

# JOINT PLANNING LAW CONFERENCE

THE PLANNING BALANCE IN THE 1990'S

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IS THE PLANNING SYSTEM NOW UP TO THE JOB?

by

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## INTRODUCTION

This paper approaches the question by reviewing the existing planning system and analysing it for its strengths and weaknesses, on the basis of experience. It then comments on the performance of the preparing agencies, regarding "strategic guidance", structure and local plans, with some preliminary conclusions on unitary Development Plans. As a basis for looking to the future, the subsequent section begins by considering changes to the context for planning. It will be contended that the strategic planning dimension - establishing the policy case for development - is becoming critical, arising from two forces which will be in increasing conflict: provision for economic development to advance the nation's economic strengths, particularly arising from the Single European Market, and the growing popular awareness of the environment and its political support, especially in areas of development pressure.

From this the main issues which need to be addressed at the strategic scale will be identified alongside what Borough and District scale plans need to deliver. This leads to conclusions regarding how the system might be improved organisationally, in terms of relationships between Central and Local Government, and the functional case for different planning tiers. The perspective is that of London and the South East, but reference will be made to the situation elsewhere.

### THE EXISTING PLANNING SYSTEM

The present system is in effect a sharing of powers in the planning of land use, development and transport between Government Departments (Environment, Transport) and Local Government. In London, the latter takes the form of 33 unitary planning authorities, with LPAC established in the 1985 Act to provide a joint co-ordinating forum advising both Government and the 33 London Boroughs on London development issues. Unitary authorities also exist, but in far fewer numbers (4 - 6) in the other metropolitan areas; there is no statutory joint committee in these areas, but voluntary arrangements are possible.

In the rest of the country, local planning powers are shared between the county and district tiers. County Councils are responsible for structure plans, the prime function of which is to define "how much" development is required and set a broad locational framework for it, in balance with conservation policy, and for minerals and waste planning. Districts are responsible for the more detailed, site-specific local plans and for the general operation of development control and enforcement. In the South East region outside London there are 12 County Councils and 96 Districts for an area with about 10 million population. Let us look at the strengths and weaknesses of this system.

## Strategic Guidance

The Department of the Environment maintains the legislative framework and sets out national policy for land use and development planning. In London, in the single-tier system operating since 1986, DoE now has responsibility for such London-wide strategic policy framework as it considers necessary, in the form of "strategic planning guidance". This notion of guidelines set by Central Government seems to have arisen for the wider South East in the early 1980s and became enshrined in the 1985 Local Government Act as providing the strategic basis for the unitary planning authorities following the abolition of the Greater London and Metropolitan County Councils. The Guidance materialised during 1988 and 1989. Subsequently, in Planning Policy Guidance Note 15 (Regional Planning Guidance, Structure Plans and the Content of Development Plans), the Government is proposing that "regional planning guidance" is extended beyond the South East to other regions, to provide "the necessary framework for the review of structure plans".

The 1985 Act states that the form and content of the Guidance will vary according to the circumstances of each area, and that the Secretary of State will, following consultation, determine its scope. The concept therefore has a clearly defined purpose and its preparatory content and end product are matters for Central Government. It can be seen as a metropolitan or regional amplification of national planning policy, taking into account the issues and circumstances in those areas. The scope, as well as incorporating broad issues such as the scale of housing development and policies for development to support economic activity, and the balance between development and conservation including matters such as green belts, also includes a strong transport component incorporating Government policies for roads, railways and other public transport.

How adequate is the concept of "strategic guidance" proving ? In considering this, it is necessary to bear in mind the statutory planning system it is serving. In London and the other metropolitan areas it acts as a framework for unitary development plans, prepared at the Borough scale : there is no intermediate county tier. Outside the metropolitan areas, county structure plans provide a thorough strategic basis, set out in the form of integrative and topic policies and general locational development proposals. These are formal plans, statutorily required. Local development plans at District scale need to be in general conformity with them.

The purpose of regional guidance, providing a framework for structure plans, is therefore different to the situation in the metropolitan areas, where there is no overall strategic-scale plan. It is primarily concerned with establishing the role of each part of the region on such matters as the scale and distribution of new housing and the general approach to economic development and conservation. The structure plan then provides a deeper analysis and more detailed distribution to reflect circumstances at the sub-regional and district scales.

