



ACRE Consultation Response: Transforming Places; Changing Lives: A Framework for Regeneration

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About ACRE and the Rural Community Action Network

Action with Communities in Rural England is the national umbrella of the Rural Community Action Network (RCAN), which operates at national, regional and local level in support of rural communities across the country. RCAN adopts a holistic approach to regeneration, delivering economic, social and environmental initiatives, and working in partnership with local and regional government policies and programmes. We aim to promote and help deliver healthy, vibrant and sustainable rural communities, where local people are well connected to policy and decision-makers.

The Department for Environment, Food and Rural Affairs (DEFRA) has invested in the Rural Community Action Network under a £10 million, three-year contract, administered by ACRE, to deliver strategic advocacy on behalf of rural communities at national, regional and local level. This recognises the complementarity between RCAN aims and Defra's strategic objective on *strong rural communities*. ACRE is also recognised for its contribution to third sector policy through its strategic partner status with the Office of the Third Sector, with whom it has a three-year funded relationship, and has been a significant Communities and Local Government stakeholder in the development of the Local Government & Public Involvement in Health Act and the recent Community Empowerment White Paper.

ACRE's role is mirrored by its members interests at regional and local level. RCAN regions play a major role in influencing policy and delivering programmes. At regional level, delivery of regeneration investment through the Rural Development Programme for England and the various regional Market Towns Programmes have all benefited from the participation by RCAN members.

RCAN are therefore well-placed to provide knowledgeable input into the development of CLG's Regeneration Framework proposal and ensure that the evidence base on which it is based adequately reflects rural circumstances.

Regeneration and the rural community context

There are around 11,000 different rural communities across England ranging from small hamlets to large bustling market towns. Their character, local economy and access to local services vary significantly. In countering the isolation from centres of local government and public services, rural people have taken on the challenge of doing more for themselves by providing services, caring for their area and providing mutual support to help those less able to travel.

The quality of life in most rural areas depends largely on the viability of public and private service delivery, the fragile sustainability of community facilities, the provision of community-led services and innovative solutions to supporting them. Community action plays a far greater role in regeneration initiatives and the creation of sustainable communities, both of which need a supportive context through spatial planning frameworks and through local economic strategies.

Despite the apparent affluence and quality of life generally associated with rural life, approximately 20% of rural residents experience disadvantage as a result of low incomes, inability to access services and higher costs of living¹. However, their circumstances remain largely hidden from public view because affluence and poverty exist side-by-side in most rural communities. The widening gap between the 'haves' and the 'have nots' in rural areas is not reflected in area-based statistics, though it is common to use such measures in national statistics to demonstrate whether government policy is producing an equitable society.

Government's approach to analysing deprivation through spatial measures therefore fails to acknowledge the extent or impact of rural poverty across the country. This contrasts with the much more visible concentration in particular urban communities and neighbourhoods, but also makes it far more difficult to address within public policy and programmes.

Until recently, rural regeneration initiatives have been driven by Defra policies and programmes, with a long history of what works and how to achieve it through strategic interventions. The attempts to mainstream such activities and investment through Regional Development Agencies and Local Authorities means that rural stakeholders have had to advocate strongly for the lessons learned to be embedded within their overall strategies.

For all these reasons, creating a regeneration framework that is fit for purpose for rural as well as urban areas is a challenge. Regional and local partners tasked with the design and delivery of regeneration initiatives should be actively encouraged to recognise the characteristic regeneration needs of rural communities. More importantly, they also need to work within a framework that allows them to adopt appropriate solutions to delivering sustainable rural communities and make strategic investments that can support initiatives and solutions

We consider that, contrary to CLG's assertions that the proposals will deliver its objective of allowing local and regional flexibility to deliver priorities (Annex J, p131), the framework has actually narrowed the freedom of action that currently exists to deliver cost effective regeneration in a way that empowers local communities to contribute to achieving those objectives.

