

# RESPONSE PROFORMA

Transforming places; changing lives: A framework for regeneration

## Respondent Details:

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**Is your response confidential?**

Yes  No

**Comments:**

Provision is made throughout this questionnaire for you to provide additional comments. If, however you wish to provide more detailed comments on any aspect of the consultation then please feel free to append additional materials and supplementary documents, clearly marked and cross referenced to the relevant questions, as necessary.

Organisation type (tick one box only)			
Architects	<input type="checkbox"/>	Neighbourhood Manager	<input type="checkbox"/>
Commercial Developers	<input type="checkbox"/>	Non-Departmental Public Body	<input type="checkbox"/>
Consultancy	<input type="checkbox"/>	Other non-governmental organisation	<input checked="" type="checkbox"/>
Housing Association (Registered Social Landlords)	<input type="checkbox"/>	Private individual (unaffiliated)	<input type="checkbox"/>
Individual in practice, trade or profession	<input type="checkbox"/>	Research/academic organisation	<input type="checkbox"/>
Journalist/media	<input type="checkbox"/>	Specific interest or lobby group	<input type="checkbox"/>
Local authority	<input type="checkbox"/>	Third sector	<input type="checkbox"/>
Manufacturer	<input type="checkbox"/>	Trade body or association	<input type="checkbox"/>
		Other (please specify):	<input type="checkbox"/>

## Questions in Chapter One

**Q1.** Is this analysis right?

Yes  No

**Comments:** We are convinced of the analysis of what constitutes Regeneration and for the need for continuing government intervention to tackle the cycle of decline in communities. However, we do have a number of key concerns over this initial scene setting chapter:

- What is Regeneration? The initial definition in 1.1/1.2 is succinct and we welcome its inclusiveness in terms of aiming towards equality, sustainability and securing long term change. It is also important to stress the link with market failure. For our rural areas, government intervention has been a fact a life for many decades with the Common Agricultural Policy (CAP). Whilst not a Regeneration "programme" itself, CAP has recognised the failings of the market place and been used as a result to support the agriculture sector and the communities that have relied upon it. More focused regeneration initiatives have come and gone, for example Rural Development Programmes (and associated Rural Development Areas), Rural Challenge, LEADER, Objective 5(b), 2 and 1 (in South Yorkshire).

Today, rural regeneration has been "mainstreamed" in government policy and programming and this in itself provides a fundamental risk when considering resource allocation on the basis of deprivation/disadvantage/need, where such issues are identified and prioritised on the basis of indicators which are biased towards urban scenarios.

- Addressing dangerous Climate Change: Should more be said at the front-end of the document - and indeed throughout - of the relationship between regeneration and the needs of communities to adapt to climate change? This relationship can be seen in terms of localised flooding events and the regeneration activities that follow the clean - up operations. A more strategic approach would be to see communities become increasingly climate change resilient - prevention rather than cure. However, according to the current definition, this would not constitute 'regeneration'. This area is relevant to both urban and rural areas, but particularly so for rural areas because:

a) Rural communities are often defenceless in the face of flood events - market towns and smaller villages located alongside primary rivers and their floodplains being particularly at risk.  
b) The impact upon the agricultural industry of increasing flooding of fields in flood plains.  
c) The potential role rural areas can play in enabling adaptation for larger settlements (e.g. investing in upland blanket peat bogs as water retainers, improved tree cover on flood plains to slow run off etc.

- Area based initiatives (ABI): Rural Development Areas (later Rural Priority Areas in some regions) were effectively disposed of as a means of targeting rural regeneration investment some 5+ years ago, having worked as a reasonably successful model for targeting rural need since the 1980s. This model was, in some ways, superseded by another area-focused initiative in rural areas - the Market Towns Initiative (evolving in the Yorkshire and Humber region as the Renaissance Market Towns programme), which has run since 2000 in some regions (not nationwide).

The key problem with proposing such an ABI model (as is proposed by the paper) unweighted towards hidden rural deprivation, is that inevitably it is urban areas and urban deprivation which will receive virtually all the attention and resources. For a Region such as Yorkshire and the Humber, it is likely that only a small number of rural coalfield and possibly coastal communities would be targeted as a result of regeneration mapping, with great swathes of North and East Yorkshire in particular ignored because the IMD does not identify enough need. Our key concern then is that the aspiration for Rural Proofing set out in Annex J cannot be achieved if the key mechanism for targeting regeneration is a "one size fits all" approach which fails to recognise rurality factors. Better, more sensitive indicators are urgently required for both the national framework and Defra's DSO.

**Q2.** What further analysis is needed to ensure the needs of different demographic groups are properly reflected in our regeneration priorities?

