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Date: 19<sup>th</sup> June 2008

Dear Sir

## **TAKING FORWARD THE REVIEW OF SUB NATIONAL ECONOMIC DEVELOPMENT AND REGENERATION**

The East Midlands Rural Affairs Forum (EMRAF) is both enthusiastic and pleased to be able to respond to this consultation.

EMRAF is a partnership of some 60 organisations across the statutory, public and voluntary sectors within the region and has established over its lifetime a number of thematic sub-groups together with specific task and finish groups, which are charged with sharing and promoting good practice and delivering activities in light of the opportunities provided by the East Midlands Rural Action Plan 2007-2013, which has an overall vision of *the rural East Midlands being a vibrant place for people to live, work and visit*.

Following on from a workshop organised jointly between EMRAF and the Commission for Rural Communities in June, we have taken a collective view across EMRAF's membership to secure an overall response to 10 out of the 15 questions, as detailed below. The list of organisations that attended our workshop is indicated within Annex 1 and the specific responses made by workshop delegates included as Annex 2.

As an overall statement, it can be stated that delegates who attended the workshop strongly supported any delivery framework which will enable central and local government and other partners to work together to help maximise prosperity in all parts of England, especially in our rural areas where social deprivation and inequalities often remain hidden. In relation to securing the best outputs for our rural communities, any rural proofing or, indeed, rural mainstreaming should be monitored, measured and challenged to ensure suitable equitable consideration has been taken into account.

There was also a feeling that in the East Midlands, whilst there was good evidence to suggest that the East Midlands Development Agency, *emda*, is working well with sub-regional partners, this could be developed further through the delivery of clearer and closer partner working relationships, especially through existing networks.

Notwithstanding the above, it was recognised by our Members during our discussions that any new arrangement should be demonstrably *as good as* the current regime. If not, areas where sub-regional and local partnerships are already delivering positive results should be encouraged and strengthened.

**Q1 How should RDAs satisfy themselves that sufficient capacity exists for programme management and delivery at local or sub-regional level?**

It was recognised by delegates that, on the whole, there should be a presumption that the capacity for programme management and delivery at a local or sub-regional level does exist and that the onus of proof should be on the RDA to prove otherwise, if necessary.

This is re-enforced by the strong track record and available evidence base offered by delivery agents, such as local authorities, in delivering existing funding programmes through the likes of European, SRB and single pot frameworks. Indeed, it was also suggested that the voluntary and community sector should also have an important role to play as capacity builders, as would the private sector.

However, there was a view expressed by some that it would be difficult to identify sufficient capacity needs until there is an agreement as to local and sub-regional priorities (and structures) across any region and that consensus may be difficult to achieve in light of the large number of stakeholders to be engaged.

**Q2 Do you agree that local authorities should determine how they set up a local authority leaders' forum for their region, and that the Government should only intervene if the required criteria are not met or if it failed to operate effectively? If not, what would you propose instead?**

Whilst it was recognised that there is little substantive guidance or detail concerning the mode of operation of the leader's forum (and that this would be most welcome), there was strong support for the concept, mindful that any such forum should recognise the needs for local knowledge and accountability in its development and operation.

As delegates viewed this proposal as being a critical success factor, they expressed a strong wish that any forum should secure a strong and inclusive urban/rural balance within its make-up, particularly within this region, making sure that all local authority tiers are adequately engaged and represented.

**Q4 Do you agree that the regional strategy needs to cover the elements listed at paragraph 4.13? Are there other matters that should be included in the regional strategy to help in the delivery of key outcomes?**

Whilst it is understood that in terms of a prescriptive hierarchy, issues such as the economy, spatial planning and housing are indeed pre-eminent, the overall view was that more substantial emphasis needs to be placed on wider sustainable development requirements to deliver a truly integrated regional strategy in terms of our overall economic, environmental and social well-being. The greater consideration of issues such as health, climate change and environmental stewardship (in terms of both natural environment and land based demands) were all endorsed.

It was also acknowledged that a sustainable integrated strategy should recognise that urban and rural areas may have similar problems though their solutions may be different and that the importance of effective rural proofing/mainstreaming was emphasised.

It is noted that this region's Rural Action Plan highlights 7 key priority areas, as shown below, are embedded to a greater extent within the prescriptive list within 4.13.

