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[14] Department for Communities and Local Government, 25 July 2007, *Statement on Local Government*

[15] HM Treasury and Department for Transport, 2006, *The Eddington Transport Study*,

[16] Department for Transport, May 2007, *Strengthening Local Transport – the draft Local Transport Bill consultation*

roads and public transport to be taken together. Proposals have been made for city regions and potentially other areas, to review and propose their own changes to existing governance arrangements. Structures should reflect what works best locally, but in metropolitan counties integrated strategy and implementation plans need to be provided. These could build on arrangements already being made, for example in Greater Manchester where units provide city-wide data and scheme planning, and the Solent Transport Partnership in South Hampshire to improve co-ordination of services, and to put in place voluntary working arrangements to improve the transport network.

3.3.11 Joint Local Plans exist mainly within the PTE areas (South Yorkshire, West Yorkshire, Greater Manchester and West Midlands), although also between some counties and unitary authorities (in Lancashire, the East Midlands, Bedfordshire and Dorset) and between four unitary authorities in the West of England (See Appendix 4). The new 10-year timescale for Local Transport Plans will increasingly demonstrate the need for more effective co-ordination with spatial plans, as the planning horizon for transport moves beyond committed land-use changes and needs to consider the implications of medium-term development proposals in Local Development Documents.

The Housing Green Paper

3.3.12 Tackling the under-supply of housing and lack of affordability has become a national priority. PPS3 and succeeding guidance documents has focused the efforts of planners on understanding housing market areas and delivering more housing and sustainable communities. The Housing Green Paper[17] also looks at delivering more homes through an expansion of the growth area and growth point programmes, and through new "eco-towns". The areas involved vary considerably in size.

3.3.13 Local authorities are urged to build up their strategic housing role. However, housing markets do not respect local authority boundaries, and the government expects "joint working, in sub-regional groups of local authorities, to be the norm". Either statutory (as proposed in the Sub-National Review) or voluntary groups will be established. In delivering housing, local delivery vehicles can bring several authorities together to plan, manage and deliver housing and infrastructure.

The Review of Sub-National Economic Development and Regeneration:

3.3.14 This review[18] considers regional and sub-regional arrangements, and highlights the potential to allow groups of local authorities to establish

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[17] Department for Communities and Local Government, July 2007,*Homes for the Future: more affordable, more sustainable*
[18] HM Treasury, Department for Business Enterprise & Regulatory Reform and Department for Communities and Local Government, July 2007, *Review of Sub-National Economic Development and Regeneration:*

statutory sub-regional arrangements that enable pooling of responsibilities on a permanent basis. Decision-making needs to be based on functional sub-regions rather than local authority boundaries. Co-operation between local authorities across the wider area in which key economic markets operate can therefore help improve economic decision-making. Economic impacts often go beyond the level of individual local planning authorities and it is therefore vital that there is close co-operation when planning for developments that may have an impact on a wider economic area. It claims that better decision-making for policies such as transport, planning and regeneration at the city-region level would be likely to support economic growth.

3.3.15 In advocating working at a sub-regional level, the review notes that accountability arrangements need to be robust at sub-regional levels if policy responsibilities are to be managed effectively. It suggests specific measures, for example pooling resources, responsibilities and targets at the sub-regional level, and supporting the development of robust decision-making. The duty to co-operate will assist, whilst a long-term delegation of RDA spending programmes to local authorities or sub-regions is a possibility.

3.3.16 The review states that the government will encourage further joint working as has already been developed for example in Northamptonshire so that other sub-regions gain the benefits of taking account of the impacts of land use planning across the spatial areas where those impacts occur. The role of sub-regions in developing regional strategies and plans can also be strengthened.

3.3.17 Governance is an important consideration. It is suggested that some sub-regions may wish to establish permanent structures at the sub-regional level, in order to bind in the relevant local authorities to long-term decision-making. There may also be benefits in pooling responsibilities for other policy areas such as planning and housing at the sub-regional level. Clear, transparent and accountable governance arrangements would be needed in order to ensure effective decision-making. Statutory sub-regional authorities (beyond what is being developed for transport) are also a possibility.

3.3.18 In December 2007, DCLG published a statement on taking forward the sub-national review[19]. Primary legislation is expected in 2008. In advance of legislation, there will be consultation on how the government intends to implement the SNR proposals.

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[19] DCLG December 2007, *Taking forward the Review of Sub-National Economic Development and Regeneration*

Implications:

All these reports suggest a consistent move towards integration and collaboration, including an underlying theme that areas for which decisions are being made should be coherent in terms of their function and community and stakeholder relations. Methods of working, and to some extent structures, need to adapt to the new understanding of sustainable economic development and "place shaping". Not all the reports are explicitly directed at regional or local planning, but the implications can be clearly discerned (as has been shown in the study for the RTPI).

Nevertheless, none of these reports can be said to give an entirely consistent view of a "sub-region" in the delivery of national and regional policy, although there is a common assumption that joint working and a sub-regional approach (however defined) is the way forward. Neither do the policy documents give a comprehensive analysis of regionalism, although the main driver currently is the maintenance of economic growth and the facilitation of this through various measures, including planning.

Underlying the direction of national policy is the desire for solutions to be sought through local agreement, rather than be centrally imposed. It could be argued that the regional and local planning reforms facilitate this through the concept of spatial planning and the inherent flexibility of the forward planning arrangements possible in any locality. For this to be effective, however, there needs to be clarity in approach, with decisions based clearly on evidence of how the area functions, is governed, and its relations with the communities it serves.

4 DEFINITION OF SUB-REGIONS

4.1 Analytical Approaches

4.1.1 Appendix 3 contains a summary of analytical approaches to the definition of sub-regions and some approaches in current practice, with views of officers of Regional Planning Bodies (from our questionnaire survey) about the main influences on sub-regional definitions in Regional Spatial Strategies.

4.1.2 There is an extensive literature on the definition of sub-region. Some recent academic and policy papers are listed in the bibliography to this report.

4.1.3 Some of the defining concepts are from urban economics and location theory; based on market areas for labour, housing, or other goods or services; and defined according to significant degrees of self-containment.

4.1.4 Analysis of **sub-regional markets** often focuses on economic performance and perceived competitive advantages, derived from specialisation, 'clustering' or 'agglomeration' economies in skills or other resources. International comparisons are often made of sub-regional economic performance, with 'league tables' for output, productivity, innovation or other indicators.

4.1.5 The POLYNET study[20] drew attention to complementary relationships between **functional urban regions** within the London and South East *Mega City Region*; suggesting a need for policies that emphasise integration rather than competition between sub-regions that have different economic strengths.

4.1.6 PACEC's research for the LGA[21] found that, although sub-national economies tend to be sub-regional rather than regional, there is only limited data on **supply chains** at a sub-regional level. In cases such as retailing, leisure or health facilities, catchment areas are often defined according to major facilities rather than wider patterns of interaction at the sub-regional level. In some industries self-containment is low even at the regional level.

4.1.7 PACEC applied various criteria and data to produce a wide range of possible sub-regions before combining data on labour markets, migration and markets for goods and services, to generate a 'preferred map' of 50 sub-regions which was then analysed against a number of economic performance indicators. A map of their sub-regions is reproduced in Appendix 6. It shows that some are wider than RSS sub-regions, but others are smaller (e.g. Urban South Hampshire is split between the Portsmouth and Southampton City Regions).

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[20] Hall P and Pain K, 2005
[21] Local Government Association 2007/02; PACEC, 2007/01 and 2007/02

4.1.8 **_Travel to Work Areas_** are important building blocks in the definition of sub-regions. They are based on clear and objective statistical criteria rather administrative boundaries: areas, with a minimum working population of 3,500, where 75% of the resident population works in the area and 75% of the working population lives in the area. They vary considerably in size. The largest extends beyond the Greater London Area, although many are smaller than sub-regions that have been defined for spatial planning or other purposes. They are also subject to review as the criteria are affected by changes in the economy and travel patterns.

4.1.9 **_Housing Market Areas_** are an increasingly important dimension of sub-regional spatial planning and are also influenced by journey to work patterns, but also patterns of migration and characteristics of the housing stock (especially price and affordability). One definition of a sub-regional housing market is '*Typically …an area in which some 70% of all household moves are contained, excluding long distance moves which are associated with a major lifestyle change….*'[22] In the East Midlands Regional Spatial Strategy, housing market areas were used as policy areas. The South West Panel used them to structure the examination and their report and recommended they be used for housing allocations in the approved strategy.

4.1.10 **_City Regions_** have been examined in some detail in recent years, especially in the research of Professor Michael Parkinson for the Government and the Core Cities Group.[23] Some of his conclusions are summarised in the statement: *"...the evidence from continental Europe is that increasingly the city is regarded as too small and the region too large a platform on which to base economic competitiveness. The trend is to develop city-regional solutions…"*[24]

4.1.11 The work on city regions has addressed questions of international economic competitiveness, sub-regional governance, financial devolution and the appropriate scale for public policy interventions. A wide range of research has been undertaken on definitions of city regions in terms of flows of workers, goods and services and in terms of other economic linkages. Comparisons of economic performance have been made with other European regions. This research has highlighted the importance of the economic performance of large cities to the national economy and to their surrounding sub-regions: *'in our study there were no successful urban regions which did not have successful cities at their core. The regions which performed well were those where the core city performed well – and vice versa.'*[25]

4.1.12 The importance of city regions has been taken up by the Government in discussions with the *Core City Regions*, which ultimately resulted in

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[22] East Midlands Regional Assembly and East Midlands Regional Housing Board, April 2005, '*Identifying the Sub-Regional Housing Markets of the East Midlands*'
[23] See especially references in the bibliography for the Core Cities Group, Parkinson M (2003-2007) and Marvin S, Harding A, Robson R et al (2006/02)
[24] Parkinson et al., July 2003 (*Final Report to the Core Cities Working Group*)
[25] Parkinson M et al 2004/01

proposals for sub-regional devolution in the Review of Sub-National Economic Development and Regeneration.[26]

4.1.13 Eight city regions were placed at the heart of *The Northern Way*, the pan-regional economic strategy of the three northern region development agencies. They were shown on the regional strategy map with 'fuzzy' boundaries, but were defined for working purposes on the basis of travel-to-work areas around whole local authority areas, including some that had previously operated as metropolitan counties (e.g. Greater Manchester) and others that were formed specifically for the purpose (e.g. Central Lancashire).

4.1.14 Some sub-regional partnerships have been formed to promote **shared objectives** between areas that do not form a contiguous sub-region, although they are in the same region. *Regional Cities East* is a partnership between Peterborough, Luton, Ipswich, Norwich, Colchester and Southend-on-Sea who, as medium-sizes cities in the Eastern Region, have shared objectives for economic growth, improved infrastructure and skills and are collaborating on joint ventures and sharing best practice. The five *Haven Gateway* ports of Felixstowe, Harwich international, Harwich Navy Yard, Ipswich and Mistley have also formed a partnership as an economic cluster.

4.1.15 **Historic and cultural traditions** are less prominent than economic considerations in the literature about defining sub-regions, although it is clear that a sense of sub-regional identity may be as important as economic linkages or shared policy objectives. In some cases a county area or former county area provides a clear identity for a sub-region (e.g. the historic county of Berkshire or the more recently created and disbanded metropolitan counties or counties of Avon, Cleveland and Teesside).

4.1.16 The County Surveyors and Chief Economic Development Officers have drawn attention to the **county dimension** of sub-regionalism.[27] County Councils are heavily involved in sub-regional initiatives and partnerships in areas with two tiers of local government. Sub-regional working is also common between counties and unitary authorities that were formerly within the county, where the urban area boundaries are often 'under-bounded'. In the South West RSS, a grouping of Camborne/Pool/Redruth, Falmouth-Penryn and Truro (the Cornwall Towns) has, in effect, been designated as a sub-region using different terminology. Although the Cornish towns have shared economic and locational challenges, the treatment of Cornwall in the RSS also appears intended to underline the county's distinctive identity. In the latest round of local government re-organisation some new unitary authorities (such as Cornwall) will maintain (or largely maintain in the case of Wiltshire) the historic identity of a county area.

4.1.17 **Devolution and governance** at the sub-regional level has been a focus of interest for organisations like the Local Government

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[26] HM Treasury (with BERR and DCLG), July 2007
[27] County Surveyors Society, 2004/10, *England's County Sub-Regions – Cornerstones of Economic Growth*

Association and New Local Government Network and is now the subject of proposals for change by the Government following the Sub-National Review. Questions include the appropriate levels at which decisions on public policy, expenditure and taxation or revenue raising should be taken; whether policy interventions and expenditure can be co-ordinated more effectively at sub-regional level; and whether devolved decision-making would encourage more effective leadership and wider participation in local democracy.

