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National planning systems and the emergence of city-region planning in England and France

1. Introduction

Trends in urbanisation, linked to changes in the economy, have led to the emergence of wide zones around cities in Europe which are integrated to a variable extent in terms of housing and labour market processes to the urban core or central city (Castells, 2002; Denters and Rose, 2005; Parr, 2007). These urban hinterlands typically encompass the territories of a number of municipalities, and the management of these areas has led to considerable interest in city region governance and planning in academic and policy debates not only in Europe (Newman and Herschel, 2002; Salet et al, 2003; Van den Berg et al, 2004; Heinelt and Kubler, 2005) but more widely (Phares, 2004; Hambleton and Goss, 2007).

Whilst there is a sense that these urban trends have posed considerable challenges for traditional planning systems in Europe and case study evidence from different urban regions suggests that there has been significant change in planning systems over the last 20-30 years (Healey et al, 1997; Newman and Herschel, 2002; Salet et al, 2003), we know little about the way this change has facilitated planning at the city-region scale, whether the ‘re-territorialisation’ of traditional planning systems might vary between countries, and if so why this might be the case.

This chapter sets out to explore the nature of top-down planning system reform, using a comparative method. The two cases deal with the distinctive national contexts in France and England. The English system was reformed in 2004 and the French system in 2000 (see Booth et al, 2007). Behind this approach is the belief that the shape of city-region planning which emerges as a result of reform will vary in response to the mediating influence of nation states (see Deas and Giordano, 2003). More concretely the question is posed: why has reform in France aimed to support and reinforce planning at the city region scale whilst in England this has not happened and there is a new emphasis on the region in planning policy, at a geographic scale above conventional descriptions of city regions? In contrast to most explanations of the development of city regions which give primacy to economic competition between places (see the critical review by Ward and Jones, 2004), the argument here is that national housing policy, as part of the changing welfare state, is a key factor that shapes the difference between countries (Murdoch and Norton, 2000). Britain and France are nations often identified with different types of welfare state (Esping-
Anderson, 1990): Britain with its ‘Anglo-Saxon’ model of social policy and France with a more ‘corporatist’ approach. They have been subject to the same economic pressures, hence an examination of change in these two countries is illuminating in this respect.

In explaining the re-territorialisation of planning, I use insights from ‘historical institutionalism’ a perspective which helps to explain the distinctiveness of national political outcomes. Such explanations see ‘the institutional organisation of the polity or political economy as the principal factor structuring collective behaviour and generating distinctive outcomes’ (Hall and Taylor, 1996, p937). In the next section the definition of city region planning is set out, then there is a brief review of the explanations in the literature for planning system reform before the two cases are discussed.

2. **City region planning: the view from the literature**

To describe ‘city-region planning’ one has to acknowledge that it is a normative concept with a number of dimensions. It is also a contested concept (Lloyd and Peel, 2006). City region planning for the purpose of this chapter means, in the first instance, some recognition in the thinking (discourses) of politicians and some reflection in their policies of the existence of urban-rural linkages and of the phenomenon of urban sprawl within the city region. Planning is taken to mean following Healey et al (1997, p12) ‘the legal and administrative procedures and institutional arrangements for guiding the location of investment in development projects and for regulating the way land is used and developed’.

City region planning is often seen as consisting of the development of some appropriate policy instruments, typically a ‘strategic plan’ for the city region which provides a ‘guiding framework for the exercise of the regulation of land rights and other interventions in the development process.’ (Healey et al, 1997). Such strategic plans allow the sectoral approaches of policy for employment and economic development, housing and transport to be integrated (so that these inter-relationships can be managed more effectively). Finally, the institutional arrangements for such planning are of interest since behind the definition of the city region is the assumption that it extends beyond the administrative boundaries of a single urban authority (see Tewdwr-Jones and McNeill, 2000) though, of course, this is a contingent matter. Following Bollens and Schmandt (1970), quoted in Goldsmith (2001), these arrangements can be classified as: the one government approach; the two level approach and the cooperative approach. The one government approach (the annexation of land or consolidation of municipalities) has not been adopted in Europe. Here the formal two tier approach or the cooperative approach (horizontal inter-governmental cooperation across municipal boundaries) have been adopted with the latter generally flourishing since the 1980s (according to Goldsmith, 2001).

Most work on the emergence of city region governance and planning takes as its starting point globalisation and the pressures that this imposes on welfare states. Salet et al (2003), for example, argue that from the 1950s to the 1980s, national governments in Europe
expanded welfare states. ‘Rising social expectations kept governments under pressure to produce results during this period and most followed a kind of social democratic consensus (Esping Anderson 1990). It was in this period that most national systems of town and country planning were born.’ (Salet et al, 2003, p5). The nature of these states varied however so that welfare states had different styles or types, in different countries. From the early 1980s, it is argued, a dramatic shift occurred in the position of national governments. The common features identified are: a reduction in government’s proactive role in the economy and society; the diversification of decision-making through a wide range of organisations; the restructuring of inter-governmental relationships. Two factors have lead to this situation: the globalisation of the new informational economy and the opening up of national markets to international competition, as part of wider international agreements about trade and also as a result of increasing European economic integration (Wilks-Heeg et al, 2003).