¹ Commission for Rural Communities State of the Countryside 2008

Summary of ACRE response on behalf of the Rural Community Action Network

What we do like:

- We welcome the references to rural communities within the document, especially the recognition it gives to Community Led Plans, the role of Parish and Town councils and the opportunity given to local communities to have a say in the planning for their local community.
- We also welcome the thrust of the approach, which is to build the regeneration strategies bottom up from local level, to provide an aggregated strategy at regional level. This is consistent with the new localism, reflecting relevant local circumstances in strategies and programmes.

What we don't like:

- The framework has a strong urban focus and appears to have ignored existing best practice in rural regeneration. The proposals infer that the framework will apply equitably to urban and rural areas, but this cannot happen if the nature of the proposals prohibit this.
- The spatial analysis of the needs of communities through the Indices of Multiple Deprivation automatically neglects the large section of the population that live in poverty in dispersed rural communities.
- The connection between place-based regeneration investment and the impact of person-based initiatives from other government departments misses the crucial role of provision of infrastructure and support services for communities that are part and parcel of rural regeneration solutions.
- Tight spatial targeting of investment is not the only strategic approach to take, nor does it always provide the best value for money. Our experience shows that strategic small investments in specific rural initiatives can achieve significant multiple outcomes across social, economic and environmental objectives that together ensure value for money is delivered.
- Local and regional partners should not be prohibited by the framework from adopting regeneration strategies that reflect rural needs as well as urban. In fact, they should be required, in the interests of rural proofing their activities, to say how they have addressed rural needs.
- Since the framework is to rely on priorities maps, built bottom up through local government structures, the proposals will automatically create tension in three tier local government areas where parishes and districts will vie for inclusion. This will not help deliver the coherent democratic accountability and decision-making processes and will inevitably lead to widespread dissatisfaction with the process.

Response to individual questions

Q1: *The analysis*

We agree that regeneration is a set of activities that reverse economic, social and physical decline in areas where market forces will not do this without support from government. Market failure by both public and private sector services typifies the state of rural communities, particularly with spiraling delivery costs.

Poverty of opportunity is a major factor in rural areas². The framework's analysis (page 23) asserts that relevant *factors 'included the lack of social networks to find jobs particularly via informal networks; a lack of contact with the world of work leading to the poor development of interview and work skills; and a lack of mobility which limited the search radius for work. Other barriers reflected practical problems including high transport costs in relation to low wages and an absence in some places of good, reliable and affordable public transport.'* Since this typifies the needs experienced by many in rural communities, dispersed from main centres of support, it is disappointing that recognition of such needs within regeneration strategies will be largely prohibited by the methodology adopted.

Q2: Further analysis required

We suggest that a much deeper analysis of regeneration needs is undertaken that taps into all the available data that has driven past **rural policy and programmes**. This includes the Commission for Rural Communities State of the Countryside report, as well as the specific poverty-mapping and financial inclusion reports. The connection between low wages and high costs of housing and transport create their own dynamics in assessing regeneration needs in rural areas. Since other areas of CLG and their partners now acknowledge the crisis in **rural affordable housing**³ in a low wage economy, we would have expected some mention of these issues within the analysis that led to the framework's development.

We are also disappointed that the framework analysis made no mention of the key roles of two major reports recently commissioned by the Prime Minister:

- The **Potential for England's Rural Economy** (Rural Advocate, 2008) which showed the significant contribution that rural areas could make to the national economy if the appropriate investment and context was set
- The **Taylor Review of Rural Housing and the Economy** (CLG, July 2008) which outlines its own proposals for delivering sustainable communities, with strong reference to the spatial planning system and the potential role of local communities in ensuring they can achieve their own aspirations for sustainability

We question the lack of inclusion of both these major reports in the analysis, since they demonstrate very positive ways of achieving regeneration with a mix of both policy mechanisms and investment but also requiring communities and local people to contribute their own energies to making it happen. We attach at Annex A the summary of recommendations from the Taylor report, which are central to the regeneration needs of rural areas.

