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Dear Kate Barker,

Core Cities observations to the Barker Review of the Land Use Planning System in England

Please find attached a response to the above Review from the Core Cities.

The response advocates for further coordination at the city-region level for land use planning, which we believe to be the correct spatial level, and for connecting this planning much more closely to economic and other planning at that same level.

We also advocate for additional freedoms and resources for the Core Cities, to enable them to achieve this coordination and its attendant benefits. However, we are very clear that this is not an end in itself, nor is it just an argument for increased local accountability and a reduction of the democratic deficit; as important as these things are. Our argument has two further central points.

Firstly, that such devolution, by providing increased local control and coordination, improves quality of life, well being, inclusion and prosperity for all residents and communities of the Core Cities and city-regions, in this case through a more sophisticated and coordinated approach to land use planning, aligning it with sub regional spatial economics. Secondly, that devolution to the Core Cities will, as articulated in the business cases of the city regions, help to deliver on core Government objectives in relation to number of areas, including land use planning and enhanced economic competitiveness through local coordination. Recent reports, in particular *The State of the English Cities* (Parkinson, 2006) have added a weight of evidence to the validity of these arguments.

We look forward to the outcome of your Enquiry and would welcome further questions and discussion regarding the issues above and in the attached paper.

Yours sincerely,

Chris Murray
Director, Core Cities

REVIEW OF THE LAND USE PLANNING SYSTEM IN ENGLAND

OBSERVATIONS OF THE CORE CITIES GROUP

Introduction

1. Core Cities is a network of England's largest non-capital cities - Birmingham, Bristol, Leeds, Liverpool, Manchester, Newcastle, Nottingham and Sheffield. The Group works together, and with Government and other national agencies, on issues concerned with improving the international economic competitiveness of the cities.
2. Core Cities welcomes the strategic approach taken in the Interim Report - the recognition of the need for the planning system to respond to economic globalisation, climate change, population and housing growth, and the planning implications of rising disposable income and leisure time.
3. We also welcome the focus on the planning system as an instrument for delivering economic growth and improving productivity in the context of globalisation. We endorse the principles of speed, certainty, reduced complexity and flexibility set out in the Interim Report.

National and Regional Spatial Frameworks

4. We support the principle that the planning system should facilitate, rather than slow down, economic development and growth.
5. We also believe, however, that this means much more than merely responding to existing market demand and trends. Initial public investment in infrastructure is often a key determinant of both the amount and the location of private investment and the employment and population growth that accompanies it. For example, the remarkable renaissance of the city centres in the Core Cities in recent years has been driven to a large extent by public investment in major facilities, pedestrianisation, tram systems and other infrastructure.
6. In the same way, many of the demand and development pressures in the South East are in part being driven by the concentration in that region of infrastructure such as international airport capacity and public R&D.
7. One crucial aspect of making the planning system more supportive of economic growth must therefore be to establish a national spatial framework that supports, through public investment and other national policies, the expansion of this type of infrastructure in other regions - particularly in the Core City Regions, which are recognised as the main economic engines outside of the South East. This will simultaneously reduce the demand pressures in the South East that create major problems for the planning

system, whilst also enabling the planning system to promote economic growth more effectively in other regions.

8. A similar argument can be made with respect to Regional Spatial Strategies (and other regional strategies). These strategies all need to recognise and support the Core City Regions as the principal drivers of economic growth in the regions with, for example, Regional Spatial Strategies giving priority to development and population growth in these key urban areas.
9. Within a planning system built around a national spatial framework for public investment, and regional strategies supporting growth agendas, particularly within the Core City Regions, we believe that further devolution of planning powers and infrastructure investment from national and regional level to the cities and city regions would deliver economic growth more effectively.
10. Transport and highways investment, for example, is vital to stimulating developer interest and confidence. Yet the current highly centralised decision making system does not easily permit effective responses to local opportunities. English Partnerships has a role to play in funding regeneration, and has recently funded infrastructure within innovative financial models where the Government recoups its investment over several years from developer contributions. If the Core Cities and their city regions were given additional fiscal freedoms and flexibilities, they could potentially contribute enormously to infrastructure costs using similar innovative approaches, and deliver best value from current resources.

City Regions

11. Core Cities has long argued that the city region is the most appropriate spatial level at which to address competitiveness and economic growth. Each of the eight Core Cities is working with neighbouring authorities to build up a city region partnership, and each partnership gives high priority to economic growth. We also recognise that these issues are similar in other city region partnerships in England, such as those being developed as part of the Northern Way Growth Strategy.
12. We therefore welcome the reference to city regions in the Interim Report, and strongly urge that city regions be recognised as the building blocks of the national spatial framework referred to above, and of Regional Spatial, Economic and Housing Strategies. The planning system also needs to recognise the different economic roles of different city regions, with the Core City Regions being acknowledged as England's main international players, alongside London, in the global economy.
13. Agglomeration and clustering needs to work with the grain of the economic footprint of these Core City Regions if growth and productivity gains are to be maximised, and the planning system can help to achieve this.