- Improving Access to Affordable Rural Housing
- Increasing the Quality of the Region's Green Areas (Green Infrastructure)
- Improving Enterprise, Innovation and Employment
- Improving Accessibility to Jobs and Services
- Developing Active Communities
- Supporting Land-based Rural Businesses
- Addressing Climate Change

**Q5 Do you agree with the way in which we propose to simplify the preparation of the regional strategy, as illustrated in the figure (on page 35), in particular allowing flexibility for regions to determine detailed processes? If not what other steps might we take?**

There was strong agreement that the diagram is less important than the actual culture within the process to be established, in that it should be sufficiently flexible to consider the needs of local areas and communities to ensure true inclusivity, integration and, by application, rural proofing. Indeed, the pro-active engagement with partners through the whole process, such as local authorities, rural affairs forums and strategic health authorities, were endorsed within this response (noting that our response to Question 4 also offers additional stakeholders to those suggested within the consultation document, such as health).

However, there was some concern raised that whilst flexibility is important, there needs to be a degree of enforceable minimum standards for stakeholder engagement within the process to maintain a national consistency of approach, which embeds a clear rural dimension.

In light of experiences to date in relation to the development of current regional strategies, there was some concern raised as to the unrealistic and challenging time limits envisaged for its implementation, based on the comprehensive process being suggested.

It was noted at the start of the workshop discussions that delegates were pleased that both BERR and CLG Secretaries of State were to consider the regional strategy for approval. However, it was also suggested that the Defra Secretary of State should also sign-off this integrated document in light of its sustainable development aspirations, thus offering stakeholders the assurance that rural, land based and environmental issues have been adequately addressed. Indeed, it was also felt by some that Defra was not sufficiently embedded within this consultation process.

**Q8 What additional information or support do local authorities consider valuable for the purpose of preparing assessments?**

Delegates strongly endorsed the potential role of regional observatories, though the availability of more detailed joint sub-regional information rather than regional data would be welcomed. However, it was recognised that whilst the duty to carry out economic assessments will fall on upper tier authorities, it was noted that functional economic areas do not always match these boundaries.

It was also suggested that there is a potential risk of creating a “one size fits all” approach in terms of economic assessments in light of the perceived lack of understanding/appreciation of statistical analysis, unless standards of data quality provision and interpretation are improved. For example, in the East Midlands we have the 3<sup>rd</sup> largest county by area in England (Lincolnshire) bordered by the smallest unitary authority (Rutland).

In relation to the consideration of the economic impacts and needs of rural areas, it was noted that rural partners should have a role in assisting local authorities in the preparation of such documents. Indeed, this is re-enforced through Government guidance that suggests that whilst regional development agencies should focus on cities as drivers of economic growth, due regard must be made to the rural hinterland. In relation to the developing LAA agenda, there was some concern expressed that if economic assessments are aligned with LAAs, strong and effective monitoring will need to be implemented to secure an evidence base to demonstrate its focus on delivery isn't just within urban areas.

In the East Midlands, it was noted that there was a developing rural evidence base prepared by the regional development agency, the Rural East Midlands, which informs the delivery of the region's Rural Action Plan, facilitated through EMRAF. This document presents a wide range of statistics and information on the demography, economy, labour market, social conditions, infrastructure and environment of rural areas in the East Midlands.

**Q9 How should lead local authorities engage partners, including district councils, in the preparation of the assessment?**

There was a strong consensus that existing networks and partnerships should be utilised, especially in relation to those with strong track records that should be promoted as good practice case studies. Suggestions included local strategic partnerships, sub-regional strategic partnerships and community forums. It was acknowledged that district councils must be a primary contact within this approach, as were the rural community councils who were also endorsed as having a major role to play in securing inclusive rural representation.

**Q10 Which partner bodies should be consulted in the preparation of the assessment?**

In addition to those partners listed within section 5.2 of the consultation document, further suggestions included local strategic partnerships, the third sector infrastructure bodies, environmental non-governmental organisations and NHS primary care trusts. In terms of rural considerations, the role of the rural community councils and rural affairs forums was endorsed as providing the means to embed rural considerations within the assessments.

[In terms of the East Midlands Rural Affairs Forum, our membership which includes public, private and voluntary sector representation offers a strong mechanism to engage with other key stakeholders, such as local authorities, governmental agencies, rural community councils, National Farmers Union, Country Land & Business Association, the Campaign to Protect Rural England, Federation of Small Businesses and the Association of Parish Councils, amongst approximately 60 members.]