Also absent is any mention of sustainable development In terms of mitigating the impact of **climate change**, which presents particular challenges and opportunities for rural areas. Whilst combating flood risks and providing infrastructure and adequate public services is a challenge, the opportunities exist in investment in effective use of land assets for energy production, food security and meeting housing targets.

A further challenge to fulfilling the economic potential of rural areas is the lack of effective **broadband connectivity**, which disadvantages the creation of new enterprise as well as personal access to IT solutions for those most in need of advice services. Since stimulating the rural economy tends to rely disproportionately on the growth of micro-businesses, rural regeneration initiatives traditionally recognise such specific needs, which are nowadays taken for granted in most urban conurbations.

² In East Anglia, 40% of those without any qualifications live in rural areas (OCSI analysis Norfolk and Suffolk)

³ Rural Affordable Housing Commission report 2007; Homes & Communities Agency Rural Housing Advisory Group work programme

We are disappointed that the framework automatically responds to the issue of market failure by assuming the solution is government investment in large scale regeneration schemes or, via other government departments, direct support to individuals. Rural people resort far more to **self-help solutions or third sector initiatives** which traditionally fill the gap left by market failure.

For instance, community action provides community facilities, community shops, community transport and good neighbour schemes. In rural communities, local people benefit from the services provided by their own local neighbourhood governance in parish and town councils. The third sector can act as the catalyst for many regeneration initiatives that build on these community resources, such as our members' activities in providing Wheels to Work schemes, credit unions, outreach training, adult education and health and social care services.

We consider this would be entirely consistent with other areas of CLG policy and interests in empowering communities, extending the use of third sector's role in delivering public service and benefit and in re-invigorating civic and civil participation. Unless there is due recognition of such solutions within the regeneration framework, then the overall strategy appears to lack **coherence with other CLG objectives**.

Q3: Are the outcome measures proposed helpful? Will they ensure regeneration benefits the poorest people and places in society?

Chapter Two sets out three priority outcomes which, subject to the outcomes of this consultation, will guide targets set for the Government expenditure on regeneration in future. They are:

1. Improving economic performance in deprived areas;
2. Improving rates of work and enterprise in deprived areas; and
3. Creating sustainable places where people want to live and can work, and businesses want to invest.

We welcome this move to focus on outcomes rather than outputs. However we feel that it is important to point out that outcome 3 will be difficult to achieve unless a more comprehensive strategic approach is adopted within regeneration policy. Disenfranchising whole swathes of the population by adopting such a tight designation to areas in which regeneration attention and investment applies does not appear to be conducive to delivering sustainable places where people want to live and can work, and businesses want to invest. We would assert that making appropriate provision for regenerating rural communities within the framework would not unduly dilute the impact on deprived urban areas, whilst releasing some of the untapped potential of rural areas to make significant contribution towards the wider economy. Unless a more widely based approach is taken to regeneration solutions, many rural communities will become second class communities, servicing a commuter population with no local services and no sustainability.

Q4 Have we proposed the right measures?

The suggestions for measuring progress simply confirm that, despite its claims, the framework has little relevance for rural areas. Since the chosen indicators will ONLY be measured in deprived areas or primary urban areas, the impact of any regeneration initiatives outside these areas will not register towards the outcomes, regardless of how much they may contribute to the overall objectives of the framework. How does the framework help install the appropriate checks to identify and learn from wider regeneration activities that go unaccounted for in these outcome measures?

We are surprised at the lack of mention of indicators associated with sustainable economies, given outcome 3, which means perpetuating low wage economies and lack of choice in jobs and training in rural areas. Again, we would like to see some account taken of broadband availability and the impact of climate change on land-based economies, together with measures that recognise the potential for rural areas to make a positive impact.

Q6: What can central Government do to give communities a stronger voice in shaping regeneration? How can other agencies help?

