Reflecting on the English Devolution White Paper 2024: implications for planning

Introduction

The English Devolution White Paper (EDWP) (MHCLG 2024a) with the revised National Planning Policy Framework (NPPF) (MHCLG 2024b), published shortly before, together represent a major shift in the scalar emphasis of policy planning in England. The EDWP is focused on growth and devolution, relying on the recommendations to achieve this made by the OECD (2019; 2020), which state that the silo and centralising nature of English governance needs to be reformed to create integrated horizontal and vertical structures for multilevel governance and delivery. The EDWP introduces a common scale of 'meso' government in England through the creation of Strategic Authorities (SAs), (previously identified as Combined Authorities) which comprise of multiple Unitary Authorities (UAs). Where these do not exist, they are to be created for the parts of England which currently have two tier local government. The SAs are expected to be for 1.5m people and the UAs for populations of about 500,000 each, with the balance of responsibilities leaning towards the SAs, most of which will be led by directly elected mayors. Under these reforms there will be a new layer of universal strategic planning called Spatial Development Strategies (SDS) led by the SAs.

This is the not the first time that local government and planning reforms have been undertaken within the same policy package. Local government reorganisation in 1972 swiftly followed on from the 1968 Planning Act and the introduction of Structure Plans following the PAG Report (MHLG 1968) and under the guidance of the Development Plans Manual (MHLG 1970). The Planning Acts of 1990 and 1991 accompanied the introduction of a more haphazard form of local government reorganisation, which led to a mishmash of local government structures across England, with most people living in unitary authorities and most land within two-tier government.

The EDWP links these scalar reform initiatives together. However, the implementation of the planning reforms may pose challenges for the government seeking to achieve complete coverage of local plans across England (Rayner 2024) while SDS are being prepared by the new SAs. The EDWP makes clear that SDS will require vertical integration with constituent authorities of the SA and horizontal integration across government for the range of plans and strategies to be operated at this universal

strategic scale (MHCLG 2024a). Previous rounds of reform leave a legacy of experience which can inform the application of these models today (Morphet 2017). In this short commentary, using this context, we seek to identify what these changes will bring to the planning system and their potential outcomes.

The current planning context as set out in the NPPF

The EDWP's proposals for planning fulfil many of the strategic dimensions of local plans as set out in the Planning and Compulsory Purchase Act 2004 and its accompanying guidance in the National Planning Policy Framework (NPPF) (MHCLG 2024b). However, hitherto, the strategic components for local plans have been provided by county councils in two tier authorities and internal departments in single tier councils. The NPPF requires that those preparing local plans collaborate on relevant matters with strategic authorities including the Combined Authorities where there is one (MHCLG 2024b). The EDWP proposes instead the full coverage of SDS across England (MHCLG 2024a) even where there is no SA. However, the geographies of the SAs have to consider the need for effective delivery of the SDS integrated with Local Growth Plans (Reeves 2025), Local Transport Plans, Great British Energy Local Power Plans and the skills and labour market provisions of the Get Britian Working Plans (DWP 2024).

The EDWP proposes a universal system of strategic planning. The powers to prepare an SDS will be greater in mayoral SAs, where the mayor will be empowered to lead the SDS 'working closely' (MHCLG, 2024a) with the SA's constituent authorities and agreed by a majority vote, with the mayor having the casting vote. In non-mayoral SAs, then there will be a requirement to work with adjacent areas and, where there is no agreement between constituent members, then the government will take powers to intervene. Once mayors have an SDS in place, they will be given strategic development management powers for intervention and be permitted to raise a mayoral Community Infrastructure Levy. The mayors already have powers to establish Mayoral Development Corporations and make compulsory purchase orders to which will be added the power to make Mayoral Development Orders. For housing provision, mayors will be required to ensure adequate provision in the SDS and their Local Growth Plans with full devolution of the delivery of affordable housing proposed. Finally there are requirements for government departments, arm's length bodies and government agencies to build Local Growth Plans and SDS into their work

Implications for local planning

It is clear there are significant implications for local planning from these changes. There is enhanced pressure being placed on local plan production and in planning for housing growth (Rayner 2024): the NPPF (MHCLG 2024b) changes have reintroduced mandatory housing targets and requirements to identify five-year housing land supplies as part of local plan preparation. Writing to all local planning authorities across England, the Chief Planner said that the Deputy Prime Minister was asking for revised Local Development Schemes (LDS) which are the project plans setting out the timetables for local plan production. The letter also notes that "The Deputy Prime Minister made clear the intention to make rapid progress towards universal local plan coverage both through support and using Government's powers of intervention when needed" (Averley, 2024: 5).