The London-wide strategic part of London's planning system is provided by "Strategic Planning Guidance for London" issued by DoE in Summer 1989. It is a slim document of 14 pages and 84 paragraphs, in the form of a statement with a series of short chapters (Business and Industry, Transport, Housing, Environmental issues....) and two maps, one showing London's 33 Boroughs and the Green Belt and the other the Strategic Road Network. It sets general developmental objectives and matters to which UDPs should have regard, and gives a policy framework in narrative and generalised form, eg "In Central London further land for business development should be made available".

Strategic Guidance for the other metropolitan areas emerged during 1988 and 1989, the first being for the West Midlands, and are about 30 paragraphs in length. They set a clear theme, generally economic revitalisation and urban regeneration. Like that for London, specific housing provision targets to 2001 are indicated. The topic format is standard : economic development; housing; green belt, open land and environment; town centres and retailing; transport. Compared with London's, that for the West Midlands gives specific guidance for business development, requiring 300 ha for high quality industry on the urban periphery, and dividing this between geographical sectors, with criteria : a typical structure plan activity. The Guidance documents end by setting out the need for monitoring and review.

Regional Planning Guidance has received most attention in the South East; with the exception of broad frameworks advanced for East Anglia and the West Midlands, the notion is in its infancy elsewhere. The situation in the South East is no doubt a reflection of the pressing need for Government statements of policy to address the major conflicts which continue to arise between development requirements and pressure, Green Belt and conservation policies and articulate opposition to further urban growth which has secured growing political support. It also stems from the activities of SERPLAN, the voluntary but powerful association of planning authorities in the region, led by the Counties and in which LPAC acts as the focus for London. Following the demise of previous regional planning machinery at the end of the 1970s, SERPLAN persuaded the Thatcher Government to modify its distaste for regional planning in the early 1980s, fortified by well-publicised controversy about housing land and green belts and fears about the impact of the M25. This led to the emergence of short Government statements brought together in "Regional Guidance for the South East" (PPG9), a compendium of three letters from the Secretary of State of the day issued in 1980, 1984, and 1986 and totalling eight pages and one diagram. PPG9 has provided the basis for reviews of structure plans during the second half of the 1980s, which has occurred widely in the region.

## Structure Plans

The initial structure plans were mainly produced following the 1974 Local Government reorganisation and generally took 4 years to prepare and a further 3 to secure the Secretary of State's approval, a protracted process which attracted considerable criticism. While the Act requires their review to ensure continuing relevance, there is no stipulation as to how frequent this should be, and performance has been erratic : some Counties attempt it on a regular basis (Kent, for example, pursue a 5-year cycle); others are much less regular and by 1990 few had completed the process of more than one review. DoE seems unable to reduce its approval time significantly.

A Government consultation document at the end of 1986 "The Future of Development Plans" proposed replacement of structure plans by "county policy statements" - strategic planning guidance at the County scale according to DoE approved topics, with one tier of Development Plan prepared by District Councils for the whole of their area. This was strongly opposed, not only by Counties but from both sides of the planning spectrum. The House-building and Minerals industries saw the "how much" structure plan function as essential if local plans were to make adequate provision, while the CPRE and conservation bodies saw a vital role for formal structure plans in establishing the countryside protection policy framework. Following a White Paper in early 1989 the Government bowed to this pressure and structure plans were given a reprieve. PPG 15, while simplifying and improving the scope and format of this upper tier of the system, deliberately breathed new life into the Counties' planning role : regularly reviewed structure plans would "indicate how the balance between development and conservation has been struck geographically".

Whether the reprieve granted by PPG 15 is permanent is doubtful. It is worth considering at this point whether the pattern of Counties continues to make sense for what is, functionally, a sub-regional planning activity. This posits areas large enough to discharge effectively those supra-district roles of establishing realistic requirements for development in balance with environmental policies and infrastructure, setting the framework for local plans and securing consistency with plans for neighbouring areas. It also requires a reasonable degree of geographic coherence, in social economic and spatial terms. Comparing these criteria to the present pattern of counties, it can be concluded that whereas some counties (Kent, Essex, Hampshire) make sub-regional sense, others are too small and geographically ill-drawn: for example, there appears to be little logic in separate plans for East and West Sussex, with Brighton in the middle. There are, I suggest, too many structure plans to discharge their strategic function in the planning system effectively.