4.1.18 The devolution process is now progressing through the medium of *Multi-Area Agreements*, which seem likely to be for groupings of whole local authority areas. The first 13 areas that have been announced to develop MAAs generally feature as sub-regional divisions in Regional Spatial Strategies. If this approach develops more generally, it will be necessary to consider whether areas with MAAs should always be recognised in the RSS. There may be tensions between the need for MAAs to be based on administrative areas and functional approaches to defining sub-regions.

4.1.19 The concept of a city region containing core cities has become well established in the regions not dominated by London, although the boundaries are fuzzy. They are not themselves "sub-regions" but are an important input into the sub-regional debate. A strong case is being made for delivery at a "sub-regional" scale, i.e. above that of individual (mostly unitary or lower tier) local authorities. In the past, the county scale has represented strategic matters, notably highways and structure planning, but traditional boundaries are often no longer relevant to how economies function, and the role of individual county councils may vary. Proposals for devolution may need to build on historic groupings (where they are still relevant) but recognise that functional relationships may be of growing importance.

4.2   Sub-Regions in the Regional Spatial Strategy Reviews

4.2.1   Appendix 4 contains an account of the various approaches to sub-regional definition, spatial strategy and planning policy that appear in the current round of RSS reviews, with the comments of examining Panels and changes proposed by the Secretary of State, where applicable.

4.2.2   Some of the reasons for differing approaches are explored in the next section, based on the questionnaire survey of Regional Planning Bodies. They include the different sizes of the regions, the diversity of settlement patterns, national planning policy, previous regional and sub-regional strategies (including structure plans), the advice of Section 4 (4) authorities and the activities of different kinds of sub-regional partnership.

4.2.3   It is important to remember how widely English regions vary in size. Populations vary from 2.26m in the North East to 8.24m in the South East. They also vary widely in land area, with the North East covering

an area of only 8,573 sq. km compared with 19,200 sq. km in the South East. Population densities therefore also vary. The South West has the largest land area of the English regions (23,829 sq. km), extending some 350 km from the south west tip of Cornwall to the northern border of Gloucestershire and is one of the more diverse regions, with the lowest overall population density, but also major conurbations.

2006 Population Estimates:

	2006 Population	% England Total
South East	8,237,800	16%
London	7,512,400	15%
North West	6,853,200	14%
East of England	5,606,600	11%
West Midlands	5,366,700	11%
Yorkshire and the Humber	5,142,400	10%
South West	5,124,100	10%
East Midlands	4,364,200	9%
North East	2,555,700	5%

Source: ONS Mid-Year Population Estimates (Crown Copyright)

4.2.4   Patterns of urbanisation vary widely and the influence of large cities extends across regional boundaries. The inter-regional, City-region approach to spatial planning of local authorities and regional development agencies in the northern regions, through the *Northern Way,* has been an important influence on the northern Regional Spatial Strategies and has had an influence on adjoining regions. However, the North East RSS also identifies the distinct and varied needs of the rural areas and the North West RSS adopted a sub-regional framework that covered the whole region to define sub-regional divisions outside the city-regions (and is working on a trans-national sub-regional spatial strategy for West Cheshire and North Wales). In the Yorkshire and Humber Plan, sub-regions also covered the whole region to highlight different policy priorities for the City Regions, York, the Humber estuary, and other coastal and rural areas.

4.2.5   In general, there have been widely varied approaches to the definition of sub-regions and the content of spatial strategies – both between regions and within them. In the East of England, there are no large conurbations, but a number of medium-sized cities and towns that share similar challenges, extensive rural areas and the growth area of the Thames Gateway. Perhaps it was because of this diversity that the approach of the draft RSS raised questions, at the EiP and afterwards,

about the appropriate levels of detail for sub-regional policies in a Regional Spatial Strategy.

4.2.6 In the East Midlands, the *Three Cities* and their surrounding county areas are still significant sub-regional entities, although joint working between them is also important. There are also cross-regional links through the *Northern Way* in the north and the *Milton Keynes South Midlands Sub-Region* in the south and other sub-divisions, such as Lincolnshire and Rutland and the Peak Park. A distinction was made between sub-area policies and sub-regions requiring spatial strategies.

4.2.7 The West Midlands conurbation may be seen as one large city-region encompassing Birmingham, Coventry and the Black Country. However, the RSS review has taken a phased approach focusing initially on the Black Country, following the requirement of RPG11. The second phase work on spatial options has proposed a second city-region for Stoke and North Staffordshire and a number of sub-regions based on housing markets have been identified.

4.2.8 Within the South East there is a wide diversity of sub-regions. Although there are 9 or 10 sub-regions, they do not cover the whole region. Some follow from the *Sustainable Communities Plan*; others appear to reflect more localised interests and the advice of Section 4(4) authorities. There are differences in approach to the definition of sub-regions – some detailed; others broad-brush – and different approaches to the scope of policy and the levels of detail within the sub-regional strategies. Many districts are split between sub-regions and 'rest of county' areas.

4.2.9 The diversity of the South West region is reflected in the variety of sub-regional approaches in the draft RSS, which were based mostly around the main urban areas, but also paid attention to the Cornish towns. Different *strategic emphases* were also said to apply in different parts of the region (which the Panel recommended should be two rather than three). However the Panel focused on Housing Market Areas as useful sub-regional divisions for a variety of spatial policies.

4.2.10 The current round of Regional Spatial Strategies, Panel reports and Secretary of State's modifications has raised a number of general questions. These questions include how much sub-regional spatial policy should be within the RSS and how much should be left for LDDs (including joint working on LDDs or joint LDDs). A related issue is the degree of locational specificity that should be included in the RSS. These questions were raised, in particular by the East of England and East Midlands plans. Attention has been drawn to the guidance in PPS 11 paragraphs 1.13 to 1.17 and particularly advice that *'the sub-regional definition should be based on a clearly recognisable 'strategic policy deficit' which cannot be adequately addressed by general RSS policies or by LDDs on their own.'*

4.2.11 Some participants in the process have suggested that sub-regions should be identified in RSS for the purposes of ensuring the delivery of national planning objectives and the implementation of the regional spatial strategy – rather than to fill a notional policy deficit. A focus on

delivery raises questions about the continuing roles of the sub-regions that are identified in the RSS: for joint working on core strategies and area action plans; and for partnership working on transport and infrastructure plans and their funding, including operation of the forthcoming Community Infrastructure Levy. Related questions are how sub-regional strategies within the RSS should relate to, or seek to influence, partnership structures at the sub-regional level.

4.2.12 We have the impression that the current round of RSSs are somewhat transitional, building on the previous RPGs, the legacy of structure plans and advice from structure plan authorities, but taking steps to incorporate new policies (especially city regions and growth plans from the Sustainable Communities Plan) and, where the evidence suggests it, changes in the direction of strategy to meet the needs of particular parts of the region.

4.2.13 Sub-regions are likely to vary considerably in size and function. Analytical methods may be valuable to describe the region, define sub-regions and formulate policy. However, there are limitations in data and in the relevance of relying on economic market information in all sub-regions. Economic analysis needs to be balanced against other considerations, including governance arrangements and identifying areas that are meaningful to their residents. Market areas for housing and employment will change within a reasonable planning period in response to the economy and transport accessibility. They may also be influenced by spatial strategies and should not therefore be seen as a fixture for the long term.

4.3   Current Practice:

4.3.1   Appendix 5 contains a fuller summary of the responses we received from Regional Planning Bodies on the approaches taken to define sub-regions in Regional Spatial Strategies. A summary of the questionnaire is in Appendix 2.

4.3.2   Overall, the results confirm that there is a great diversity in the approach to the definition of sub-regions. Different drivers are important in different regions and within regions. It appears from these results that – from the RPB's viewpoint – there are a range of influences bearing on the definition of sub-regions in general, and some highly specific ones, related to the circumstances of each sub-region. The replies to the question asked about the *"most important influence"* show a wide range of responses highlighting such drivers as:

- Policy deficiency needing to be filled (in some cases needing analytical work to provide evidence)

- Need for spatial strategy where little existed before

- Incorporation of new policy initiatives (e.g. implications of Northern Way)

- Articulating the Core City/City Region concept

- Role of partnerships and development of joint working, including recognition of where there is a dynamic for change

- Opportunity to rethink previous RSS assumptions in light of new policy demands.

- Need to give recognition to specific circumstances (for example rurality or remoteness)

4.3.3 There are clearly variations between regions. The influence of the City Region concept is strong in the northern regions, and the influence of growth areas is strong in the south, but even allowing for this there is no "one size fits all" approach to sub-regions. In some of the comments offered, there is recognition that the current sub-regional pattern does not match functional areas.

4.3.4 We also asked about the use of **analysis of sub-regional structure**, function or political processes in preparing the current RSS. The replies are generally on the use of such studies in RSS preparation (rather than specific sub-regional studies) that may have contributed to knowledge of sub-regions.

4.3.5 The most commonly used studies were recorded as:
- Economic development
- Trends
- Deprivation
- Constraints
- Environmental (linked with Sustainability Appraisal and Habitat Regulations Assessment in RSS preparation).
- Role of climate change (as an example of scenario building)
- Transport

4.3.6 Other analysis reported as being used in some regions included:
- Comprehensive spatial analyses based on GIS.
- Housing – market and capacity analyses (including some early work on Strategic Housing Market Assessments).
- Retail – not universal coverage
- Regional leisure – e.g. casino studies, but little on leisure generally
- Policy constraints – green belt etc is an issue in some sub-regions
- Biodiversity, water quality – not universally noted (although the role of the Sustainability Appraisal may not have been recognised)

4.3.7 No region reported any analysis of either Health or Education matters which raises questions about the scope of the RSS as a spatial plan, but (as suggested in our workshops) may be a function of the split of responsibilities and the short-term nature of policy in these sectors.

4.3.8 There was a very mixed and limited response on how studies were used to consider the structure of the region, define sub-regions or

develop sub-regional strategy, suggesting that analysis of functional sub-regions played only a limited role in the development of policy,

4.3.9 Questions 3 and 4 asked about the main ***processes involved to secure agreement on the sub-regions and any changes from consultation.*** Responses varied from no explicit consideration to asking Section 4 (4) authorities for advice and commissioning studies from them. Where relevant consultation had been undertaken, four regions out of the six who responded had made changes.

4.3.10 Question 5 asked about ***the scope of policy and level of detail***. Responses showed a high level of diversity. However, some general themes were:

- The scope of policy is related to what the sub-regional approach sets out to do in respect of different sizes of settlements.

- A different approach is necessary where there is overall coverage of sub-regions in the RSS

- City regions need a different level of policy than a smaller rural area, even though there may be an overall template for the policy subjects covered in the RSS

- Specific policy need is very important, either to fill perceived policy deficiency (in the PPS11 sense) or to reflect particular needs, e.g. for specific growth areas

4.3.11 Where there are formal arrangements for joint working among local authorities, more detail may be left to the local authority level once sub-regional guidelines have been agreed (although in some cases, the extent of change itself may suggest more policy in the RSS).

4.3.12 Question 6 raised the issue of ***continuing planning and delivery arrangements*** at the sub-regional level and question 8 asked about ***likely future changes to sub-regions in future reviews***. Generally, sub-regions (where articulated in the RSS) were expected to be the basis for future consideration, but the extent to which this is reflected in either joint or aligned LDFs, or in other delivery vehicles is unclear. There has been some progress on joint LDF work, but in some areas (where more radical changes from traditional "sub-regions" are proposed) it is likely that much will continue to be managed on the old basis.

4.3.13 Uncertainties about the future that were noted were:

- Local government reorganisation and the prospect of unitary authorities

- The degree of change that might be needed to the relationships between traditional groupings of authorities, particularly geographical counties, especially if functional sub-regions in the RSS are found to be significantly different

- The implications of the SNR.

4.3.14 Despite these uncertainties, several very positive thoughts were offered:

- Encouragement for the development of joint LDF activity

- Need for recognition of a "common geography"

- Need to integrate with the forthcoming single regional strategy

- Value of government funding and facilitation (through delivery arrangements, including planning structures) to hasten the process

- However, the establishment of a spatial vision amongst different stakeholders will take time and resources

4.3.15 Overall, there was a recognition that rational geography would need to co-exist with the realities of what one RPB described as "geopolitics" in the development of sub-regional arrangements, and a call for the maintenance of flexibility to develop approaches applicable to each region.