At the same time, noting that "Councils are the foundation of our state" (MHCLG, 2024a: 95), the EDWP contains proposals to reform local government funding and reorganise local government structures with an expectation that "all two tier areas and smaller or failing unitaries" develop "proposals for reorganisation" (MHCLG, 2024a: 100). It is argued this will lead to efficiencies, clearer local accountability and, interestingly, could apparently ease workforce pressures with less competition for staff. By pushing reorganisation not just of remaining two-tier council areas (impacting 164 remaining district councils) but also potentially some existing unitary authorities, we are entering an era of major change affecting large parts of England.

The scale of local authorities being proposed here feels somewhat similar to the proposals from the Redcliffe-Maude report on 1969, which reported under a Labour government but then not implemented by the following Conservative administration whose own alternative 1972 reforms (implemented in 1974) introduced a two tier structure of district or borough and county councils across England. The district councils introduced at the time had an average population of 125,000 which was seen as large at the time by the standards of European municipalities (Wollmann, 2000). The evidence base for now introducing even larger population unitary authorities is lacking in the EDWP and surely open to contestation even if removing the confusing division of functions in two-tier areas is understandable. Indeed, with such large unitaries seemingly the direction of travel, the proposals potentially risk introducing local government that is more remote from people and the everyday geographies through which lives are typically structured, driven by reducing costs and seeking efficiencies in an age of austerity.

Key to what happens next will be the practicalities of implementation. Under a previous Labour government, radical changes to the scale and scope of spatial development planning were introduced through the Planning and Compulsory Purchase Act in 2004 (Morphet 2010). A central part of this reform agenda was introducing a new system of local planning called the Local Development Framework. At the time, the aim was for the then 396 local planning authorities to have an adopted 'Core Strategy' as part of this within three years. In practice, only 22 managed this (Clifford and Tewdwr-Jones, 2013). These reforms were called by the Minister at the time "the gestation of an elephant" (Clifford, 2013: 363) but by February 2010, the Conservative election manifesto was claiming planning in England was broken.

Government commissioned reports at the time (ODPM 2006; Morphet et al, 2008) highlighted concerns over skills, particularly as the new spatial planning approach required arguably different skill sets but insufficient time and resource was given for training and upskilling to support this. Other research (Clifford, 2013; Clifford and Tewder-Jones, 2013) further noted that whilst there was support for the principle of the reforms from frontline planners, there was concern that the reforms had been primarily process-driven without sufficient consideration of their implementation. Detailed drafting of government regulations sometimes lacked clarity or misleading advice was given and there were poor feedback mechanisms from local to central government. Sometimes guidance from central government was late or lacking clarity over what frontline planners felt they really needed. There were also financial implications as new, wider evidence bases were more expensive and staffing resource issues had not sufficiently been considered. Further, more generally, there were tensions within central government's planning reform agenda, for example between desires for planning to be speedier and better at public engagement.

These issues reflect many of the classic problems of policy implementation, with central government often not sufficiently considering the practicalities of implementing their policies, with complexity and resourcing issues very frequently stated as key issues (Morphet 2025). Although at the local state scale, the EDWP proposals do not propose drastic changes to the scope of local planning in the way that the 2004 reforms did – assumably local plans would continue to have much the same format and process for preparation as at present – there are significant organisational and scalar changes taking place which could be hugely disruptive, particularly if the implementation issues are not properly considered.

Over the past few years, some new large unitary local authorities have been created in England in Cornwall, North Yorkshire and Somerset. Cornwall now has one single local plan covering the unitary authority (formerly six district councils, each with their own local plan). In Somerset and North Yorkshire, which have been more recently merged, there are still different local plans from the former district councils but with the apparent aim for single council-wide local plan some years into the future.