### Local Plans

The performance of District Councils in producing clear and relevant local plans since the 1974 reorganisation has, taken overall, been woefully slow and inadequate, although there have been several examples of good practice. Strong Government criticism was voiced in the 1986 Consultation Document, and was repeated in the Planning Policy Guidance on Local Plans of November 1988 (PPG 12). This noted (over 14 years after Districts were given the responsibility) that large areas are still without formally adopted and up-to-date local plans; the Government "wish to urge .... the importance of local plans as the basis for sound and effective development control, especially in areas where there is strong and persistent pressure for new development". PPG 12 states that outside London, only 20% of England and Wales (by population) was covered by adopted local plans; only 54 of the 333 non-metropolitan districts have plans on deposit or adopted fully covering their areas; some 70 districts have no local plans at all.



PPG 12 therefore seeks to stimulate District Councils to the urgent production of up-to-date plans, which should be on a District-wide basis. Ministers have put increasing stress on the importance which would be attached to such plans in controlling development : the provision of the plan would now be seen as the primary factor in decisions on planning applications.

Plan preparation at District scale is however bedevilled by problems. Three seem particularly noteworthy. The first is that District Councils do not have control over many of the inputs their plans require, which are in the hands of higher-order authorities (highways, education, health, environment ...). Secondly, co-ordination, both of plan-making between functionally contiguous areas and between the timing of local planning and structure plan reviews, is often poorly exercised : while there are good examples of using the "Development Plan Scheme" to this end (eg in Hertfordshire), it has not been pushed by DoE and it has often been resented by Districts ("big brother County"). Thirdly, mechanisms for ensuring that the strategic requirements for development, relationship with infrastructure, and balance with conservation are carried through into local plans are inadequate, either through insufficiently clear structure plans or District intransigence; this leads to many of the main issues ending up before the Secretary of State.

### Unitary Plans

The single-tier planning system established by the 1985 Act in London and the former metropolitan counties is now yielding its first Unitary Development Plans : preparation commenced upon the issuing of the Strategic Guidance referred to above.

In London, within the limited framework set by the DoE Guidance, augmented by LPAC's advisory work, 33 separate plans are now steadily emerging. The key issue is whether these 33 UDPs will form one coherent whole to meet the capital's needs. Co-ordination between these plans for parts of a continuous metropolitan area is to be secured by an obligation to consult, augmented by LPAC's attempts to provide a co-ordinating service with very limited resources, and with the sanction of Government intervention on grounds of lack of adherence to its narrative guidance. So far (August 1991), 22 consultation draft plans have appeared; the rest will emerge before the year's end, while 5 of these have reached the formal deposit stage. To help co-ordinate, LPAC is advising Boroughs at consultation stage on whether the plans are adequately addressing broad London issues (economy, housing, regeneration, Central London, environment, transport ...), so as to give the best chance possible within the present system that 33 jigsaw pieces will make one picture. It is too early to say whether the outcome will be satisfactory.

The situation in the former metropolitan counties is significantly different : they comprise only 4 - 6 Boroughs, and whereas in London (apart from the City) the Boroughs are similar in size (if variable socially and economically), in these areas they vary widely (eg Birmingham and Walsall). The number of plans and the relationship between the preparing authorities is not therefore comparable with London, and makes co-ordination issues simpler and easier to handle through normal consultation processes.

Advantages of one tier of formal development plans are becoming apparent. Certainly more understanding and awareness of the issues is apparent from local groups, businesses and developers. The situation of all UDPs being prepared at broadly the same time, following the issuing of Strategic Guidance, provides a far better prospect for an effective planning system, based on a regular cyclical process of strategic and Borough-level planning activity, than exists elsewhere.

## THE PREPARING AGENCIES

Bearing the experience set out above in mind, I now turn to whether the present institutional system of local planning authorities, guided by the DoE Regional Offices, is delivering an effective plan-making service. This will focus on, firstly, the scarce and stretched resources available, and then examine briefly the extent to which there is collaboration, duplication or conflict between the agencies involved.

### Strategic Planning and the Preparation of "Guidance"

Given the increasing importance attached to Metropolitan and Regional Guidance in the planning system, it is worth examining further how this is prepared. The Secretary of State is of course the executive authority in the matter, but his Regional Offices have neither the staff numbers, expertise, nor information on which to undertake authoritative analysis of the situation and formulate proposals. He therefore relies on the preparation of "advice" as to what is seen to be required, from the local planning authorities acting conjointly. In the case of London there is a statutory body established for the task; elsewhere arrangements are voluntary. As the London situation is the best resourced (although LPAC only has 15 planning staff) its experience is interesting.