4.3.16 Question 7 requested information on **collaborative arrangements in local authorities**. This drew a mixed response – some RPBs provided examples of known arrangements, but others confined remarks to a general view about their desirability. Where information was provided, we followed it up by sending out invitations to a workshop or to contribute to the local authority / partnership questionnaire. Section 6 below discusses the arrangements developing at the local level.

4.3.17 The process of defining sub-regions in RSSs seems to have been a combination of information about functional relationships, the starting point of previous RPGs and the political and institutional relationships current in the region. At this stage in the preparation of new RSSs, different influences seem to have been at work both in different regions and in some cases different parts of the same region. It is therefore not possible to perceive a consistent pattern, although the varying influence of the drivers can be examined to greater or lesser extent in any particular area.

4.3.18 The responses to our enquiries suggests that the current RSSs are on a path to being more "spatial" (in the sense of the culture change contained in PPS1) but still have some way to go. There are opportunities through both the proposals for the SRS and the implementation of the new delivery arrangements (especially MAAs) for the scope of the RSS (and its successor) to fulfil a wider role. These will need to be reflected in activities and strategies at the local authority level, including joint LDFs.

4.3.19 There have been differing opinions on how much sub-regional policy should be included in RSS and how far the RSS should go in prescribing the need for joint working on Local Development Documents. In our view, this has so far been constrained by the relatively tentative progress on joint working on LDFs, which may not be surprising given the steep learning curve that has attended the introduction of the new local planning system.

5   SCOPE OF SUB-REGIONAL POLICY

5.1   The need for sub-regional spatial policy

5.1.1   The Government's approach to Regional Spatial Strategies set out in PPS11 builds on the general principles spatial planning in PPS1. Spatial planning is expected to go beyond traditional land use planning: to integrate policies for the development and use of land with other policies and programmes that influence places and how they function.

5.1.2   Since PPS11 was written, the understanding of spatial planning has developed, especially in the delivery of planning at the local level, where integration is strongly promoted. Although PPS 11 notes that RSS policies have to be related to the development and use of land within the region under section 1(2) of the PCPA, they should not be restricted to policies that can be implemented through the grant or refusal of planning permission.

5.1.3   The scope of sub-regional policy within Regional Spatial Strategies is defined partly by legislation and guidance, and partly through practice based on the status of RSS as part of the statutory development plan. PPS 11 refers to the culture change that is intended to be part of the new spatial planning system, including partnership working, integration with other strategies and sustainable development.

5.1.4   One of the 'main principles' of RSS described in PPS 11 is *'making the RSS more regionally and sub-regionally specific with a focus on implementation…'* although *'the RSS should confine itself to matters of genuine regional and, where appropriate, sub regional importance. Policies in the RSS will need to be sufficiently detailed to provide clear guidance for LDDs, LTPs and/or other regional or local strategies and programmes. However, it is important that they strike the right balance between providing a clear strategic framework and avoiding unnecessary or inappropriate detail....'* [28]

5.1.5   Questions of locational specificity and integration with other strategies have been important in defining the scope of sub-regional policy in Regional Spatial Policies. Emerging Regional Spatial Strategies, Panel Reports and the questionnaire responses and workshops of this study show varied approaches to the scope of sub-regional planning. Examples include the approach to housing figures for sub-regions or housing market areas rather than districts (or more usually as well as districts) and the treatment of separate spatial strategies. Sub-regional spatial strategies contain varying levels of detail, for example, on the roles of settlements, economic development objectives, infrastructure requirements or environmental designations.

5.1.6   PPS 11 also sets out some 'key principles' for *the RPB, in consultation with LPAs and other stakeholders to identify the circumstances in*

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[28] ODPM, 2004, *Planning Policy Statement 11: Regional Spatial Strategies*, paragraphs 1.1 and 1.5

which a sub-regional approach to spatial policy development is required.' [29]. They include functional relationships between settlements, planning issues that cut across administrative boundaries, economic 'clusters' and city-regions. *'Sub-regional definition should be based on a clearly recognisable 'strategic policy deficit' which cannot be adequately addressed by general RSS policies or by LDDs on their own...'* PPS 11 makes a distinction between splitting a region into sub-regions *'for the purposes of developing distinct sets of policies for each sub-region'* and for the purposes of distributing housing or employment. It also points out the exceptional need for a *'non-statutory sub-regional framework* where strategic issues cut across regional boundaries (as in some of the Communities Plan Growth Areas).

5.1.7 Sub-regional policies are expected to be common in RSSs, either because of the need for strategic guidance or because strategic issues cannot be tackled through a joint LDD though, as will be seen below, there may be more scope than envisaged for joint LDDs and the SNR speaks of sub-regional administrative arrangements. It will be interesting to see what changes (if any) will need to be made to PPS11 in the light of the Single Regional Strategy.

Implications:

Questions raised in this study include whether a more wide-ranging view of sub-regional spatial planning is now required and whether there are justifications for a sub-regional approach other than a 'policy deficit', such as the need for coordinated, joint working on implementation. Policy on spatial planning has firmed up in the few years since it was introduced, and there is a case for a revision of PPS11, including more on the importance of sub-regions and their relationships with community and infrastructure planning and delivery. Revisions to PPS 11 could be used to promote a more positive view of sub-regional planning, without the need for legislation.

If there is a wider role for sub-regions, then this will need to be matched by work on evidence, analysis and monitoring. This is already the direction of guidance on housing market areas, employment and transport in major urban areas. Sub-regional studies, and, where contributing to the development of policy, non-statutory frameworks will be important in forming a bridge between the RSS and the LDFs. Such collaborative working may assist in establishing a sense of identity in the sub-region and be the basis for sub-regional; partnership and joint LDF activities.

5.2 Sub-regional partnerships

5.2.1 Evidence of a culture change and a new 'spatial planning' approach is less apparent in the first round of RSS reviews than perhaps PPS 11 envisaged. This may be because the first round was a transitional

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[29] ibid, paragraph 1.13

phase, prepared under new procedures, with new organisational arrangements and challenging programmes. The scope of non land-use policy is therefore limited in sub-regional spatial strategies within RSS, although there are sometimes sub-regional partnerships in place that are actively engaged in economic development, housing, transport, urban regeneration, infrastructure planning and funding bids, and other sub-regional strategy documents outside the RSS.

5.2.2 In some cases, pre-existing sub-regional partnerships played an important part in shaping sub-regional policies in the RSS through' advice' to the Regional Planning Body, 'arrangements' or 'first, detailed proposals' (under Sections 4 and 5 of the Planning & Compulsory Purchase Act 2004). Pre-existing bodies included strategic economic and planning partnerships. Some of the economic partnerships were formed in response to Regional Development Agency initiatives, economic development funding and Regional Economic Strategies. Strategic planning partnerships were sometimes the legacy of joint working on structure plans.

5.2.3 In other cases, sub-regional partnerships came together specifically to prepare 'first, detailed proposals' under Section 5 (5), in response to the RPB's notification and brief under Regulation 8.[30] The RSS procedures contained in the Regulations prescribe formal arrangements for working relationships between RPBs and local authorities. It is evident that local authorities and other sub-regional partners varied in their abilities or willingness to operate under these unfamiliar procedures according to strict timetables.

5.2.4 Some partnerships experienced difficulties putting in place joint decision-making arrangements that met the requirements of the RPB's brief (or 'information'[31]), including the recruitment of non-local authority members (also called 'stakeholders' or 'social and economic partners') and complying with the decision-making arrangements and timetables of their constituent councils. RPBs sometimes prescribed the membership structure of partnership decision-making bodies: requiring that 30% of partnership members should not be members of constituent councils. [32]

5.3 Sub-regional strategies in Regional Spatial Strategy Reviews

5.3.1 Emerging Regional Spatial Strategies include various approaches to sub-regional strategies, although they have common elements. They are each described in more detail in Appendix 4 and can be characterised as:

- policies that focus mainly on settlement strategy: defining settlement types and the opportunities for urban extensions and green belt reviews;

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[30] The Town and Country Planning (Regional Planning) (England) Regulations 2004
[31] the term used in Regulation 8 (2)
[32] also the criterion in Regulation 4 for Government recognition of Regional Planning Bodies

- strategies that provide key objectives and specific sub-regional polces for housing, economic development and transport;

- sub-regional approaches that focus mainly on housing provision and the distribution of employment land;

- differing sub-regional approaches to the scope of policies and levels of detail (e.g. variations in the inclusion of employment floorspace, affordable housing targets or key infrastructure projects);

- sub-regional policies that define the roles of regional and sub-regional centres and main towns widely in relation to their economic, social, cultural, environmental and transport roles, with policies for infrastructure to support different spatial strategies (e.g. of concentration or dispersal);

- defining sub-regions and sub-areas according to different spatial priorities (e.g. regeneration, containment, growth or inter-regional links);

- a large number of sub-regions and sub-areas with a strong emphasis on sub-regional policy (later modified to a smaller number of sub-regions and less locational detail after public examination); and

- sub-regional strategies with specific housing allocations and spatial details for the main cities and towns, but variable details on infrastructure requirements and a settlement strategy that does not generally identify other towns.

5.3.2   Important differences in current approaches include the extent of sub-regional coverage, reasons for the definition of sub-regions and differences in policy approaches between sub-regions.

5.3.3   Some regions sub-divide the whole region into sub-regions, whilst others are more selective. In some regions there are very well established city-regions that meet all the relevant criteria and cover much of the region (e.g. the North East and North West). In other regions, the importance of smaller cities and towns has led to more detailed settlement strategies that are described at a sub-regional level. In the East of England, the importance of medium-sized cities and towns led to the definition of relatively small sub-regions or sub-areas (and subsequently to the Regional Cities East partnership, which is not based on a sub-regional area and is not reflected in the RSS).

5.3.4   The questionnaire survey revealed a variety of reasons for the definition of sub-regions (see Section 4.3 above) including historic relationships, previous planning arrangements and established organisations, analysis of functional relationships and shared policy objectives. Previous structure plan arrangements and the roles of county councils have also been influential.

5.3.5   In the South East and South West, sub-regions were defined largely as areas where future growth would be concentrated (85% of housing in the sub-regions of the South East and 65% of housing in the 'Strategically Significant Cities and Towns' of the South West) although

the emphasis in some sub-regions in the South East was on the containment of growth, regeneration or other objectives.

5.3.6   In Yorkshire and Humber, sub-regions were defined to achieve different policy emphases, including urban containment (Leeds) and dispersing economic development (the Coast). In the South East, the policy emphasis varied between economic growth (in the designated Growth Areas and South Hampshire), urban containment (with the Green Belt policies of the London Fringe), environmental constraints (with the Thames Basin SPA in the Western Corridor and Blackwater Valley), and regeneration (in the Thames Gateway, East Kent and the Sussex Coast).

5.3.7   Sub-regional policies in draft RSS appear to have reflected 'advice' or 'first, detailed proposals' from Section 4 (4) authorities to a significant extent. This 'bottom-up' approach to sub-regional strategies resulted in differences of approach.

5.3.8   As well as sub-regional differences in policy emphasis, the South East RSS also contained differences in the scope of policy and levels of detail, with sub-regional targets for employment floorspace and housing affordability in some cases; variable levels of locational detail in settlement strategies and the distribution of housing and employment; and variations in the level of detail about infrastructure requirements.

5.3.9   These differences in sub-regional approach were more significant than the generic regional policies in some cases. However, some Panels (for example in the East of England and East Midlands) have been concerned that sub-regional strategies contained more detail than was appropriate in the RSS, as defined by legislation and guidance. Panels have also been concerned that it is difficult for them to recommend the re-definition of sub-regions on the basis of evidence presented at examinations in public and they are therefore effectively limited to recommending the confirmation or deletion of sub-regions and sub-regional strategies.

Implications:

Questions raised by the existence of different forms of sub-regional partnership include whether it should be made easier for established partnerships to engage in the RSS process in less formal ways, and whether partnerships that are established for the purposes of the RSS (under Section 5 of the Act) are likely to have continuing roles in implementing the RSS, for example through joint working on LDDs, LTPs and infrastructure funding.

It is unlikely that the same model of engagement will be appropriate for all sizes and types of sub-region or that the same sub-regional boundaries will be appropriate for all purposes. Some relaxation in the Regional Planning Regulations and/or additional guidance to RPBs may be appropriate to encourage engagement in the RSS process by a variety of sub-regional arrangements. These possibilities should be considered to secure continuing sub-regional engagement in the new Single Integrated Regional Strategy.