As council reorganisation comes closer, local planners will be considering their new roles. There is likely to be considerable staffing flux ahead of any reorganisation, and time taken to settle into new arrangements and understanding new geographies. The central government objective is that there should be no delay whereas many local authorities may soon cease to exist. Continuing to develop local plans in these circumstances seems wishful thinking against everyday realities. Development management could be similarly impacted by these staffing these organisational changes and uncertainties with new teams being formed over a lengthy time frame. This is not to deny potential positives from reorganisation, such as if district councils with elections three years in four (the current normal arrangement in two-tier areas) are replaced by new unitary councils with elections every four years creating greater political stability which can help progress local plan. However, there will be considerable churn at both local and the new sub-regional strategic scales.

There is also the unresolved issue of the relationship between the local and the new sub-regional strategic plans. Much may depend here on the exact geographies of both scales and the difference between them. The intention of an SDS may be quite different to a local plan whatever the scale, but if there are only a small number of local plans within the SA (it seems in many cases there may be just 2 or 3) then, in practice the plans could become increasingly similar and with less distinct roles. Further, in practice, local plan preparation may be delayed while the SDS are prepared given that authorities are unlikely to want to spend money on a local plan which may quickly become outdated and local planners are likely to want to see what the SDS are saying before finalising their own work. This could perversely lead to a longer delay in improving the coverage of local plans across England, further hampering the realisation of a properly plan-led system and instead leading to increased centralisation through the NPPF, National Development Management Polices introduced through the Levelling Up and Regeneration Act 2023 and planning by appeal (to the Planning Inspectorate) stepping into any local policy vacuum.

Implications for strategic planning

There are also implications for the creation of a proposed set of universal SDS across England. Firstly, the EDWP does not indicate a likely timescale for their start and completion, whether they will require new legislation or can be prepared within the context of the Planning and Compulsory Purchase Act 2004. There is a significant issue in the development and understanding of the content and format of the SDS and the methodology for their formation. The NPPF states that SDS will be prepared within the context of a sustainability appraisal, should be reviewed every five years and examined against the tests of soundness in the same way as local plans. However, as yet the government has offered no guidance on the content, evidence and methodology for these plans, although there is an informal advisory group considering strategic planning approaches based on experience in England undertaken at the local level. Structure plans were abolished in 2004, when Regional Planning Guidance (RPG) was also replaced by Regional Spatial Strategies. Both were under the control of central government. In two-tier local government areas, the RPG were operated through structure plans prepared by counties which interpreted their land use requirements for housing, growth and other strategic facilities for their areas, allocating these between their constituent authorities. Since the abolition of both regional and structure plan formats, there has been pressure for their return to provide a more certain context for housing and infrastructure investment. However, the system in Greater London still operates with a two-tier process in the context of the Mayor London's Plan and the London Borough spatial plans prepared within the structure of the 2004 Act.

There are also concerns about the budget to make these new SDS and the availability of planners to prepare them. This is within the context of local government reorganisation in two tier authorities and the movement of other related functions from UAs of all forms to the new SAs, including for transport. There will also need to be a programme of training for all those involved in preparing and contributing to the SDS including government departments, statutory consultees and other strategic bodies as well as the Government's Planning Inspectorate, who might also need to expand their numbers if these plans are submitted simultaneously.

There is also a requirement that the strategies being undertaken for the SAs should be prepared and operate in an integrated way (MHCLG 2024a; Reeves 2024). This presents issues demonstrated through previous attempts for integrated working between spatial plans and other strategies (Lambert 2006; Morphet 2009) and, as yet, there is no detailed advice on the content, structure and agreement for Local Growth Plans (Reeves 2025) or local transport plans. Additionally, the mayors of the SAs will have responsibility for designating energy networks, local growth hubs, innovation hubs and plans for towns. There is also a national housing plan and more on the industrial strategy to be announced as

part of the 2025 Spending Review. In some SAs, the mayors are to be provided with integrated settlements for funding that will include a Local Outcome Delivery Plan managed by a programme group chaired by a senior civil servant (MHCLG 2024c).