However, it was emphasised that as local communities and their agents will be expected to contribute to the delivery of these activities, they will need to be

engaged and aware of its purpose throughout its life-cycle and not just added on piecemeal.

**Q12 Do you agree that there is value in creating statutory arrangements for sub-regional collaboration on economic development issues beyond MAAs? What form might any new arrangements take?**

Delegates offered strong feelings both for and against this suggestion and as such no consensus was reached. Though there was recognition that the approach may be worthy of consideration *if it is demonstrated to work*, the effective delivery and suitability of MAAs has still to be established.

**Q13 What activities would you like a sub-regional partnership to be able to carry out and what are the constraints on them doing this under the current legislation?**

Delegates offered no strong consensus on this issue. Suggestions included the promotion of existing sub-regional best practice to ensure overall higher quality delivery, the creation of an objective co-ordinator to assist in effective sub-regional liaison and the development of a regional rural development company to embrace all elements of the integrated strategy within the rural arena, using a model analogous to that seen in certain urban areas. Such a model could neatly link with the Rural Action Plan within the East Midlands.

However, there was concern raised as to what would be the most appropriate geographic fit in relation to sub-regional partnership areas, be it counties, housing market areas etc?

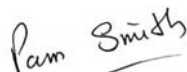
**Q15 Should there be a duty to co-operate at sub-regional level where a statutory partnership exists? To whom should this apply?**

There was strong agreement that there should be a statutory duty to co-operate. However, there was real concern as to the capacity and abilities of agencies, both national and more local, to react in a substantive manner.

To ensure that rural areas are not overlooked, there was keenness to secure the statutory engagement of the Rural Community Action Network, recognising that they are already funded through Defra to provide rural engagement.

We hope you find these comments of value and if you require any clarification of the points made, do not hesitate to contact us.

Yours sincerely



**Pam Smith OBE – EMRAF Chair**



**Peter Orban – EMRAF Co-ordinator**

## **Annex 1**

### **List of organisations engaged within the consultation process**

Campaign to Protect Rural England  
Country Land & Business Association  
Derbyshire Dales District Council  
East Midlands ACRE (Action with Communities in Rural England) Network (EMAN)  
East Midlands Development Agency  
East Midlands Rural Affairs Forum  
Government Office for the East Midlands  
Leicestershire County Council, Better Places  
Lincolnshire County Council  
North Kesteven District Council  
Northamptonshire County Council  
Rural Community Action Nottinghamshire  
Rutland County Council  
The Big Lottery Fund  
The Department of Health  
The Welland Sub-Regional Strategic Partnership

Delegate responses to joint EMRAF/CRC Workshop posed questions, noting that with a process of this nature, transcription errors do occur and errors and omissions are expected.

**Q1. How should RDAs satisfy themselves that sufficient capacity exists for programme management and delivery at local or sub-regional level?**

- Capacity does exist at local level. Evidenced via European funding, SRB Single Pot etc projects delivered at local area. Delivery is fundamentally a local authority function.
- Para 17, what are 'poor performing' local authorities.
- In region there are some Beacon councils who don't deliver well on rural issues. We need assurances that new arrangements would mean **BETTER** delivery in rural areas.
- They need to engage in closer working relationships with LA's to share their knowledge within local delivery agents in how to focus work more strategically. Some LA's/local delivery agents are excellent in how they operate across departments, work locally, regionally and understand bigger national pictures. Some LA's still lack understanding of existing strategies. Others focus so much on the local 'political' agenda on their 'patch' RDAs will struggle to satisfy themselves that capacity is there.
- Para 16. Will group of stakeholders be too large to get meaningful engagement? In last 10 years power has been taken from LA's & given to many wide ranging groups & partners who are no longer involved with LA. How do you put this back together & make it work without creating a big stakeholder group that can never reach consensus.
- EMDA has strong record of working. Other bodies in the sub region, and has a strong will to continue in that direction through any new structures.
- By establishing robust network of engagement with local/sub regional delivery agencies – ensuring that a proper appreciation of agencies capacity exists.
- There should be **PRESUMPTION** that local government (accountable bodies) have capacity. RDAs should argue if they think any one does not. LAs would offer reinforcing evidence.
  - Budgets, policies.
  - Policies/commissioning/delivery mechanisms.
- Use SSPs as a benchmark to measure the level of capacity required to deliver effectively.
- SNR suggest change management programme – could use process to carry out capacity building. Promotion of best practice examples.
- Any identification of sufficient capacity can only be agreed once priorities at local/sub regional levels have been ascertained across the region.
- Don't forget capacity and opportunity to enhance it – of voluntary sector, which includes the voluntary environmental sector, so often not counted as voluntary sector.
- Capacity at sub regional level depends in part on what will constitute the sub regions.
- For integrated rural economic & social development & regeneration it may be preferable to delegate/devolve elements to a nominated development company, following the model of City Development companies, giving us an East Midlands
- Rural Development Company. This would enable a formed organisation to bring together private, public & third sector interests in rural developments, reporting back to RDA & leadership group & delivering the rural elements of the strategy.
- What is the 'appropriate level' for a decision to be made on Q1. how will this be decided. Until RDAs know what is to be delivered & by who how can they decide?
- RDAs should monitor activity in rural areas and know that areas of rural deprivation have funding directed towards their areas. RDAs to monitor this activity.