But the degree of change in the position of government, and by implication in the nature of the welfare state, varies between countries in Europe. ‘These differences can be largely traced to the alternative traditions that existed within the general welfare state approach’, they claim (Salet et al, 2003, p5), but ‘the period from the 1980s brought institutional transformation to all European cities.’ (Salet et al, 2003, p6). There are thus different starting points for change, and national welfare state traditions shape outcomes. Salet et al (2003) are broadly right in this conclusion but, in relation to the reform of planning systems, explanations have to take account of the importance of different policy areas within the welfare state for the form that city-region planning takes. Housing policy has always been an ambivalent dimension of the welfare state – ‘neither fully part of the welfare state, nor fully part of the free market’ (Kleinman, 1996, p1) - but the nature of government intervention in housing has very significant impacts on the nature of the planning systems in different countries (Barlow and Duncan 1994), if only because of the significant demands made for land for new housing, and this in turn it is argued here has a significant impact on the national outcomes of planning system reform.

There has been little comparative research on the changing nature of planning systems in Europe. There has been plenty of comment about the pervasiveness of change but little by way of detailed examination of change (for an exception see Booth et al, 2007). Rosa Pires et al (2000, p257) argue that the context of planning is ‘quite different from the one in which dominant ideas of modern planning thought were established’ and ‘traditional approaches seem less and less relevant’. But they argue, in an implicit convergence framework, that planning practice has ‘advanced’ less rapidly than ideas about planning, and that there are many problems in implementing new ideas, in part because there are ‘deeply ingrained institutional cultures’. Tewdwr-Jones (2000, p8) too claims that planning today has little resemblance to the same activity that existed twenty years ago in different European countries. ‘A planning system that was intended to facilitate development, regulate land use, and differentiate between urban and rural, has been almost decimated.’
Moreover, the phenomenon of change in ‘traditional’ planning systems does not feature strongly in the literature on the emergence of city region governance and planning in Europe, it seems, for two reasons. First, planning as part of governmental activity has been by-passed by a broader interest in ‘governance’ implying a wider range of non-governmental actors in the policy process. Second, it has been by-passed in the tendency to speak of ‘spatial’ planning which sees changes in the scope of planning (Tewdwr Jones and Allmendinger, 2007) as involving the integration of a wide range of policy areas, not just confined to matters of land use change.

Where there have been studies of planning system change, writers have stressed rather than welfare state traditions either change in systems based in different ‘families’ of legal/administrative traditions in different European countries (Newman and Thornley, 1996) or within different ‘regional’ perspectives within Europe (northern versus southern European) (Rivolin and Faludi, 2005). These studies have been framed within an implicit normative institutionalist perspective. In this chapter I adopt a historical institutionalist perspective (see Taylor and Hall, 1996; Thelen and Steinmo, 1992) which shares with normative institutionalists the view that institutions, broadly defined, have a structurally independent influence on political, economic and social change. Norms and values as well as formal organisations are regarded as causal factors in their own right (see Lim, 2006). But for historical institutionalists, these institutions and the practices associated with them are historically embedded and follow from decisions taken at ‘critical junctures’ which set countries on particular tracks or paths of development. The metaphor of path dependence is used by scholars adopting this approach. Policy makers have to address policy change in a situation in which history matters. It matters in terms of shaping the context within which decisions about policy change are made and the ‘terms of the debate’. In consequence, therefore, different countries will adopt different solutions to common pressures: there will be a divergence in policy outcomes.

3. City-region planning in France and England

The discussion in this section of the chapter deals with the case of England, rather than the UK more generally. This is because the asymmetric character of the British state has become obvious with devolution to Scotland and Wales (Allmendinger and Haughton, 2007), and the overall pattern of city region planning has become more complex (Lloyd and Peel, 2006). How far are there similarities or differences in the nature of city-region planning that has emerged in these two countries?

3.1 Policy rhetoric and the policy agenda

At the level of policy rhetoric, both have now adopted policies that recognise that there are urban development pressures outside urban cores and that this has undesirable environmental and social consequences. There is thus some similarity in the policy debate between the two countries.
Both have responded by adopting ‘urban compaction’ policies which stress the importance of sustainable development. The approach building on a long-standing tradition of rural protection was adopted in the England under the umbrella of sustainable development, from the early- to mid 1990s onwards and has become increasingly central to planning policy. It was adopted in the late 1990s in France with a series of Acts – la Loi Chèvenement, la Loi d’orientation pour l’aménagement et le développement durable du territoire (LOADDT), la loi pour la Solidarité et le renouvellement urbain (SRU).

