

RESPONSE PROFORMA

Transforming places; changing lives: A framework for regeneration

Respondent Details:

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Or by hard copy to:

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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 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 checked="" 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:

The analysis referred to here concerns the nature of deprivation in England and the barriers to economic growth in the most deprived areas, as set out in Chapter One of the White Paper. It sets out the case for better targeted and co-ordinated intervention to tackle place-specific economic barriers. The analysis is broadly correct, but the following issues need also to be taken into account:

Whilst the paper is right to link social housing with deprivation, it underplays the high levels of deprivations linked to areas with high levels of private rented accommodation, as is the case in East Lancashire. The link is not so much one of tenure, but one of choice – deprivation is linked with tenures of last resort.

The analysis also underplays the complex relationships between worklessness, crime and health. The analysis assumes that worklessness leads to crime and ill health. Whilst this is to some extent true worklessness isn't always the cause, but can be the consequence and the two become self-enforcing. The analysis also underplays the role of educational attainment and skills in perpetuating high levels of worklessness and deprivation.

It would be accurate to describe these areas as 'entrenched concentrations of poverty.' Third and fourth generation of worklessness and the culture associated with this presents an ongoing economic challenge for the whole of society. Equally important is how the Government ensures there is a shared understanding and commitment to collaborative working amongst the different organisations that deal with the people in these communities.

Having a good first point of contact for residents with a range of complex issues is important in terms of obtaining and sustaining resident involvement residents. Resident perceptions of success can be very different from that of an agency.

There is an insufficient recognition in the paper of the social issues that result from the decline and economic problems that are well described in the paper and which regeneration needs to turn around. These social issues include social conflict, demoralisation, alienation - a terrain in which issues become further disputed and conflicted. All this means that successful regeneration has to involve work to address, manage and resolve social issues and the emotional and social dynamics which go with them.

The Burnley Good Relations Programme is a pioneering and positive attempt to do this as an integral part of regeneration activity: this is an approach which should be more widely used. The need to manage and address social issues of this kind was one of the key points made in government policy papers on regeneration and cohesion a few years ago and is a clear omission from this document.

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

Comments:

Given the varied nature of places it is difficult to do this at a national strategic level and it is best done locally, in partnership with those communities, enabling regeneration priorities to be tailored to specific local needs.

Whilst a focus on the most deprived areas is welcome, it should be recognised that there may be adjacent areas which are in decline, and are at risk of slipping into more severe deprivation unless preventative action is taken.

The ageing population need closer analysis in terms of planning future regeneration. With people living longer, the economic and social burden on the most deprived communities could potentially increase. We know that people from deprived communities suffer from poorer health. Ensuring that health is part of this economic approach is imperative. Supporting residents in these communities by keeping them healthy means lengthening peoples' working life besides recognising that as people get older they tend to take a more active interest in community or civic duties.

Young people aged 12-25 years are a key part of successful and sustainable community. However in terms of community engagement and getting them involved in the decisions that affect their neighbourhoods their voices are often not heard. Having young people as central strand to future regeneration framework is crucial.

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: The first two are useful in terms of ensuring a focus on deprived areas. The third is somewhat vague, but is crucial in ensuring that people benefit from the first two.

The outcomes, in fact the whole white paper, miss a crucial point and it is that of connecting deprived areas to economic growth. These outcomes assume that economic growth will take place in deprived areas, this may not happen or be feasible in some areas, but the second and third outcomes could be achieved through improving links with economic growth areas. Therefore, we would propose an outcome based around improving links between deprived neighbourhoods and areas of or with potential for economic growth. This also needs to be expanded in the measures.

The focus on level 2 outcomes may deflect attention from the support needs of those who are furthest removed from the jobs market, who require long term intervention to tackle barriers such as poor levels of literacy and mental health before they even become work or training ready. There is also a need to address higher level skills gaps, above level 4.

Resident ownership and real involvement in delivering the outcomes is critical. Past regeneration programmes have underestimated the resources needed to support resident capacity to be properly involved. Having residents as an equal partner in the process is key to tackling the issues. This can only be on based on wholehearted buy-in and commitment from service providers. If local authorities are to lead this process then this also means support for electing member involvement.

A genuinely shared ownership of the key issues based on good evidence and listening properly to all stakeholders views is core. Outcome levels such general satisfaction with the local area as a place to live are good headline indicators. Under this should sit satisfaction rates with specific services including rubbish collection, street cleaning, street lighting, maintenance of open and green spaces, maintenance of footpaths, perceived levels of anti-social behaviour.

Q4. Have we proposed the right measures?

Yes No

Comments: The paper proposes a good range of measures, but it is doubtful that some of them can be measured (accurately) at all spatial levels, including neighbourhoods, as suggested.

We would like to see a measure also for level 3 and 4 skills in deprived areas. This is a useful measure of social mobility in neighbourhoods as well as economic prosperity and the ability of residents to engage with the higher value economic growth.

Section 2.12 rightly points the need to create linkages to employment hubs or growth areas. Deprived areas typically have very small travel to work areas. Measuring distance travelled to work would be a useful measure of linking deprived neighbourhoods to economic growth opportunities.