**Q2. Do you agree that local authorities should determine how they set up a local authority leader's forum for their region, and that the Government should only intervene if the**

**required criteria are not met or if it failed to operate effectively? If not, what would you propose instead?**

- Yes, agree this is the only way to engage all tiers.
- EMRAF already exists, it could help to create the forum.
- The government should set out the criteria & operations from the start and then enable LAs to develop accordingly any other way will lead to inconsistency in delivery and set up also time in setting up.
- Leaders Forum should continue established good practice of early and continuous involvement of all stakeholders including rural and environmental ones – North West model good, stakeholders (ESEP) will be member of Leaders Forum with voting rights.
- Is the “rural” CRC concern correct for the East Midlands as we would have strong “shire” county potentially on the Leaders Forum.
- LALF will be critical to success. Concern that decision to establish each regional LALF rests only with LA’s – possibility that some rural based authorities might not be represented on LALF.
- Local authorities should determine how they set their side of the delivery structures. There must be checks that rural areas are receiving their fair share of resources.
- Local authorities should set up a Leaders Forum but this should be based upon a detailed assessment of regions and sub-areas and define specific urban and rural areas.
- Yes – to be effective Leaders Forum need to have local knowledge, accountability, trust and respect from all sides, only achieved if done locally.
- Leadership Forum should reflect a rural/urban balance in terms of local authority representation.
- Local authorities need to ensure there is sufficient and adequate rural representation and demonstrate this.

**Q4. Do you agree that the regional strategy needs to cover the elements listed at paragraph 4.13? Are there other matters that should be included in the regional strategy to help in the delivery of key outcomes?**

- Instead of economic growth, aim should be economic development as consistent with wider sustainable development requirement – SD needs to include and specify environmental sustainability. – aim with regard to environmental sustainability should be wider than climate change adoption, needs to include protection and enhancement of land = scope and valuable agricultural land.
- SRS must specifically cover the specific needs of rural areas in terms of economic development, housing/community (open market and affordable) and environmental stewardship.
- Health needs to be addressed in the strategy. Poor health affects productivity.
- Review talks about working in areas identified from regen investments and intervention, however it makes it specific to mention to the snip of rural areas to the economy – given the different interventions that these require it should be in.
- I agree with the areas listed but they should focus on the rural aspects of this especially rural affordable housing and growth in light of CRC report economic wellbeing and infrastructure,
- With the RDA still being business lead we must ensure better than lip service to sustain development and rural equitability. We need a rural centre added to decisions.
- Would encourage a “not over” prescriptive approach.
- The focus for strong rural policies for employment, land use etc.
- SRS need to recognise that urban and rural may have similar problems but solutions may be different. Therefore mainstreaming might not always work.
- Recognition that the rural economy especially land based activities which are of actual importance. Agriculture and climate/environmental aspects should be a major component.
- Health needs of rural communities are different to those of cities and major urban areas in that, live deprivation, it is hidden within an overall picture of good health – rural health requires specific consideration.
- List is appropriate as far as it goes. However, current EM IRS covers a wider range of topics and especially health. Given that health is a pre-requisite for a good quality of life,

health inequality is perhaps the most unacceptable inequality, 160,000 East Midlanders are excluded from work because of poor health, sickness absence is a major drag on productivity, having a job improves health then health must be part of future IRSSs.

