

Cabinet

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Transforming Places: Changing Lives, a framework for regeneration

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Purpose of the Report

- 1 The purpose of this report is threefold. It informs members of the new Communities and Local Government (CLG) consultation document entitled “Transforming Places: Changing Lives, a framework for regeneration” (July 2008), it outlines the key messages from it, and it asks for approval of a consultation response (Appendix 3).
- 2 Transforming Places sets out a package of ambitious proposals which are linked to a number of other recent Government proposals emerging from the Sub-National Review of Economic Development and Regeneration. It consults on a regeneration framework which suggests revised roles for organisations involved in tackling deprivation.
- 3 The proposals are a positive step towards better regeneration programmes and should be welcomed; however, there are three key messages which the County Council (DCC) may want to respond to. Firstly it recognises that deprivation can be tackled with investment outside deprived neighbourhoods, rather than investing directly in them. Secondly it determines that “regeneration is a sub-set of economic development”, and finally it perceives de-industrialisation and economic restructuring as past events. The implications of these messages for County Durham are explored below.
- 4 The consultation runs until 31st October 2008¹. Cabinet is asked to authorise the submission of the consultation response set out in Appendix 3.

Background

- 5 “Transforming Places” sets out a regeneration framework for achieving better value for money from regeneration investment and enabling people to reach their potential wherever they live. It sets out new expectations for local authorities, sub-regional partnerships (SRPs), Regional Development

¹ The full consultation document can be obtained from:
www.communities.gov.uk/publications/citiesandregions/transformingplaces

Agencies (RDAs), the new Homes and Communities Agency (HCA)², and central government. It has three specific aims:

- to improve the coordination and prioritisation of regeneration investment;
- to devolve power to more local levels and improve alignment from regional to local levels;
- to tackle underlying economic challenges (worklessness, careers, enterprise).

Key messages

- 6 Transforming Places emphasises the need to tackle deprivation and social inequity through public and private sector investment. It states that regeneration investment can be more effective in tackling deprivation when focused in areas of opportunity such as town centres rather than in deprived areas themselves. The case is made that direct investment in deprived neighbourhoods can be very expensive compared to the economic uplift it generates, whereas reinforcing economic opportunities in central locations provides better value and greater success - although there is a risk this strategy might fail to tackle underlying deprivation problems. Nevertheless, people in deprived neighbourhoods often suffer from a range of accessibility problems, so it is vital that indirect investment benefits deprived neighbourhoods directly.
- 7 Transforming Places proposes that regions develop a “Regional Regeneration Priorities Map” which would identify priority locations for regeneration investment. It is proposed these will be prepared by RDAs and regional assemblies in association with regional partners and could inform a second Regional Funding Advice (RFA) exercise which is due for completion in February 2009. This leaves just six months to prepare, consult on, and agree a Regional Regeneration Priorities Map for North East England, which is extremely challenging. However, existing maps in the Regional Economic Strategy and the Regional Spatial Strategy may provide a starting point for them and Transforming Places determines how regeneration priority locations should be identified³ which is beneficial. There is potential for this guidance to be interpreted in such a way that it supports infrastructure improvements in the core of the city regions rather than throughout the dispersed settlements of County Durham. Therefore we must ensure that a Regional Regeneration Priority Map for the North East does help to directly tackle deprivation in the County.
- 8 Transforming Places states “regeneration is a sub-set of economic development” and that the success of regeneration programmes will be measured by improvements in economic performance. This follows the ongoing recognition by Government that planning, regeneration, transport,

² The HCA will be launched in April 2009 and will combine English Partnerships, the Housing Corporation, the Academy for Sustainable Communities and CLG regeneration programmes.

³ Four criteria are proposed: deprivation; strength of the sub-regional economy; economic and social characteristics of the area, and; dynamics of the area.

healthcare, housing, and education support economic growth. This increased focus on economic growth has implications for DCC – particularly in terms of the structure and operational planning of the new Unitary Authority.

