



COMMONON FUTURES NETWORK

RESPONSE TO CONSULTATION DRAFT OF LONDON PLAN

Context

This response to the London Plan consultation has been prepared for the Common Futures Network (CFN). The CFN has been established in response to a perceived need for a more explicit understanding of the spatial dimension in setting national priorities, particularly for England, which lacks any form of national development framework.

The CFN is independent of political, business or other sectional affiliations and our members include professionals with extensive experience in UK planning practice and consultancy, economic development, regeneration, transport planning utility planning and academia, across the UK and internationally.

Its recommendations arise from a symposium held in December 2016 following which the CFN has published a **Prospectus** which sets out eight key propositions for tackling short and longer-term national spatial priorities. A summary containing these Propositions is at Appendix A, and a copy of our **Prospectus** is attached as supplementary evidence.

This **Prospectus** sets out a *New Agenda for England and the UK* which has direct implications for the London Plan including:

- The need to secure the global role of the nation through flagship projects which re-engineer the nation's infrastructure and assist the rebalancing of opportunities within the Nation;
- A devolved development programme building on sub-national strengths
- The need to deliver a new urban agenda designed to support and nurture the inherent growth potential of the networked system of cities outside of London
- A new rural agenda to connect with the rural hinterland and secure the natural capital of England.

More specifically the **Prospectus** recognises the vital role of the London Capital Region in the fifth of its eight key propositions. The CFN response therefore focuses on the relationship of the draft London Plan to the Wider South East. This is becoming increasingly critical as the balance between the central city and its wider economic region changes with the 'activity' increasing outwith the GLA area but impacting on it.

PROPOSITION 5: SECURING THE GLOBAL ROLE OF LONDON

A high level non-statutory public – private forum should be created with the express remit of preparing a strategy for the London Capital Region in order to:

- *secure the global role of London*
- *create the capacity for the potential scales of future growth*
- *ensure that all London's residents and workforce benefit from its economic success;*
- *rebalance the focus from being solely on London to one including its network of outer centres, and*
- *relate its economy and growth, to the planned changing connectivity to the rest of the country.*

Proposition 5 is supported by the reasoned justification set out in the **Prospectus** (refer pages 28-29). This is supportive of the core aims of the proposed London Plan. The recent efforts to bring the Local Authorities and LEPs in the WSE is also applauded. However, the success of this Plan will depend to a large extent on the relationship between London and the rest of the Wider South East and in terms of the effectiveness and sustainability of the cooperative processes for resolving the following issues:

- the balance of people and jobs;
- transport and related infrastructure; and
- the shared environmental framework.

The Unresolved Issues

Unresolved Issue 1: The Balance of People and Jobs: The principle of optimising the scales of growth within the GLA area is accepted. However, there is concern about:

- The degree of uncertainty that exists about the capacity of London to accommodate the scales of growth that are envisaged in the Plan and in other assessments that have been made (e.g. by DCLG);
- The relationship to the aspirations for increased growth elsewhere in the WSE (e.g. the CaMKOx Corridor) or the constraints upon it where there are established designations;
- The uncertainty that exists on migration estimates especially post-Brexit.

The CFN has not sought to go into the detail of the above issues since it is considered that they are recognised in the draft Plan itself either explicitly or implicitly. It is happy however to amplify them if required.

Unresolved Issue 2: The Need for a Strategic Framework for the Wider South East: Draft Policies SD2 & SD3 recognise the need for a common and consistent approach to planning issues across the WSE. At present this does not exist. These policies seek to overcome this by the GLA committing itself to on-going joint planning work to resolve, specify and implement a more collective framework for the area especially along the key Corridors. The draft Plan proposes to achieve this through the current informal liaison arrangements which are linked to annual summits between the 156 Local Authorities and 11 LEPs. This is a welcome initiative by the GLA and its partners but it is not vehicle for delivering agreed outcomes. This is illustrated by the outcomes of the latest Summit that is referred to in the draft London Plan (footnote 7).

However useful the current approach to cooperation has been in preparing the Plan, it is uncertain that it will provide an effective on-going mechanism once the Plan has been approved. This risk arises from two factors in particular. First, its dependence on setting up a series of local partnership arrangements without any stated means for dealing with their interdependencies. The resulting set of individual projects and programmes will not of themselves provide the strategic context for the WSE, Secondly, the whole process as stressed in the draft Plan is to be based on cooperation of **Willing Partners**.

