



# RTPI

mediation of space · making of place

Royal Town Planning Institute  
41 Botolph Lane  
London EC3R 8DL  
Tel +44(0)20 7929 9494  
Fax +44(0)20 7929 9490

Email [online@rtpi.org.uk](mailto:online@rtpi.org.uk)  
Website: [www.rtpi.org.uk](http://www.rtpi.org.uk)

Registered Charity Numbers  
England 262865  
Scotland SC 037841

Patron HRH The Prince of Wales KG KT PC GCB

30<sup>th</sup> October , 2009

Email response sent to: [regionalstrategy@communities.gsi.gov.uk](mailto:regionalstrategy@communities.gsi.gov.uk)

Dear Sir/Madam,

## **RESPONSE TO CONSULTATION PAPER: Policy Statement on Regional Strategies and Guidance on the Establishment of Leaders' Boards**

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) is a membership organisation representing over 23,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

This response was drafted by the RTPI Development Planning Network and Politicians in Planning Network (PIPA) following an internal consultation and network event. Thanks are due to members of the networks for their substantial contribution in reviewing the document.

General comments are set out below and more detailed responses to the consultation questions are attached.

This Policy Statement - like the Local Democracy, Economic Development and Construction Bill - falls short of expectations raised by the Review of Sub-National Economic Development and Regeneration that new arrangements would provide for the effective integration of spatial planning and investment strategies at regional and sub-regional level, involving national Government agencies as well as regional bodies and local authorities. Since central government accounts for much of the regionally relevant capital and revenue expenditures this is not a trivial gap.

Some mechanisms for effective integration at sub-regional level are being developed through Multi-Area Agreements and other arrangements. It would be helpful if the Policy Statement pointed to potential linkages between spatial planning and new models for sub-regional co-operation, even though there may be different sub-regional arrangements for different purposes. There is also a need for spatial planning to interface with the full range of 'programmes and policies affecting the nature of places' (PPS1 & PPS11), as embodied in central and local spending programmes.

The new arrangements for regional planning rely on co-operation between appointed Regional Development Agencies (RDA) and Boards of local authority leaders. The involvement of stakeholders will rely on arrangements proposed by these 'Responsible Regional Agencies' (RRA). Although the Draft Guidance sets out general criteria for these arrangements, the Secretary of State's powers of approval and intervention suggest a need for more detailed guidance on what the Government expects, for example in relation to engagement with the RDA and other stakeholders, membership, voting rights and decision-making. No doubt there will be informal discussions with Government, but it is

important that stakeholders can also understand the underlying aims and principles so they can comment effectively on proposed Schemes.

There has been a large investment in current regional and sub-regional arrangements, including Regional Spatial Strategies (RSS). The transition to new arrangements should build on this experience. However, the RSS process is not yet complete. There are problems of delay and legal challenge, resulting from the shortcomings in the procedures followed by Government Offices for the Regions, especially in relation to the consideration of options for Sustainability Appraisal. The new arrangements and Draft Supplement on Sustainability Appraisal of Regional Strategies should draw lessons from this experience.

Arrangements for Leaders' Boards, working arrangements with RDAs and the involvement of stakeholders are already being developed. There is cross-party political support for such arrangements and for new sub-regional structures in many parts of the country. The Institute hopes that new democratically-led structures at regional and sub-regional levels will be supported by the Government and by successive governments, as there have been too many changes of policy on regional governance in recent years.


The Institute supports the objective of reducing the volume, detail and level of prescription in Government policy statements and guidance, which has been excessive in recent years. However, the Policy Statement and Guidance in this case are in danger of appearing bland: i.e. they state what is obvious whilst avoiding clear statements on some difficult and contentious issues.

The Government should recognise that there are several audiences for policy statements and guidance on spatial planning. These documents may be directed primarily at local authorities, regional and government agencies, but they also have a role in informing stakeholders and the general public (to the extent that they can be distinguished from stakeholders) about the Government's intentions. In preparing a strategy it is important to obtain support from the public and stakeholders on the objectives of the plan as well as to secure the agreement of the key public and private implementation agencies responsible for implementation and delivery.

A degree of clarity is therefore essential if stakeholders are to be able to comment effectively on regional strategies and schemes for regional governance and know how they can engage more effectively with regional and sub-regional spatial planning.

If you require any further assistance, please contact Rhian Brimble, RTPi Network Manager on 01443 229852 or email [rhian.brimble@rtpi.org.uk](mailto:rhian.brimble@rtpi.org.uk)

Yours faithfully,

A handwritten signature in black ink, appearing to read 'M Thomson', followed by a long horizontal flourish.