‘Urban renaissance’ or ‘renouvellement urbain’ is a fashionable ideology in both countries. Having roots in, amongst other things, the EC’s Green paper on the Urban Environment (CEC, 1990), urban compaction policies involve a range of rather similar and inter-linked policies: the concentration of development within existing urban areas, urban regeneration, higher densities, mixed use, social integration and transport policies which support public transport and attempt to restrict automobile use. This latter approach reflects the view that there should be better integration of urban policies, particularly transport and land use policies. Within this broadly similar set of policies there appear to be some differences in emphasis with a particular focus in England on the re-use of previously used urban land.

3.2 Institutional responses
But beyond having policies that recognise that urban sprawl is a problem, city-region planning also requires some institutional arrangements by which the ‘city region as a whole’ can be managed with some control and regulation of public and private activities. Reform of planning legislation in both countries has also been accompanied by institutional changes to produce more appropriate territorial governance for the management of urban development. Whilst in both countries there has been some discussion of the need for planning to be conducted at the city region scale (see Pumain, 2004; Marshall, 2007), the institutional restructuring has had different emphases: there is a ‘new localism’ in French planning, whilst in Britain there is a ‘new regionalism’.

The French response has involved some rather dramatic changes in institutional structures at the urban level (Borraz and Le Galès, 2005; Négrier, 2006). France has a rather fragmented system of local government with urban areas being composed of large numbers of small communes. There are over 36,000 communes in France. There have been various attempts in the past to bring these together for service provision in urban areas. But recently there has been what some have called a ‘quiet revolution’ since the 1990s, with large number of communes grouping together in Établissements publics de coopération intercommunale (EPCI) – see Table 1. Nearly 90% of communes are now in EPCI. These EPCI created by the Chevènement Act 1999, Communautés urbaines (for the biggest cities), Communautés d’agglomération (medium sized towns) and Communautés de communes (smaller communes) have responsibilities and fiscal resources which were previously held at commune level.
For strategic issues like planning, economic development, housing (habitat), social welfare and urban management, the Communautés urbaines, Communautés d’agglomération must transfer responsibilities to the intercommunal level. Other activities like the management of local roads and car parking, sewage and water management, environmental issues and the provision of major facilities can also be transferred to this level from the communes. One factor that has facilitated urban sprawl has been the variable taxe professionelle (a tax levied on employment) between communes within a city region. But there has been a revolution here too. A rapidly growing number of city regions are opting to adopt a single tax rate across the entire region allowing factors, such as environmental and transport factors, other than tax to influence employment distribution.

The process of creating inter-communal groupings (inter-communalité) has been an interesting one. Traditionally (Goldsmith, 2001) two tier city region government structures have been created by central government and imposed on appropriate city regions within their territory. Here the process of creating a formal two-tier solution has been voluntary, cooperative, locally driven and bottom-up within the framework of national legislation. One consequence is that there is a great deal of variety in implementation in different city regions (Négrier, 2006). Another is that the boundaries selected for the creation of the intercommunal groupings do not always coincide with the boundary of city regions as identified by INSEE when they identified built up areas (agglomerations) and city regions (aires urbaines) in the 1999 census. In Bordeaux, for example, the communauté urbaine is composed of 27 communes (660,000 population) whilst the agglomération covers 51 communes (754,000), and the aire urbaine 149 communes (925,000 population) (Marconis, 2005). However critics point to the problems of legitimacy created by this process: there are no elections at this level and the leaders of these groupings are chosen amongst those elected at communal level.

Table 1 City region intercommunal groupings (EPCI) in France

<table>
<thead>
<tr>
<th>Category Jan 1st 2005</th>
<th>Number</th>
<th>Number of communes</th>
<th>%</th>
<th>Population</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communautés urbaines With TPU</td>
<td>14</td>
<td>355</td>
<td>1.0</td>
<td>6,210,939</td>
<td>10.0</td>
</tr>
<tr>
<td></td>
<td>11</td>
<td>322</td>
<td>0.9</td>
<td>5,872,605</td>
<td>9.5</td>
</tr>
<tr>
<td>Communautés d’agglomération</td>
<td>162</td>
<td>2750</td>
<td>7.5</td>
<td>20,391,934</td>
<td>32.8</td>
</tr>
</tbody>
</table>