It is therefore considered that as it stands Policies SD2 & SD3 set out the clear commitment by the GLA to cooperative working. However, it has limited power to deliver the desired cooperative outcomes. As a corollary, the processes envisaged are clearly related to the current Duty to Cooperate. This is however recognised as weak and less effective than it was intended, and is a matter that is being actively reconsidered by the CLG in its review of the NPPF. Therefore, the risk is that the highly desirable aims of Policies SD2 & SD3 could remain unfulfilled aspirations, and that the status quo continues to constrain the future of London.

A [Roundtable](#) held by the CFN in 2017 with participants across the Wider South East highlighted the need for collective action and effective strategic planning. This could be achieved by a range of potential mechanisms which the CFN is working on. Its current position (as set out in the Prospectus) is based on experience in London's closest international comparator – the New York metropolitan region. Here the Regional Plan Association (RPA), refer Appendix B, has provided a collective forum of public and private partnership which avoids seeking a new layer of administration and brings together stakeholders. It is accepted that there may be alternative bespoke models suitable for the London Capital Region. What is not in question is that there needs to be change the way things are done. London should no longer have to rely on ad hoc and intermittent liaison between local public bodies.

Implications

The implications of the forgoing considerations are twofold, namely that:

- (i) The overall scales of aspirations for growth need to be set out more explicitly in the Plan against the WSE provisions, and a demonstrated urban capacity; and
- (ii) The positions set out in the draft Plan in its draft Policies SD2 & SD3 are strengthened by more specific proposals to set up some form of standing strategic planning arrangements advocated in the CFN *Prospectus*.

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APPENDIX A: SUMMARY PROPOSITIONS OF COMMON FUTURES NETWORK

Towards a Common Future

The nation needs vision, determination and a plan to drive growth and jobs up and down the country - from rural areas to our great cities to create an economy that works for all.

These ambitions require an integrated framework of action, which gives confidence to those who want to invest in the future of the country. The empowerment of local communities through the devolution and localism agenda needs to be strengthened, by providing a clearer context for local decision-making. Business development needs confidence in the longer-term future for investment.

There exist the foundations of such an integrated approach for Scotland, Wales and Northern Ireland, as set out in their respective national development frameworks - but there is no equivalent for England. The recent consultations on a National Industrial Strategy and a National Infrastructure Assessment were therefore welcome but not sufficient to be successful in delivering this agenda in full.

The Common Futures Network (CFN) has therefore come together to respond to the interlinked challenges of inequality, low productivity, economic imbalance, and social and political cohesion. It seeks to transform rhetoric into action through a consensual, forward-looking and independent Agenda for shaping the future of England over the next 50 years.

Opportunities for Change

The following opportunities to rebuild the nation need a national framework of action:

- A better national balance of investment, research, culture, people and jobs, both urban and rural
- An economic strategy that harnesses the UK's full potential as a global mega-region
- An urban policy which sets out the roles of the major cities and their regions
- Securing the global role and functioning of the Capital Region of London
- Enhanced relationships between devolved administrations
- An infrastructure framework that underpins these, including movement and energy.

These challenges are overlain by the impacts of climate change and the potential implications of BREXIT. They are also hampered by fragmented administrative areas, and short-term outlooks. We need to change the way we do things!

A New Agenda for England and the UK

We need to build on the existing initiatives by harnessing fully the potential opportunities created by England's position as a *global economic region*. A fresh national agenda will help unite the nations of the UK by expressing their separate but interlinked identities, needs and ambitions. A new agenda is needed to translate government objectives into their spatial implications throughout England. Conversely, we need to consider geographical implications much more explicitly than at present when national policy decisions are taken, including those related to mainstream funding.

The immediate actions to tackle the short-term and longer-term national development priorities are therefore set out in the following eight Propositions. These could be informed by an independent body (comparable to the Office of Budget Responsibility).

The Propositions

Proposition 1: Creating a New Agenda for England to promote a portfolio of actions recognising geography based on:

- The global role of the London mega-region within the UK
- A new devolved development programme building on sub-national strengths
- An urban agenda to support the networked systems of cities
- A new rural agenda as a basis for connecting the rural hinterland of England
- Securing the natural capital of England
- An integrated infrastructure strategy rebalancing opportunities within England as part of the UK.

Proposition 2: Introducing a Place-based Industrial Strategy to harness the agglomerative capacity of the UK, and England in particular, as a global mega-region, and a refreshed regional development programme reducing peripherality, identifying areas of industrial specialisation, linking research and development, and setting priorities and goals for underperforming parts of the country.