**Comments:** We regard rural areas as having particular needs based around particular demographic groups where need has been established. These groups are, in the main, those who are both over represented in rural areas (the over 60s) and under represented (young people and children). For young people in particular, access to education post 16 and skills are of critical importance in enabling upskilling for the rural economy and rural employed. However, in addition to this there are other smaller groups, harder to identify, but of significance nonetheless, for example:

- Ethnic Minority Groups.
- The disabled.
- Those people suffering long term ill health.

All these groups and individuals have needs which are not easily met in rural communities where service provision is harder to access.

A critical question with regard to rural areas and communities concerns access to affordable housing. Rural areas nationwide are becoming increasingly unaffordable as 2<sup>nd</sup> homers, commuters and retirees populate desirable rural communities. The Taylor agenda of growing rural communities is one key way of addressing this and must be regarded as a critical platform for the future well being of rural communities. This should be regarded as a regeneration priority for a key group in the countryside- those who are excluded from the housing market - and thereby to economic opportunity in their home community. If this priority is accepted then larges swathes of rural England must be regarded as a priority for this aspect of regeneration as a means of addressing social imbalance and increasing the sustainability of rural communities.

A specific area of concern here realtes to the process of Rural Proofing and the role of DEFRA as the "guardian" of this: Mainstreaming has increased the need and indeed utility of Rural Proofing as a means of ensuring rural areas and residents are not disadvantaged by policies. For Rural Proofing to be effective, and seen to be effective, DEFRA - perhaps via its agents, the CRC - need to have a far more effective policing role to ensure that Proofing takes place. This point is highlighted in the recent EFRA report on "the potential of England's rural economy" (Volume 1).

## Questions in Chapter Two

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

Yes  No

**Comments:** we agree that there is a need for a "tight focus on improving economic outcomes". However, the focus upon "deprived areas" is not always helpful from a rural perspective. The first two priority outcomes (para 2.3), focused as they are on deprived areas, do not necessarily fit comfortably with the 3<sup>rd</sup>. We would argue strongly that the 3<sup>rd</sup> outcome alone is in fact sufficient and allows the Framework to incorporate and encompass rural communities as easily as it does "deprived urban areas".

Such a re-casting would also allow the statements in Annex J regarding rural proofing to be properly incorporated into the body of the report - recognising the commitment by government - and the need to make this Framework - sensitive to rural areas, utilise finer grain data (and sometimes different indicators from the standard IMD) and to tailor solutions to rural circumstances.

**Q4.** Have we proposed the right measures?

Yes  No

**Comments:** We would again stress the need to incorporate a climate change resilience outcome for the framework - so if the headline outcome is "Creating sustainable places where people want to live and can work and businesses want to invest", then subsidiary outcomes flowing from this would include a) improved economic performance; b) improved rates of work; c) improved enterprise; d) improved community climate change resilience; e) healthier environments to live and work in.

We would also highlight issues (not just found in rural areas but very prevalent there nonetheless) relating to:

- a) Low wage economies.
- b) Part time working
- c) Job quality
- d) Job security (in relation to many micro businesses, homeworkers and the fragility of some economies heavily or over reliant on small number of industries, eg tourism, agriculture.
- e) Access to skills.

**Q5.** Should we measure the scale and rate of private investment in deprived areas, and how could we do so?

Yes       No

**Comments:** Assuming we are interested in primarily knowing what private sector investment is going into an area in support of or adjacent to regeneration funding, then this should be simply measured as part of the KPIs put in place for any regeneration strategy: a) how much is levered into a project from the private sector; b) what private sector investment is forthcoming in support of the regeneration strategy (for an area) - aligned to the key objectives for regeneration in that area.

Private investment in other forms, for example new business formation, inward investment, can also be measured relatively simply using existing indicators and monitoring systems. However, it is key that the right infrastructure is laid down to enable and attract business growth - eg high speed broadband, small business units, planning regimes which enable conversion of premises etc.

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

**Comments:** We strongly endorse the notion of community involvement in regeneration strategies at as local a level as is possible/practicable. This can be through established mechanisms such as LSPs, Local Authority Area based structures, Parish and Town Councils, Market Town Regeneration Partnerships, LEADER Local Action Groups. However, there is an urgent need to make this commitment a requirement for structures seeking to/given the responsibility to lead regeneration initiatives. Considerable best practice in community involvement, engagement, consultation and empowerment can be drawn upon to provide toolkits for regeneration strategies to adopt, drawing from both urban and rural experience. Parish Plans in particular can be developed into a much more useful tool which is already in place but could do with 'sharpening' to make them (in their 2<sup>nd</sup> and 3<sup>rd</sup> generation forms) more "regeneration focused".