One of the two main objectives of the EDWP is that it should complete the devolution settlement for the UK that was first introduced in 1999 for Scotland, Wales and Northern Ireland. Each Devolved Administration is on at least the third iteration of their national plans which are linked with infrastructure investment in Scotland (Scottish Government 2023) and Northern Ireland (DRD 2010) and wellbeing in Wales (Welsh Government 2021). There has been a call for a similar national plan for England to provide a context for the range of new integrated strategies for growth, housing, energy, transport, ecology, the circular economy and employment (NIC 2020; UK 2070 2020; Wong 2022). In addition, the review of the Planning Act 2008 and its National Policy Statements for each type of nationally significant infrastructure can be added to this strategic framework for England. However, unlike the Devolved Administrations, England does not have a Parliament or Assembly to develop or own a national plan, nor is one proposed in the EDWP, although the new Mayoral and Leaders' Council, established by the Deputy Prime Minister, could be extended to undertake this role in relation to a national spatial plan for England.

Discussion

The proposals for governance and planning reform in the EDWP are significant, and with its reliance on the principles of decentralised government (as set out by the OECD (2019; 2020)) and its focus on integration, there is much to be welcomed here. However, as yet there is no plan for the implementation of its many proposals. This will not be easy not least given the "complex geohistory of England's territorial enigma" (Jones and MacLeod , 2004: 434). There are a number of considerations here. Firstly, the often overlooked challenges in building identity in subnational governance arrangements (Gherhes et al, 2023) and trying to ensure stability through a coherence of governance arrangements and territorial identity. This is an important consideration for the success (OECD 2020) in English devolution narratives (Denham and Morphet 2024). There is also expected competition between and within places for resources:

"A weak imagined coherence fosters disengagement and perceptions of inter-place rivalry, with some hinterland communities feeling disconnected from the city-regional narrative and contesting the SCR [Sheffield City Region] imaginary ... politically driven rescaling can create asymmetries between material and imagined coherence, and show how competing imaginaries can hinder subnational arrangements" (Gherhes et al, 2023: 163)

Secondly, the absence of a national plan for England, unlike Wales, Scotland, Northern Ireland and Ireland, leaves an aporia in the framing of these many SA strategies at this meso-scale. The geographic scale of SDS without this national context will potentially mean more competition, overlap and delay. This could be more problematic than having RSS covering England, as in the previous system, due to the smaller geographical scale of the SAs compared to previous regions although the SDS will be under local democratic rather than central government control. Without a plan for England, where will be the principles and evidence for redistribution, inequality, climate change and investment for infrastructure be located? Will hard questions about issues like regional inequality and the hard choices around national infrastructure decision-making really be made, and the spatial implications fully considered?

Thirdly, there are significant puzzles about the relationships between the institutional architecture between central and SA government – both existing and proposed. There will also need to be new cultures and skills in working together which have proved challenging in the past (Denham and Morphet 2024). Over recent years, internationally, strategic planning has increasingly been embracing "a more socio-political and open governance approach that emphasises collaborative approaches with wider stakeholders and communities" and also being increasingly linked to "the wider digital revolution in terms of encouraging more joined up thinking in related policy fields" (Wong et al, 2021: 74)This "requires a future generation of planners to be able to take a holistic and longer-term view with associated technical and analytical skills but also be politically astute and policy focussed and engage in a collaborative way with communities and stakeholders within an increasingly open system of governance rather than top-down government" (Wong et al, 2021: 74). There will be challenges in identifying these skills and ensuring those practising in this new institutional setting have them.

Finally, while the introduction of SDS at the heart of the SA agenda, working with new Growth Plans is a major opportunity for the rebirth of an understanding of the role of planning in supporting places in both growth and decline, there are also major risks. Planning is potentially being given an opportunity with the reintroduction of a form of strategic planning following the vacuum after the 2010 abolition of RSS. But this now being done alongside significant local government reorganisation, following over a decade of super-austerity for local government and when financial and staffing resources are particularly challenged in planning. If the SDS and local plans are not delivered, or the disruption is

perceived to hinder rather than facilitate the 'growth agenda', could planning and planners be opened up for yet more criticism and with further reform reducing the role of planning that follows? Or will the centrality of the SDS for decentralised governance of places prevail (OECD 2020; EDWP 2024)?