Source: Marconis 2005

In the case of England, it is clear that in recent years the regional level in planning has been of growing importance, a level which has traditionally been the weakest one (Baker et al, 1999). Its recent history can be mapped briefly. In 1990, a system of Regional Planning Guidance (RPG) was introduced. PPG15, one of a series of central government documents providing policy advice for local government’s planning function, sought the introduction
of this guidance during the early 1990s. The regional institutions which were established were rather informal, and were based on the SERPLAN model set up in South East England in 1961, essentially composed of ‘conferences’ of local planning authorities who aimed to provide draft guidance to the Secretary of State (SoS) who, taking into account what the regions produced, would issue Regional Planning Guidance (RPG). This regional guidance was to provide a context for the county-prepared structure plans. Under New Labour there was an early shift to support the regional level and to give it more responsibility for policy development. The Future of Regional Planning Guidance (DETR 1998) suggested that guidance should reflect to a greater extent than previously regional rather than national priorities. The regional conferences should work more closely together with regional stakeholders. There would be an examination in public of the draft regional guidance before an independent panel where regional stakeholders were able to express their views. Taking account of the Panel’s report, the guidance would be issued by the SoS (Baker et al, 1999; Stephenson and Moxon, 2001). A new phase of regional planning, however, was introduced in 2001 with the abolition of SERPLAN, the grouping of local authorities in the South East which had produced the draft RPG for the South East. According to Marshall (2007, p116) this strengthened the role of central government in this region, ‘now the only body which could overview the whole of the south-eastern region’.

The Planning and Compensation Act 2004 went further in strengthening the regional level. It abolished the role of counties and established the Regional Planning Body (RPB) as the organisation that would be responsible for strategic planning. Responsibility for planning at the local level rests with the lowest tier of local government, (though this can be unitary authorities, districts and metropolitan authorities).

There has been no reform of institutional structures at city region level. However, the English system has in recent years been characterised by a range of partnerships at sub-regional level in response to both ‘top-down’ and ‘bottom-up’ pressures. According to Roberts and Baker (2004, p268): ‘These pressures include the desire of central government to identify areas of search for new housing and other development; the requirements of groups of local authorities and other stakeholders to collaborate in order to develop or roll forward strategies for land use planning, economic development, transport, environmental management and other purposes; and, in some regions, the need for partnerships to establish a capacity to design and implement special development programmes and projects such as the (sub-) regional programmes supported by the European Union Structural Funds budget.’

Some of these partnerships may have happened to coincide broadly with city region boundaries, based on travel to work patterns. For example, the joint working of local authorities in and around Bristol (CUBA) in the late 1990s resulted from the abolition in 1996 of the two tier city region government (County of Avon) established in the 1970s in the area, but with the subsequent need to develop a joint statutory development plan for the city region. But most sub regional working has been based on indistinct boundaries in the
Cooperative arrangements between local authorities within city regions could emerge under the new planning system in England, for example, to coordinate the production of local development frameworks, following the Regional Spatial Strategies, discussed in the next section. Sub-regions might also be the basis for groupings of authorities with some responsibility for city-region planning. According to Marshall (2007, p111) under the 2004 Act if the Regional Planning Body (RPB) decides that there is to be ‘different provision in different parts of the region’ then counties, unitary authorities and National Park Authorities would have a role in developing detailed proposals for these areas. The boundaries that are established for these sub-regions have an impact on the authorities involved, and there has it seems been a degree of negotiation between local authorities and regions about boundary drawing.

In the North West, for example, the sub-regions identified in the Draft Regional Spatial Strategy are described explicitly as ‘city regions’ based around the cities of Manchester, Liverpool and Central Lancashire, an approach which draws explicitly on ideas from the Northern Way economic development strategy (ODPM, 2004). The Strategy identifies the local authorities which fall within each of these sub-regions though there is some degree of overlap. A similar city-region terminology is used for sub-regions in the North East. In the South West, the Regional Assembly has identified ‘principal urban areas’ in the region, and also sub-regions but the city region notion has not been adopted. If there is cooperative working within these city regions it will depend on a continuation of the informal, cooperative one tier structures of government, reflecting as Roberts and Baker (2004) put it the unsettled nature of regional, sub-regional and local governance in the English regions. As with the French system there is an issue of accountability with these arrangements. The RPBs are indirectly elected (as in the French case for city regions) but key decisions will be made about sub-regional strategic planning with very indirect democratic control. In the case of the Bristol city region, which is under development pressure, these proposals include very detailed allocation of new development to ‘greenfield’ sites, in different parts of the city region, a process which is sparking considerable local opposition.

3.3 Policy instruments
A third dimension of city region planning is the nature of the policy instruments which are available to use. Have strategic plans for city-regions been proposed and implemented? Do these seek the coordination of different sectoral policies?

In noting the differences in the nature of the re-territorialization of the planning systems in England and France, Verhag et al (2007, p94-95) also note that in England ‘The relations between the elaboration of metropolitan development strategies and the statutory planning system are necessarily different from those in France where the idea that spatial planning, through the intermediary of the SCOT, can play an integrating role in policies at the
metropolitan level is central. This seems to be a fundamental difference between the planning system introduced by the SRU law in France, and that introduced by the Planning and Compulsory Purchase Act in England.