- 9 Transforming Places also follows a series⁴ of recent Government policies focused on using “infrastructure” improvements as a means of tackling a wide range of social, economic, and environmental issues. Although it recognises that millions of people have been affected by decades of de-industrialisation and economic restructuring, it fails to recognise that some areas of the country are *still* undergoing economic restructuring (e.g. County Durham). Pockets of concentrated long-term worklessness are a result of the withdrawal of large employers from numerous communities in the County but infrastructure improvement projects which connect deprived communities with economic opportunities can help address long-standing problems. It is likely that a North East Regional Priorities Map will direct infrastructure investment so DCC has a proactive role to play in its creation.
- 10 The role of the new Housing and Communities Agency (HCA) is outlined in the document which links their housing and regeneration roles with “economic renewal” at regional and local levels. It illustrates relationships between areas of low quality housing and deprivation and reiterates government commitments to ensure regeneration benefits minority groups. The “credit crunch” is noted as a potential short-term challenge to regeneration and Transforming Places outlines a new national study⁵ to consider these implications in more detail, which should be welcomed by DCC.
- 11 Transforming Places proposes a set of indicators for measuring progress which cover a range of economic, social, and environmental issues. It notes the recent Government proposal for a statutory Economic Assessment duty, which DCC is already working towards. The indicators outlined in the document are a good starting point for Economic Assessments; although we are still awaiting detailed guidance from central Government. Transforming Places recognises linkages between Economic Assessments and community strategies and planning documents, and the importance of partnership in the development of a shared evidence base.
- 12 Finally, Transforming Places sets out new responsibilities for a range of regeneration bodies including local government, RDAs, the HCA, Government Offices and national government. It also sets out what the private sector and third sector can expect from these bodies and how other government bodies and initiatives are integrated with the proposed regeneration framework. Despite the executive summary of Transforming Places noting new expectations for Sub-Regional Partnerships (SRP), these are not specifically outlined in the main report. However, there are some subtle proposals for strengthening SRPs such as building the capacity of SRPs to lead economic development and regeneration activities; which should be welcomed.

⁴ Including the “Growth Fund” and the “Community Infrastructure Fund”

⁵ Professor Michael Parkinson has been commissioned to undertake a study of “The Impact of the Credit Crunch on Regeneration”

Next steps

- 13 The consultation on Transforming Places closes on 31st October, but while it sets out many proposals it does not determine when these might be translated into statutory guidance or responsibilities. North East authorities have begun proactively planning Economic Assessments in anticipation of statutory guidance. It is vital that this work is integrated with the proposed Regional Regeneration Priorities Map. Furthermore, if the North East map is to inform Regional Funding Advice in February 2009, the map needs to be developed quickly. Therefore it is anticipated that One NorthEast and the North East Assembly will begin this work soon, and County Durham must be fully engaged in preparing the map to ensure its development priorities are fully incorporated.
- 14 It is vital that DCC prepares for the new proposals in the document; principally we must refine and determine our own priority regeneration locations. Existing regeneration programmes such as the Durham New Growth Point and the Coalfield Housing Programme, which regional and national bodies are supporting, could be championed as priority County Durham regeneration locations.
- 15 The detailed nature of the proposals contained in Transforming Places suggests it is supported by a considerable amount of work helping to build on themes sketched out in SNR. In this respect, it is reasonable to assume that many of the consultation proposals and core principles will be brought forward, and this consultation offers the opportunity to influence them.

Recommendations and Reasons

- 16 It is recommended that officers prepare evidence which identifies priority regeneration locations in the County and are involved in regional discussions about investment locations and the development of a Regional Regeneration Priorities Map. It would be logical to propose existing or planned regeneration programmes as priority locations for County Durham.
- 17 It is recommended that DCC should respond to this consultation as a means of shaping a key area of Government policy and representing the County's need to be fully engaged in regional regeneration activities. A draft consultation response is attached for consideration in Appendix 3.

Background Papers

Communities and Local Government consultation document entitled, "Transforming Places: Changing Lives, a framework for regeneration" (July 2008).

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Appendix 1: Implications

Local Government Reorganisation

The increasing government focus of infrastructure development and regeneration activities could impact on the operational structure of the new unitary authority structure.

Finance

Implications are unclear at this stage.

Staffing

Implications are unclear at this stage.

Equality and Diversity

Implications are unclear at this stage.

Accommodation

Implications are unclear at this stage.

Crime and Disorder

Proposals aim to link economic growth and regeneration to greater reductions in crime and disorder.

Sustainability

Proposals fortify links between economic and social sustainability. However, proposals to link deprived areas to opportunities (rather than investing directly in deprived areas) may lead to longer commuter distances and travel times.

Human Rights

Implications are unclear at this stage.

Localities and Rurality

Proposals could lead to additional or more effective regeneration activities in localities throughout the County.