We applaud the principle that communities should have a stronger voice in decisions affecting the sustainability of their area, its services and the quality of life and opportunities for those most in need. This is the principle behind the role of community led planning, the relevance of which is mentioned in the Framework. However community led planning goes one stage further in challenging communities themselves to contribute, through their views on development of their area and through community action harnessed to support delivery of initiatives identified. The role of parish and town councils is a crucial element in ensuring this happens, but their advocacy is given credibility if drawn from the results of community led plans.

We would therefore be concerned if the efforts of all those that contribute to the success of community led plans, including our network members that have led the field in developing, promoting and facilitating the concept, find their efforts countered by such plans not having any chance of registering high on the scale of regional priorities, due to the approach of tightly targeted spatial regeneration interventions. Far from empowering communities, this will result in a distinct negative impact and bring policies such as the regeneration framework into disrepute at local level.

Given that our network has such a long history of influencing and delivery of rural regeneration programmes, we suggest that CLG should specifically engage in detailed conversations with our network and other agencies, for instance the Commission for Rural Communities, RDA Market Towns initiatives, with relevant local authorities and with Defra, around the design and development of alternative strategic interventions that deliver regeneration in areas other than the 'deprived' neighbourhoods focus currently adopted.

Q7: What else can we do to ensure regeneration is responsive to environmental change?

We have already registered concern that there seems to be little mention of impact or outcomes on environmental change, particularly as they are key challenges and opportunities for rural communities.

To highlight the potential that could be achieved by adopting a more positive approach to investing in regeneration that delivers benefit to those most disadvantaged by where they live, we offer the following quote from the report on a nationwide initiative undertaken by the Rural Community Action Network in 2007 in delivering sustainable rural communities in rural areas:

'The 21st Century Village initiative builds on this [self-help] approach to address new challenges, harnessing the tradition of community action to deliver sustainable futures for rural communities. Communities will need to plan and act together and make the most of the land assets that surround them and the willingness of rural people to become involved in controlling their own future. We already know that rural communities can respond to environmental challenges with many small actions. Economic development can be supported by intelligent use of existing facilities, home working and provision of adequate IT. This localisation of services can generate vibrancy in rural areas, rather than watch it slowly drain away.'

<http://www.acre.org.uk/DOCUMENTS/sustainabledevelopment/21%20century%20village/21st%20Century%20Village%20Report%20051207Lweb%20version.pdf>

Q8: How can we further strengthen sub-regional partnerships to deliver regeneration outcomes?

We believe it is essential that subregional partnerships are able to act in the flexible manner promoted by this framework. We do not consider this possible, given the criteria and reliance on deprived areas as defined by CLG. Many subregional partnerships may, in fact, see no point in spending time and effort 'feeding' the regeneration framework with local knowledge, knowing that they will not qualify in any way on a priorities map at regional level.

Q9: Is the criteria based approach a helpful way of ensuring greater consistency in prioritising regeneration investment?

Q10: Should we ask regions to work with local authorities to develop regeneration maps? What are the disadvantages of that approach?

We welcome the approach that local communities are best places to identify what solutions are needed in their area. We also welcome the role that Sustainable Community Strategies and Local Development Frameworks will play in developing the proposals as these are strategies that will involve all sections of the community.

However as previously mentioned, the creation of regeneration mapping creates polarisation between the priority areas identified and all other regeneration needs within the wider area. We are unaware of any research that shows the benefits of such a tightly targeted approach, nor that it produces best value overall. We are not arguing for equal dispersal of investment across the country, but the creation of local solutions that are tailored to the characteristics and profile of the needs of different areas. In particular, we are concerned that the framework requires no local agency to identify where communities exhibit high levels of the kind of disadvantages that typify rural areas i.e. the lack of choice, low wages economies and high cost of access to housing and services.