The new types of policy guidance/instruments of planning – Schéma Directeur de Cohérence Territorial (SCOT), Plan Local de l’Urbanisme (PLU) - which have been introduced represent a move towards a more strategic, socially and environmentally informed, style of planning with the requirement for public participation close to the British model. The SCOT was conceived under the SRU Act in 2000 as a plan for a functional urban region and it aimed to reinforce the role of planning among the inter-communal groupings being established under the 1999 Act. There were also clear attempts to integrate at the functional urban region scale, various sectoral policies with the new instruments of planning. Transport policies but also housing, economic development, and retailing plans need to be compatible with the SCOT, not just take them into account. In practice the SCOT may not correspond with any institutional grouping, and may extend well beyond their boundaries (Verhag et al, 2007).

In England, new regional spatial strategies (RSS) which are intended to coordinate policy across sectors, including economic development, transport, housing, and waste plans as well as healthcare, education and crime, are being produced with the possibility of sub-regional plans where they are deemed necessary. Structure plans which were produced at county level and which had the potential to some degree (county boundaries were not always compatible with labour market and housing market boundaries) to take account of urban-rural inter-relationships have been abolished. At the district level (the lowest tier authority) Local Development Frameworks will organise the patterns of development at the local level. Unlike the French system there does not seem to be a clear mechanism by which the key issues of transport and housing and planning policies will be coordinated at the city region scale.

4. Explaining differences in city-region planning

The previous section established that there have been significant differences in the institutions responsible for strategic planning at city region scale and in the nature of the plan-making undertaken. Why has this happened?

National political traditions play a key role in understanding the ability of the two nation states considered here to create new institutions for the exercise of planning powers. These traditions have origins in the period at the beginning of the nineteenth century when modern local government was founded. If there is an interest by national government in creating new institutions (for city regions, for example) for the exercise of planning powers, how could it be done? In the UK, since central government is completely sovereign and Parliament is ‘master of all other institutions in the land, with the power to ‘make and break’ as it wishes’ (Wollmann, 2000, px), it could create new institutions covering any
area with whatever powers seem appropriate, since as Breuillard et al (2007, p53) argue ‘it is the function not the space governed that explains the nature of local government’ in the UK. And the record of local government reform in the UK since the 1960s compared with other European countries demonstrates the radical nature of such changes, both in terms of the number of times reform has been undertaken and the scale of local government units created with the resulting districts (at the lowest level) having a particularly large population size (Wollmann, 2000). Devolution to Scotland, Wales and Northern Ireland also shows that the UK has become a quasi federal state.

In France, this possibility does not exist. The established institutions (collectivités territoriales) of région, département and commune are protected by the Constitution, with ‘immutable administrative boundaries’ (Breuillard et al, 2007, p52) which helps explain their persistence. Moreover, collectivités territoriales are strongly represented in the Senate through an electoral process which ensures that a large majority of Senators hold local positions, and they scrutinise bills concerning local government particularly closely (Breuillard et al, 2007). Even attempts to bring about the voluntary amalgamation of communes via financial incentives in the early 1970s, for example, failed almost completely, ‘suggesting the political strength of the notables locaux, as well as the great allegiance and sense of identity with which the French relate to and wish to hold on to their localities ’ (Wollmann, 2000, p42). So the French state has had to provide incentives for cooperation between communes on such matters or promote ‘intercommunalité’ as discussed above.

The question then becomes why, if it could create city region institutions, has central government for England decided to strengthen the regional level? This is where the politics of rural development and land supply become important to the story. But first we turn to consider housing policy and the welfare state.

### 4.1 Housing policy and the welfare state

The emergence of the welfare state in England led to increased central government interest in issues connected with infrastructure and social policy which had previously been the responsibility of local government. In addition local authorities were more and more seen as instruments for the implementation of national welfare-state policies, including the problem of what to do about the shortage of housing for the urban working classes. The decision to encourage local authorities to provide housing as a way of tackling the housing shortage at the end of the nineteenth century was a significant moment in the history of housing policy in the UK, which was set on a path of development which was quite different from that in most of western Europe where according to Lowe (2005) a tradition of direct provision, using their own organisations, grew strongly among European working class movements. The role of the state in these countries was to assist indirectly through funding, most commonly in the form of cheap loans. Another period when key housing policy decisions were taken followed the end of the Second World War. This was a period of convergence in policy across W Europe, reconstruction being associated with significant
state intervention in housing and the development of mass social housing programmes (Harloe, 1995) (though their form reflected the decisions taken earlier about who the providers of such housing would be). But from the 1970s onwards, Lowe (2005) – drawing on Castles’ (1998) analysis of trends in welfare states and public policy - argues that more varied policies emerged following pre-war traditions, with Britain in a ‘catch-up’ position as far as owner-occupation is concerned in relation to the Anglo Saxon model.