Young People

Proposals aim to give young people greater opportunities to gain jobs and raise aspirations.

Consultation

Consultation 31st October 2008.

Health

The document considers that successful regeneration will have a positive impact on health.

Appendix 2: Implications of Transforming Places proposals

Local Government will...

- Lead the delivery of economic development, and physical and social regeneration and playing a role in delivering regional strategies
- Put communities at the heart of the design and delivery of regeneration
- Play a strategic housing role; making connections with decent homes funding to secure employment opportunities.
- Ensure that housing and regeneration policies are mutually reinforcing

Local Strategic Partnerships will...

- Prioritise regeneration funding within the local area; both geographically and thematically

Regional Assemblies will...

- Provide indicative regional regeneration priorities maps as part of their regional funding advice by early 2009

Regional Development Agencies will...

- Help to build the capacity of local authorities and sub regional partnerships, to deliver sustainable economic development and regeneration activity
- Delegate their funding in line with the regional strategy, MAAs and LAAs
- Work with regional partners to provide indicative regional regeneration priorities maps as part of their regional funding advice by early 2009
- Consider developing employment hubs
- Explore the use of special purpose vehicles and funding to promote regeneration

Government Offices will...

- Work with local authorities to achieve LAA targets that deliver regeneration
- Work with groups of local authorities to develop MAAs
- Work with LSPs to develop effective regeneration strategies
- Feedback good practice examples and barriers to regeneration to Whitehall
- Work with regional partners to provide indicative regeneration priorities maps

The Homes and Communities Agency will...

- Base their approach to regeneration on this framework
- Prioritise regeneration in line with priorities outlined in regional funding advice
- Develop a range of integrated housing and regeneration programmes
- Consider the access to jobs in decisions on housing regeneration
- Put communities at the heart of the design and delivery of regeneration
- Consider how to meet residents' wider needs for training and work
- Co-operate with local authorities to implement regeneration priorities.

National Government will...

- Integrate investment appraisals that impact on regeneration
- Unringfence money to tackle joined up problems collectively
- Encourage partnerships across functional economic areas
- Merge funding streams where departmental objectives overlap
- Provide responsive mainstream services

Chapter One

This chapter sets out what we want to be different about regeneration in future. It talks about the nature of deprivation in England and considers what is holding back underperforming areas. Over the past decade, we have made substantial progress, narrowing the gap between underperforming areas, particularly deprived neighbourhoods, and the rest. However, targeted regeneration programmes have been less successful in bringing about a significant reduction in the number of people without work in some places and deprivation is still intense in some areas.

Government believes that, in future, regeneration should be more focused on tackling the underlying economic causes of decline, ensuring that every place can reach its potential – transforming lives, by tackling barriers to growth, reducing rates of worklessness, promoting enterprise, and giving people the skills to progress. We want to see regeneration better targeted and co-ordinated, based on a shared strategy to improve deprived areas.

These changes are aimed at improving the effectiveness of regeneration spending; tackling deprivation; increasing economic prosperity; and improving value-for-money.

Q1. Is this analysis right?

We consider the analysis is generally appropriate and the Parkinson report on the “Impact of the Credit Crunch on Regeneration” will be a very important policy tool. However, there are two issues in Chapter 1 about which we are concerned:

- The recognition that “regeneration is a sub-set of economic development” in paragraph 1.4 is particularly welcomed, although it over simplifies the process and problems involved with regenerating deprived communities. One of the ultimate outcomes of successful regeneration is improved economic performance, but the social and environmental outcomes are equally important. Furthermore, the environmental improvements generated by a regeneration scheme may be immediately apparent whereas the economic and social improvements may be indirect and longer-term.
- Paragraph 1.11 states “decades of de-industrialisation and economic restructuring adversely affected millions of people”. This suggests communities are no longer affected by economic restructuring; whereas restructuring is an ongoing process. Large areas of northern England continue to lag behind the leading economic regions and are still de-industrialising in comparison to the South East. The OECD report “Building a Competitive City-Region: The Case of Newcastle in the North East” clearly identifies the value of the manufacturing sector to the region. It recognises that manufacturers require continued support while steps are taken to bring forward other sectors and renew the value of manufacturing itself. This is particularly appropriate in County Durham and the Government should recognise this ongoing need for restructuring in County Durham and the North East more generally.