**Q5. Do you agree with the way in which we propose to simplify the preparation of the regional strategy, as illustrated in the figure (on page 35), in particular allowing flexibility for regions to determine detailed processes? If not what other steps might we take?**

- Need to ensure that the evidence based does not mask the real picture. Amalgamation of information will distort the picture especially on rural poverty.
- Given that there is general agreement that National and Sub-national influences are most significant for economy, there should be strong sub-regional input at first stage.
- Strategy should be developed by RDA, LA's and other appropriate stakeholders, ie: EMRRAF, to ensure it will be truly inclusive, integrated and rural proofed.
- Devolution needs to be complemented by including enforceable minimum standards including standards for stakeholder involvement.
- The diagram is less important than the culture of the process.
- The envisaged time limit put forward not be practical based upon the nature of the review being put in place (partial/full review).
- Question how appropriate "stakeholders" are identified at pre-draft stage. How do specific rural and health views input into the initial draft (EMRAF/SHA as specifically listed partners).
- It is important to simplify the preparation of the regional strategy, but flexibility is paramount to cover rural areas.
- A clear role for EMRAF is needed with respect to rural proofing, the integrated rural strategy.

**Q8. What additional information or support do local authorities consider valuable for the purpose of preparing assessments?**

- If LEA are aligned with LAA there is no guarantee they will deliver for rural areas, unless monitoring done properly, targets could be hit by carrying out urban projects.
- Need to get the real benefits not just VFM eg: work on heritage and listed properties where rewards are more than economic.
- Duty to carry out economic assessment will fall at upper tier but functional economic areas do not match county boundaries.
- Rural areas must be properly included in duty – existing government guidance tells RDAs to focus on cities as drivers of economic growth, but to pay regard to rural.
- Concerns that approach will be "one size fits all" ie: same expectations of Rutland as say Leicestershire.
- More detailed joint sub-regional information, rather than regional studies would be useful.
- All LA's need to gather information at the very local level to identify when the needs are required. Rural organisations should be involved in assisting LA's in the preparation of assessments.
- Additional resources would be welcome at Local Authority level especially at small county (Rutland).

**Q9. How should lead local authorities engage partners, including district councils be involved in the preparation of the assessment?**

- LA's could/should create effective and strong links with rural evidence/knowledge sources eg: ref to rural action plan.
- Follow the process of LAAs in which while it had some issues, it's useful in terms of engagement.
- Engagement through existing local strategic partnerships and community engagement framework, community forums. Major role in engagement with districts.
- There is a strong need for district councils to have a meaningful role in any engagements. It is vital that in two tier regions checks should be built-in to any assessments.

- Districts should have an equal part to play in production of an economic assessment. Many economic markets operate below county level., joined up economic assessments jointly asked with potential district differences identified.
- An effective evaluation should be made of partners involved to ensure that both Urban and Rural are being adequately represented.
- Moving through to LSP and using the knowledge available via partners.
- Through local strategic partnerships at county and district level.
- Rather than creating a new bureaucracy to do this, use the existing LAA partnership arrangements such as those already in place for the “fifth block” (economic development).
- Local authorities should have a duty to engage with Rural Community Councils in the preparation of economic assessment duty.
- The Rural Community Action Network through ACRE should be involved. A duty for involvement should be written in.
- SSP model (sub regional strategic partnerships) may not have accountable body function but Boards do bring together business, Third Sector and Local Government. May still be useful stakeholder mechanism.
- Each accountable body could establish a Lead Councillors Forum for Economic Regeneration ie: lead councillors from County and Districts. (It is right to have a specific local government view because of its democratic legitimacy).
- Role/activity of Rural Affairs Forums should be harnessed to provide input/support/knowledge where appropriate.
- Clarity in what they are trying to say. Partnership engagement will need an open honest approach and lead local authorities will need to ensure they break down any barriers that are previously in place. LSPs are a good example of how to assess this. Many LSPs fail to deliver usually through lack of financial commitment or poor partnership working. Where LSPs are not strong partner engagement would need reviewing. Some LSPs are so strong this would be an ideal form of engagement.
- Single Tier should use LSP as a main way of engaging local partnerships.