References

Averley, J. (2024). Chief Planner's Newsletter at

https://assets.publishing.service.gov.uk/media/675c1cc0b745d5f7a053eeed/Planning_update_news_letter_13_December_2024.pdf

Clifford, B. P. (2013). Reform on the frontline: Reflections on implementing spatial planning in England, 2004–2008. *Planning practice & research*, *28*(4), 361-383.

Clifford, B., & Tewdwr-Jones, M. (2013). The collaborating planner. *Practitioners in the neoliberal age*. Policy Press.

Denham, J., & Morphet, J. (2024). Centralised by Design: Anglocentric Constitutionalism, Accountability and the Failure of English Devolution. *The Political Quarterly*.

DWP (2024) Get Britian Working

Gherhes, C., Hoole, C., & Vorley, T. (2023). The 'imaginary' challenge of remaking subnational governance: Regional identity and contested city-region-building in the UK. *Regional studies*, *57*(1), 153-167.

Jones, M., & MacLeod, G. (2004). Regional spaces, spaces of regionalism: territory, insurgent politics and the English question. *Transactions of the Institute of British Geographers*, *29*(4), 433-452.

Lambert, C. (2006). Community strategies and spatial planning in England: The challenges of integration. *Planning, Practice & Research*, *21*(2), 245-255.

MHCLG (2024a) English Devolution White Paper

MHCLG (2024b) National Planning Policy Framework

MHCLG (2024c) Annexe to MOU for integrated settlements

MHLG (1968) The PAG Report

MHLG (1970) The Development Plan Manual

Morphet, J. (2009). Local integrated spatial planning—the changing role in England. *Town Planning Review*, 80(4-5), 393-414.

Morphet, J. (2010). Effective practice in spatial planning. Routledge.

Morphet, J. (2017). Sub-regional strategic spatial planning: the use of statecraft and scalecraft in delivering the English model. *Town Planning Review*, *88*(6), 665-682.

Morphet, J. (2025) The British Civil Service. Bristol University Press.

Morphet, J., Mark Tewdwr-Jones, Nick Gallent, Bill Hall, Mathew Spry, and M. Howard. "Shaping and Delivering Tomorrow's Places Effective Practice in Spatial Planning." (2007): 1-112.

NIC (2020) Principles for effective urban infrastructure. https://nic.org.uk/studies-reports/cities-programme/principles-for-urban-infrastructure-strategies/.

Northern Ireland Assembly (2010) Regional Development Strategy 2035 — — Building a Better Future ODPM (2006) Spatial Plans in Practice Supporting local planning reforms. London. ODPM.

OECD (2019) Making Decentralisation Work A Handbook for Policymakers. OECD Multi-level Governance Studies Paris OECD.

OECD (2020), Enhancing Productivity in UK Core Cities: Connecting Local and Regional Growth, OECD Urban Policy Reviews, OECD Publishing, Paris, https://doi.org/10.1787/9ef55ff7-en.

Rayner, A. (2024) Letter from the Deputy Prime Minister to local authority leaders, mayors and chief executives of local authorities: Building the homes we need. 12th December.

Reeves, R. (2024) 'Chancellor unveils a new era for economic growth'. July 4th. https://www.gov.uk/government/news/chancellor-unveils-a-new-era-for-economic-growth.

Reeves, R. (2025) Chancellor unveils plan to turbocharge investment across the UK. 24th January https://www.gov.uk/government/news/chancellor-unveils-plan-to-turbocharge-investment-across-the-uk

Scottish Government (2023) National Planning Framework 4 A National Spatial Strategy for Scotland 2025

UK 2070 Commission (2020) Declaration of Intent: The Final Report of the UK2070 Commission: Make No Little Plans – Acting At Scale For A Fairer And Stronger Future. https://uk2070.org.uk/wp-content/uploads/2022/06/Declaration-of-Intent-Brochure.pdf

Welsh Government (2021) Future Wales: The National Plan 2040

Wong, C. (2022). Spatial thinking and policymaking in the UK: A spatial planning perspective. *Space and Polity*, 26(2), 135-142.

Wong, C., Bafarasat, A. Z., & Baker, M. (2021). Strategic planning. In *Contemporary planning practice: skills, specialisms and knowledge* (pp. 59-74). Red Globe Press.