6   DECISION-MAKING AND GOVERNANCE

6.1   Current practice towards joint working on LDFs:

6.1.1   Joint working at the local level has been an aspiration driven by the themes of integration and collaboration. In common with the great diversity of approach to sub-regions in RSSs, there is a bewildering variety of arrangements at the local level.   Our investigation of the RSSs, of the available literature, the questionnaires, and from the workshops and other meetings show that many authorities are involved to some degree in working collaboratively with their neighbours and (in two tier areas) with county councils in preparing LDFs. Joint working has been promoted throughout the short life of LDFs, and is being advocated more strongly in recent policy announcements.

6.1.2   We have seen that national planning policy promotes joint working and joint documents in LDFs. In addition, an incentive has been offered through the Housing and Planning Delivery Grant[33]. This aims to incentivise local authorities to improve delivery of housing and other planning outcomes as part of their strategic, place shaping role and to provide more support to communities and local councils in delivering new homes. It was proposed to reward local authorities that are working jointly on the production of a DPD and those who are working together to jointly publish Strategic Housing Market Assessments across sub-regions.

6.1.3   More effective sub-regional planning and achievement of the national policy aims outlined in previous sections suggests that more attention needs to be given to the arrangements for delivering policy through the local level. In addition, the planning documents of the local authorities (especially the Core Strategies) are likely to be the main instrument to deliver planning policy set out in national policy guidance and RSSs. Moreover, the relationship of the LDFs with the RSS in different sub-regions will be uncertain unless the extent of local collaboration is understood.

6.1.4   Joint planning at the LDF level can both support and influence the RSS, its implementation – and in the future its review.   At the same time, we are aware of potential negative factors that inhibit closer integration. Perceptions of the slowness of LDF preparation may be one, whilst the constraints caused by the need to observe strict procedures whenever development affecting land value and land use introduces a legal component to development plans and associated planning decisions (with much case law).

6.1.5   Joint working is not just a matter of technical collaboration: the arrangements for decision-making have to be considered, both as to the programmes of work and the steps taken to secure approval of documents and meeting all the formal requirements of the local democratic process. This introduces another level of potential diversity,

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[33] DCLG October 2007, *Housing and Planning Delivery Grant (HPDG) – Consultation on allocation mechanism.*

as different levels of collaboration require different degrees of decision-making. Although all LDSs have to record joint LDDs, there appears to be no comprehensive record of joint working, with the exception that where joint committees have been formed under the PCPA, they will have their own LDSs and can be identified. However, a number of studies have attempted to gauge the extent of joint working, and the underlying factors that need to be taken into account.

6.1.6 Given the considerable diversity in practice, some studies have attempted to classify the approach local planning authorities are taking. The Spatial Plans in Practice[34] study has examined case studies as part of a continuing investigation of the performance of the new planning system. As part of this, questionnaires were sent to 40 local authorities. It has identified four key factors that lead to joint working.

- The recognition of an overriding need to tackle a shared development issue
- A previous history of beneficial cooperation across boundaries
- Leadership from politicians and from top-level officers
- The benefit of a stronger 'voice' in regional planning matters.

6.1.7 The study notes that much of the cross-border working activity to date has been in relation to issues that self evidently require cross boundary working, for example Waste DPDs and LDF core strategies in areas of growth, and may indeed have actively been the subject of some form of joint activity for some time. There has also been, in some cases, a significant top-down encouragement for joint working, not just in terms of the new planning legislation but also through pro-active involvement and advice by some Government Offices and Regional Assemblies.

6.1.8 The study found that joint working and the level of integration is dependent on the characteristics of each individual case, which includes not only the issues on which joint working may or may not be necessary, but also the resource base and political factors affecting the participants. It set out a broad categorisation of approach:

- Competition, not co-operation – independence
- Information sharing – representing a loose network of interest
- Consultation and harmonisation – involving informal joint activities
- Co-operation – embodying limited agreements between authorities to avoid inconsistencies
- Co-ordination – with the use of formal joint nodes
- Collaboration – involving formal bodies and the establishment of joint competence
- Joint goals and policy – leading to the possibility of merger.

6.1.9 There were no examples in the SPIP research sample of complete independence, where no cross boundary dialogue takes place on any

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[34] Spatial Plans in Practice: working papers on joint working (2007, unpublished)

spatial planning issues at all. The overall picture was of considerable activity in the middle range of the spectrum, from consultation and harmonising, through cooperation, to co-ordination. Most of the authorities would therefore fit into the middle range, being engaged in reciprocal dialogue and data sharing, with some evidence that in some cases timetables are being synchronised for compatibility. These authorities are seeking to avoid inconsistencies across boundaries, working together to achieve their own separate goals.

6.1.10 The research found a few examples of collaboration, with formal joint bodies holding joint competences and joint working on delivery mechanisms. An example is a joint AAP. However, there was evidence of movement towards greater integration, with some authorities anticipating further development in cooperation in future, moving towards joint decision making bodies.

6.1.11 A second study has been undertaken by one of the present authors for the Planning Advisory Service working with Hampshire and the Isle of Wight planning authorities[35]. This looked at progress in joint working throughout the area. It examined the practical and governance issues authorities would need to face when deciding whether to pursue joint local development documents, and identified some of the benefits and savings that can occur when authorities share resources and tasks.

6.1.12 A practical categorisation was given, which is not dissimilar from that offered by SPIP but based more on the experience of the Hampshire authorities and by others involved in more advanced models of collaboration on LDFs throughout the country. This took the level of commitment and identified likely governance models as have been applied to date. They present an "escalator", in that each step builds on the one immediately before. This categorisation was used as a basis for our local authority questionnaire:

- Common information and analysis at Officer level

- Agreement between Officers on a joint approach, ratified by Members in each authority individually at key stages

- Member commitment to broad principles of LDF policy across participating authorities

- Member support to common activities with a public face – eg community involvement

- Member agreement to common outputs (eg policies) within separate products (LDDs)

- Integration of plan production (joint teams / boards or panels)

- Joint committees with officer support (plus scrutiny arrangements) for production, but LDD signed off by each authority individually

- Joint outputs (joint LDDs) published on behalf of all.

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[35] Paper presented by J Hack to PAS Collaboration Conference January 2008 – see www.pas.gov.uk

6.1.13 Authorities could be placed on any level of the escalator, depending on its degree of commitment to joint working.   In deciding on how far to commit, authorities would need to consider a number of aspects of plan making and their decision processes, including:

- the degree of policy convergence between them

- the current planning position in respect of existing plans and plans under preparation

- the degree of officer and member commitment available now and aspired to for the future

- the programme management of collaboration (including ensuring the arrangements are reflected in the LDSs of all participating authorities)

- the arrangements applicable to each type of LDD to ensure timely delivery.

6.1.14 During the work with Hampshire, the authorities came closer together by forming a joint committee and agreeing to increase levels of collaborative work on LDDs. This experience – of gradual movement to more joint activity – is borne out by our questionnaires and discussions.

Joint working is being actively promoted, and is being implemented by many authorities. There remains much uncertainty about the methods of working to be employed, in addition to the need to grow confidence and trust amongst participating authorities.

Approaches to joint working at LDF level have been very mixed. However, the increasing importance of collaboration in public policy affecting local authorities and the importance of recognising functionality in some way in forward planning suggests that in the future, it will assume greater importance. Better knowledge of the issues would increase confidence and its effectiveness.

6.1.15 Our starting point in considering what level of joint working is appropriate to a sub-regional approach is the concept of hierarchy that runs through the planning system.   There is an inherent division of scale between the RSS and the local development documents. PPS 11 notes that the RSS should provide a broad development strategy for 15 to 20 years. It should confine itself to matters of "genuine regional and, where appropriate, sub-regional importance" (paragraph 1.5). A balance therefore has to be struck between providing a clear strategic framework and avoiding unnecessary or inappropriate detail.   It is recognised that this level of detail may vary between topics. Moreover, the RSS is enjoined to adopt a sub-regional approach (in consultation with LPAs and stakeholders) (para.2.13). The existing guidance points to the need to fill a policy deficit that cannot be addressed by the RSS policies or by LDDs on their own. In some cases, the RPB may need to encourage the LPAs to produce a joint LDD, or to undertake a joint

study or non statutory framework to contribute to the eventual development plan policies at either level.

6.1.16 Similarly, a clear distinction occurs between the Core Strategy DPD and the other LDDs in the LDF. The core strategy sets out the key elements of the planning framework for the area (PPS12 paragraph 2.9), and all other DPDs must be in conformity with it. Site allocation or development policy DPDs and Area Action Plans provide more detail within the compass of its policies. SPDs provide detail at a finer grain, must be in conformity with a DPD (or saved development plan) policy, but cannot allocate land. Neither are SPDs part of the development plan, so carry less weight in decision making.

6.1.17 It is not possible (nor probably desirable given the current degree of diversity) on the basis of the information gathered in this project to provide definitive suggestions for joint working to support sub-regions, but some boundaries can be drawn. We offer the following for considering joint working on strategic matters:

- There is likely to be a distinction at the upper end of the scale between the need for a co-ordinated (but sub-regionally distinctive) approach and the number of local authorities and their common interest. That is to say, joint working should be manageable, especially in the light of the number of documents making up the LDF and the calls on stakeholders and community engagement.

- Where a reasonable number of authorities have a common interest in the development of strategy for a sub-region (or part of a sub-region, as explained in the next section), and the needs can be better served by working at the LDF level, then joint working might be considered.

- Account needs to be taken of the number of authorities involved, as the issues relating to decision making and programme management multiply with the number of authorities.

- The scope for joint working might be informed by studies showing functional relationships and partnership arrangements that can be related to population size. Recognising that there may be an upper boundary does, however, suggest that joint LDDs across the whole of very large city regions containing many authorities are neither practicable nor desirable, although there may be substantial scope for joint working within them.

6.1.18 At the opposite end of the spectrum, there was a general recognition in our discussions that plans for the delivery of specific outputs often require joint working and joint plans, but should not be called "sub-regional". Thus joint Area Action Plans for development across a boundary would fall below the sub-regional threshold. Again, we would look to evidence of functionality and partnership to inform decisions.

6.1.19 We are also conscious of the need for joint working on common topics across a wide area. These are less than the spatial strategy but in their own right are subjects that need to be dealt with consistently across authority boundaries. Examples are minerals, waste and Gypsy and

Traveller provision. The subjects lend themselves to joint working – in the case of waste, for example, there is also a strong financial incentive because the Landfill Levy and the economics of waste management suggest large sub-regional catchments for some kinds of waste management facility

6.1.20 Where sub-regional arrangements are being implemented in the form of joint working, the parties concerned could identify the benefits and savings sought. The Hampshire work referred to above suggests that officers prepare a business plan to articulate them.

Implications

There are advantages in the flexibility of approach being taken to joint working in sub-regions and between LDFs. However, progress has been patchy and opportunities may be missed. Clarification of the criteria to be considered when deciding on the division between work at the RSS and LDF levels would be desirable.

Given the increasing reliance in public policy on decisions being taken for meaningful functional areas, and for the demonstration of delivery when plans are examined, some enhancement of the arrangements for sub-regional spatial planning seems desirable. Joint working on LDFs and LDDs has an important part to play in achieving articulation of the sub-region, in addition to any benefits that might accrue to the participating local authorities through better local decision making and resource savings.

6.2 Implications of proposed changes in local authority governance in the White Papers and SNR.

6.2.1 We have earlier reported on the extensive changes proposed in the Local Government and Planning White Papers, and in the SNR. In this section, we draw attention to some aspects likely to affect governance arrangements and decision-making for sub-regions. Clearly, it is not possible to speculate on the likely outcomes, as they are subject to consultation. However, we can point to the various opportunities for sub-regional working provided by the encouragement given by government policy. Two underlying principles seem important:

- scope for greater devolution (to improve local co-ordination for meaningful areas) and

- clear accountability through appropriate decision-making arrangements involving both democratic decision-making and financial management.

6.2.2 There are two streams of reform currently being promoted by government. One is the reform to local governance represented by the changes in financial management, assessment and monitoring of performance, which sees expression in Local and Multi Area Agreements bringing together stakeholders into partnerships with the local authority sector having a leading role. The other is the desire to

see planning and delivery for meaningful functional areas. Both have implications for the approach taken to sub-regions, in which spatial planning should play an important role.