LPAC spent two years of analysis (1986 - 88) in preparing the advisory report on the London-wide policy framework its Boroughs needed in order to fulfil their unitary planning responsibilities effectively : consultants were employed, the Boroughs involved and there was wide consultation. The document which emerged in October 1988 was negotiated and agreed by the Boroughs' 33 Committee representatives without dissent. It is based upon a Four-fold Vision for London, as an economically buoyant World City, a social City of opportunities for all, a civilised City with a high quality of life, and an environmentally friendly City of stable, secure neighbourhoods.

From this, sets of objectives were formed, and series of topic policies (132 in all) aimed at achieving them. These came together in spatial policies seeking a balanced development structure across London, related to its capacity to sustain development and addressing an East/Central/West imbalance in social and economic health. The "Advice" was widely supported on publication.

Contact was maintained with DoE during preparation. However, following submission of "Advice", any meaningful liaison ceased; the DoE considered its position alone. Clearly, LPAC's closely-articulated policy framework, casting its strategic net wide in its recognition of what needs to be done to realise its vision, went further than a free-market Government seeking to minimise public policy intervention wished. The DoE draft was an emasculation of LPAC's work. While the issues were recognised, the action proposed to deal with them was substantially omitted. The lack of dialogue between October 1988 and April 1989 when DoE issued "draft guidance" reveals a fundamental weakness in the process.

Particular weaknesses are, firstly, DoE's failure to understand the strategic linkages surrounding economic development and to produce a meaningful guidance on the conditions which need to be created if a better balance across the London region is to be achieved, particularly regarding office development. The second failure is to appreciate the importance of a clear geographical structure for development, in terms of central London, strategic centres and growth points, in indicating the role of individual Boroughs and to guide investment. This is surely a key function of strategic planning.

The saving grace is the DoE's recognition that "Guidance" is subject to review, capable of being augmented, if justified. LPAC resolved to keep its work alive, with encouragement from the London Boroughs, through an Annual Review process. This seeks both to monitor the relative achievement of the London-wide policies, and to extend the advisory policy framework in a way which is responsive to Borough concerns. The 1990 Review is specifically attuned to providing Boroughs with strategic support to their Unitary Development Plans.

These are indications that the new Ministers in John Major's team are recognising that Guidance needs to be fuller. The test will come in the Government's response to the regional planning advice for the wider South East submitted by SERPLAN in Autumn 1990, expected imminently. SERPLAN is seeking clear recognition that development in the South East should be based on its sub-regions' capacity to sustain it in labour supply and infrastructure terms; that there should be positive promotion of opportunity areas such as the East Thames Corridor; and that London Guidance should be extended with a clear policy for office development.

### Structure Plans and District Plans

It therefore appears that, despite the problems of institutional relationships and staff resources currently inherent in their preparation, a shift to metropolitan and regional strategies is apparent. Do, therefore, two tiers of formal plan continue to make sense - are their purposes sufficiently distinct ?

The functions of Structure Plans have already been referred to : setting an overall framework for District Plans; distributing regionally-derived housing provision by District; establishing the need and locational basis for economic development; broad policies for conservation, green belts etc and the relationship between development, transport and other infrastructure. These are similar topics to those covered by regional guidance; the question is the extent to which they require amplification at sub-regional scale. Given therefore, that the functions of regional planning statements and structure plans broadly coincide, the pragmatic answer to this lies partly in the disposition of planning resources between the two, and the extent to which it is managerially sensible to divide any region, for example the South-East, into coherent areas while providing that the centre co-ordinates adequately.

Local Plans, now being prepared District-wide, set the detailed development and conservation policies and allocate areas for specific land use change. They form the basis for most development control, guiding planning decisions. Their function and style, particularly being map-based, is certainly distinct from the Structure Plan, but experience reveals considerable overlap in policy formulation. This is particularly apparent in the smaller counties with few constituent districts, and where Structure Plans are seeking significant urban growth or renewal. It is clear the DoE sees the District Plan as where all policies and proposals concerned with how development occurs on the ground - and be assisted to where necessary - should appear. This is a logical principle for establishing the policy division between strategic and local planning.