Proposition 3: Integrating Infrastructure to move the agenda beyond re-engineering the nation to rebalancing opportunities within England; also, opening up new development areas required to meet the additional 9m population by 2040.

Proposition 4: Building Networked Systems of Cities: Understanding and maximising functional linkages between cities, building upon, but not confined to, the three existing trans-regional priorities (Northern Powerhouse, Midlands Engine, and the Cambridge-Milton Keynes-Oxford Corridor), and other nationally significant opportunities (e.g. Heathrow-Swindon-Bristol), as well as the HS corridors.

Proposition 5: Securing the Global Role of London: Ensuring action throughout the London Capital Region supports the commercial, labour and housing markets upon which the future of London as a global city depends, through a high level non-statutory public – private forum, and also strengthening London's relationships with other major UK cities.

Proposition 6: Facilitating Devolution: Reinforcing the potential created by the emerging framework of Combined Authorities through a more structured and incentivised basis for collaborative action, whilst retaining a safety net for vulnerable towns.

Proposition 7: Identifying the Components of a Framework: Based on these propositions identifying the key issues that must be decided at a national level for England in terms of the *National Economic Hubs, Corridors and Networks* in support of the *National Flagship Projects* and the *National Priorities for Collaborative Action*.

Proposition 8 : Linking Devolved National Frameworks through the British Irish Council's Working Group to provide a common context for cross-border cooperation, creating synergies and identifying cross-boundary and external relationships and nation-wide approaches to increasing self-sufficiency in food, raw materials and energy

The Next Steps

These Propositions have been taken forward (and amplified) in a Prospectus for 'A New Agenda for England and the UK'. The form of follow-up will be responsive to and in liaison with partners, and be seeking cross-party support.

APPENDIX B : Civic Led Strategic Planning for the New York Region: A Regional Plan Association Case Study

**Robert D. Yaro, President Emeritus, Regional Plan Association and
Professor of Practice, University of Pennsylvania**

Overview

This paper describes the role that Regional Plan Association, a nearly century-old, non-statutory organization that does strategic planning and advocacy for the New York Metropolitan Region, America's largest urban area.

RPA's experience should be of interest to officials and scholars interested in improving strategic planning and management for the London Capital Region. With 24 million residents and a \$1.5 trillion economy, no other large metropolitan region in the world is more like London than New York, in terms of its size, the diversity of its population, its portfolio of industries, its leading role in the global economy and its strong economic and population growth.

And as in the London region, New York lacks a statutory metropolitan government institution to address the issues and manage the major systems that function at the regional level. These include transport, environment, energy and telecommunications systems and housing and labor markets.

Obstacles to Establishing a Statutory Metropolitan Planning and Implementation Body

In an ideal world, the NY Region would have a strong statutory body to manage these systems. (Think Singapore!) But we don't live in that ideal world, and for much of the past century the region has used other means to address these needs.

There are several reasons for this --some geographic and others political. The first is historic: 350 years ago King Charles II decided to place the border between the newly constituted colonies of New York and New Jersey down the middle of the Hudson River, immediately west of Manhattan Island. Further, HM Government left in place the western boundary of Connecticut Colony only 25 miles east of Manhattan. These boundaries were recognized by the United States Constitution and its federal system, which delegates control over most urban systems to the states. This wasn't a problem until the early 20th century, when a rapidly growing New York City expanded into portions of New Jersey and Connecticut, Long Island and the Lower Hudson Valley.

There were also considerable political obstacles to empowering a strong statutory body to manage metropolitan-scale urban systems. Principal among these has been the sheer size of the metro region in comparison with that of the three states from which it is comprised. The population of the New York metropolitan region represents two-thirds of New York State's population of 19 million, and more than 80% of its economy and tax base. Similar ratios apply in New Jersey and Connecticut. So establishing a strong statutory body, with regulatory, taxing and other powers would create alternative power structures in all three states, threatening the political base of governors and legislatures, and creating a powerful disincentive for politicians to create such a body. Similar circumstances apply in London, where the metropolitan region encompasses more than one-third of the UK's population and half or more of its economy.

Finally, there is the fundamental challenge that Americans --and New Yorkers-- have long been suspicious of large, distant public authorities and other government entities. (Thomas Jefferson's first draft of the American Declaration of Independence said that "All men were entitled to life, liberty and freedom from distant tyranny." In the late 18th century, this meant King George III; today distant tyranny means large public authorities.