6.2.3 The SNR emphasised the local authority's role in promoting prosperity (see in particular Box 6.1 of the SNR, reproduced below).

6.2.4 This is to be achieved through the medium of Local Strategic Partnerships and within the framework of Local or Multi Area Agreements. Draft Statutory Guidance following the enactment of the Local Government and Public Involvement in Health Act sets out proposed arrangements for the creation of strong, safe and prosperous communities through a new settlement between central government, local government and citizens[36].

6.2.5 The draft guidance is based on the concept of local partners in the LSP creating a shared vision, which is set out in the Sustainable Community Strategy (SCS). New LAAs form the heart of the new local performance framework and are the vehicles for agreeing targets between local government and their delivery partners and central government. There are concomitant duties to involve and to co-operate to bring about robust local partnership working.

Box 6.1: Local authority role in promoting prosperity

In order to fulfil their economic well-being role, the Government believes local authorities should work in partnership with other public, private and third sector organisations through Local Strategic Partnerships and within the framework of Local or Multi-Area Agreements, to undertake measures including the following:

- *provide clear, transparent leadership for raising prosperity across their areas, working with partners including business;*

- *develop a vision for the future of the local economy, informed by input from business and analysis of the local, regional and national context and opportunities to build on indigenous assets and areas of comparative advantage, and taking account of the need to move to a low-carbon, low-waste economy;*

- *support the development of wider regional and sub-regional strategies and ensure that local strategies are consistent with these;*

- *use the considerable resources and powers at their disposal to develop the economic potential of all local areas, including the most deprived, and manage economic change, working with partner agencies, businesses and communities;*

- *leverage investment from the private sector; and ensure that business* support is coordinated with relevant partners within regional and national frameworks, avoiding overlap and duplication.

Source: DCLG, July 2007,
Review of Sub-National Economic Development and Regeneration

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[36] HM Government, November 2007, *Creating strong, safe and prosperous communities - Statutory Guidance: Draft for Consultation*

6.2.6 We are aware that the introduction of the SCS in the form proposed will be a step change for many authorities. Indeed, we heard in the workshops the often-repeated view that existing community strategies are bland and give very little strategic guidance or vision to the participating stakeholders. There is a widespread view that many community strategies to date have not been sufficiently robust to underpin the spatial strategy set out in the LDF. The development of the SCS into a meaningful document and nurturing its relations with spatial planning will be an important part of the success of the reforms.

6.2.7 The draft statutory guidance outlines the purpose of the SCS and its relationships with LAAs, LDFs and sustainability appraisal (including SEA). An earlier guide[37] provided advice on the processes involved, especially for non-planners, in forging a positive relationship between the responsibilities of the LSP and the local planning process. It included the importance of taking a corporate approach; sharing evidence and understanding; joint monitoring; interlinking timescales; co-ordinating consultation collaborating with parishes and neighbourhoods, and applying sustainability appraisal.

6.2.8 The basis for the SCS is an authority area (but see below for two-tier areas). LDFs are required to have regard to SCSs and core strategies should be aligned with the SCS. Housing and Homelessness Strategies should be incorporated into SCSs where possible. However, we have found that there is scope for confusion between consultations on LDDs, SCSs and other plans.

6.2.9 SCSs are focused on authority areas, with LAAs at unitary and county level (though targets can be disaggregated to districts or sub-district level). MAAs have a wider focus. The SNR notes that individual authorities have to enter into LAAs even though the impacts of economic development policies occur at higher spatial levels, including sub-regions. MAAs involve a group of local authorities coming together to agree targets. Thirteen areas have been announced initially as working up MAAs[38], for which arrangements will be in place in mid 2008. Not surprisingly, these are some of the defined sub-areas that appear in some guise in RSSs:

- **Tyne and Wear:** Gateshead, Newcastle, North Tyneside and South Tyneside plus northern parts of County Durham, South East Northumberland and the Tyne Valley.

- **Tees Valley:** Darlington, Hartlepool, Middlesbrough, Redcar and Cleveland and Stockton-on-Tees.

- **Leeds City Region:** Barnsley, Bradford, Calderdale, Kirklees, Leeds, Wakefield, York, North Yorkshire, Selby, Craven and Harrogate.

- **Hull and Humber Ports:** Hull City, East Riding, North East Lincolnshire and North Lincolnshire.

- **South Yorkshire:** Sheffield, Barnsley, Rotherham and Doncaster.

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[37] *Planning Together*, DCLG and RTPI, January 2007
[38] Announcement by Hazel Blears 7 November 2007

- **Greater Manchester:** Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan.

- **Liverpool City Region:** Liverpool, Sefton, Knowsley, St Helens, Wirral and Halton.

- **Fylde Coast:** Blackpool, Fylde, Wyre and Lancashire CC.

- **Pennine Lancashire:** Blackburn, Burnley, Pendle, Rossendale, Hyndburn, Ribble Valley and Lancashire CC.

- **Birmingham, Coventry and Black Country:** Birmingham, Solihull, Sandwell, Dudley, Wolverhampton, Walsall, Coventry and Telford and Wrekin.

- **Partnership for Urban South Hampshire:** Portsmouth, Southampton, Eastleigh, Fareham, Gosport, Portsmouth and Havant, parts of the New Forest, Test Valley, Winchester and East Hampshire, and Hampshire CC.

- **Bournemouth, Poole and Dorset**

- **West of England:** Bristol, Bath and North East Somerset, North Somerset and South Gloucestershire.

6.2.10 It is envisaged that some of these sub-regions may wish to establish permanent structures to facilitate long-term decision-making. Passenger transport already operates on this basis in some areas, and opportunities to extend this are being explored through the Local Transport Bill. The SNR states that there may be benefits in pooling responsibilities for planning and housing. "Statutory sub-regional authorities" are therefore mooted – although the arrangements need primary legislation. Whether or not any formal body is created, it is clear that to be effective in the new context SCSs need to be prepared in a rigorous way and have regard to the regional and sub-regional context.

Implications

There are considerable opportunities for spatial planning at both regional and local level to be part of the delivery arrangements of local partnerships, through strategy at sub-regional level and joint action by groups of authorities, including joint working on LDFs and collaboration on SCSs.

The outstanding issue is how the essentially functional concept of the SNR can be reconciled with the local authority basis of LAAs, particularly in two-tier areas. In the meantime, it is to be noted that whilst most of the proposed MAAs involve whole authority areas, some include parts of authorities – potentially cutting across the alignment proposed in the SCS guidance – and not necessarily having a close relationship with functional areas such as HMAs.

There is a need for reconciliation, either through more joined-up national policy or through specific mechanisms at the sub-regional level. This could be articulated in the RSS – or in future in the SRS.

6.3 Role of existing administrative arrangements and responsibilities including one or two-tier LA systems.

6.3.1 This report cannot be the place to consider in depth the geographical structure and functions of local authorities, except to note that – as is pointed out in many studies and policy guidance – traditional boundaries have very little relevance to spatially defined functions. Often, they have more meaning to communities interested in preserving a sense of place based on past geographies and mental maps.

6.3.2 Many attempts have been made over the years to reorganise boundaries, some more radical than others, ranging from the establishment of county boroughs and their enlargement to follow the continuous built-up areas in the 19th and 20th Centuries to proposals to fundamentally restructure areas in 1972. None has been carried through to a logical conclusion, and many proposals have been reversed as a result of consultation and debate.

6.3.3 Perhaps most radical were the proposals of the Redcliffe-Maud Report[39] (reproduced in Appendix 7), which recommended a structure based on city regions: 61 English authorities outside London: 58 of them unitary and 3 two-tier, metropolitan areas. A dissenting report from Derek Senior[40] favoured 39 'city regions' and 148 districts. After a change of Government, a White Paper and consultations in which arguments about local identity, participation and urban-rural relationships were deployed, the 1972 Local Government Act created a two-tier system with 6 metropolitan counties, 40 non-metropolitan counties and 296 districts in England.

6.3.4 More recently, efforts have concentrated mainly on tidying up the worst anomalies created by the arrival of strong physical features (such as motorways, or the shifting banks of rivers) although some more significant changes have occurred[41].

6.3.5 A detailed discussion on local government structures and their history is contained in written evidence given to the House of Commons Communities and Local Government Committee for their investigation: *'Is there a future for Regional Government?'* [42] The Committee's report contains a discussion on governance through city regions in which the Government's proposed Multi Area Agreements are described as *'the main instrument which will enable areas unsuited for or unwilling to adopt city-regions to achieve similarly effective collaborative approaches'.* The Committee cautioned that *'the Government should*

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[39] Cmnd 4040 (1969) Report, Royal Commission on Local Government in England 1966-69, Chairman: The Rt.Hon. Lord Redcliffe-Maud; HMSO, London.
[40] Cmnd 4040-I (1969) Memorandum of Dissent by Mr. D. Senior, Royal Commission on Local Government in England 1966-69, (Chairman: The Rt.Hon. Lord Redcliffe-Maud. HMSO, London.
[41] More details can be found in the relevant reports of the various boundary commissions. A particularly helpful summary is *People and Places* The Local Government Boundary Commission for England, Report 550, 1988
[42] House of Commons, Communities and Local Government Committee, Fourth Report of Session 2006-07, HMSO March 2007

give real assurances to those for whom a city-regional style of governance is inappropriate that the development of the policy will not result in a reduction of support for other areas.'

6.3.6 It is arguable that the changing economic relationships stimulated by improvements in transport, developments in land uses serving wide and diffuse catchment areas, and the increased mobility of the population, together with widening choice of locations for community facilities are poorly served by the current pattern of boundaries, both in scale and alignment. Sub-regions and arrangements such as MAAs could be a means of securing planning for meaningful areas without more drastic changes in structure. However, this requires (in the words of the SNR) *'clear, transparent and accountable governance arrangement'"* to secure effective decision making.

6.3.7 The current government position is set out in its proposals for a move to unitary authorities and the streamlining of arrangements in those two tier areas that remained. Following the Local Government White Paper[43], the Government invited changes, based upon the view that local government in two tier areas face additional challenges with risks of confusion, duplication and inefficiency, and a lack of capacity in small districts[44]. Proposals have therefore been made to replace two tier areas with unitary authorities based on existing boundaries. The main criteria are affordability (i.e. to deliver value for money and be self-financing); and securing a broad level of support from key partners, stakeholders and citizens. In areas where two tiers remain, partnerships between the county and all the districts within its area are invited to unify service delivery between the two tiers, provide stronger leadership for place shaping and integrate delivery and share office functions. These "pathfinders" are expected to deliver efficiencies on a par with unitary authorities.

6.3.8 To date, a number of proposals have been made for unitary authorities, of which many have been accepted, and pathfinders been identified. The reduction in the number of authorities could be beneficial to spatial planning, by enabling a more strategic view to be taken and by reducing the number of development documents needing to go through the procedures. It could also assist the implementation of stronger arrangements for sub-regions, by bringing together a smaller number of larger authorities. However, it will be important to resolve transitional arrangements including, for example, the merging of concurrent work on separate core strategies. There are also likely to be frictional effects on resources including the loss of staff during the transition. Reductions in staff resources needed to prepare Local Development Documents were cited among the prospective cost-saving benefits from the merger of local authorities, but they need to be viewed against a widespread shortage of experienced local planners and a potential loss of local expertise.

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[43]DCLG October 2006, *Strong and Prosperous Communities: The Local Government White Paper*
[44] *Invitations to councils in England,* DCLG October 2006

6.3.9 We are conscious of the reaction from some that the creation of more unitary authorities would entail a reduction in the county's strategic role, especially where the resulting unitaries are only part of a county. In many places, the provision of advice under Section 4 (4) of the PCPA has been instrumental in strengthening the sub-regional element of RSS, and providing an input that the RPB might not have been able to make on its own. We are still benefiting from the legacy of structure plans, where these are reasonably up to date and before they are overtaken by policies in published RSS. However, we have observed from our discussions that the relevance of county areas has not been universal. In many areas, the county has been a useful means of combining the views of constituent districts. However, we have also heard that the reality of functional areas, particularly around major conurbations, means that place shaping needs to be seen against a different pattern from the traditional areas (even where some adjustments have been made over the years).

6.3.10 It seems, therefore, that a simpler pattern of local government may emerge in future years, but not everywhere. There are three challenges

- To ensure that the administrative changes where they occur, do not crowd out the need for integrated thinking and cause delay to planning in the years when they are being established. There could be a danger of inward looking in the new units, to the neglect of wider concerns.