**Matt Thomson**  
**Acting Director Policy & Partnerships**  
Enc.

## **Draft Policy Statement on Regional Strategies**

### **1.1 Do you consider that the scope of the Policy Statement enables regional flexibility while providing sufficient certainty and consistency about how new Regional Strategies should be prepared? Do you wish to suggest any improvements?**

Although the Institute supports the idea that national policy and guidance should not be too detailed and prescriptive, the Policy Statement should help to clarify expectations about the new form of Regional Strategy – e.g. that it is not a continuation of the RSS with additions, nor the merger of existing strategies. The objectives of the new system could be explained: e.g. seeking to achieve a shared vision about the needs of the region and priorities for action.

The Policy Statement has less emphasis on infrastructure co-ordination than might have been expected on the basis of the Sub-National Review. More emphasis is needed on implementation and regional funding mechanisms. It will be necessary to secure involvement by Government Agencies in agreeing and delivering regional priorities for investment.

### **1.2 Do you agree with the scope of Regional Strategies set out at Paragraph 3.4? Do you have any suggestions as to how this can be improved further?**

Encouragement should also be given to make the new Regional Strategies much more concise and focused, and to be reviewed in much less time than RSSs have taken to prepare.

Although flexibility is welcomed, there is also a need for members of the public to know what is expected of the new Regional Strategies and what the Secretary of State will be looking for when deciding on whether to 'sign-off' the RS or to intervene.

### **1.3 Do you agree with the sub-regional approach at Paragraph 3.6. If not, what do you think needs to be improved?**

The RTPI supports a sub-regional approach where appropriate, which will be the case for many city regions and urban areas where the main economic activities and land requirements extend beyond the boundaries of the individual authority. Inter-authority co-operation on local Development Plan Documents should be explicitly encouraged at sub-regional level through the new Regional Strategy system, as it has not been found easy to prepare joint DPDs or to achieve joint action at sub-regional level under the current LDF arrangements. However, we recognise that different sub-regions may need to be identified for different purposes, for example specific issues of flood mitigation or in some predominantly rural areas. The place for these sub-regions to be determined is, ideally, the Regional Strategy, but mechanisms may need to be identified that allow for flexibility where a need arises to address an issue on a sub-regional basis not foreseen in the Regional Strategy.

### **1.4 Is the policy framework at Paragraphs 4.8 and 4.9 on the content of Regional Strategies appropriate to ensure Regional Strategies focus on the key priorities for the region?**

It is important to balance the policy emphasis on economic development with sustainable development and climate change.

Environmental policy is not listed as one of the top 3 topics, yet the statutory targets for carbon emissions under the Climate Change Act appear to put this issue in a superior category to all other considerations, including economic. In addition, the statutory responsibility in development planning to have regard to the objectives of sustainable

development must be reflected in policy at the regional level. If this is not the case then concern is raised regarding the resolution of conflict between the key priorities.

Requirements on conformity and content appear much looser than in PPS 11. Whilst it is understood that the Department wants regions to take more responsibility for the form and content of the new Regional Strategies, it is notable that there is, for example, no longer a requirement to provide *'housing figures for individual districts or appropriate sub-regional housing market areas.'*

**1.5 Is there a need for more detail in the policy on how responsible regional authorities should decide on the priorities for their Regional Strategy? If yes, what should this detail comprise?**

More detail may be appropriate on actions that need to be implemented in the first 5 years of the strategy, but these actions may need to include long-term commitments e.g. to strategic transport infrastructure, renewable energy, flood relief or waste management.

**1.6 Is the policy on the project planning and the preparation of a Project Plan appropriate? If not, how can it be improved?**

There is support for proper project management; however there appear to be no penalties for failure to achieve programmes. If transport and other plans have to be prepared to a timetable, why not spatial plans? It must be remembered that local authorities' delivery of LDFs is often dependent on regional policy.

The Secretary of State has to agree revisions to the Project Plan, but it is unclear what happens if the SOS does not agree revisions.

**1.7 Is the policy on Statements of Policies on Community Involvement at Paragraph 5.17 appropriate? If not, how can it be improved?**

The removal of Regional Assemblies, with their 'social, economic and environmental partners' could result in reduced stakeholder participation unless effective structures are put in place for the continuing involvement of stakeholders in Regional Strategies. It will be important to ensure adequate representation of rural communities in primarily urban regions and urban areas in more rural regions.