Managing the Development of the New York Metropolitan Region

Now after nearly four centuries it is probably no longer fair to blame Charles II and George III for New York's problems. And it would be reasonable to assume that at some point a visionary politician would have stepped forward to fix this problem. That someone was New York Governor Nelson Rockefeller, who, prodded by the federal government, worked with his counterparts in New Jersey and Connecticut to create the Tri-state Regional Planning Commission in 1965. However, Tri-state had only limited powers to conduct strategic planning for transportation, environment, housing and spatial development across the metropolitan area. And it never gained broad public or political support, and when the Reagan Administration eliminated metropolitan planning requirements and funding in the early 1980s, Tri-state was abolished.

Rockefeller also acted on RPA's recommendation that a Metropolitan Transportation Authority be established. But RPA's vision for a tri-state transport authority was never realized. Not wanting to relinquish control to a large regional bureaucracy, New Jersey and Connecticut have both maintained their own transport agencies.

The metropolitan development and infrastructure challenges faced by the NY metropolitan region predated the creation of Tri-state by several decades. For this reason, early in the 20th Century a visionary group of political, civic and business leaders promoted the creation of two entities --one public and statutory, and the other civic and non-statutory. The first of these was the Port of New York Authority (now called the Port Authority of New York and New Jersey), established in 1921 to manage inter-state transportation systems. The PA now manages the region's airports, part of its rapid transit system, bus terminals and trans-Hudson bridges and tunnels.

Creation of Regional Plan Association

One year later, Regional Plan Association was created as an independent, non-statutory civic group to prepare a long-range strategic plan for the fast growing metropolitan region. RPA was established by a well-connected group of business and civic leaders, including two former Chicagoans, Charles Dyer Norton and Frederick Delano. They had led in creating the Burnham plan for Chicago in 1909, and believed that New York needed a similar long-range vision for the entire metropolitan area. And importantly, Delano's nephew, Franklin Delano Roosevelt, later became Governor of New York, and then President of the United States, providing RPA's vision with a powerful friend in the state capital, Albany and then in Washington.

RPA's visionary 1929 Regional Plan for New York and Environs was led by Thomas Adams, founder of the Royal Town Planning Institute. The Plan set forth a broad vision for the region's growth and development through 1965. It laid out proposals for the world's first metropolitan limited access highway system, an expanded and integrated regional rail network, a system of regional and state parks and preserves, and proposals for urban development and housing across the region. Importantly, Adams' plan was built around the concept of what he called "concentrated deconcentration," resulting in proposals to decant development and population from New York City out into a polycentric network of regional centers.

From Plan to Action

Much of the plan was implemented before the onset of World War II, by master builders Robert Moses and others, with funds provided by President Roosevelt's New Deal public employment programs. Delano left RPA in the early 1930s to join the Roosevelt Administration as head of the National Resources Planning Board (the planning arm for the New Deal's public works programs), where he directed funds to New York's ambitious highway, parks, housing and other programs that emerged from the Plan, and which which became models for other American cities.

These investments underpinned New York's growth and development and quality of life through the middle of the 20th century. RPA's Second Regional Plan was completed in 1969 to address a new set of issues

facing the region, including the need for environmental restoration and managing suburban sprawl. RPA's Third Regional Plan, [A Region at Risk](#), addressed the issues of disinvestment in the urban rail network, urban disinvestment and destruction of water and ecological resources. The Fourth Regional Plan, [A Region Restored](#), will be completed in late 2017 and will address the challenges of climate change, increasing social and economic inequity and rising housing costs, the need to reform regional institutions and tax systems and other urgent issues facing the region.

Following completion of each of its plans, RPA has led ambitious advocacy programs to promote implementation of key policies and investments called for the plans. Over nearly a century, perhaps three-quarters of RPA's key plan recommendations have been implemented. This is a result of the organization's persistence, the credibility and connections of its leadership and staff, and the power of big ideas to attract public and political support. The organization's \$5 million annual budget is funded in part by membership contributions from concerned citizens, civic leaders and major employers, and additional support from philanthropies and public authorities and agencies.

Upshot for London

The upshot of New York's experience for London is that if it is not possible to create a statutory strategic planning and implementation body for the Capital Region, a non-statutory, civic led group could assume this role, and achieve many of the benefits that a statutory group would provide.

Bob Yaro was Executive Director and then President of Regional Plan Association from 1989-2014. He has also served as Professor of Practice in City and Regional Planning at the University of Pennsylvania since 2002. He has consulted on strategic plans for global cities in North America and around the world. He is an Honorary Lifetime Member of the Royal Town Planning Institute.