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

The document does not adequately represent the regeneration challenges facing different communities throughout England. Clearly the report cannot identify the unique problems of every deprived neighbourhood in England but nevertheless it is important to recognise that each deprived neighbourhood has a unique history that has led to its current problems. More detailed good practice guidance would be helpful in determining how to identify the needs of different demographic groups and how to translate these into regeneration priorities.

Chapter Two

This chapter argues that regeneration in the future needs to be more tightly focused on improving economic outcomes in deprived areas. It 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:

- + improving economic performance in deprived areas;
- + improving rates of work and enterprise in deprived areas; and
- + creating sustainable places where people want to live and can work, and businesses want to invest.

We are clear that a tighter focus on economic outcomes does not mean that all regeneration activity should be focused on reducing worklessness. However, in future, regeneration will need to be aligned with economic activities that strengthen the wider economy, to create places where people want to live and help residents into jobs.

Q1. Are the outcome measures proposed helpful? Will they ensure regeneration benefits the poorest people and places in society?

Many of the measures overlap with LAA targets and other data that is commonly collected, which is welcomed. However, the document recognises that regeneration is often focused on neighbourhoods but does not recognise that data for these geographies can often be difficult to collect, unavailable, or inaccurate. One of the best sources for local level data is the Census but this has its own accuracy issues and is updated only once a decade. The Indices of Deprivation is a key source of data and is collated more regularly, but this also has reliability problems. A major problem for developing timelines of data to measure progress is that the methodology, geography, or reporting of statistics is generally different each time (although it is recognised that the changes are usually attempts to make the data more accurate). The timeliness of data is also problematic as there is usually a time lag of a number of years between the analysis of data and the publication of it (2008 data may not be available until 2010, for example).

However, the measures used to report regeneration are not the major problem. The lack of availability, short-term nature, and overly ambitious expectations of regeneration funding streams are far greater barriers to effective regeneration programmes. The focus on clear, short-term economic improvements and financial

returns also mean that regeneration funding is often concentrated in the areas of greatest return than those of greatest need. Chapter 2 correctly recognises that deprived communities can benefit from investment in more central locations (such as “employment hubs” and “town centres”) than direct investment in the neighbourhoods themselves. In this context we are pleased to support the approach of Government in bringing forward the New Growth Points agenda and its emphasis on coupling housing development with local employment opportunities and environmental matters. However, regeneration funding *outside* deprived communities must lead to direct opportunities for them. There is a risk that the intentions of Transforming Places are interpreted to mean that investment is solely concentrated in the urban cores. Whilst this may be appropriate for London which offers excellent public transport connectivity between inner and outer areas, it is not the case in the North East where the cores are poorly connected to large areas of the city regions (as defined by the North East Regional Spatial Strategy). Therefore, the proposed “regional regeneration priorities maps” must address how investing in areas of opportunity directly connects with and benefits areas of need.

Q2. Have we proposed the right measures?

See previous comment.

Q3. Should we measure the scale and rate of private investment in deprived areas, and how could we do so?

One way of determining the success of public investment is to compare it to the proportionate leverage of private investment. Therefore, it is important to measure the scale and rate of private investment in deprived areas and compare it to public sector investment. However, while Transforming Places follows a trend of government guidance pursuing greater returns from public investment, there is a risk that this could be to the detriment of social and environmental objectives. Deprived neighbourhoods are deprived because they do not attract private sector investors and developers, so public sector investors should expect that returns will be comparatively lower than in areas of opportunity. The success of regeneration schemes must be measured across a range of indicators as Transforming Places suggests, but the focus should be on how changes have improved the circumstances for established communities rather than people who have been attracted by new investment.

Q4. What can central Government do to give communities a stronger voice in shaping regeneration? How can other agencies help?

For County Durham, it is vital the Government supports and reinforces the role of Local Authorities because they are the elected representatives of local people. The Government’s LAA approach will provide a key measure of the effectiveness of Local Authorities. As the largest unitary authority in the North East (from April 2009), County Durham is taking robust steps to ensure local communities have a clear route for influencing the policy and strategy through Area Action Partnerships.

Additionally, the Homes and Communities Agency should focus on giving communities a stronger voice. Transforming Places suggests a focus on the leverage of private sector investment which is important but may mask deprivation rather than tackling it. The development of executive homes near deprived communities may raise average income levels but not tackle lower incomes and low quality housing issues, for example. Furthermore, current national policy seems

focused on housing led regeneration, but while investment in housing can help improve the social mix of an area it must be complemented by investment in jobs, education/skills, healthcare and transport.