This is not to argue that there were not some commonalities between countries. Kleinman (1996, p59), for example, notes two related crises for housing policy in Britain and France: ‘first, and more generally the fiscal crisis of the welfare state, linked to the more uncertain economic environment; secondly and specifically, a crisis of confidence in mass housing brought about by the loss of faith in technocratic solutions. These came together to produce a decisive switch in state housing policy in both countries away from planning and towards the market’. In both countries there was a switch from renting to owner-occupation but Britain has been a more extreme case than France, where as Kleinman (1996, p2) notes in the former, ‘an entire politics of owner-occupation has arisen ‘ based around the notion that to be a home owner is closer to a political right than to an informed consumer choice; that cheaper housing in the form of constant or falling house prices is not only undesirable, but actually a threat to economic growth and political stability.’ The result of this shift to the market is that housing policy in both countries has bi-furcated with the state concerned to maintain reasonable market conditions for the middle mass of households but interested in social housing for the impoverished minority. Maintaining reasonable market conditions includes ‘providing a legal framework for the enforcement of contracts; for maintaining the supply of finance; for providing output to some degree, especially counter-cyclically; for defining a land use planning framework; for maintaining affordability through subsidies, especially to owner-occupiers; and perhaps most importantly, for ensuring steady economic growth and a reasonably high level of employment. ‘(Kleinman, 1996, p2).

The important point here is that the restructuring of the welfare state, in particular the role of housing policy in the process, has taken place at a different pace and in a different way in the two countries. This has had an impact on tenure restructuring in the two countries. One of the most important differences between France and the UK is in the extent to which there has been a growth of owner-occupation as a tenure. Over the period from the early 1960s to the late 1990s, the two countries starting at much the same level of owner-occupation have diverged quite significantly in growth rates so that at the end of the period the UK was above the OECD average and France was below it.

One consequence of these rather different trends in tenure restructuring is that, a larger section of the population in the UK is dependent on market forces to secure their housing. Policy for housing has become more concerned with setting the conditions within which the private market can operate. But from the point of view of an analysis of the role of the planning system, the important point here is that in France, over the period from the 1970s, new construction has included both social rented housing, whose output well into the 1990s
remained more or less stable, as well as housing for owner occupation. In the UK, by contrast, there has been little new social housing construction which has effectively ‘collapsed’ (Kleinman, 1996).

**Table 2 Trends in owner-occupation**

<table>
<thead>
<tr>
<th>Country</th>
<th>Early 1960s</th>
<th>1970s</th>
<th>Late 1990s</th>
<th>Change 1960-late 1990s</th>
</tr>
</thead>
<tbody>
<tr>
<td>UK</td>
<td>42</td>
<td>49</td>
<td>68</td>
<td>26</td>
</tr>
<tr>
<td>France</td>
<td>41</td>
<td>45</td>
<td>54</td>
<td>13</td>
</tr>
<tr>
<td>OECD mean</td>
<td>50</td>
<td>53</td>
<td>60</td>
<td>9</td>
</tr>
</tbody>
</table>

Source: adapted from Lowe (2005)

There is increasing demand for housing in both countries caused by rather similar trends in household formation. New housebuilding obviously requires a supply of land, and for the market to work, those building new housing for owner-occupation need to be able to acquire land where there is a demand for them to build. Land supply for housing has become a major political issue in Britain, when compared with the case of France, and this issue has been the principal perspective through which planning policy issues have been debated with competing environmental and development interests. Large housebuilding companies dominate the market for new owner-occupied housing in Britain compared with France, connected in part with the nature of labour regulation in both countries (Ball, 2004). Partly because of the dependence of the state on their cooperation for the effective implementation of housing policy, housebuilders have in England been given disproportionate access to the decision-making process. This concern about land for housing reflects a southern-centric bias to planning policy in Britain, despite the fact that this issue has not been so significant in the rest of the country. The reason for this is connected to the growth of demand for housing in rural and suburban areas surrounding large cities but particularly the areas in the south of the country around the greater London region. To understand why this is an issue we need to understand the contrasting rural ideologies between the two countries. Once again we need to explore, if very briefly, historical socio-political forces.

**4.2 The politics of rural development**

The socio-political forces in the late nineteenth and early twentieth centuries were associated with the ‘peasantist’ movement in France and the ‘preservation’ movement in Britain and these have come to define ‘distinctive and potent rural ideologies which have outlived their progenitors’ (Lowe and Buller, 1990, p14). The period at the end of the nineteenth century was associated with agricultural depression in both countries and concern about ‘the rural’ but with different starting points for the debate. In France, with a large though declining rural population and with an electoral system with constituencies arranged to favour the rural vote, governments could not be elected without rural or peasant support. Peasants were important property owners, with peasant proprietors owning over...
half the land. Rural to urban migration became an issue which ‘precipitated a reassessment of the role of the peasantry as part of a broader political movement which came to project the peasantry as part the cornerstone of national stability and strength (Lowe and Buller 1990, p9).’ Hence the main prism through which rural issues have been projected by agricultural interest groups in France in the twentieth century has been the threat to the traditional rural way of life.