**Q10. Which partner bodies should be consulted in the preparation of the assessment?**

- At local level would expect the local NHS Primary Care Trust to be the key health partner.
- Include EMRAF and RCC’s who are key delivery and rural proofing partners.
- Include voluntary and community sector and environmental NGO’s who have evidence and experience of economic and social value of tranquillity, green spaces etc.
- Rural offices ACRE, Parish Council or Network.
- LA’s need to share this information down and explain it and its function to communities at local level. As local communities will be expected to deliver and participate in the activity they need to be aware of its purpose from the start.
- Rural organisations to be consulted and involved in the participation of the assessment eg: EMRAF, Local Rural Partnerships, Rural Action Zones plus National/Regional Organisations, CLA/CPRE etc.
- Partner bodies must include SSPs and Third Sector Infrastructure Bodies/Rural Partnerships at County Level.
- We would wish to ensure that Rural is consulted throughout the process. Need clear evidence that this is happening.
- Environment Agency, Highways Agency and Communities Agency, Learning and Skills Council, Local Strategic Partnerships.

**Q12. Do you agree that there is value in crating statutory arrangements for sub-regional collaboration on economic development issues beyond MAA’? What form might any new arrangements take?**

- If there was a duty on named partners to respond within a given time frame, the lead authority would be able to ensure a timely development of an economic assessment.
- Collaborative sub regional working essential and needs to be done if SNR to work.
- Yes particularly if a rural development organisation could be introduced to ensure equity for delivery of strategy across rural and urban areas.
- Yes including duties ensures it gets done.

- No, unless local government decides to establish them, probably under existing powers.
- Only if they work. The success of MAAs is still to be tested. It is important not to cloud relatively new sub-regional collaboration with new ideas until MAAs can be fully evaluated.
- Support sub regional partnerships but need to be given the wider walls being duty local authorities currently – don't narrow it down to economic assessment.
- Where as MAA has developed to a point and agree to move on. Should not be forced.
- There is value and credibility to this process.
- Definitely this will be necessary across all identified sub-regions in each region.

**Q13. What activities would you like a sub-regional partnership to be able to carry out and what are the constraints on them doing this under the current legislation?**

- Sub-regional ensure use examples of best practice, eg: Welland SSP and not lose any in the process.
- A regional rural development company could embrace all elements of the strategy ie: managing progress of business support and development, regeneration activities, social and environmental development activities.
- Need to evaluate which areas would be suited to sub-regional activity, eg: reference to Rural Action Plan.
- Need careful consideration of what is the sub-regions of East Midlands housing market areas? Counties etc.
- They will require an objective Co-ordinator to assist with effective sub-regional liaison.
- They duty to co-operate needs to apply to national agencies in particular.
- Yes – to keep to rural aspect involvement it should include the Rural Community Action Network via ACRE, they are funded by Defra.
- Yes but consideration would need to be given to the demands placed on certain organisations eg: Highways Agency – have they got the capacity to respond to demand?
- Yes, all identified LA's and County Councils (sec 4141 Authorities) as well as other key specific partnership groups where necessary.
- Co-operation should continue at sub-regional level, as this does in many cases cover the most deprived parts of the rural areas and they should not be overlooked.

**General Comments**

- Is SNR really needed? Why not strengthening areas where sub-regional and local partnerships are already delivering.
- Forward emphasises supporting lagging areas and districts – rural areas are starting to miss out because of hidden deprivation.
- The rural areas need to have fair treatment in this review and the voice of the small communities either in the uplands or the costal and other vital rural areas must have protection of funding for regeneration and other matters.
- Don't let's throw the baby out with the bathwater. Need to ensure that new IRS arrangements deliver at least as good and as comprehensive a strategy as that currently delivered by the regional assembly.
- Risk – where businesses have been involved, they will not welcome having wasted time and not want to be involved again.
- EMRAF have role sharing good practice between sub-regional authorities like the LAAs as well as regional overview/challenge.
- How can adequate rural proofing be demonstrated/measured? Main streaming should be challenged to ensure that rural needs have been taken into account.

**Single comment on Question 3 (not discussed)** - Scrutiny proposals ignore the key role of regional business (urban and rural) as well as other stakeholders in scrutiny role.

**Single comment on Question 7 (not discussed)** - Local government should be its own master. We do not need statutory guidance (option 1). Option 2 provides the best compromise to balance local/central government needs.