Notably with regard to this area is the absence of significant reference to the 3<sup>rd</sup> Sector in the consultation paper as facilitators of these community involvement processes. Social Enterprise, community focused voluntary sector bodies and supporting organisations such as Rural Community Councils and Regional Forums for Voluntary Organisations can also play a key role in the regeneration agenda.

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

**Comments:** We have already referred to climate change resilience and creating healthy living and working environments as key aspects of the regeneration agenda. Both need to be embedded into the objectives and outcomes of the regeneration framework, so that communities and commerce can increasingly protect themselves from climate change, and can benefit from a natural and built environment which enables healthier, more productive lives. Embedding the economic and social benefits of the Green Infrastructure agenda into regeneration frameworks would provide a critical linkage to both the climate change and environmental quality/health points made previously - as is happening with Growth Points and City Regions currently.

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

**Comments:** No comments.

**Questions in Chapter Three**

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

Yes  No

**Comments:** Regional priority maps have the potential to exclude rural areas from the regeneration agenda - with some exceptions in a small number of areas which can demonstrate disadvantage to the extent that it registers highly in IMD. The criteria listed in the consultation are:

- levels of deprivation
- strength of the sub regional economy
- economic and social characteristics of the area
- dynamics of the area

In competition with urban areas, and assuming a prioritisation process which "counts" urban deprivation indicators as the key set of domains in determining where lines are drawn on maps, then rural areas will be at a very significant disadvantage, even where declining economic and social conditions can be demonstrated, such as fragility in the local economy and deprivation as demonstrated by fine grain/rurally sensitive indicators.

Regional priority maps also have the potential to exasperbate economic decline in those places located beyond the lines drawn on the map, both immediately adjacent (so-called boundary effect) and further afield, as investment is often sucked into regeneration areas and away from other opportunity areas. Decline in rural areas may also be accelerated by urban centric planning policy encouraging growth in regeneration zones whilst effectively discouraging growth elsewhere.

Finally, the process of mapping regeneration zones is both difficult, controversial and a relatively unsophisticated methodology for targeting investment. A more thematically based approach which identifies where need is relative to a range of KPIs and then seeks to address those needs through interventions in the most geographically appropriate manner allows for a more flexible response which, while still rooted in places, also recognises the fluidity of modern life - commuting, travelling for services, internet /IT based solutions, for example.

**Q10.** Should we ask regions to develop regional regeneration maps? What are the disadvantages of that approach?

Yes  No

**Comments:** We understand this approach is already being progressed. There are significant disadvantages of this approach and exposes some inconsistencies in the Consultation Paper. Our comments are shown above. In small rural communities it is deprived people we need to identify and regeneration strategies which reach out to those people, not fundamentally deprived places. If a place-based solution is insensitive to the needs of these people, then the rhetoric of this consultation paper will remain unfulfilled.

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

Yes  No

**Comments:** It seems wholly sensible to seek this form of alignment and wherever possible to enable subsidiarity principles to apply.

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

Yes  No

**Comments:** The private sector need to be shown the return for their investment primarily. With regeneration investment, business and commerce want to know that their investment is in the community that matters to them, not the community that matters to government. On that basis, locally based and managed regeneration has a far greater potential to involve and thereby seek investment from the private sector than top-down regional or national government interventions. Programmes in rural areas such as the Renaissance Market Towns programme in Y&H have shown considerable success in bringing the private sector in from the start and this good practice should be embedded in the framework and programming activity from the outset.

**Q13.** If there is 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?

**Comments:** Hard to comment here. In principle, there may be issues that arise which require a central government co-ordinated approach and response. 'Lesson learning' is not a rationale for this, as common monitoring and evaluation frameworks can enable best practice to be learned and disseminated without central government targeting.

#### Questions in Chapter Four

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

Yes  No

**Comments:** We do not think the consultation paper provides enough detail to comment sufficiently and critical will be extent of both effective partnership working and appropriate resourcing to enable regeneration to actually make a difference to people's lives.

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

**Comments: No comment**

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

**Comments: 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

**Comments: See earlier comments relating to EMGs and disability.**

#### **Further Information**

We would be grateful if you could provide us with the following information to feed into the full Impact Assessment:

How are the regeneration priorities, you deal with, currently decided? Are these communicated clearly?

How much time do you currently spend on negotiating regeneration priorities?

To what degree is the local community in your area engaged in this process?

What would be the likely cost of doing this if it is not done already?

What analysis do you currently undertake to support regeneration policy?

Are the analytical proposals in the Framework additional to what you are currently undertaking?

Will the proposals set out in the consultation document lead to a more focussed approach?

And better value for money? If so, how?