- To manage complexity in the areas where both unitary and two-tier authorities remain. As suggested in the pathfinder prospectus, better integration is essential in two tier areas. There is a need to co-ordinate planning and transport, housing, economic development, education, community infrastructure, etc. across the two tiers of local government.

- To achieve smooth transitional arrangements that will not disrupt LDD programmes, result in confusion among stakeholders and members of the public who are trying to engage in the LDF process, or result in a substantial loss of professional expertise from local planning.

Implications

Proposals for changes in arrangements to local authority structures already follow the trend toward efficiencies through bigger units or through collaboration, and are based on functional and delivery considerations. These arrangements need to be seen as a means to drive sub-regional co-operation and facilitate more effective planning at regional and local level. They could assist a more efficient preparation of LDDs, especially core strategies. In implementing this, the expertise in existing authorities needs to be retained, including the more strategic approach, which has characterised many county activities.

6.4 Implications of proposed changes in the spatial planning system

6.4.1 Consultation documents have been prepared as noted earlier on the main reforms to the local planning system, although a more detailed manual is awaited. A consultation is promised on the Single Regional Strategy. In the light of this, and the fact that changing the responsibilities for regional planning will be a matter for primary legislation, we consider it more appropriate to raise questions and a general way forward rather than set down a preferred position. Many people will have views on the changes and no doubt many issues will be raised in consultation.

6.4.2 Previous sections of this report have highlighted the main proposals set out in the SNR and associated statements and documents. It is envisaged that local authorities will have a stronger involvement in the regional strategy development process and scrutiny. Local authorities *'and especially sub-regions'* will need to draw up detailed evidence-based proposals for the future of the region. Local authorities leaders *'and all sub-regions'* will be represented[45]. Exactly how this will be done is not clear, especially as there seems to be no direct tie-up with how sub-regions are defined. If LAAs are county-based and if county sustainable community strategies are key to decisions on many local services, they may not always accord with realistic sub-regions, and certainly not with housing market areas and travel to work areas, which are important components of spatial policy. In addition, the list of MAAs given above shows that some proposed areas are whole city regions, and would therefore in reality contain several sub-regions. It is arguable that local authority groupings for such large and diverse areas – if not disaggregated in some way into sub-regions – could be difficult to manage.

6.4.3 None of this implies the need for complete coverage of a sub-regional structure for its own sake, but for the local authority voice to be heard effectively in the SRS process every authority would need to be in some grouping. These groupings would need to be meshed with the arrangements for continuing partnerships if integration on such matters as economic development and sustainability appraisal is to be achieved, and if consultation is to be effective in the community. The alternative is to build in some form of bias towards the areas needing action represented by MAAs and formal sub-regional structures, which would as a result have more influence on the regional spatial strategy than elsewhere. This could cause accountability problems – and is likely to be resisted by "under-represented" areas.

6.4.4 At the local level, integration between spatial planning and the Sustainable Community Strategy has been promoted[46] and is being realised by a number of authorities. Integration of policy making in authorities is recognised as a factor in the success of LDFs. Further

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[45] Sub-National Review, chapter 6

[46] In such government supported documents as *Shaping and Delivering Tomorrow's Places: Effective Practice in Spatial Planning* and *Planning Together,* both prepared for the RTPI.

integration with delivery mechanisms and infrastructure provision and funding has also been advocated, not least in the EPISP[47] report, and there are important tie-ups with arrangements such as LAAs. The question then arises: on what basis can both spatial and community planning be integrated between authorities in a sub-region?

Implications:

Further effort is likely to be needed to facilitate a simpler approach to LDF preparation between several authorities, particularly of the Core Strategy. To this need to be added partnership and community arrangements to ensure that the vision for a sub area is prepared with community involvement and owned by the participating bodies.

There are also questions about the sub-regional arrangements that will be needed for local authorities to play their new roles in the preparation of Single Regional Strategies; what kinds of groupings will be appropriate; how these groupings will help to shape (and be shaped by) sub-regional strategies within the SRS; and how they will relate to arrangements for joint working on LDDs, implementation and other policy areas.

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[47]UCL and Deloitte, April 2007,*Shaping and Delivering Tomorrow's Places: Effective Practice in Spatial Planning*

7 CONCLUSIONS

7.1 Overview

7.1.1 This study has provided us with an opportunity to examine all the RSSs in preparation in response to the new requirements of the PCPA 2004 and to discuss the approach taken to sub-regions with the RPBs and other stakeholders. We have been very conscious of the challenges RPBs have faced in preparing RSS to replace the former regional planning guidance, especially in responding to the emerging needs of their regions. To date, this has been a learning process for everyone involved, not least the panels, who have had to take a pragmatic approach based on the evidence presented by the RPBs, the representations and the broad guidance given in PPS11.

7.1.2 An overwhelming conclusion is that there has been considerable diversity in the approach taken to sub-regional issues. As is described elsewhere in this report, it does not seem possible to relate particular sub-regions to the influence of specific drivers – a number have been influential in different circumstances. Moreover, the drivers have themselves been changing. Even within the short life of the present (draft) RSSs, there have been significant developments in national policy affecting development strategy. An example (which has been particularly important in the northern regions) has been the City Region concept developed in the *Northern Way*.

The changing context:

7.1.3 Over the last year, there have been considerable developments in policy affecting regional economic development, local authority responsibilities for sustainable community planning and place shaping, and the delivery of national policy for, *inter alia*, housing and infrastructure. Major concerns, such as climate change, have been rising up the agenda. The current round of RSS preparation could therefore be described as transitional from the old way of thinking – RPGs – to a new highly integrated spatial approach, which (on current policy) is likely to see its expression in the Single Regional Strategy (the SRS).

7.1.4 The RPBs have been gradually moving away from the influence of structure plans and embracing new sub-regional structures and agendas. It could be argued that the current RSSs are not yet sufficiently spatial in terms of the new requirements, and need to integrate a wider realm of activities. For example, we found very little account had been given to health in the current round. Even in planning and transport, we found panels questioning the effectiveness of delivery and expressing the need for more joined-up thinking. Some of the solution may be better co-ordination of policy across government. However, it seems to us that there will always be some conflict between different national objectives, which is what planning attempts to reconcile to secure a sustainable future and deliver a vision for an area. The regional level is a good place to achieve the integration of strategy, as outlined in PPS11.

7.1.5 As much activity affecting communities occurs at the sub-regional scale, we consider that a more proactive approach to the issues affecting sub-regions in future RSSs and the SRS would facilitate a fuller discussion of the issues. Conflict resolution could be sought through appraisal and assessment techniques, based on a more specific recognition of the functional relationships and incorporating the need for stakeholders to work together collaboratively to deliver sustainable outcomes.

Need for a more consistent approach:

7.1.6 Our findings point to a diverse pattern of sub-regions between all the regions, on the three main aspects of definition / coverage; scope, and decision-making and governance arrangements. We do not think that there is a "one size fits all" solution. However, at the moment, this approach is very haphazard, and it seems difficult in many places to relate sub-regions to the real needs and future planning requirements of each area. This is unlikely to be helpful to stakeholders and the community, and it is not likely to be efficient if there is confusion in the minds of the main delivery partners, including local authorities using the RSS policies in everyday decisions.

7.1.7 Rather than suggest an idealised model or models for sub-regions in RSSs, we have looked for criteria that might be applied to decisions about them. Essentially, a balance needs to be struck between the needs of a locality for a distinctive approach and the wider considerations of many stakeholders who need to work within policy in different regions and across different authorities. This is not only to argue for clarity for the policy itself and the way it is expressed in the RSS but also how it is delivered at the local authority level. It should be clear which planning documents guide the process at each level. If there is diversity in approach, it should be related to the underlying issues affecting the region and locality, brought out into the open and discussed during the strategy-making process.

Underlying principles:

7.1.8 On the basis of our study, we suggest some underlying principles against which decisions on sub-regions and how decision-making within them is organised can be taken. First, we summarise the nature of the policy challenge to be tackled. This includes:

- The need to secure delivery of key policy aims. Economic growth and regional performance, housing, infrastructure, sustainable communities, climate change and environmental impact need to be integrated through an accountable planning system.

- Ensuring community engagement is undertaken thoroughly, that stakeholders are fully involved and that the roles of local authorities and regional bodies in "place shaping" are facilitated.

- Resource considerations – There is a scarcity of skills in planning, particularly in administering the new systems, and a need for effective arrangements for implementation and monitoring. The

resource implications of different approaches should therefore be considered.

- The need for more co-ordination to articulate strategy and meet objectives, including effective implementation at a relevant scale. Regional planning has moved on since PPS11 called for sub-regional elements to fill "policy deficits" between the regional and local levels and this needs to be recognised in any revision of guidance for RSSs.

- Policy reforms are highlighting the need for areas to be planned – and strategies delivered – that cover meaningful areas. Essentially, this implies areas that are **functional** (in terms of spatial criteria), **accountable** (via democratic processes) and **meaningful** to the many stakeholders contributing to planning and implementation.

- Introducing the Single Regional Strategy should create opportunities for more effective integration of land-use, housing, transport, economic development and other strategies. It should also create opportunities for more effective collaboration between local authorities within functional sub-regional areas.

- A stronger emphasis on sub-regions in the RSS/SRS and Local Development Frameworks should support the Government's objectives in the Sub-National Review of strengthening collaboration within functional economic areas, streamlining the regional tier of government and increasing sub-national devolution.

- There are opportunities to build on established sub-regional programmes and initiatives (such as growth areas, new growth points and core city regions) and on the experience of the various formal and informal working arrangements that already exist, e.g. sub-regional economic and regeneration partnerships, joint local transport plans and strategic housing market area assessments.

There is therefore a need for the scope of sub-regional spatial policy in RSS to be redefined and strengthened.   It is evident that considerable progress has been made in the current round within the parameters of PPS11 but future regional work will need to recognise significant developments in:

- policy affecting the role and conduct of regional and local bodies and

- policy regarding economic development and the establishment of sustainable communities.

The RSS process itself (and later the SRS) is the vehicle within which discussion should take place about the approach to sub-regions within each region.

<u>Criteria for considering sub-regions in RSSs:</u>

7.1.9 Findings of the research suggest that sub-regions should be more consistently considered in RSSs, having regard to the criteria considered below. This is not the same as saying that all sub-regions should be treated the same in the RSS. The sub-regional level is an important bridge between regional and local in making spatial planning more relevant and effective. There is a case for a greater emphasis on sub-regions in some RSSs, especially where there are relatively few issues that truly have a regional dimension (we consider this is especially the case in the South West, because of its size and diversity). In other areas, much closer collaboration between local authorities might deliver the needed sub-regional component of planning in the area with a more local focus, as is already being experienced where statutory joint committees for LDFs have come into being and in some other examples of joint working on core strategy DPDs.

7.1.10 The role of each sub-region would therefore depend on the need for the sub-region in planning, economic development and sustainability terms and on the approach and capacity of the regional and local levels to deliver the strategy. The criteria should be set out for each region/ locality as the basis for cooperation and collaboration. We have used the shorthand "SRS/RSS process" to encompass all those who, now and in the future, will contribute through the formal processes for future regional and sub-regional planning.

7.1.11 We conclude that the approach should be based on:

- **Evidence** about the proposed sub-region from regional and local sources. Both RSS and LDF processes have survey requirements. A clear evidence base is essential, and will be of value in justifying the approach to be taken, as well as providing consistency in strategy making at both regional and local levels (both of which are tested at examination)

- **Consistent presentation**. This is important within a region, but should also occur between regions, to assist national stakeholders and participants (including panels). This is not the same as saying that the preferred solutions will be same in all regions, but some consistency in how major policy topics are handled would be helpful – for example, how the concept of "city regions" and "core cities" within them are to be implemented in a region.

- Particular attention should be given to presentation where functional or policy areas cut across regional boundaries. In this case, consistency of approach between regions across the area concerned needs to be taken particularly seriously.

- As far as possible, ensure **continuity of time-based data** sets to assist analysis, assessment and monitoring. Often these are based on local authority boundaries. Changes need to be carefully implemented to avoid unnecessary complexity (in attempting to split

data sets within districts for example), whilst not hiding significant local differences.

- Develop the sub-regional spatial planning framework **collaboratively** between the RPB, local authorities and other partners working through the RSS/SRS process. New arrangements will be needed for engagement with the RPB to prepare and review the SRS. They should build on Multi-Area Agreements; experience gained from operating Sections 4 and 5 of the PCPA 2004, and other established sub-regional partnerships.

