



RTPI

Royal Town Planning Institute

RTPI Briefing for the Ministry of Housing, Communities, and Local Government

Managing the interim period between the reforms to the NPPF and the introduction of a legislative framework and powers for England-wide strategic planning

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1. Background

In recent policy roundtables hosted by MHCLG and the RTPI, the Minister for Housing and Planning identified managing the transition between the introduction of the recently consulted-on reforms to the NPPF, and the introduction of England-wide statutory strategic planning, as a policy challenge which officials would welcome input on.

The RTPI strongly supports the introduction of full strategic planning across England. This can be seen in [our response to the NPPF consultation](#), where it is clear we view strategic planning as a crucial means of ensuring that the proposed national policy reforms (particularly the introduction of the New Standard Method) deliver their intended outcomes as effectively as possible.

We also agree with the Minister that, before the Planning and Infrastructure Bill puts new strategic planning arrangements in place, the proposed changes to the NPPF bring with them a series of challenges and risks. These would benefit from being clearly identified and proactively managed by the government during this transition process.

This briefing provides recommendations to MHCLG on how it may effectively manage these challenges and risks, via:

- **The creation of a 'route map' by MHCLG.** This would provide LPAs (and the wider sector, including housebuilders) with the certainty they need to continue making local plans and delivering new homes, while being enabled and ready to prepare and mobilise for cross-boundary planning, ahead of the bringing into legislative effect the strategic planning framework and powers; and
- **The establishment of 'shadow' strategic plan making bodies in the areas which will in future be enabled and required to produce strategic plans,** but which currently do not have the powers to do so. MHCLG has a crucial role in facilitating and incentivising their creation.

2. The need for an interim strategic planning 'route map'

2.1 The case for a 'route map'

Our analysis suggests that MHCLG will need to do three things in order to set the conditions for maintained housing delivery and plan production during this interim period, while maximising the coverage of strategic plans as soon as possible:

- **Reduce the uncertainty that LPAs (and other actors, such as combined authorities, landowners and developers) face in the period between the changes to the NPPF being introduced and statutory strategic planning being fully rolled out.** There is a significant risk

that the combination of emerging transitional arrangements, significantly higher housing targets, and the prospect of new governance structures will result in a slowdown in plan making in some areas. There is already evidence that some LPAs are stopping the production of their local plans in this context.

- **Provide a positive signal and incentives to LPAs** on the benefits of continuing with local plan production, proactively engaging with emerging strategic planning arrangements, and working within a framework of strategic planning in the future.
- **Enable the authorities which will become part of strategic plan making bodies (for example, LPAs, county councils and combined authorities) to begin putting the institutional and procedural groundwork for strategic planning in place** before the legislative framework for it is introduced.¹

Each of these issues could be addressed by MHCLG publishing an accessible and self-contained resource that aims to provide as much clarity and guidance to LPAs (and other public sector actors in the planning process) as possible about the transition to England-wide strategic planning.

As we describe in more detail in part 3, below, this 'route map' would make clear to all key actors what they should expect at different times in the process, including, sequencing, overall timelines, new geographies, links to other policy regimes, resourcing and support, and the work that should go into strategic planning before the legislative framework and powers for it are in place.

This is a relatively-low cost intervention that could play a significant role in reducing the uncertainty that risks undermining plan making, housebuilding and the swift introduction of strategic planning.

2.2 Presentation and communication

The resource described below should be made available to all. A dedicated website (or set of web pages) on the transition to strategic planning should be set up by MHCLG, so all information on the subject and the 'route map' itself are contained in one place. Crucially, officers from any individual LPA (or other public sector body) should be able to read the route map and interpret its consequences for them at any point in time.

It would also be valuable to include wider official communication about the reforms within the resource. For example, links to letters to Mayors and Chief Planners should be provided through the dedicated site and vice versa.

Below we outline what the contents of this route map should be.

3. What to include in the route map

A range of topics will benefit from clarity in this interim period and should therefore feature in any route map. The following are set out as a starting scope:

¹ This should take into account and directly refer to pre-existing non-statutory or informal strategic planning that is already being undertaken in many areas of England (as [RTPI-commissioned research](#) has documented). How planning in these areas will evolve or compliment emerging institutions and processes is an important question to address.