By producing such a geographically polarised framework map, we do feel this will cause local friction; where all three tiers of local government need to work in partnership in rural areas. This will be to the detriment of democratic decision-making. Despite our welcome of the bottom-up approach to building such maps, and the role of community led planning, we feel that this competitive approach to inclusion or exclusion in regeneration strategies will have an overall negative impact on other CLG interests, such as NI4, when measured across a local authority area.

Q11: Should we go further? What else can be done to align national Government investment behind local and regional priorities?

We are concerned that regeneration initiatives are couched in a consistently negative way, as a burden on the public purse, rather than as an investment in the potential to contribute to the local economy and raise living standards for those most in need. By adopting a more integrated approach to regeneration, the full impact of using the new local Government Performance Framework and Comprehensive Area Assessments could be an opportunity to address positive as well as needs-based regeneration, in a way that is more suited to rural (and perhaps other) communities.

Our solution to this is that local partners should be required to consider the impact of the priorities map on meeting needs of deprived and disadvantaged people throughout their area, and that their proposals are accompanied by separate, tailored measures which could address those more specific needs, particularly those that reflect rural priorities. This should be a mix of area-based, service based and person-based regeneration initiatives. We also believe that the contribution such initiatives make should be measured by overall value for money, rather than their impact on any one of the national indicator set. This is because in rural regeneration experience, the most effective and the most sustainable initiatives tend to be those that deliver multiple outcomes.

It is important to make the distinction between the need for capital and revenue investment. In the past, rural regeneration has recognised that projects and initiatives require an appropriate mix to be effective which often also involves providing support mechanisms alongside community initiatives so they can fulfil their potential and be sustainable into the future.

Q12: Will this approach give the private sector confidence and unlock long term investment? If not, what would?

In terms of private investment, our experience is that, within the travel to work area that forms the large hinterland of major urban areas, the rural communities become 'second class' because they are not recognised in a regional development strategy. The result is those areas suffer lack of investment, so businesses are less likely to invest, services decline, job prospects become less and as a consequence wages are lower.

Q13: Is there a case for central government still identifying some specific neighbourhoods and targeting particular assistance at them in future in order to learn lessons, as we have done with NDCs?

The learning that has been done through central government's specific investment in NDCs and Neighbourhood Renewal Areas appears to have completely distorted the understanding and policy development on regeneration as it affects different types of geographical areas. We suggest that there may be significant benefit in widening the search for best practice and evaluation of impact by looking at different approaches to regeneration, including the long history of development of rural regeneration programmes.

Q14: Taken together, do these new and enhanced roles for different agencies equip them to deliver the expectations in the framework?

We are concerned that, despite the welcome attempt to clarify roles of different agencies within the framework, the working relationships required to achieve success will inevitably suffer from the negotiations and polarization that result from the 'winners and losers' approach to tight spatial targeting. This is a real risk to the framework's credibility in both civic and civil arenas, and a risk that is not acknowledged within the proposals.

Q15: What would be the costs and benefits of this approach?

Q16: How should this framework be implemented in London given London's unique governance arrangements?

No comment

Q17: What would be the impact of this approach on different groups, according to:

- gender and gender identity;
- disability;
- race;
- age;
- religion/belief; and
- sexual orientation.

We wish to point out that rural communities contain a population that is ageing more rapidly than in urban areas and this will create new challenges for public service delivery and personal support and benefits in rural areas. Those that suffer with lack of mobility also rely disproportionately on the quality of service provision in rural areas and the degree to which community-led support is available. Unless there is equitable recognition of rural regeneration needs, then a proportionately greater number of the elderly and those with disability will suffer negative impact.

Additional comments on the Framework document

Annex B: Understanding the drivers of decline page 80

This analysis is based on evidence for urban studies focussing on neighbourhood decline and does not provide an analysis of the disadvantage faced by rural communities, nor the fragile base of some local rural economies. Our experience is that, within the hinterland of major urban areas which constitute travel to work areas, the rural communities are not recognised in a regional development strategy. The result is they suffer lack of investment, so businesses are less likely to invest, services decline, job prospects become less and as a consequence wages are lower.