Two further factors are important in considering whether the system can support two types of plan, efficiently prepared, regularly reviewed and up-to-date. The first is scarce staff resources. Expertise in plan-making is thinly spread and appears to be biased in favour of counties, who see a need to maintain comprehensive teams for monitoring and review. District plan-making staff, outside the main cities, are scarce, relatively inexperienced and mobile. There is a general reluctance to engage consultants. This seems to be a major explanation for slowness and patchiness in Local Plan preparation across the country. This point is underscored by the added weight attached to the Development Plan in reaching decisions by the Planning and Compensation Act 1991 : this increases the pressure on the plan-making process to ensure that plans are up-to-date, which must increase the onus on the staff resources available to Boroughs and Districts.

The second factor is procedural rigidity : Structure Plan reviews are protracted, creating difficulties for a sequence of District Plans seeking to fit into the strategic framework. There is rarely any strong control to establish an orderly cycle of Structure Plan review and District Plan preparation.

There is therefore, a prima facie case for simplifying the system, to create one tier of strategic planning activity, providing the basis for better - resourced District-wide Unitary Development Plans which can be reviewed on a regular cyclical basis.

#### **EFFECTIVE STRATEGIC PLANNING, MEANINGFUL LOCAL PLANNING**

This section of the paper draws some findings as to what is now required of the planning system, by considering what it must deliver given the development issues the country faces, and the main concerns it needs to address on the ground. Only by having a clear understanding of these can we justify the case for change.

Change will need to take account of the new context for development in Britain arising from the international economy, especially the implications of the Single European Market. This creates important issues for the nature and location of development to support the nation's economic strength, and the enabling infrastructure for it (housing as well as transport and communications). In this regard, international transport links are of growing significance, including airports, the Channel Tunnel Rail Link and European road connections from London and elsewhere.

This is a task only Government can discharge, and requires a new approach to regional policy, in terms of the disposition of activities and investments, much underplayed in recent years. A particular need is to indicate the respective role of the South East - the London region - and other relatively buoyant parts of the "South", with the Midlands, North, Scotland and Wales. To what extent, and how, can pressures be steered away from the South East? One of the dangers of the simplistic notion of a "north-south divide" is that the London region may be starved of the resources it needs to succour its World City and "UK Ltd" corporate role, essential to national economic health and under increasing European competition.

If the revival of regional planning activity is to succeed, "Guidance" must therefore fit into a much clearer inter-regional frame-work than currently exists: an urgent matter for Central Government. This should incorporate the growing concern over environmental issues, including the significance of Environmental Protection legislation for development. It will provide the basis for economic development policy to be set out in strategic planning statements.



We now turn to the matters effective strategic planning needs to address. These will vary according to the broad developmental objectives sought for each region. It is worth considering London and the South East, to establish what strategic planning should deliver in this congested and core region:-

- a clear vision of its future, leading to specific objectives (e.g. economic growth);
- the need for transport and other enabling infrastructure, to provide accessibility and combat congestion;
- broad indicative quantities of required development, particularly housing, with some locational guidance;
- a clear policy for economic development and location, based on capacity to sustain development, with particular reference to Central London (so it functions efficiently and is environmentally attractive), East London/East Thames Corridor (to secure regeneration and realise the opportunities), and other locations outside London (a north-east axis, and Kent);
- policy for overheated areas-(in and out of London) where the scale of further development must be based upon available resources;
- the conservation and environmental framework, including green belt and rural land use policy, but also a strategy for the urban environment (the quality of which is now a key issue).

In preparing regional and metropolitan planning strategies it is important to address how their essential purpose of establishing the need for development, and the provision of infrastructure to enable it to occur, is carried out. There is much to be said for leavening the Local Government input with the voice of business, and for closer involvement of Central Government. Local Government will, so long as county planning remains active, provide the basic information and analytical resources, but to establish robust policies for the development of economic activities, and for transport and other public expenditure, other vital inputs need to be made.

This leads to a further important point. A key conclusion from a current LPAC project "London : World City Moving into the 21st Century" is that the two most important strategic problems facing the capital's continuing development are at least peripheral to traditional land-use planning. These are enhancing London's transport system, and raising the skills of its labour force to fill the jobs being created. The extent to which these can be done will increasingly guide London's capacity for future development. Effective strategic planning therefore requires inclusion of those concerned with such decisions.

Assuming that control over economic policy as the basis for development, and the availability of capital resources for infrastructure remain with Government, improvements need to be made to the strategic planning machinery. A two-stage augmentation of the present system is suggested. The first grafts a formal advisory panel of business and other private-sector interests onto the present LPAC and SERPLAN models, also explicitly involving Government Departments in the strategy review process. The second takes to its conclusion the logic of Government

responsibility for the key strategic decisions, and replaces these advisory models with an appointed Commission, including Local Government representation, possibly operating through a Parliamentary Committee.