- **Public scrutiny** of evidence in support of existing arrangements and new proposals for sub-regional working in the RSS/SRS through consultation and Examination in Public. The evidence will need to reflect continuing change in local authority structures, powers, funding and governance arrangements as they emerge from proposals for local government restructuring and reform.

- The need for **forward thinking**. There is a danger that data from the past, past trends and established relationships hide important changes under way or which ought to be considered as part of the planning process itself. An example is changes in accessibility caused by factors affecting different forms of transport and communication. These are very likely to change significantly over the planning period of a regional strategy or LDF Core Strategy. Decisions on sub-regions should have regard to the planning period. At the least, the evaluation of alternatives in the RSS/SRS process should consider the significance of change.

7.2 Definition of Sub-Regions:

<u>The starting point</u>

7.2.1 The starting point is what exists, in terms of sub-regional structure in current RSS, the local authority approach to spatial and community planning and the organisation of partners and their interrelationships. Because of the wide range of sizes and types of sub-regions (including large city regions or growth areas that span more than one region), the concept of a sub-region is only meaningful in relation to the purposes for which it is defined. A clear definition is essential to aid stakeholder understanding and facilitate strategy delivery. It should be explicit, related to indicators that can be monitored and subject to review.

7.2.2 We have argued on the basis of our findings that at present no single model will be appropriate to define sub-regions. However, a very broad classification of some common types of sub-region would appear to include examples such as:

- major growth areas and city regions where comprehensive strategies for development and regeneration are required;

- sub-regions of smaller urban areas with their rural hinterlands or polycentric groupings of towns, where spatial planning issues include urban expansion and the location of new communities;

- rural or coastal shared social, economic or environmental challenges or infrastructure needs; or

- physically separate urban areas that are co-operating to address strategic issues in a co-ordinated way.

7.2.3 The definition of sub-regions within the region might need to reconcile:

- Scale – a large city region might need to be divided into component sub-regions to be meaningful to stakeholders and the community –

- Functionality – what do the studies tell us about the relationships within the area?

- Practicality – decide where the cut-off is between comprehensibility of a sub-region and the number of parties necessarily involved in it.

7.2.4 The SRS/RSS process needs to take account of all the functional relationships exhibited for key policy issues, and the comparative strength of these over different areas. Current policy highlights such factors as housing market areas, travel to work areas and employment[48]. The integration of transport and spatial planning should therefore be a major consideration in shaping sub-regions. However, these functional relationships may themselves be subject to change as part of the planning process – for example, reducing the need to travel, or the introduction of a new high-speed link. Some parameters likely to be used in sub-regional definitions, such as travel to work areas or housing market areas, are themselves likely to change.

Reconciling functional and administrative geography:

7.2.5 In the absence of any changes in government policy prior to the establishment of the SRS – which may provide greater clarity on the issue – the RSS should attempt to reconcile any inherent tension that may exit between a "county based" approach and a "functional" one. The county basis has been promulgated for actions on LAAs and in respect of Sustainable Community Strategies in two tier areas, while the Sub-National Review and much planning guidance (for example on housing and employment) highlights the need to embody functionality and market areas. The SRS/RSS process should make decisions explicit on the basis of evidence.

7.2.6 A decision also needs to be made on how to define the boundaries of sub-regions in the RSS. It would appear reasonable to base them normally on principal local authority boundaries, except where there are clear reasons not to do so, in which case the boundaries need to be clearly defined for data and governance purposes. However, it is always important to recognise that all boundaries are proxies for the aspects considered important in the definition, and should not constrain wider processes of decision-making where this needs to be done differently to meet any particular issue or to introduce delivery mechanisms to meet shorter term and urgent needs.

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[48] This is in many ways akin to the long-standing spatial planning principle of "homes, work and movement" (though to this today might be added leisure and retail, and health and higher order community facilities).

<u>Defining sub-regions in the RSS:</u>

7.2.7 Based on the evidence obtained about the region, factors that would be instrumental in decisions on the definitions of sub-regions might include:

- National policy statements and decisions. These could be used constructively, for example building on the concept of city regions, and recognising the effects of major changes in infrastructure (for example high capacity transport) in reshaping economic geography.

- Information sources provided by all the stakeholders, community involvement, regional laboratories or academic studies, commissioned studies of the region or sub-regions, and the base provided by all the existing plans and strategies. National studies of functional areas (such as that prepared for the LGA) will also be helpful.

- Information gained from the survey and analytical work for the RSS itself, assisted by the survey work of local authorities and sustainability appraisal carried out for the RSS.

- Recognition of the political and personality elements in any decisions affecting the sense of place. The desire to maintain different cultures may need to be reconciled with the need for achieving a common vision for the area.

- Identification of the benefits of funding streams available to assist delivery in identified areas. The role of MAAs and initiatives such as growth funding will be important.

7.2.8 A neat fit between indicators of function and sub-regions is unlikely. There will always be some "fuzziness" at the edges, as flexible geographies are more likely than all-purpose sub-regions. However, the RSS should try to avoid arbitrary boundary decisions that leave small areas uncertain of their contribution to spatial planning (at all levels). Similarly, "overlapping" sub-regions may need to be accepted where these are truly representative of functional multi-layering, such as a historic city with a hinterland in the penumbra of a large conurbation and with a strong identity recognised by partners. This will need careful handling of governance issues.

7.2.9 Some areas that may otherwise not seem to be of a sufficient scale or cohesion to be a sub-region in the functional sense may need specific policy attention in the RSS or across local authorities. Examples are coastal management and extensive rural and wilderness areas. Similarly some topics may need to be dealt with on different boundaries, for example river systems and flooding, minerals and waste. These may cut across sub-regions based on market areas, but be at a lower than whole-region scale.

7.2.10 Sub-regions may on occasion need to be defined to achieve specific comprehensive approaches to development, regeneration, economic development, infrastructure or conservation. There may be

opportunities to better integrate waste and minerals planning into the LDF system as a whole by seeing it in relation to the sub-regional context established for other issues. A specific sub-regional approach may be needed in some instances, for example the Special Protection Areas in the Thames Basin and Dorset Heaths, assisting the conservation of specific types of habitat across these areas.

7.3   Scope of policy within sub-regions

The growing importance of regional strategies:

7.3.1   The RSS should be the starting point for discussions on the division of policy between the RSS itself and the LDFs of local authorities. Clearly, this needs to be grounded in the needs of each area as reflected in the definition of sub-regions and there is scope for flexibility in both the RSS and LDFs to accommodate regional and local needs and distinctiveness. Nevertheless, both processes need to be properly managed so that plans can be prepared in a timely manner and delivery of the strategy commenced without delay. In addition, the ground rules set out in both PPS11 and PPS12 (and PPS12's proposed revision) establish a workable hierarchy of spatial plans from the regional to the local, including the important rules of general conformity (with the RSS) and conformity (of LDDs with the Core Strategy DPD).

7.3.2   With this in mind, we suggest that decisions on the level of detail of policy at the different levels should be informed by the need for delivery and implementation by all stakeholders, within the following broad parameters. We have used the analogies of locations and transport priorities for illustration, but similar considerations would apply to the other components of a spatial strategy, for example health and education provision:

- For land use related matters, a broad guideline is in how locations and sites are dealt with in different planning documents:

    -    "broad or strategic locations" set out in the RSS

    -    "locations" in the core strategy DPD – but may include specific site identification or land area designations if they are strategic at the core strategy level and capable of being defined at that stage – and

    -    "sites" in the subsidiary DPDs such as area action plans and land use allocation documents (where needed).

- For transport, a distinction between:

    -    Regional and interregional priorities (related to discussions in the *Regional Funding Allocation*;

    -    Transport networks and major schemes extending beyond the confines of an individual district or unitary area and needing to be planned as a whole (related to *major schemes* in Local Transport Plans and funding bids)

- Minor schemes and management measures that can be implemented at a local level (related to *minor schemes* in Local Transport Plans and funding bids).

7.3.3 This report has described the increasing emphasis being placed in national policy on sub-regions. The emphasis on infrastructure and planning as demonstrated in such reports as Eddington, Barker, the Local Government and Planning White Papers, the Housing Green Paper and the Sub-National Review and in the various planning guidance documents (see Section 3 above and Appendix 1) requires more explicit sub-regional working to be implemented effectively.

Sub-regions within regional strategies:

7.3.4 We conclude that the sub-regional level should be more often articulated in planning than it has been in the first round of RSSs. The aim should be for a combination of the RSS and core strategies (hopefully joint core strategies in many areas) to contain sound policies for the sub-regions set out in the RSS. The next section discusses the decision-making approach that will be needed to achieve this.

7.3.5 With this in mind, decisions on the level of detail of policy suitable to achieve good planning in sub-regions could be based on:

- Embodying the principle of **subsidiarity** – devolving to the appropriate level those decisions that do not need to be taken at a higher level, but

- Maintaining **consistency and conformity**, so that strategies established at the higher level are delivered through the actions of all lower levels in the policy hierarchy.

- **Avoiding additional layers** of bureaucracy, plans and strategies unless there is a clear need (able to be demonstrated from the evidence) and value added from the process.

- Using the established provisions in spatial planning (consistency with national policy, general conformity with the RSS and conformity between local development documents) to scope the need for **distinctive policy** at a sub-regional level

- Taking account of **partnership** arrangements and financial planning provisions established for regional development and **community planning** arrangements established in district and county areas.

- Using the evidence provided by **analysis** of function, the structure of the region and the nature of the issues to show where sub-regional policy is needed.

7.4 Decision-making and governance

7.4.1 Existing arrangements for sub-regional spatial planning take a wide variety of forms, in the sizes or types of areas that they cover, the scope of policies or activities that they are addressing, their organisational structures for decision-making, administrative and technical support, and funding arrangements. Partnerships of various

combinations of unitary authorities, counties, districts and other stakeholders are possible.

Increased importance of joint working:

7.4.2 The increasing reliance on partnership and the more specific encouragement of joint working between local authorities on planning matters (for example in the proposed revised PPS12 and in the publications of the Planning Advisory Service) suggest that firmer arrangements will be needed for securing joint working and decision-making amongst local authorities. The sub-region is likely to be the area most suitable for establishing different degrees of collaboration for all but very local planning issues. There is a case for more joint action on area action plans in delivering such outcomes as urban extensions and sustainable development that cross boundaries. However, this is outside our specific remit to investigate sub-regions.

7.4.3 We have in section 6.1 above described studies of joint working, and consider that there is a strong case for promoting joint structures to achieve planning over areas larger than local authorities, particularly for core strategies, but also for dealing with individual issues that cross boundaries (as mentioned in 7.2 above).

7.4.4 We are mindful of the arguments that an additional level of planning may be construed by many as – indeed it could be if poorly executed – an additional level of bureaucracy, creating more confusion in the community, and delaying the delivery of timely plans. However, we consider that if a clear policy direction is set out in the RSS and implemented through joint working at the local authority level, considerable benefits could be achieved, both in terms of plans for meaningful areas, and in terms of resources saved by the responsible authorities and stakeholders.

7.4.5 The creation of effective sub-regional partnerships requires some reduction of sovereignty and political independence, with implications for council constitutions and the roles of elected members; especially for the decision-making roles of executive councillors and cabinets, but also for the policy-making functions of full council meetings (e.g. in relation to development plans). It is important to remember that, especially to local communities, councillors are elected to represent local wards, rather than wider sub-regional constituencies. There are also questions to resolve about the pooling of staff resources and other expenditure, and about structures for decision-making and administration of the partnership, including membership, voting and chairing arrangements. The steps outlined in Section 6.1 above should help to clarify arrangements for joint working on LDFs, More generally, building trust and a sense of shared ownership is an important part of collaborative activity[49].

7.4.6 Party political differences between neighbouring authorities need not be an obstacle to effective sub-regional co-operation and partnership,

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[49] See for example *Real Collaboration – a guide to establishing effective collaborative relationships in planning services*, Planning Advisory Service, 2007

when there are common interests and objectives. In some city regions (especially in the north), party political differences between a city and its surrounding districts have not prevented co-operation through sub-regional partnerships on shared objectives for economic development, urban regeneration, environmental improvements and infrastructure planning. This co-operation has also reflected a perception that joint action between local authorities in the sub-region is more likely to raise the area's profile, attract wider political support (e.g. from the regional bodies, the UK Government or the European Union) and secure enhanced funding.