3.1 Overall timeline and sequencing

The route map should include a timeline of milestones and actions to be taken between now and when a legislative framework and powers for strategic planning are in place. This should include, at a minimum:

- The timeline for establishing the new strategic planning areas, including any related consultations (see below);
- The likely timeline for the passage of the Infrastructure and Planning Bill;
- The likely timeline for changes to national planning policy (including, but not limited to, the introduction of the recently consulted-on changes to the NPPF, new planning fee regulations, the NMDPs, and new plan making system);
- The dates by which different authorities will be working with/within statutory strategic arrangements and the key milestones towards this outcome;
- The preparatory work that should be undertaken at the local and strategic levels before a statutory framework, processes and institutions are in place (alongside any 'pathfinder' resources – see part 4); and
- What the government's desired national and local 'end goals' are.

Officers in all types of authority (LPAs, county councils, existing combined authorities, etc) should be able to develop a clear understanding of the opportunities relating to, and consequences of, each step/milestone for their authority (and others) with very little ambiguity.

3.2 The geography of strategic planning

A consultation on the boundaries of new strategic plans and the bodies that will deliver them – particularly those outside of the current combined authority areas – should be launched as soon as possible. The geographies of strategic planning in these wider areas are important to get right, but the process of engagement is also valuable in itself – it will encourage preparation work for strategic planning to begin.

However, while this input from the sector and public is valuable, it is important that the Government ensures that the geographies of strategic planning that are created add up to a coherent whole, and fully cover England.

3.3 The relationship between strategic plans, local plans and mineral and waste plans

The route map should make clear:

- How and why local plans and minerals and waste plans should continue to be developed alongside the introduction of strategic plans across England;
- What the future relationship will be between local plans, minerals and waste plans, and the new strategic plans;

- How transitional arrangements for plan making (as described in the recent consultation on changes to the NPPF) align with the making of strategic plan making; and
- Any required early review mechanism to follow the initial introduction of and transition to strategic spatial planning.

3.4 Strategic planning bodies' relationship with central government and resourcing

The route map should set out the level of central government support (financial and professional) for strategic plan making that LPAs and strategic plan making bodies should expect in both the interim period and once a legislative framework and powers for strategic planning are in place.

This will enable those bodies to be realistic about their resource commitments while providing certainty. It will be particularly important in areas where the government is considering appointing county councils as the body responsible for strategic plan making, given that they currently do not have any direct role in statutory planning, but do influence the development of local plans indirectly in a large number of important ways (e.g. they are responsible bodies for transport, local nature recovery strategies, public health, flood risk, minerals and waste).

More broadly, strategic plan making bodies will need additional financial and professional resources in order to begin developing their plans, as it is unlikely that pooled LPAs resources will be sufficient in many areas. In most new strategic plan making bodies, however, this resource could be relatively small, so long as it is dedicated and impartial.² A plan on how these skills and resource gaps will be filled will provide clarity for local planning departments and relieve their funding and resource pressure.

Alongside capacity and capability funding, the government should consider as a matter of urgency how its digital technology programme can be used to support the new generation of strategic plans (see part 3.7) and whether the funding currently available could be used to pilot some of the front runners in the process.

3.5 The scope of emerging strategic plans

Clear guidance on the scope of emerging strategic plans will be important. For example, while housing and employment land allocations should form part of the emerging strategic plans, detailed design policy should not. They also need to be about more than housing, and to take a truly integrated approach in terms of connectivity, environment, economy and infrastructure.

Critically, strategic plans must provide an integrated framework for growth across strategic planning geographies, aligning ambitions and priorities set out in emerging local growth plans, local nature recovery strategies, local transport plans and strategic regeneration areas (see part 3.8).

² See the findings of [RTPI-commissioned research](#) on strategic planning in England.

3.6 Developing visions for new strategic plans

New strategic plans should be vision-led, and the route map can set out the processes for developing these visions before the legislative framework is formally in place. It will be particularly important to set expectations on the level of public participation, and to link these processes to the development of evidence bases (see part 3.7).

Building up engagement before a legislative framework is in place will enable strategic plan making bodies to 'hit the ground running' when statutory framework and powers are brought into effect.