**1.8 Is the policy framework on the role of Sustainability Appraisals and the appraisal of issues and options in relation to the Regional Strategy process appropriate?**

The requirements of Sustainability Appraisal have resulted in major problems for some Regional Spatial Strategies, along with the need to complete Appropriate Assessments under the Habitats Directive.

Although Annex 4, Figure 1 is helpful, there is a need to improve understanding about how the SA Report is to be reviewed at successive stages, especially in relation to the consideration of alternative options.

**1.9 Is the policy framework to guide the Examination in Public process appropriate?**

The status of the Panel's Report now appears unclear compared with the binding reports of Inspectors on DPDs, especially as the RS report is considered initially by the 'Responsible Regional Authorities' rather than the Secretary of State. There is scope for unnecessary delay if the RRAs do not agree with Government policy.

**1.10 Appendix A describes the broad stages of the Regional Strategy revision process. Does this provide the**

**appropriate level of detail to guide responsible regional authorities in preparing their Strategies? If not, how can it be improved?**

If the scope and content is to be left to the RRA, then no further detailed guidance can be given on the preparation of the regional strategy.

**1.11 Paragraph 5.49 sets out the key expectations of Implementation Plans. Are these appropriate and do they provide sufficient clarity?**

Commitment to the Implementation Plan by a wide range of delivery agencies is essential and more prescription about the 'duty to cooperate' of public agencies may be necessary.

The relationship of the Implementation Plan to Regional Funding Advice, LAAs/MAAs, Local Transport Plans and other expenditure programmes also needs further consideration.

**1.12 Paragraph 5.60 sets out the broad policy for the preparation of annual monitoring reports. Is this appropriate and does it provide sufficient clarity?**

Monitoring needs to be more focused and with more emphasis on effective communication/dissemination. Comprehensive Monitoring Reports are not the most accessible way to make information available and take too long to produce. For example, basic statistics like housing completions for a financial year are often not available until the following February.

The emphasis on targets and performance indicators should not stand in the way of making basic information readily available on web sites.

Monitoring reports should be a tool for considering issues and future options as well as examining past performance; assessing and reviewing policies as well as reporting on past changes in outputs and context.

**1.13 Paragraph 6.1 set out the approach to the preparation of documents to support the Regional Strategy. Does this make it clear how documents should relate to the Regional Strategy?**

Paragraph 6.1 clarifies that the supporting documentation is not part of the development plan. No further comments.

### **Draft Regulations**

**2.1 Do you have any comments on the proposed scope and detail of the proposed regulations set out at Annex 2?**

There appears to be an absence of sanctions to perform – see response to 1.6.

### **Establishment of Leaders' Boards: Draft Guidance on the Preparation of Schemes**

**3.1 Do you agree with the range of considerations under each of the three broad criteria that the Secretary of State will take into account when considering schemes for the establishment and operation of a Leaders' Board, as set out in the guidance at Annex 3? If not, how should they be changed?**

Joint responsibilities of the RDA and Leaders' Board could prove problematic if a Leaders' Board fails to agree

on structures or policy. It appears that the RDA is 'first among equals' and can take the lead in preparing the Regional Strategy if there is political disagreement. (This is inherent in the legislation, rather than a comment on the Policy Statement.)

### **Sustainability Appraisal of Regional Strategies: Draft Supplement to "A Practical Guide to the Strategic Environmental Assessment Directive"**

#### **4.1 Do you support the approach proposed for the new guidance at Annex 4, taking the Practical Guide as the main document with a supplement on Sustainability Appraisal?**

There is scope for confusion about the relationship between SA objectives and those of the strategy. Integration of SA within the process seems to conflict with the idea of formulating SA objectives that are separate from the evolution of issues, options and strategy. There is a tension, if not a contradiction between the idea of SA as an independent appraisal and its integration in the process. Documentation of SAs should also be better integrated with the strategy.

Further clarification and simplification of processes and outputs is needed, especially as the meaningful appraisal of many high-level policies is questionable in principle. In some cases, there are no effective tools or sources of information. SAs must avoid becoming a litany of subjective verbal judgments or a meaningless box-ticking exercise. The solution is to streamline the process by focusing only on significant changes that can be identified.

#### **4.2 Do you think that the Practical Guide and the supplement together provide enough guidance to undertake Sustainability Appraisal that are compliant with legislation and meet the Regional Strategy's objective of promoting sustainable development?**

Support for further clarification of the need to appraise options, which has been demonstrated by recent legal challenges to emerging Regional Spatial Strategies.