14. Planning where future housing, including social housing, is located within a city region in a way that plays to its spatial economic footprint, and allows for flexible growth, is a complex matter. The role of the Housing Corporation is central to this, and it is looking at how best to achieve it in a current study for the Northern Way. However, planning objections frequently arise from existing residents over additional housing that has, for pragmatic purposes, been placed within existing infrastructure. This is often a completely correct choice, and the planning system should balance such objections from residents with the benefits of creating new, and upgrading old, infrastructure within the Core Cities and their city regions.
15. Local government remains the key agent in all of this and its capacity, powers and resources need to be increased to maximise the value of the planning system for the public good at the local and sub regional level. The growth patterns of the future will no longer respond to or respect administrative boundaries, and partnership working is therefore essential. The Core City Regions have begun to develop effective partnership models that point to a way forward, and these partnerships need to be supported.
16. Much can be done voluntarily by these city region partnerships to develop a city region spatial framework. There is a case, however, for strengthening this collaboration through the national planning system - for example by giving the city region partnership the right to comment on major planning applications submitted to member authorities of the partnership, and by establishing a duty for the member authorities to consider these comments.
17. Within the larger city regions, more localised problems may occur due to the existence of inappropriate planning boundaries. Often, local authorities have on their own initiative developed ways of collaborating on local cross boundary planning issues, but again the review of the planning system could consider ways of encouraging or institutionalising such collaboration.

Avoiding the Risks of a More Relaxed Planning System

18. Core Cities recognises that one of the implications of the focus on growth and competitiveness may be a relaxation of the planning system in certain ways.
19. Whilst we support this in principal, we would argue that changes to the planning system must not be geographically blind, or be disproportionately influenced by issues and challenges that arise primarily in the South East. An undifferentiated policy response will have differential impact across the country. In particular, we would strongly urge that any relaxation should not be counterproductive in terms of long term economic objectives such as supporting the engines of the national economy outside of the South East and achieving more balanced growth across the regions. In this context, we would be concerned if a relaxation of the planning system resulted in more development gravitating to the South East at the expense of other regions.

20. A vibrant, high profile, 'international' city centre with a critical mass of higher level service activities is a key driver of competitiveness, at least for the Core City Regions. Decentralisation of these high level activities from city centres needs to be avoided. We do not wish to see a return to large scale out of town development of the higher order retail and other activities that enable our city centres to compete on the European and global stage.
21. More generally, all of our city region partnerships have growth agendas that depend more or less upon drawing both population and economic activity back into the urban cores. We recognise the need for an element of growth in other parts of our regions. Nevertheless, the planning system should recognise and support the unique economic engine role of the Core City Regions, and we would be concerned if any relaxation of the planning system resulted in an acceleration of decentralisation from them. Even where there is pressure for growth in more outlying free standing towns, this is often due to their proximity to the key assets of the Core City Regions - their city centres, research universities and airports. These development pressures can therefore often be accommodated closer in to the urban core. We believe that a planning system that strongly supports economic and population growth in the Core City Regions will deliver more sustainable development, more balanced communities, and more balanced economic growth across England.
22. In the knowledge economy, the quality of urban design and of the built environment are critical factors in a city's competitiveness. The quality of urban design and the built environment in new development is particularly important to the Core Cities, most of which are seeking to address long term planning and design problems through the planning system by the imposition of quality design standards. We would be concerned if any relaxation of the planning system made it more difficult for our cities to achieve high standards of design, particularly in those areas such as the city centres where development pressures mean that high planning standards do not usually result in a loss of investment. There is a need to establish a balance between the role of CABE in urban design and of English Heritage in relation to built heritage and conservation, with planning's being sensitive to heritage but not being driven solely by heritage considerations.

Planning Capacity and Skills Levels

23. As the Interim Report points out, the Government has recognised the issue of capacity and skills levels. This is a particularly acute issue within major planning authorities such as the Core Cities and authorities elsewhere in their city regions.
24. Local authorities can undertake some initiatives themselves - for example, by establishing academies and sponsoring courses. This is, however, part of a wider issue about the development of place making skills. The Department for Communities and Local Government increasingly sees itself as the Department for 'place'. Core Cities supports this move, and would welcome

the opportunity to work with the Academy for Sustainable Communities on this agenda.

Conclusions

25. Core Cities supports the Interim Report's focus on enabling the planning system to support economic competitiveness and growth more effectively. We believe that the review provides an opportunity to establish national and regional spatial frameworks that more clearly focus upon supporting the main engines of the national economy - London and the Core City Regions.
26. We accept that this focus on growth may lead to some relaxation of the planning system. We would be concerned, however, if this resulted in a weakening of the competitiveness of the Core City Regions through the further concentration of development in the South East, the decentralisation of high level activities from their city centres, further dispersal of development and growth beyond the Core City Regions, and a decline in the quality of urban design and the built environment.
27. Core Cities recognises the existence of capacity and skills issues, including 'place making' skills, and would welcome the opportunity to work with the Government to address these issues.