Annex J: Sectors affected, Page 128 to 139

We find it puzzling that the roles of the third sector, of neighbourhood governance and of community action in general is not recognised as being relevant to regeneration, whereas the role of the public and private sectors are. This is certainly not the case in rural regeneration practice and we do not believe this is consistent with CLG policy on the role of the third sector in contributing to CLG objectives on sustainable communities. We consider this contradicts the focus within the framework on empowering communities to contribute to the regeneration of their area.

The contribution that community led planning can make to defining the priorities of an area is acknowledged within the framework, yet the role of our Rural Community Action Network practitioners in instigating, promoting and supporting inclusive consultation within communities and brokering the required relationship between communities and local government is not considered relevant. This is despite the clear benefits to J37 to J3, which relate to the behaviour of communities towards change and development, and to J46 and J47, which identifies the need to overcome the dominance of special interest lobbies in consultative approaches.

Annex A

ACRE briefing on the recommendations within the Taylor Review (CLG, July 2008)

The Prime Minister asked Matthew Taylor, MP for Truro and St Austell, to conduct a review on how land use and planning can better support rural business and deliver affordable housing. His report, published by Communities and Local Government, responds to the realities of life in rural areas. The rural population has grown by 800,000 people in the last decade, twice the rate of urban areas, driving up house prices and pricing young families out of the communities in which they work. Average wages for people working in rural communities are now £4,655 lower than the national average, while first time buyer homes cost £16,000 more. A mortgage now costs a higher proportion of average income in the South West than in London.

The review recommends:

- New planning policies to shift growth of market towns from endless bland housing estates to create instead new neighbourhood extensions with shops and community facilities, workplaces and open spaces;
- Communities taking the initiative to secure small developments where they meet criteria of local support, good design, and are affordable in perpetuity to meet local housing needs
- Land owners being able to offer land for small extensions to villages, with the option of retaining an interest, for instance, securing a house for themselves or family members
- Trialling new planning rules designed to control second homes and holiday lets in one or more of the national parks to avoid the risks to local schools and other services.
- Ending planning rules and practices that encourage small rural businesses to move out of the countryside into urban centres as soon as they start to grow
- Encouraging work-based extensions to homes to encourage home-based working and start up businesses and relaxing Housing Association bans on setting up home-based business
- Creating an exemplar programme to bring forward new rural business hubs and live/work clusters to support and encourage small rural businesses
- Issuing new government guidance on the Community Land Trust model, in anticipation of increased interest as a means of securing affordable housing
- Exempting affordable housing schemes from the Community Infrastructure Levy
- Updating best practice planning guidance on setting thresholds and affordable housing contributions from developers
- Government review of the rural impact of Regional Spatial Strategies to inform the development of the new Single Regional Strategies.

ACRE welcomes the review conclusions and the measures which aim to deliver a radical change in the way planning rules regard the sustainability of rural communities. We are especially pleased that communities themselves are being challenged under Recommendation 14 to decide on solutions to lack of affordable housing and loss of key services. Small developments in villages can secure a mix of uses that can sustain local facilities and services much needed by those who are unable to benefit from the apparent high quality of life in rural areas. To help communities tackle this, there is welcome acknowledgement of the work of rural housing enablers and concern over the depletion of their network across the country. We hope relevant agencies will recognise the need for new ways for supporting the housing enabler role, as identified in Recommendation 15.

ACRE sees these recommendations as complementing the initiatives under Communities in Control: the Empowerment White Paper and looks to the forthcoming Empowerment, Housing and Regeneration Bill to bring them to fruition. We are especially pleased that the recommendations will give a boost to the role of parish and town councils in tackling land use planning and that the stipulation of local support for small scale developments in villages can be underpinned by the use of community-led planning undertaken by local residents.