7.4.7 However, in other sub-regions (especially in the south), there are often clear differences of interest between adjacent local authorities that represent urban areas and their more rural hinterlands, even if they are controlled by the same political party. These may be tensions or conflicts between urban expansion and protecting the green belt; a desire to maintain distinctive identities for the countryside and settlements around a major urban area; or a resistance to urban infrastructure encroaching on the rural hinterland (e.g. new roads, park-and-ride, airport expansion, water resources, waste management facilities or mineral extraction).

7.4.8 A number of commentators and participants in this study have pointed to the importance of effective local leadership to identify shared objectives and to persuade others of the advantages of pursuing those objectives through partnership working. Support for partnership working will also be needed from regional bodies and central government, including help with resources and procedures, and the prospect of real benefits for the area. Moreover, for sub-regional partnerships and strategic plans to be effective, they must be seen to offer real local benefits, such as economic and environmental gains or increased investment in infrastructure improvements.

Benefits of joint working:

7.4.9 There are likely to be economies of scale and better utilisation of resources in joint working. Specific cost savings are likely to include the better use of teams; joint evidence gathering, commissioning of studies and consultation / engagement exercises, in administrative costs and in the production process (both printing, presentation and production materials, and the costs of holding and servicing examinations). Similarly, if joint working is undertaken within a sub-region there may be a range of benefits derived from sharing best practice and understanding policy; more effective dialogue with stakeholders and the community; hopefully a more robust justification for policies at examination and as a basis for individual decisions; the transfer of expertise between teams and the development of scarce specialist skills.

7.4.10 Working together in sub-regions is likely to give benefits to regional planning itself. First, the quality of future RSSs is likely to be improved by a co-ordinated input of information and views from the sub-regional

grouping of authorities. This has already been noticeable in parts of the South East, where, for example, Partnership for Urban South Hampshire contributed to the sub-regional component of the South East Plan. Secondly, the establishment of a grouping of authorities (with member accountability) could form a basis for the exercise of democratic accountability that will be needed to give credibility and legitimacy to any future SRS. Building on relationships being established now will give these arrangements a flying start.

7.4.11 There is also a potential benefit in streamlining the number of plans that need to be prepared, consulted upon and examined in the sub-region. This could be of considerable help to stakeholders in reducing their burdens and increasing understanding of the issues across a functional area. In addition, we think there may well be advantages to engagement generally if it is targeted around functional areas – those within which (by definition) much regular activity takes place. It has been a long-standing difficulty to get communities to engage in strategic issues. A more consistent approach using identifiable sub-regions could be used to engage people more effectively around issues they understand. To be fully effective, this would need to embrace both spatial planning and the SCS.

Role of the RSS in advocating sub-regional arrangements:

7.4.12 We conclude that there is a need for decision making at the sub-regional scale to be clear, transparent and accountable. Mechanisms should be open and explicit and responsibilities should be identifiable to the community and subject to control through democratic processes. There may be implications for the internal organisation of individual councils, delegation structures, accountability and scrutiny arrangements, but *the over-riding principles might be*:

- On the basis of the definition of the sub-regions and the policy requirements, RSSs set out the preferred arrangements needed to deliver national and regional objectives in their region. This would include making clear the need for collaboration in planning activity, including LDFs and SCSs, in the different sub-regions.

- The detailed arrangements are a matter for agreement at the sub-regional level, involving the RPB (or its successor), principal authorities, responsible regional stakeholders and other agencies set up in the area, for example delivery vehicles. The arrangements are set out as part of the RSS preparation, and therefore subject to the normal processes for community involvement, scrutiny and examination, as they are integral to demonstrating the deliverability of the regional strategy.

- There are cases where the RSS goes further to advise on the framework for implementing sub-regional planning and ensuring delivery through joint working on LDFs, joint DPDs, the co-ordination of SCS activity and local delivery vehicles. Some discussion can be expected during the preparation and examination of RSSs. Where arrangements are generally agreed as necessary to effective delivery of the strategy, the RSS itself is more

prescriptive: specifying arrangements needed in the sub-region to deliver the regional strategy. In practice, this is only likely to be effective with the agreement of the principal authorities concerned.

- Negotiating agreement for joint working and building up trust can take time, and it might be counter-productive to attempt to rush it. Nevertheless, the aim is to encourage authorities to move up the "escalator" of joint working as expeditiously as possible, as set out in section 6.1 above, where this is desirable in the interests of effective planning and the better use of all stakeholders' resources.

- The RSS does not seek to dictate the actual pattern of local development documents, as this is a matter for the local authorities acting together, although the RSS can point to the need for joint core strategies or, exceptionally, a joint AAP where this was regarded as vital to the success of the regional strategy. Such recommendations can be taken on board by the authorities in revising Local Development Schemes, and by the Government Offices in deciding whether to intervene in them[50].

- Given the need for effective planning to be maintained even if authorities within a sub-region fall out of agreement, there is some form of default or arbitration power to be vested in a higher level or independent body, to be exercised in the event of disputes. A variety of planning and financial powers already exist to avoid a planning or delivery vacuum in the last resort. The role of the Government Office could be important here, but may not be necessary if agreements to joint working contain their own provisions to resolve disputes or deal with the consequences of a defaulting member.

- Sub-regional governance arrangements embodying collaboration at varying degrees of formality are kept under review as part of regional strategy monitoring and the annual monitoring report for LDFs.

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[50] The Secretary of State also has powers under Section 15 of the Planning and Compulsory Purchase Act 2004 to direct local planning authorities to amend their Local Development Schemes.

8   RECOMMENDATIONS

8.1   Approach

8.1.1   The above conclusions suggest a practical approach to sub-regions that can be applied to future RSS revisions, the SRS and in LDFs. The approach is not meant to be prescriptive, but tailored to circumstances to facilitate the definition of sub-regions in RSSs in an open and transparent way. Detailed recommendations about the nature of sub-regions are not appropriate. However, with the expectation of more emphasis on sub-regions in future regional strategy work, which is a desirable development, there are some issues that should be addressed in recommendations. We divide them into two main strands;

- what might reasonably be expected in the SRS (which could form the basis for guidance on sub-regions to replace those parts of PPS11) and

- recommendations to various bodies to assist the understanding of sub-regions and the delivery of sub-regional policies.

8.1.2   Finally, we are conscious that the resources available for this study have enabled only a cursory examination of many of the factors underlying sub-regions. If sub-regions are to be taken seriously as an aid to the delivery of the intentions of the Sub National Review and in the future SRS, more work needs to be done. We therefore make a few recommendations as to future work.

8.2   Possible guidance on sub-regions in the SRS:

8.2.1   The 2004 Act does not restrict the scope of sub-regional spatial planning, although Section 5(5) appears negative by referring to the sub-regional dimension simply as '*different provision for different parts of the region'*. However, changes to PPS 11 will be required if there is to be greater attention to the sub-regional dimensions of policy and its implementation in the SRS. PPS 11 presents too restrictive a view of the sub-regional content of the RSS and the need for sub-regional spatial plans, based on *'a clearly recognisable strategic policy deficit'*. A more positive view of sub-regional spatial planning is now required to support current Government policy as stated in the Sub-National Review and represented by other policy initiatives.

8.2.2   New Guidance should include the following points:

8.2.3   The Single Regional Strategy should integrate different aspects and levels of spatial planning; indicating the appropriate levels of intervention at which to achieve specific policy objectives. It should identify policy initiatives that will be required at the national, regional, sub-regional and local levels: for example

- national infrastructure projects,

- regional investment priorities,

- sub-regional spatial planning and transport strategies,

- joint core strategies or joint working on co-ordinated core strategies that set out a spatial strategy for the sub-region including (where necessary) strategic site allocations or the safeguarding of infrastructure, and

- joint working on local development documents (in specific circumstances area action plans) to implement strategic development proposals that cross local authority boundaries.

8.2.4 The SRS should provide the framework for sub-regional working: identifying issues of sub-regional significance and areas where sub-regional working is required through co-operation between local authorities, the Regional Planning Body and other partners, including:

- joint studies and collaboration on evidence and monitoring (e.g. strategic market and land availability assessments for housing and employment);

- joint working on local development documents, transport plans and infrastructure programmes;

- joint action to implement strategic proposals for development and regeneration through delivery vehicles such as City Development Companies and inter-authority co-operation to operate the Community Infrastructure Levy.

8.2.5 The SRS should make clear where there is a need for sub-regional working on core strategies and other local development documents to deliver strategic development proposals for specific issues. Sub-regions may not always need to be areas sharing a common rational boundary requiring comprehensive spatial planning approaches covering different purposes (e.g. for co-ordinated studies of housing, economic or transport policy). Sub-regions may also need to be defined in different ways for different purposes.

8.3   Recommendations to assist the understanding of sub-regions and the delivery of sub-regional policies:

8.3.1 Government should take steps to revise PPS11 if necessary in advance of guidance on the SRS to clarify the role of sub-regions and the approach to be taken to them in RSS.

8.3.2 Government should be clearer about the relationship between functional regions and their administrative arrangements (expressed in the SNR) and the promotion of LAAs and MAAs (which may or may not be the same areas).

8.3.3 Government should consider the implications of a sub-regional approach to the future development of Sustainable Community Strategies so that strategy preparation, partnership arrangements and consultation arrangements can be aligned with sub-regions set out in the RSS.

8.3.4　RBPs should make explicit their evidence for the definition of sub-regions and the role each should play in the delivery of the spatial strategy for the region.

8.3.5　RPBs and RDAs should, in advance of the SRS, seek to align partnership arrangements to the sub-regions set out in the RSS. Where this needs to be done by changing the sub-regional definition in the RSS, this should be done as part of the next RSS review, with involvement from the RDA and relevant local authorities.

8.3.6　RPBs should, when setting out sub-regions in the RSS, take account of the local arrangements for joint working on spatial planning and the desirability of encouraging more (and more effective) arrangements.

8.3.7　GORs should take a constructive role on LDSs to promote joint working where this would contribute to the delivery of sub-regional strategy.

8.3.8　Local authorities should take steps to share resources and work together on both LDFs and the SCS especially where RSSs have identified sub-regions.

8.3.9　GORs and/or PAS should draw up a comprehensive (and regularly updated) list of joint LDFs, LDDs and any joint SCS work, perhaps as a development of the Planning Portal LDD database.

8.3.10 RPBs/RDAs should draw up regularly updated lists of economic partnerships and delivery vehicles covering more than one principal authority.

8.3.11 PAS, POS and RTPI should promote practical methods of joint working between authorities and facilitate the sharing of good practice.

8.3.12 Government should sponsor guidance to assist engagement across sub-regions, including the development of techniques to better present and obtain views on strategic issues in planning.

8.3.13 Government, in considering future structural reforms of principal authorities, the establishment of new unitaries and delivery arrangements in remaining two-tier areas, should embody as an objective the achievement of the regional strategy, including the authorities' roles in sub-regions.

8.4　Recommendations for further work

8.4.1　The findings of this report should be published in order to stimulate a debate in regions and among local authorities about the issues raised and to encourage a more integrated approach to regional and local planning.

8.4.2　The state of play of RSSs needs to be reviewed as more RSSs come to the end of the current cycle and as reviews take place. The part of this study that examined RSS documents requested information from RPBs and facilitated discussion should be repeated to obtain up to date information to inform the development of thinking for the SRS. The most effective times to do this are:

- when most of the current RSSs reach the stage of 'proposed changes' by the Secretary of State, and

- when draft RSS reviews are published incorporating the response to the government's request for up-dated housing allocations (by 2011).

8.4.3 A training module should be constructed for use by RPBs, RDAs and local authorities to assist in the understanding of sub-regional issues and how they can be addressed through collaboration including joint working amongst local authorities.

8.4.4 Facilitated discussions should take place involving RPBs, RDAs, representatives of delivery vehicles (of more than purely local importance), local authorities and GORs, to explore prospects for better sub-regional integration in planning activities. For both logistical reasons (not least the potential number of authorities involved) and in recognition of the different contexts in the different regions, we suggest that these are organised either for each region separately, or in three groups of regions (broadly northern, midlands and south).

8.4.5 The basis for the functional approach to planning (as set out in for example the SNR and the PACEC work for the LGA) should be reviewed so that a national view can be taken of the appropriateness of data sets and so that all the factors contributing to sustainable development (economic, environmental, social and resources) can be fully assessed in the establishment of an economical evidence base to inform the sub-regional debate. This should be related to current requirements for monitoring indicators.

8.4.6 The position in London should be explored and any transferable lessons incorporated into future work.

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