### Borough/District Plans

We have noted what plans at this scale should deliver, and that there are advantages in concentrating plan-making effort here. Much is made of getting "planning close to the consumer", but local residents and their political representatives tend to dominate the debate, over other consumers of planning : those in need of development, business and landowners. Eric Davies' paper suggests that some development plans may be seeking a restraint agenda, in which local self-interests and "nimbyism" become too powerful. There is also a perception that local politicians are "passing the buck" upwards when unpalatable decisions are to be taken. These points can be overstated : evidence from recent District Plans and UDP preparation in London and elsewhere is that planning at this scale is proving proactive in identifying the potential for and action required to achieve urban regeneration and redevelopment, addressing the issue of environmentally sustainable development.

If increasing reliance is to be placed on plans at this scale, and particularly if we are to move more widely to unitary development plans, their relationship with the strategic planning framework - regional, metropolitan or sub-regional - must be explicit. As we have seen, this framework establishes the requirements for and scale of basic development. These strategies should therefore be more than "Guidance". They must be enforceable on the District or Unitary Plan, through a formal process of certification. For this to be acceptable, it would follow that an understanding needs to be worked out between the strategic and local tiers, establishing the Borough or District capacity for development - where supply (in land terms) is related to development demand.

We have seen that the Borough/District tier has little control over the provision of infrastructure to enable new development. The identification of new key infrastructure, and of capital resources to implement it, is a function of strategic planning; it is a weakness in the current Local Government-led preparation arrangements. It is essentially a Central Government activity, and it is critical that strategic planning is so organised that it can give a clear perspective on the sustainable scale of development at District level in this respect.

### Conclusion : Re-organising the System

What then, as we face up to the challenges of the final years of the century and beyond, does the British planning system need to deliver ? Its first task is to define the case for and nature of new development and where it should occur. This must be achieved alongside tightening legislation to protect the environment, so the second task is to strike a balance between environmental conservation and provision for development, with the latter making the most of opportunities for urban regeneration.

We must also take a full European perspective in our approach to planning, particularly the significance of the single market. Again this operates in two ways : planning frameworks need to foster British business, both manufacturing and services, to maximise its competitive advantage in the new Europe, while at the same time acknowledging the environmental directives from the European Community, including impact analysis of major projects.

This paper has reviewed the existing planning system and has sought to identify the strengths and weaknesses of its components. The principal conclusion is that, to strike the all-important balance - and it is an essentially political matter - a stronger strategic planning framework is essential. This needs to start from an appreciation

of the roles of the different parts of Britain : a clear regional policy. Within that, the task of strategic planning is to achieve the optimum relationship between the need for development, starting with economic development and the infrastructure to support it, and environmental protection. The economic notion of "capacity" is valuable here, because it relates to the environmental notion of sustainable development. My definition of this is the capacity of an area which relates land (as a developable resource, starting with that available for urban redevelopment and renewal); capital resources for improving transport and other infrastructure; and - increasingly important - labour resources, particularly in terms of available skills.

If this is the task, it is clear strategic planning is essentially a Governmental activity, particularly as any real devolution of power from the Centre (which would have to include financial resources) seems a very remote prospect. The question then becomes how best to equip Government to deliver. I have noted the strengths and weaknesses of input from Local Government : strong on land and environmental analysis. However, bearing in mind that the strategic planning framework is wider than land use and must encompass infrastructure and labour market dimensions, inputs from those responsible for these matters must be encompassed, together with financial resources. So this suggests that the preparing agencies should blend Local Government, Central Government, business and other private sector interests, and probably be accountable to Parliament.

Given regional and metropolitan planning frameworks prepared this way, there is much to be said for a single tier of formal "on the ground" plan. Unitary Development Plans are currently being "proved" in London and other metropolitan areas : another year will allow an evaluation of their relative success. It is then for Government and Parliament to consider how to strengthen the strategic planning machinery to meet the objectives I have suggested, and to ensure an effective relationship of strategic control with the local development plans.

The Government is currently reviewing the structure of Local Government and as part of that, Central-Local relations. This is evaluating a further shift to unitary authorities. The Labour Party seems to favour a regional tier. Such changes must assess their implications for the delivery of an effective planning system to meet the tasks and strike the balance which has been the theme of this Conference.

The views expressed are those of the author and may not necessarily be those of LPAC.

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