In Britain in contrast, the ‘preservation’ movement was influenced by a number of strands of thinking, including the eighteenth century and distinctively English idea of ‘landscape gardening’, of seeing the whole landscape as a garden, requiring particular attention to the aesthetic arrangement of ‘nature’ to produce a work of art. Significant too were the negative reactions to the conditions of Victorian urban life generated by the early industrialisation and urbanisation of the country. Agriculture in Britain had been revolutionised before the industrial revolution so that capitalist relations had been established in agriculture, which was for the most part not the case in France, and as the towns and industry grew rural areas lost their previously more diverse range of activities and became dominated by agriculture. Agricultural depression in the late nineteenth century associated with the availability of cheap food from overseas, contributed to a situation in which, ‘Much land went out of cultivation, the rural population declined sharply and many village communities became depressed and stagnant. (Lowe and Buller, 1990, p9)’ In addition to the concern about the loss of traditional rural ways of life, the preservation movement sought to protect land for various forms of countryside recreation for the urban population and was also influenced by early ecological concerns about the threat to wildlife. The foundation of the CPRE in 1926 campaigning for the preservation of the countryside and for controls on urban sprawl saw the launch of a significant force in British politics, which has been absorbed into the contemporary environmental movement. The protection of the countryside, and of traditional buildings and settlements, has been a prime concern of theirs and of the planning system established in 1947.

Thus peri-urban development raises significant environmental protests in Britain, and particularly in the traditional rural landscapes of England in the south, whilst it has little resonance in rural France. Local authorities in peripheral areas of city regions in England have adopted, it is perceived by development interests, a strongly protectionist stance towards housing development, stressing the environmental cost of further growth under pressure from local residents (John et al, 2002). Central government has however taken a different view. The Crow Report (1999) dealing with regional planning guidance for the South East on the demand for housing in the South East rejected the low housing growth proposed by SEPLAN (the conference of local planning authorities) and argued strongly for meeting housing demand, in part on the grounds that in comparative European terms the South East is not a particularly high growth region ‘the Crow Report is a symbolic testament to the fact that economic growth in the South East will be fuelled rather than frustrated under new Labour.’ (Morgan, 2002, p800).
So why strengthen the regional level in planning and downplay the city region level in England? Murdoch and Norton (2000) are right to argue that part of the answer to the strengthening of the regional level must be devolution to Scotland and Wales, the strengthening of the regional level for economic development purposes in England with the setting up of Regional Development Agencies (RDAs). But the explanation that the central state wanted to divest itself of the ‘unpalatable function’ of the centralised direction of housing policy (Murdoch and Norton, 2000) is not plausible given the subsequent evidence. Housing policy and the creation of reasonable conditions for the support of the market is too important for that. Rather the explanation is that the central state could continue the centralised direction of housing policy but through different institutions. Thus RPBs can set housing targets for the whole region and for sub-regions within it. Marshall (2007, p111) shows that government thinking behind the perhaps grudging acceptance of sub-regional planning is that the whole process will be under RPB control ‘from the setting of the brief (apparently with the answer wanted clearly specified at the start), through to writing the sub-regional strategy’. And, in turn, the RPB can be given central government direction whilst, the fact that they are not directly elected, means they are to a considerable degree immune to local political pressure (Farthing and Carriere, 2007).

5. Conclusion

In the introduction, I argued that despite considerable academic and policy debate about city-region governance and planning and evidence of significant change in European planning systems, we know little about the way these changes have facilitated planning at the city-region scale, whether the re-territorialisation of traditional planning systems might vary between countries, and, if so, why this might be the case. This chapter has started to fill this gap.

The shape of city region planning can be defined by the objectives which it seeks to achieve; the institutions which are responsible for planning; and the nature of the policy instruments available. Clearly, there are some common themes in the policy debate in France and England about the undesirable environmental and social consequences of urban sprawl and the desire to promote urban compaction as away of promoting ‘sustainable development’. But there are significant differences in the re-territorialisation of planning between these countries, associated with the creation of new institutions responsible for planning at the city region scale and in the policy instruments available.

By way of conclusion, I comment on the implications of these findings for two broader debates within planning. First, are European planning systems converging towards some harmonised planning system (see Healey and Williams, 1993; Bohme, 2003)? The evidence from this research would not support this view, since for countries like France and England with long-established planning systems, which have been the subject of investigation here, the nature of city region planning which has emerged in recent years is significantly different, whatever the similarities in policy themes in the two countries. Deeply ingrained
institutional cultures account for the fact that these planning systems have been ‘reformed’ implying a significant degree of continuity in policy within countries. By the same token, these institutions are also a partial explanation of enduring cross-national differences in public policy. In particular, the nature of the welfare state, and the changing role of housing policy within the welfare state, has had a significant impact on planning system reform. The more general conclusion that can be drawn from this investigation for the understanding of planning system reform in different countries is that research has ignored the importance of national housing policy traditions as part of the welfare state.