The type of engagement should be considered given the slightly more abstract nature of strategic plans. For example, past experience demonstrates that whilst public engagement is important, the role of economic, environmental and social stakeholders is vital, especially those that will have a role in implementing the plans.

3.7 Plans for the strategic plan making bodies' development of a shared evidence base

The route map should set out clear expectations on the evidence base that strategic plan making bodies should gather and maintain. These should be directly aligned with the overall objectives of the strategic plans and, where possible, provide a shared resource for LPAs.

As well as guidance on policy issues and scope (closely linked to other plans and strategies – see part 3.8, below), this should include modern transferable data formats and the need to have a standardised evidence base across regions, as well as the use of digitisation to help develop spatial strategies (e.g. digital mapping).

This will allow existing and future strategic plan making bodies to begin identifying and collecting relevant data before new strategic planning arrangements are brought into effect. It will also benefit LPAs, which will be able to draw on this evidence base in their own plan making.

3.8 Links to other plans and strategies

There are a number of national and regional plans and strategies related to other policy regimes that it will be crucial for emerging strategic plans to coordinate with.

The geography of these plans/strategies may not coincide neatly with that of existing and emerging strategic plans. They may, for example, be national-level (e.g. National Policy Statements) or regional (such as River Basin Management Plans) and several are currently emerging (e.g. Local Growth Strategies and Local Nature Recovery Strategies). However, there remains a strong need for new strategic plans to be integrated with these plans and their evidence bases. These plans include, but are not limited to:

- Local Growth Strategies;
- Local Nature Recovery Strategies;

- River Basin Management Plans;
- Water, Drainage and Wastewater Management Plans;
- Local Transport Plans;
- Strategic Spatial Energy Plans;
- Regional Energy Strategic Plans; and
- Joint Strategic Needs Assessments.

The route map should direct ‘shadow’ strategic plan making bodies (on which we elaborate in part 4) to start identifying links between strategic plans and these other strategies/plans.

3.9 Expectations regarding examinations

The route map should make clear how emerging strategic plans will be examined. In our response to the recent NPPF consultation, we highlighted that the current examination process for Local Plans will not be appropriate for strategic planning. There should instead be a separate testing process with accompanying clear guidance on developing strategic and on how they will be tested.

It will be crucial for this guidance to be published ahead of the implementation of forthcoming strategic planning legislation as it will guide the work of the ‘shadow’ strategic planning bodies, described below, and will help inform the passage of the legislation.

The government should also give some consideration to the capacity (and skills) of the Planning Inspectorate to manage this - especially if these new plans are being prepared on a similar timescale. For example: Should the examinations be staggered? And should strategic plans across wider geographies be examined on similar timetables? This may help address functional overlaps between strategic planning areas.

4. The potential role of ‘shadow’ strategic planning bodies

Following the confirmation of the new strategic planning boundaries and bodies, government should direct or advise future strategic planning bodies to set up shadow strategic governance structures (these may be, for example, committees comprising elected members from constituent authorities) and officer teams.

New shadow strategic planning arrangements should include representatives from constituent authorities and undertake preparation work in line with the route map, such as:

- Identifying links between SDSs and other national and regional spatial plans;
- Beginning evidence collection work;
- Beginning consultation work on the visions for the respective areas; and
- Setting expectations for local authorities on the level of decision making when strategic legislation is in place.

The governance of these shadow strategic planning bodies will be important. On the member-side, the ‘shadow’ governance structures established should be empowered to make strategic-level decisions independently, and without having to refer back to their constituent local authorities for confirmation. As



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argued above, in order to undertake this work effectively these teams will need dedicated resourcing – even just one or two officers per body could have a transformative effect on delivery and be sufficient to carry out the tasks listed above. Once the legislative framework and powers for strategic planning are introduced and given effect, these shadow bodies should form the direct basis for the formal institutions that deliver statutory strategic plans.

This will enable valuable work to begin before the statutory introduction of strategic planning across the whole of England, including both ‘hard’ actions such as evidence collection, and ‘soft’, such as establishing necessary engagement and relationships.

Areas which have better-established strategic planning structures (Liverpool City Region, for example), could operate early pathfinder initiatives to establish practice and transitional frameworks.