Q5. What else can we do to ensure regeneration is responsive to environmental change?

Planning regulations need to be flexible enough to protect environmental assets whilst not stifling necessary regeneration and development. Sustainability experts from Local Strategic Partnerships and local authorities must be involved in regeneration schemes at an early stage.

Q6. How can we further strengthen sub-regional partnerships to deliver regeneration outcomes?

The role of sub-regional partnerships (SRPs) would be strengthened:

- if they are to be given more responsibilities by RDAs;
- if budgets are agreed further in advance (budgets are often confirmed less than 3 months before the start of a financial year); and
- if they are given more room to devise sub-regional projects within a framework that delivers regional objectives and outcomes.

SRPs must be able to agree delegated budgets with RDAs; where a financial level is set that determines how much SRPs can invest in projects without seeking RDA approval for every individual project. County Durham Economic Partnership – the recognised SRP for County Durham – had a delegated budget until recently, but now every project must go to the RDA for approval which can detrimentally impede development and regeneration activities.

Past experience in County Durham shows that SRPs also need a dedicated, professional project management team together with other professional in-house skills to ensure projects run as efficiently and effectively as possible. SRPs need to be given more security in terms of funding to ensure personnel are in place, projects are not delayed, costs do not escalate, and private sector partners are not dissuaded from investing. SRPs should also be able to switch capital and revenue between objectives and priorities. This would enable SRPs to capitalise on economic opportunities and shifting economic trends.

SRPs are also well placed to coordinate the production of the proposed Economic Assessments. This would ensure that local Economic Assessments are consistent at a sub-regional level and would therefore constitute the heart of the evidence-base informing the proposed Integrated Regional Strategy.

Rural areas such as County Durham are finding it increasingly difficult to obtain regeneration funding because often urban schemes are seen as returning better value for money. However, there is a risk that RDAs are investing public money too heavily in urban areas which are already attractive to private investors and which may be crowding out private investment, which results in 'deadweight' and 'displacement'. This leaves deprived communities in more rural locations less able to tackle underlying deprivation problems. SRPs are best placed to deliver regeneration outcomes in both urban and rural communities.

The Government must be clear about the roles of Multi-Area Agreements compared to SRPs – and ensure MAAs do not replicate the role of SRPs. This is particularly important considering MAAs do not cover whole regions or indeed city regions and should continue to be considered a means of improving the coordination of activities across areas, but not a replacement for SRPs. Similarly, the ongoing Local Authority Business Growth Incentive (LABGI) suggests that, for statistical purposes, NUTS3 areas are considered sub-regions but these geographies are not suitable replacements for SRPs either. It is also important that SRPs are not used as a proxy for functional economies. Market-based economic assessments – such as those proposed by Prosperous Places – must take account of the different spatial dimensions of economies and recognise the limitations of the geographies and data they use.

It would be particularly useful if the Government defined what an SRP is within Transforming Places, to avoid any confusion and to highlight the fact that the term SRP may have different interpretations. Additionally, the Executive Summary of Transforming Places suggests it “sets out new expectations” of SRPs and other regeneration organisations (page 5). However, while Chapter 4 clearly identifies the new expectations of other organisations, it does not do so for SRPs and therefore should be added. This guidance must enable SRPs to create stronger links to local community and delivery bodies such as LSPs and community champions.

Chapter Three

This chapter sets out proposals for a common approach to targeting regeneration investment. It explains how these approaches can fit within existing planning processes and be used to ensure central government investment is aligned with local and regional priorities, using proposed new regional priorities maps.

It suggests four criteria that can be used to prioritise regeneration investment, and to determine the type of investment that is likely to be most effective, based on an understanding of the need in those areas and the opportunities that exist to transform their economies. The Government is exploring how the criteria could be used to improve the value-for-money of targeted investment. The criteria are: the level of deprivation; the strength of the wider sub-regional economy; the economic and social characteristics of the area; and the dynamics of the area (whether it's getting better or worse).

Q1. Is the criteria based approach a helpful way of ensuring greater consistency in prioritising regeneration investment?

We consider a criteria based approach could lead to inconsistencies without detailed guidance. The “strength of the wider sub-regional economy”, the “economic and social characteristics of the area”, and the “dynamics of the area and how it is changing over time” are all subjective measures so consistency in selecting regeneration locations will be difficult. It may also be difficult for region-wide stakeholders to understand how deprived areas are identified and selected for regeneration. Furthermore, consistency depends on the Government’s approach to prioritising regeneration investment; will cities continue to be prioritised, for example?