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

Yes No

Comments: The white paper rightly points out that regeneration funding should be used to stimulate private sector investment. Therefore to understand whether regeneration is working, measuring private investment is essential. How is somewhat more complicated and will require a mix of data.

Any investment should be measured per head of population to allow comparison between areas. A number of measures could be used including, increase in business rates (as per LABGI) would be a straight forward measure, although it does tend to favour the construction of large floor plate units which may not necessarily bring with it higher paid employment opportunities or planning fees. Business Link/BERR already measure private sector investment via its business advice service converting support into GVA and £'s invested.

Offering incentives to private sector investors that have a much more community focussed ethos may be a way of improving private sector investment.

There will never be a hard and fast science to this measurement, but it is essential to assess impact.

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

Comments: This is strongly linked to the Governments Empowerment White Paper and continues the strong theme from previous regeneration programmes regarding community involvement.

Local authorities and their partners are experienced in a wide range of techniques and structures to facilitate community engagement in regeneration.

It is important that Local authorities continue to play a key role in promoting community cohesion – this area of work, which has a close interplay with regeneration – is missing from the paper. Local government and partners at a local level have a key role to work with people/communities who are not the direct recipients of regeneration activity to explain to them - and hopefully to convince them - of the reasons for the choices made in targeted activity being positive and correct choices for the wider borough / community / region / society / nation, so that the risk of resentment and backlash is managed and reduced.

Numerous good practice guides, benchmarking and engagement toolkits have been developed on an ad-hoc basis, to evaluate and enhance the effectiveness of community participation at a local level - there needs to be greater co-ordination, resourcing and promotion of such initiatives.

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

Comments: Many deprived areas are poorly served with public transport to nearby employment opportunities, this is neither sustainable in terms of the community or in environmental terms. There is a real need to align public transport planning with regeneration – this will help people's immediate needs to access employment as well as being environmentally sustainable in the longer term.

People in deprived areas will be most adversely affected by environmental change in particular the rising costs of fuel. Future housing provision needs to be highly efficient in energy use other wise rising fuel prices could hinder people's ability to break out of poverty.

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

Comments: The link between social and economic regeneration needs to be clear and this white paper goes some way to making those links. SRP's then need to be given a clear remit to deliver regeneration as well as economic outcomes in partnership with local authorities.

Government also needs to consider the geographies of SRP's to assess whether they are realistic and respond to real economic geographies. SRP's also need to be transparent in their distribution of resources and the use of Regeneration Priorities Map would go some way to achieving this.

Questions in Chapter Three

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

Yes No

Comments: The proposed approach provides a more balanced view than simply using the worse 10% previously used and will help to target those areas with the most difficult challenges and deeply entrenched deprivation as well as tackling smaller pockets of deprivation in a proportionate manner.

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

Yes No

Comments: This depends on the level of detail. It would be beneficial to work with local authorities in trying to understand regeneration priorities at a sub local authority level.

Disadvantages – unless the criteria were very clearly prescribed by government with cut off points the process could become influenced removing the objectivity from the process with a scatter gun approach to prioritisation which this paper aims to remove.

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

Yes No

Comments: It is a positive move that this white paper has been jointly produced by DCLG, BERR, DWP and The Treasury showing commitment to cross departmental working on regeneration – in the past this has not always been apparent. However the co-operation of DFT, DOH, DCFS and the Home office will also be critical. It is important that their spending priorities also align with regeneration areas identified.

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

Yes No

Comments: In theory the approach should provide investor confidence setting out clearly government priorities for investment. However, there is no indication in the white paper as to the timescales involved. The private sector, particularly in the current economic climate, is looking for a long term return and will require a longer term (5-10year) commitment from Government.

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: The NDC approach was interesting, however, the amount of funding was far in excess of anything available elsewhere which made much of the good practice beyond the reach of most agencies delivering regeneration schemes elsewhere.

Mentoring those LA's and partnerships with those that have a proven track record of delivering through mechanisms such as the Multi Area Agreements could be key to unlocking future potential. Making this a condition rather than a choice of future funding programmes could be lever to ensuring that this happens. .

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: The continued role of Local authorities as place shapers, delivering economic, social and physical regeneration is welcomed. The proposed roles re-iterate the existing role of local authorities. The proposed role underplays LA's role in working with its constituents in shaping policy and in addressing issues around social cohesion – past evidence points to poor communication by local authorities as leading to social unrest in regeneration areas.

The remit outlined for RDA's fits with the SNR with RDA's playing a more strategic role and delivery being devolved to local authorities.

The proposed "single conversation" between the RDA and HACA on their investment decisions makes sense. However, they need to be given flexibility in the use of their budgets, particularly to address softer issues that do not usually fall into their remits but which would be essential for a major regeneration scheme. For example in Burnley, COLNE ROAD Facelifting/shops. With regard to HACA it is good to see a clear link between the housing and economic development agendas.

The role for Government re-iterates a growing move towards delegation of decisions to local areas. The move to un-ringfence funding is welcomed, but it depends largely on buy-in from all government departments. We await further proposals.

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

Comments: Whilst the document sets out clear remits for various levels of Government and key government agencies, it is not clear how this will be resourced

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

Comments:

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:

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?