The second debate is about the causes of planning system change. There are two criticisms that might be made of the analysis in this chapter: that in focussing on housing policy issues, it underplays the significance of economic competitiveness as a key driver of change; and that, though both countries are within the EU, it has little to say about the impact of the EU on change i.e. the ‘Europeanisation’ of planning policies. In relation to the first, it is important to understand the claims that are being made here. In this comparison, I am not arguing that economic competitiveness has not been a significant driver of planning system reform. In fact I have argued elsewhere (Farthing and Carrière, 2007) that it has been an important factor affecting planning system evolution in both of these countries. What I am arguing is that in seeking to understand the differences in the emergence of the practice of city region planning in the two countries, both of which have been open to the pressures of global competition, domestic factors such as the nature of national housing policy and the politics of rural development have been important. It is also important to understand that I am not claiming that institutional reform has itself been driven by planning considerations alone, rather we are dealing with a situation of multi-causality. Some of the encouragement to intercommunalité in France, for example, is due to the desire for better public service delivery, whilst the drive to the regional level in England has been associated with an economic competitiveness agenda.

As for the impact of the EU on planning system change, it is important to note that this chapter has not been primarily concerned with the impetus for change in planning systems. The starting point for analysis has been the nature of domestic change in planning systems. Nevertheless, since Europeanisation research has as a common theme the idea that the EU level is in some way involved in mechanisms which affect domestic change (Lenschow, 2006), some remarks are appropriate. First, it is generally agreed in the literature that the EU level has not imposed ideas about planning on member states: the EU has no competence in planning matters (Janin Rivolin and Faludi, 20005). This does not mean that the EU might not have played some role in affecting domestic policy change, albeit indirectly, however. First, as suggested earlier in this chapter, the very existence of the EU and the single market has contributed to the opening up of national markets to international economic competition, to pressures on national governments and on welfare states, and possibly to competitive policy and institutional adaptations in different countries. Second, it is possible that EU ‘sectoral’ policies for the environment, transport, rural development and regional policy have required or at least encouraged institutional adaptations in different countries (van Ravesteyn and Evers, 2004, quoted in Dühr et al, 2007). Third, the EU has created arenas in which there are opportunities for inter-state learning (Lenschow,
2006). Thus as a number of writers have argued, these arenas have facilitated the diffusion of ideas about planning between states. Here the European Spatial Development Perspective (ESDP) (CEC, 1999) has been the focus of much attention. The creation of the ESDP, for example, required contacts between policy makers at the national level, which facilitated the exchange of ideas between countries (Bohme, 2003). Similarly, Shaw and Sykes (2003) have examined the way that the messages in the ESDP have been ‘applied’ at the regional level in England, the concept of application following Faludi (2001, p664) meaning that the messages ‘shape the minds of actors in the spatial development process’. The ESDP certainly includes discussion of the need for new urban-rural relationships, and it highlights the functional interdependency of urban areas with their surrounding countryside - ‘the outdated dualism between city and countryside’ (ESDP 1999, p19) - and the need for urban-rural partnerships (Caffyn and Dahlström, 2005). The INTERREG programme has also been an EU-created platform which has encouraged the setting up of transboundary cooperation networks exposing planners across Europe to a variety of planning approaches from other states (Colomb, 2007; Dühr et al, 2007).

The question here, though, is whether, these mechanisms have actually been causes of the planning system change discussed here. I think that there are grounds for being cautious about identifying the EU as the cause of the changes in the French and English planning systems. First, there is evidence that interest in planning reform and in city region governance and planning is not restricted to countries within the EU (Sanyal, 2005; Hambleton and Goss, 2007). Since it seems unlikely that the EU has the same effect on non-member states, which are not exposed to the single market, as on member states which are, this might be evidence to support the claim that wider international factors such as globalisation are causes of such changes (Haverland, 2006). Second, it seems at least a plausible hypothesis to suggest that the approach of the ESDP is itself a response to global economic pressures so that again the independent effect of the EU is questionable. Third, domestic factors like the nature of the welfare state and national housing policy emphasised in this account seem to play some role in affecting institutional change and the level or scale at which planning is exercised. Finally, it seems difficult in the case of the ESDP to say that particular ideas were ‘new’ ideas or even ‘EU’ ideas. Rather in the case of knowledge in a subject like planning, it seems more realistic to view it as a set of ideas circulating amongst academic and policy communities over time, ideas that sometimes are ignored, whilst at other times they are taken up and become more salient when they suit particular interests. (Böhme (2003, p24) makes a similar point but does not follow through the implications of this analysis). Key ideas like city region planning, sustainable development and even spatial planning (or coordinated policy for areas) have a long history in both England and France, and clearly pre-date the ESDP.

6. References