Q2. Should we ask regions to develop regional regeneration maps? What are the disadvantages of that approach?

Without detailed guidance on the purpose and content of regional regeneration maps it is difficult to comment. We support the general principle of such maps if they are tools to help demonstrate how investment in areas of opportunity directly benefits areas of need. We believe that regional regeneration maps should be devised from the bottom-up, as opposed to maps being formulated by regional bodies and then “consulting” with local and sub-regional partners before maps are finalised. There is also a need to ensure ongoing regeneration programmes in deprived areas (e.g. LEGI, New Growth Points, Coalfield regeneration areas) are adequately reflected in such maps.

There is a risk that if regional bodies are given the ultimate responsibility for developing regional regeneration priorities maps, the maps may be used to represent the priorities of those regional bodies in terms of corporate, organisational objectives. Investment in areas where private sector leverage is high, for example, may exacerbate intra-regional disparities. Areas of deprivation and need will, by definition, experience additional challenges in developing private sector interest, so they may lose out. Transforming Places and any subsequent guidance should specify that regional regeneration maps strike a balance between continued economic development in core urban areas which drive the regional economy, and the regeneration of outer areas which suffer from deep-rooted deprivation that can constrain regional economic performance. The proposed maps must balance social, environmental and economic objectives if they are to live up to their name.

Furthermore, there is a risk that the maps will reflect projects that are ongoing or in development but may not be flexible enough to include priorities that have yet to be identified. As national and regional funding regimes change over time, there may be opportunities for regeneration programmes in areas that were not considered when maps were drawn up. Additionally, economic, social and environments fluctuations may create new and more immediate regeneration challenges than those that are identified by the maps which suggest the need for medium-term reviews of the maps. Hence, maps must be adaptable to changing regeneration opportunities and needs.

Q3. Should we go further? What else can be done to align national Government investment behind local and regional priorities?

In line with the recommendations of the Lyons Review (2004), the Government should make provisions to relocate more civil servant jobs to northern regions to support improving skills and education levels, increasing aspirations and ongoing northern regeneration programmes. Additionally the government should do much more to ensure northern areas of the country benefit from the vast amounts of public spending in the south on other schemes such as Wembley, the Olympics, transport improvements, jobs, and housing. Higher Education research and investment monies should be more equitably distributed throughout the Country – particularly world class universities in the North of England, such as Durham.

Q4. Will this approach give the private sector confidence and unlock long term investment? If not, what would?

Yes, as in London and the South East where most civil servant jobs are located, the employers and jobs lead to demands for a range of other services such as transport, leisure, shopping, housing and education as well as conference venues, hotels and business services.

Q5. 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?

National schemes “parachuted” into local communities do not deliver sustainable long-term solutions to deep rooted deprivation and underlying economic conditions. Concentrated neighbourhood deprivation can only be successfully overcome with the commitment of long-term investment and intensive assistance for local community champions. Some neighbourhoods in County Durham need special assistance from the Government or Europe to bring them up to a “normal” socio-economic standard. Regional bodies must work with sub-regional and local bodies to identify neighbourhoods needing targeted investment and work with central government to secure special national or European assistance.

Chapter Four

Q1. Taken together, do these new and enhanced roles for different agencies equip them to deliver the expectations in the framework?

The roles outlined in the document should help improve the delivery of regeneration. Although Chapter 4 (p68) refers to the need for RDAs to work with Regional Assemblies, the document should recognise that RDAs will soon assume the responsibilities of Regional Assemblies. This is an important step forward for regional policy-making as it will align regional strategies more closely with economic growth as the main objective – which reflects the key messages of Transforming Places. However, while the objective of improved economic growth is essential, successful regeneration programmes must lead to long-term growth rather than “quick wins”. In addition, successful regeneration should not be measured by direct financial “returns on investment”; but rather a wider set of measures as suggested in Transforming Places.

Q2. What would be the costs and benefits of this approach?

See previous answer.

Q3. How should this framework be implemented in London given London’s unique governance arrangements?

No comment.

Q4. 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)?

There should be positive impacts for all concerned if a holistic approach to regeneration is administered. A narrow focus on economic opportunities will only exacerbate social inequalities.